

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ALLIANCE NORTH AMERICA, INC.
Petitioner

v.

MULTIQUIP INC.
Patent Owner

Case IPR2023-00____
Patent 8,816,651

DECLARATION OF JOHN RUDDOCK

Mail Stop Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

EXHIBIT 1027

1. I, John Ruddock, resident of Scarborough, the United Kingdom, hereby
declare as follows:

2. I declare that I am employed by Deep Sea Electronics Ltd. located in Hunmanby, North Yorkshire, the United Kingdom, with the position and title of Power Generation Technical Support Manager. I have been employed by Deep Sea Electronics Ltd. since 2018, and prior to that time was employed by its predecessor, Deep Sea Electronics PLC, since 2003. I am a custodian of records relating to technical materials for Deep Sea Electronics Ltd. and Deep Sea Electronics PLC and have knowledge of and access as to the maintaining of records of Deep Sea Electronics Ltd. and Deep Sea Electronics PLC.
3. The attached document Deep Sea Electronics DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 7, is a copy of the document to which the marking "Exhibit 1008" has been added. In the footer of the attached copy of the Deep Sea Electronics DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 7 (Exhibit 1008) the date has been automatically updated and added (19/10/2023), which is the date the copy was downloaded from the records file of Deep Sea Electronics Ltd. and Deep Sea Electronics PLC, but is not the date that the underlying document was created or distributed.
4. I obtained the DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 7 (Exhibit 1008), a copy of which is attached to this

declaration, from the records of Deep Sea Electronics Ltd. and Deep Sea Electronics PLC.

5. The DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 7 (Exhibit 1008) attached to this declaration is a true and correct duplicate of the original record, in the custody of Deep Sea Electronics Ltd., with the exception of the added marking Exhibit 1008 and the automatically generated date appearing in the footer.
6. The records attached to this declaration were originally made at or near the time of creating each of the attached documents by, or from information transmitted by, a person with knowledge of those matters.
7. The records attached to this declaration were kept in the course of a regularly conducted business activity of Deep Sea Electronics PLC and Deep Sea Electronics Ltd.
8. Such records were made by Deep Sea Electronics Ltd. and Deep Sea Electronics PLC as a regular practice.
9. The DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 7 (Exhibit 1008) has a release date of February 4, 2011. The original document properties show the creation date as the release date of February 4, 2011. I believe the DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 7 (Exhibit 1008) was added to the website of Deep Sea Electronics Ltd. (www.deepseapl.com) and was then publicly

accessible to be viewed and downloaded from that website, including in the United States of America. DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 7 (Exhibit 1008) at page 6 references documents being available from the DSE website www.deepseapl.com.

10. The attached document marked as Exhibit 1029 is a Document update checklist for the 057-074_D128 for Deep Sea Electronics DSE72/7300 Series Operators Manual, updating from Issue 6 to Issue 7, and shows the release date for Issue 7 of February 4, 2011. I obtained the Document update checklist for the 057-074_D128 updating from Issue 6 to Issue 7, a copy of which is attached to this declaration, from the records of Deep Sea Electronics Ltd. and Deep Sea Electronics PLC. The Document update checklist for the 057-074_D128 updating from Issue 6 to Issue 7, (Exhibit 1029) attached to this declaration is a true and correct duplicate of the original record, in the custody of Deep Sea Electronics Ltd., with the exception of the added marking Exhibit 1029.

11. Deep Sea Electronics DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 8 was subsequently created, released and made publicly accessible to be viewed and downloaded from the DSE website www.deepseapl.com, including in the United States of America.

12. Deep Sea Electronics DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 8 was also kept in the course of a regularly

conducted business activity of Deep Sea Electronics PLC and is maintained in the records of Deep Sea Electronics Ltd. and Deep Sea Electronics PLC which I have reviewed.

