

1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
3

4 PROVISUR TECHNOLOGIES, INC.,)
5 Petitioner,) Case Nos. IPR2024-00258
6 vs.) and IPR2024-00269
7 WEBER FOOD TECHNOLOGY GMBH,) U.S. Patent Nos.
8 Patent Owner.) 10,647,013 B2 and
9) 11, 331,823 B2
10)
11)

12 VIDEOCONFERENCE DEPOSITION OF MICHAEL JOBIN

13 TAKEN ON BEHALF OF THE PATENT OWNER
14

15 AUGUST 27, 2024
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21

22 Court Reporter:
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I N D E X

WITNESS:

PAGE

MICHAEL JOBIN

EXAMINATION BY MS. CANINO

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(No exhibits were marked.)

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

PROVISUR TECHNOLOGIES,	)	
INC.,	)	Case Nos. IPR2024-00258
	)	and IPR2024-00269
Petitioner,	)	
	)	
vs.	)	U.S. Patent Nos.
	)	10,647,013 B2 and
WEBER FOOD TECHNOLOGY	)	11, 331,823 B2
GMBH,	)	
	)	
Patent Owner.	)	

VIDEOCONFERENCE DEPOSITION OF MICHAEL JOBIN,
produced, sworn, and examined on August 27, 2024, all
parties appearing remotely, before Lauren N. Lawrence,
RPR, CCR-MO, CCR-KS, in a certain cause now pending in
the United States Patent and Trademark Office before
the Patent Trial and Appeal Board, between PROVISUR
TECHNOLOGIES, INC., Petitioner, vs. WEBER FOOD
TECHNOLOGY GMBH, Patent Owner; on behalf of the Patent
Owner.

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A P P E A R A N C E S

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1 IT IS HEREBY STIPULATED AND AGREED by and
2 between counsel for the Petitioner and counsel for the
3 Patent Owner that this deposition may be taken in
4 shorthand by Lauren N. Lawrence, RPR, CCR-MO, CCR-KS,
5 and afterwards transcribed into typewriting; and the
6 signature of the witness is expressly reserved.

7 * * * * *

8 (Deposition commenced at 9:27 a.m.)

9 MICHAEL JOBIN,
10 having been first duly sworn and examined on behalf of
11 the Patent Owner, testified as follows:

12 EXAMINATION

13 BY MS. CANINO:

14 Q. Good morning, Mr. Jobin.

15 A. Morning.

16 Q. Can you please state your full name for the
17 record?

18 A. My name is Michael Joseph Jobin, J-o-b-i-n.

19 Q. And you've been deposed before; correct?

20 A. Yes.

21 Q. About how many times would you say you've
22 been deposed?

23 A. I'd say about a dozen times.

24 Q. Okay. I'm going to go over just some basic
25 ground rules that I'm sure you know by now, but

1 especially with the nature of a remote deposition,
2 it's going to be important that we don't talk over
3 each other.

4 So that being said, I will do my best to
5 let you answer to completion; if I don't, please let
6 me know. I can assure you it's not intentional.

7 And, similarly, please allow me time to
8 finish my question to completion. And, hopefully,
9 that will help the court reporter be able to capture
10 everything.

11 **A. Understood.**

12 Q. Is there any reason, medical or otherwise,
13 that you might not be able to answer my questions
14 fully and truthfully today?

15 **A. No.**

16 Q. And I understand that you have clean copies
17 of the record with you today?

18 **A. I have one copy of each declaration, no
19 annotations.**

20 Q. And is it your preference that I use the
21 screen-share feature at all, or do you plan to be able
22 to review those documents with the copies that you
23 have?

