

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG
ELECTRONICS AMERICA, INC.

Petitioner

v.

MANUFACTURING RESOURCES INTERNATIONAL, INC.,

Patent Owner

U.S. Patent No. 8,854,595

Filing Date: March 26, 2009

Issue Date: October 7, 2014

Title: Constricted Convection Cooling System for an Electronic Display

Inter Partes Review No. IPR2023-00199

Declaration of Michael N. Gershowitz

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constricted convection plate includes multiple through-holes that provide access to the interior of the display assembly and all air to flow into the cooling chamber formed on the interior of Na's device. Na, p. 4 ("Air may move through the through-holes 212. In the present exemplary embodiment, the through-holes 212 function as an intake unit through which external air is sucked."). Therefore, Na's bottom plate is not a constricted convection plate. Further, the bottom plate 210 provides multiple entrances into its chamber and does not define a constricted convection channel," and a POSITA would not consider such a chamber with multiple intakes to be a channel or to be otherwise constricted by such a bottom plate.

124. Similarly, the alternate embodiments identified by the Petition and Dr. Smith-Gillespie all include multiple through-holes allowing air to flow into the chamber formed by the bottom plate 210. These alternate embodiments involve forming through-holes into "the first to fourth sidewalls," but not the bottom plate 210. Petition, pp. 68-69; Ex. 1002.111, ¶ 210. The configurations taught by Na involve modifying one or more of the sidewalls 220-250 to add through-holes, either in addition to the through-holes 212 in the bottom plate 210 or using a bottom plate 210 that does not have through-holes 212. However, forming through-holes in the sidewalls alone, or in addition to through-holes 212 formed into the bottom plate, simply provides additional intakes into Na's display device, as discussed above with the through-holes 212 formed into the bottom plate 210. Na, p. 5.

I hereby declare that statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true. Should further information become available to me as this matter proceeds, I may revise my opinions accordingly as necessary. I declare under penalty of perjury that the foregoing Declaration is true and correct.

Dated: September 26, 2023



Michael N. Gershowitz