

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AFFORDABLE WIRE MANAGEMENT, LLC,
Petitioner,

v.

CAMBRIA COUNTY ASSOCIATION FOR THE BLIND AND HANDICAPPED,
INC.,
Patent Owner.

IPR2024-00178
Patent 11,349,291

**DECLARATION OF DENISE L. STUDINARY
IN SUPPORT OF PATENT OWNER'S RESPONSE**

I, Denise L. Studinary, declare as follows:

1. I am over 18 years of age and of sound mind.
2. In my capacity as Vice President of Finance of Cambria County Association for the Blind and Handicapped, Inc. ("CAB"), I am an authorized custodian and keeper of records of CAB. I am duly authorized to make this declaration on behalf of CAB.
3. In the ordinary course of my work for CAB, my duties include reviewing and analyzing the business records of CAB. In this regard, I am familiar with CAB's books and records, as well as the manner in which these records are generated, maintained, and stored.
4. The facts stated herein are based upon my personal knowledge and review of the business records maintained by CAB in the regular course of its business.
5. **EX2046** is a true and accurate copy of a Microsoft Excel spreadsheet titled "Solar Sales Figures – Total Calculations (Jan 2014 – Mar 2024)".
6. **EX2056** is a true and accurate copy of a Microsoft Excel spreadsheet titled "Solar 2018-Mar2024."
7. **EX2046** and **EX2056** were created for use in IPR2024-00139 and IPR2024-00178. **EX2046** and **EX2056** detail CAB's sales of solar products, the dollar value of those sales, and the product numbers for those products that

correspond to the components of: (a) CAB's standard system for above-ground messenger wire supported cable management for solar applications, and (b) CAB's integrated grounding system.

8. **EX2046** and **EX2056** were created by compiling and summarizing information contained in CAB's records maintained in the regular course of business. I certify and declare that the business records of CAB relied upon to create **EX2046** and **EX2056** were:

a. made at or near the time by, or from information transmitted by, an employee, agent, or representative of CAB with knowledge of the act or event;

b. kept in the course of CAB's regularly conducted business activity; and

c. made in the regular practice and course of business of CAB.

9. I further certify and declare that **EX2041-EX2043**, **EX2047-EX2054**, and **EX2057** are business records of CAB and were:

a. made at or near the time by, or from information transmitted by, an employee, agent, or representative of CAB with knowledge of the act or event;

b. kept in the course of CAB's regularly conducted business activity; and

c. made in the regular practice and course of business of CAB.

10. I certify and declare that **EX2041-EX2043, EX2047-EX2054**, and **EX2057** are true, accurate, and exact copies of the original business records maintained by CAB in its regular course of business, which are in CAB's possession, custody or control.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true, and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine, imprisonment, or both, under Section 1001 of Title 18 of the United States Code.


Denise L. Studinary

Dated: 7/25/2024