24 **A. I think, generally, referring to the paper
25 copies is easiest for me.**

1 **If there's a particular aspect of them that**
2 **you want to put on screen to point to, I'm happy to**
3 **review that on screen as well.**

4 Q. Sure. That works.

5 And, Mr. Jobin, you understand that you are
6 here today to discuss two separate IPR proceedings?

7 A. Yes.

8 Q. One for covering the '013 patent and one
9 covering the '823 patent?

10 A. Correct.

11 Q. I will do my best to specify where there is
12 a distinction between your declarations or the
13 petitions.

14 And if you can do the same, that would be
15 great, but I understand -- that would be great, but I
16 understand there is some overlap.

17 A. Right. Understood.

18 Generally, when answering, I'll refer to
19 either the '013 declaration or the '823 declaration to
20 keep it clear.

21 Q. Great. Thank you.

22 Can you start by giving me a little bit
23 about your background?

24 A. Certainly.

25 My background overall, in my career, I've

1 been a product development consultant for over
2 30 years. That involves a wide range of mechanical
3 design and industrial design and product development
4 activities, ranging from consumer and medical devices
5 to industrial and mechanical devices, a wide range of
6 components and mechanisms and other features, which
7 are in the same range of complexity as what we're
8 reviewing here today.

9 I've listed a variety of examples in my
10 declarations as examples of my background and feel
11 comfortable discussing the material.

12 Q. And can you describe any experience you
13 have in the food processing industry specifically?

14 A. What I've -- what I've provided in my
15 declarations are examples which show the types of
16 experience I have.

17 In food processing, it ranges from products
18 that are more consumer-oriented, like kitchen
19 appliances, a wide variety, and then also experience
20 in manufacturing high-volume consumables; for example,
21 for single-serve coffee machines.

22 So a wide range of experience and exposure
23 to equipment and methods and techniques for packaging
24 food products on high-speed processing lines.

25 Q. And do you have any experience in web

1 handling or interleaving?

2 A. The types of mechanisms that are involved,
3 I certainly have experience with motor control,
4 pressure sensors, sheet metal fabrication, structures
5 that have high-speed motion and precision actuators,
6 pneumatics, and rack and pinions and gears, and all of
7 those types of mechanical features.

8 As for specifically an interleaver in this
9 application, I cannot have that specific product in my
10 portfolio, but a wide range of other comparable
11 products that I can point to.

12 Q. Can you give some of those examples of
13 comparable products you're referring to?

14 A. Well, I think that -- certainly, the
15 exposure and the design activities around high-volume
16 consumables and the equipment used to manufacture
17 those.

18 So we're talking about films and high-speed
19 printing and the application of those to thermoformed
20 parts; filling, forming, and sealing operations.

21 We're talking about packaging of liquids.
22 We're talking about packaging of powders. We're
23 talking about packaging of other food products. Some
24 experience in those types of realms.

25 The -- the design in the more recent time

1 frame of precision instrumentation with sheet metal
2 fabrication, with pneumatics and pressure control and
3 all of those other types of things that are comparable
4 to what we're talking about here is perhaps most
5 relevant in the time frame of the invention, in the
6 2017 frame, very active and have patents around those
7 types of concepts.

8 Q. Do any of the patents you have involve
9 interleaving specifically?

10 A. None of my patents are involving
11 interleaving specifically.

12 Q. Okay. And do you have any experience
13 specifically in vacuum systems?

14 A. Vacuum systems are specifically used in the
15 products that my company, 908 Devices, develops.

16 We develop mass spectroscopy instruments,
17 which operate at a vacuum. So the design and
18 development of a custom vacuum scroll pump.

19 The design and development of a custom
20 pressure sensor for the system. And the design and
21 development of orifice plates with precision orifices
22 for generating a -- a pressure differential from
23 atmospheric to the chamber inside the instrument.

24 So lots of recent experience in those types
25 of concepts.

1 Q. If you can go ahead and pull out
2 Exhibit 1003 for the '013 patent. It should be your
3 declaration.

4 A. Okay. I have Exhibit 1003 for the '013
5 patent. This is my declaration.

6 Q. Great.

7 And you rely on M ller as a primary
8 reference in your Ground 1 for the '013 patent;
9 correct?

10 MR. THOMAS: Objection. Form.

11 A. Ground 1 is an obviousness combination
12 involving M ller and Waffner, but M ller is included
13 in that, yes.

14 Q. (By Ms. Canino) And you also rely on
15 M ller in the '823 patent?

16 A. In the '823 declaration, I rely on M ller
17 in Ground 2 and in Ground 1.

18 Q. And is it the same M ller reference for all
19 three of the grounds from the '013 patent and the '823
20 patent? Correct?

