

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HOWARD INDUSTRIES, INC.

Petitioner,

v.

CAPSA SOLUTIONS LLC

Patent Owner.

U.S. Patent No. 7,594,668

Filing Date: August 18, 2008

Issue Date: September 29, 2009

U.S Patent No. 8,215,650

Filing Date: July 20, 2011

Issue Date: July 10, 2012

Case Nos. IPR2023-01274, IPR2023-01275

**EXHIBIT 2013: DECLARATION OF JAMES KWAK IN SUPPORT OF
PATENT OWNER'S RESPONSE TO '668 AND '650 IPR PETITIONS**

I, James L. Kwak, declare as follows:

1. I am a partner at the law firm Standley Law Group LLP (“SLG”), counsel for Patent Owner Capsa Solutions LLC (“Capsa”). I submit this declaration in support of the above-identified *inter partes* review proceeding involving U.S. Patent Nos. 7,594,668 (“the ’668 Patent”) and 8,215,650 (“the ’650 Patent”) (collectively, “the Patents-at-issue”). Unless stated otherwise, I have personal knowledge of the facts set forth below, and if called as a witness, could and would competently testify thereto.
2. Exhibit 2014 include true and accurate copies of the following:
 - a. excerpt from online dictionary at *Merriam-Webster.com Dictionary*, *Merriam-Webster*, <https://www.merriam-webster.com/dictionary/compartment>. Accessed Apr. 2023 and May 2023.
 - b. excerpt from online dictionary at *Merriam-Webster.com Dictionary*, *Merriam-Webster*, <https://www.merriam-webster.com/dictionary/forward>.
3. Exhibit 2015 is a true and accurate copy of Website pages from:
https://www.schoolphysics.co.uk/age11-14/Mechanics/Statics/text/Stability_/index.html.
4. Ex. 2017 attached to Patent Owner’s Response is a true and accurate copy of U.S. Patent No. 9,367,061 to Miller.

5. Ex. 2011 is a true and accurate copy of U.S. Patent No. 5,961,134 to
Kemnitzer et al. (including Congleton).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 28, 2024 in Dublin, Ohio.

/James L. Kwak/
James L. Kwak