13. Deep Sea Electronics DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 8 has a release date of December 17, 2011. I believe the DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 8 was added to the website of Deep Sea Electronics Ltd. (www.deepseapl.com) and was then publicly accessible to be viewed and downloaded from that website, including in the United States of America.
14. The attached document marked as Exhibit 1030 is a Document update checklist for the 057-074_D128 for Deep Sea Electronics DSE72/7300 Series Operators Manual, updating from Issue 7 to Issue 8. I obtained the Document update checklist for the 057-074_D128 updating from Issue 7 to Issue 8, a copy of which is attached to this declaration, from the records of Deep Sea Electronics Ltd. and Deep Sea Electronics PLC. The Document update checklist for the 057-074_D128 updating from Issue 7 to Issue 8, (Exhibit 1030) attached to this declaration is a true and correct duplicate of the original record, in the custody of Deep Sea Electronics Ltd., with the exception of the added marking Exhibit 1030.

15. The Document update checklist of Exhibit 1030 reflects that DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 8 has a release date of December 17, 2011.
16. I believe the DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 7 (Exhibit 1008) was added to the Deep Sea Electronics PLC website and was publicly accessible at least by the time of creation and release of DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 8. I believe DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 7 (Exhibit 1008) was on the website of Deep Sea Electronics Ltd. and publicly accessible to be viewed and downloaded, including in the United States of America, at least by December 17, 2011.
17. The attached document Deep Sea Electronics DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 9, is a copy of the document to which the marking "Exhibit 1032" has been added.
18. I obtained the DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 9 (Exhibit 1032), a copy of which is attached to this declaration, from the records of Deep Sea Electronics Ltd. and Deep Sea Electronics PLC.
19. Deep Sea Electronics DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 9 (Exhibit 1032) was also kept in the course of a

regularly conducted business activity of Deep Sea Electronics PLC and is maintained in the records of Deep Sea Electronics Ltd. and Deep Sea Electronics PLC which I have reviewed.

20. The DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 9 (Exhibit 1032) attached to this declaration is a true and correct duplicate of the original record, in the custody of Deep Sea Electronics Ltd., with the exception of the added marking Exhibit 1032.
21. The DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 9 (Exhibit 1032) has a release date of May 30, 2012. The original document properties show the creation date as the release date of May 30, 2012. DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 9 (Exhibit 1032) was added to the website of Deep Sea Electronics Ltd. (www.deepseapl.com) and was then publicly accessible to be viewed and downloaded from that website, including in the United States of America.
22. The attached document marked as Exhibit 1031 is a Document update checklist for the 057-074_D128 for Deep Sea Electronics DSE72/7300 Series Operators Manual, updating from Issue 8 to Issue 9, and shows the release date for Issue 9 of May 30, 2012. I obtained the Document update checklist for the 057-074_D128 updating from Issue 8 to Issue 9, a copy of which is attached to this declaration, from the records of Deep Sea

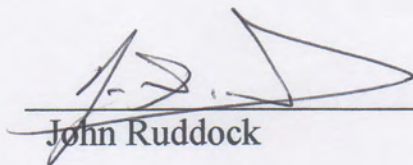
Electronics Ltd. and Deep Sea Electronics PLC. The Document update checklist for the 057-074_D128 updating from Issue 8 to Issue 9, (Exhibit 1031) attached to this declaration is a true and correct duplicate of the original record, in the custody of Deep Sea Electronics Ltd., with the exception of the added marking Exhibit 1031.

23. Deep Sea Electronics DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 9, (Exhibit 1032) was added to the website of Deep Sea Electronics PLC, on May 30, 2012. Based on the records attached to this declaration, the Release information reflects that an employee of Deep Sea Electronics PLC added the DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 9, (Exhibit 1032) to the website of Deep Sea Electronics PLC (www.deepseapl.com) on or about that date and that a separate employee of Deep Sea Electronics PLC verified that the document was publicly accessible via the website on or about that date.

24. Based on the records attached to this declaration, Deep Sea Electronics DSE72/7300 Series Operators Manual, Document Number: 057-074, Issue 9, (Exhibit 1032) was publicly accessible for download, including accessible for download in the United States of America, from the Deep Sea Electronics PLC website www.deepseapl.com on or about May 30, 2012.

25. I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that all statements made of my own knowledge are true and that all statements made on information and belief are believed to be true. I understand that willful false statements and the like are punishable by fine or imprisonment, or both (18 U.S.C. § 1001.)

Date: October 26, 2023



John Ruddock