21 A. That's -- that's right.

22 Q. Can you please turn to paragraph 150 of
23 your declaration for the '013 patent?

24 A. All right. I am at paragraph 150, which is
25 in Section IV, Ground 1, under the heading "Loop

1 **Store."**

2 Q. And what I'd like to do is just walk
3 through some of the key components in M ller that you
4 discuss here, starting with buffer 12.

5 Can you explain to me the function of
6 buffer 12 in M ller?

7 A. Buffer 12 is the -- is what I am pointing
8 to as embodying the loop store.

9 The loop is a -- a loose portion of the
10 web, which is located just prior to the ejection
11 mechanism. And this is intended to allow rapid,
12 intermittent dispensing of the paper or the film
13 without placing it under undue stress.

14 So it's got a capacity, which is adequate,
15 to buffer the differences in the continuous sheet
16 input and the discontinuous sheet output without
17 putting stress on the web.

18 Q. And how does it achieve that?

19 A. Well, this -- this approach is well
20 documented in the prior art.

21 I give several examples in my background of
22 the art section in both of my reports or in my
23 declarations.

24 And the primary advantage of having this
25 loop, as described by others who have developed these

1 concepts in the field, is that it -- the loop is --
2 it's a buffer. It's a -- it's an area of the web
3 which is free to move quickly in response to needs
4 downstream, in this case for high-speed, interrupted
5 movement.

6 So it's moving out and then stopping and
7 then out and then stopping several times per second,
8 whereas the input coming off the roll is moving
9 smoothly and continuously.

10 And so the length of the loop can rise and
11 fall as the -- as it's being ejected. And the idea is
12 that this gives you a little time to react to any
13 dis- -- any changes in the input speed or changes in
14 the output speed that would otherwise result in damage
15 to the web.

16 Q. And M ller also teaches the buffer 8;
17 correct?

18 A. M ller teaches a buffer that is located
19 further upstream, closer to the material store.

20 It is a -- for a different purpose.

21 Q. And what is the purpose of buffer 8?

22 A. Well, that's a -- what's called a
23 "high-capacity buffer."

24 And buffer 8 in this particular example
25 is -- it's a different embodiment. It has multiple

1 rollers and what's called a "dancer," which is rollers
2 that move out or in to -- to provide a lot of
3 material. And this can help to buffer the movement of
4 the -- of the roll.

5 If the movement of the roll is interrupted,
6 you have some capacity to -- to prevent disruption of
7 the process.

8 Q. And when you say "it's a different
9 embodiment," a different embodiment than what?

10 A. Than the loop store.

11 The loop store does not -- as shown does
12 not ride around a roller at the bottom of the loop.
13 It's free. So it moves up and down more quickly and
14 without constraint.

15 It's typically constrained along the sides
16 or at the top by rollers. But it's either
17 free-hanging or, in some examples, riding along a -- a
18 wall or something to guide it.

19 Q. And so is it your understanding that M ller
20 teaches buffer 12 in a separate embodiment than its
21 teachings for buffer 8?

22 A. Well, M ller certainly discloses what I
23 understand to be a loop store.

24 It's a -- it's -- it's illustrated in a way
25 that -- that's quite similar to what is illustrated

1 in -- in the '013 or the '823 references.

2 It's discussed as having a -- a buffer for
3 a very similar type of intermittent output. It's used
4 in a similar instrument or device, and it's serving
5 the same purpose, which is to -- to -- to serve as a
6 buffer for the intermittent output compared to the
7 continuous input.

