

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RED DIAMOND, INC.,
Petitioner,

v.

SOUTHERN VISIONS, LLP,
Patent Owner.

Case PGR2019-00045
Patent 10,071,852

**Declaration of Juelene Beck
in Support of Patent Owner's Preliminary Response**

Southern Visions

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I. INTRODUCTION

A. Engagement

1. My name is Juelene Beck. I have been retained by counsel for Southern Visions, LLP (“Southern Visions”) as an expert witness in the above-captioned proceeding. I have been asked to provide my analysis and my opinion about the technology described in U.S. Patent No. 10,071,852 (the “852 Patent”).

B. Background and Qualifications

2. I am the principal of JUELENE BECK & ASSOCIATES, L.L.C., a chain restaurant consulting firm. I have over 30 years of experience in the foodservice industry including operations, product development, packaging development, Quality Assurance and food safety systems, the management of suppliers to foodservice chains, relationships between chain restaurant franchisors and franchisees, and marketing. A copy of my current resume/CV is appended to this declaration as Exhibit A.

3. I have received the following education:

- B.A. in Chemistry from Eastern Nazarene College in 1975, graduating Magna cum Laude;
- M.S. in Food Science from the University of Wisconsin-Madison in 1978;

- Massachusetts Institute of Technology in Cambridge, MA, from 1979-80 as a Post-Graduate Research Associate in the Department of Food Science, and;
- MBA courses in Economics and Finance from the University of Cincinnati from 1984-85.

4. I am currently working as a Chain Restaurant and Food Product Expert. My other career experience includes:

- Burger King Corporation – Vice President of Product & Packaging Development, Vice President of Supply and Restaurant Operations Worldwide, Vice President of Supply Management and Quality Assurance. These roles included management of all products and their in-store operations, including commercial restaurant iced tea brewing systems, as well as working with the company’s 1400+ suppliers worldwide and developing and managing the company’s worldwide supplier product specifications, including iced tea systems.
- North American Association of Subway Franchisees – Chief Executive Officer (CEO) for NAASF, the franchisee association representing owners of the 20,000+ Subway restaurants in the U.S. and Canada.
- Sara Lee Coffee and Tea / Douwe Egberts Coffee Systems – Vice President of Chain Restaurants. This role included management of

operations including the sale of tea and commercial restaurant iced tea brewing systems to the company's chain restaurant customers.

- Dunkin' Donuts, Incorporated – Product Marketing Manager for Beverages, including tea and iced tea.
- Proctor & Gamble – Technical Brand Manager; Assistant Brand Manager. These roles included acting as the head of a product development team for the Crush Beverages brand, part of Proctor & Gamble's Beverages Division, which included the Tender Leaf Tea brand.
- Arthur D. Little – International Food Processing, Production, Marketing and Distribution Operations Consultant. This role included visiting and evaluating tea plantations in Sri Lanka, as well as in visiting, analyzing, and evaluating sugar cane plantations and processing facilities in Jamaica.
- RFC, Inc. – Independent Consulting primarily in areas related to chain restaurant products, franchisee / franchisor issues, industry analyses, and supply chain (including food processing companies that do business with chain restaurants) with many different chain restaurants in the U.S.

5. I have served on the following Boards:

- University of Wisconsin's College of Agricultural & Life Sciences, Board of Visitors, Chair (2007-8), Chair-Elect (2005-6), Past Chair (2009-10) and Member (2002-10).
- Institute of Food Technologists, national professional member. I was instrumental in establishing the South Florida chapter of the IFT, including Board of Director participation at an officer level.
- Women's Foodservice Forum (WFF) – active committee member from 1996 through 2002.

C. Compensation

6. I am being compensated at a rate of \$425.00 per hour to provide analysis and testimony in this Post Grant Review proceeding. My compensation is not contingent on the outcome of any matter or the specifics of my testimony. I have no financial interest in the proceeding or in the '852 Patent or in any other patents or patent applications owned by Southern Visions.

D. Materials and Information Considered

7. In addition to my education, experience in the food service and consumer packaged goods industries, I relied on personal knowledge as gained from my review of the documents identified in this declaration.

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