8 Q. Is it your understanding that M ller
9 teaches buffer 12 in a separate embodiment than buffer
10 8?

11 MR. THOMAS: Objection. Form.

12 A. It's my understanding that one -- and --
13 and -- and as one of ordinary skill in the art, I view
14 that as disclosing different types of buffers.

15 It's disclosing a particular embodiment,
16 which has these two buffers shown, but the function of
17 each of them is separate. They're separated by a -- a
18 roller. And so the -- the tension in one buffer is
19 not affecting the tension in the other buffer.

20 Q. (By Ms. Canino) And you were focused on
21 buffer 12 in your declaration; correct?

22 A. When I -- when I'm discussing the M ller
23 reference, and I'm -- I'm identifying the buffer 12 as
24 the loop store, both here and elsewhere in my
25 declarations.

1 Q. Do you rely on M ller's buffer 8 anywhere
2 in your combinations?

3 MR. THOMAS: Objection to form.

4 A. When you say do I "rely" on it, do you mean
5 do I rely on it as evidence of a particular limitation
6 or element?

7 Q. (By Ms. Canino) Do you rely on buffer 8 as
8 teaching any of the components necessary for the
9 claims of the '013 or the '823 patent?

10 A. I don't recall relying on buffer 8 for --
11 for the limitations.

12 It may be that there's somewhere in my --
13 in my report where I -- where I mention it. And that
14 is to differentiate it from buffer 12.

15 I do note that it has a higher capacity
16 than buffer 12. So while it's mentioned, I don't feel
17 that I'm relying on that buffer as -- as evidence in
18 this prior art reference for meeting that element.

19 Q. If you can turn next to paragraph 175.

20 A. Paragraph 175 is in the section "Device for
21 Determining the Size of the Loop."

22 And we're still on the section where the
23 individual elements are being described under -- under
24 Ground 1.

25 Q. So here you opine that "M ller teaches a

1 device for determining a size of the loop"; is that
2 correct?

3 A. That's what I said in paragraph 176 [sic],
4 yes.

5 Q. I'd like to walk through this process in a
6 little bit more detail. So turning to paragraph 176.

7 You state that "In M ller, 'the length of
8 the loop is preferably monitored, in particular by a
9 contact sensor."

10 Do you see that?

11 A. Yes. And that's citing from M ller.

12 Q. So there is some type of sensor measuring
13 the length of the material in buffer 12 of M ller?

14 A. Yes.

15 Q. And what is the point of that sensor?

16 A. Well, as it states in paragraph 176, which
17 is citing M ller, "buffer 12 'preferably buffers only
18 as much interleaver as is needed for the ejection of
19 an interleaver.'"

20 So it's monitoring the length of that to
21 ensure that enough loop is in the loop store to buffer
22 that intermittent interleaver ejection.

23 Q. And how is that sensor monitoring the
24 length of the loop to ensure the appropriate length?

25 A. M ller doesn't get into specifics about the

1 form of the contacting sensor that's used.

2 That's left to a person of ordinary skill
3 to determine, but many such means were present in --
4 at the time of -- of the M ller disclosure that one of
5 ordinary skill would be aware of.

6 Q. What are some examples of those types of
7 sensors you're referring to?

8 A. Well, if I go back and -- and these are
9 referenced in my -- in my report or my declarations,
10 as I recall.

11 But I recall things like a photocell. I
12 see other evidence of vacuum sensors. You could use
13 a -- a contact switch. You could use a capacitive
14 sensor, depending on the nature of the film material
15 that was being transported.

16 So there's a variety of ways that one could
17 detect the presence or nonpresence of the loop.

18 Q. And what considerations would a POSITA turn
19 to when choosing which sensor to use in M ller's
20 system?

21 A. Well, I think that one of ordinary skill
22 would take into consideration the needs of a specific
23 device.

24 In this case, the -- you know, the context
25 is in the context of an interleaver device, a

1 high-speed film, intermittent motion, and a
2 moderate-sized loop, and a relatively small
3 interleaver piece that's ejected, if the context of
4 sliced meats is considered.

5 So it really just comes down to, you know,
6 whether or not that sensor can reliably detect the
7 position of the loop in order to allow you to control
8 the loop adequately for the application.

9 Q. And where is M ller's contacting sensor
10 located?

11 A. It would be helpful to have M ller in front
12 of me, but I do have -- I do have the illustration on
13 page 83 of my '013 declaration.

14 This specific element is not shown, as I
15 recall, in this illustration. And I'd have to look at
16 M ller further to see if a contacting sensor is -- is
17 shown.

18 But I am relying on the combination of
19 M ller with other art to implement the sensing.

20 Q. The same focus, just on M ller for the time
21 being.

22 If M ller is disclosing a contacting
23 sensor, would that require that the sensor comes into
24 contact with the material?

25 A. Well, M ller describes this under the --

1 under the -- well, he calls it a "contacting sensor"
2 as -- in the context of the device for determining the
3 size of the loop.

4 And the word "contacting sensor" is not
5 a -- a -- a term that I've construed or that -- that
6 has been construed in this case, but, logically, a
7 contacting sensor is in contact where they're touching
8 the web in order to detect its presence.

9 So some sort of contact is -- would be
10 required, in my view.

11 Q. And if we're looking at buffer 12, does the
12 loop make contact with any components there?

13 A. M ller is specific about there being a
14 contact surface.

15 This is illustrated in paragraph 149 of my
16 '013 declaration. If we go to Figure 1 of M ller,
17 there's something called a "contact surface." And
18 it's a sheet metal support wall, which is pivotable,
19 and it pivots up and down to help to support the loop,
20 depending on the size of the loop that is being
21 employed.

22 So I've highlighted that in pink here to --
23 to show that contact surface.

24 Q. Are there any other components that touch
25 the paper in buffer 12?

1 A. Buffer 12 is -- is traveling -- there's
2 a -- there's a nip roller just upstream, which is
3 pushing and guiding the paper into the loop store.

4 The paper is free in air, in this case,
5 until it comes into contact with the contact surface,
6 and then it exits around the top of the curved portion
7 of the contact surface in this embodiment.

8 Q. And so looking specifically to the loop
9 portion itself, is it making contact with any
10 components other than strip guide 13?

11 A. What we're talking about here is M ller in
12 isolation. And when I'm evaluating obviousness, I'm
13 looking at M ller in combination with other
14 references.

15 Here, there's a contact surface, which in
16 combination would be modified with a sensor, for
17 example. And that's -- that's how one would arrive at
18 a contacting sensor in this case.

19 Q. You'd agree that M ller teaches a
20 contacting sensor separate from any combination or
21 obviousness theory; right?

22 A. What I would say is that M ller uses the
23 word "contact sensor" as quoted in paragraph 176 of my
24 '013 declaration.

25 It states "the length of the loop is

1 preferably monitored, in particular by a contact
2 sensor."

3 And I cite to paragraph 48 of M ller.

4 Q. And so is it your opinion that M ller would
5 have to be modified to add a sensor to strip guide 13?

6 A. What I'm stating is that the -- the
7 disclosure -- the specification of M ller includes a
8 contact sensor. While it is not illustrated, it is
9 part of the specification in written form.

10 Q. So is it your opinion that M ller would
11 have to be modified to add a sensor to strip guide 13?

12 A. What I've stated is that M ller discloses
13 it. It leaves the specifics of how it is implemented
14 to a person of ordinary skill, but it does disclose it
15 in the written specification.

16 Q. And would a POSITA understand a contacting
17 sensor to be in the strip guide -- in strip guide 13
18 of M ller in order to measure the loop length?

19 A. I think it would depend on the contact
20 sensor.

21 Certainly, a -- a -- a sensor could be
22 mounted elsewhere for the loop to contact in -- in its
23 various positions.

24 Mounting a sensor like that on that strip
25 guide surface would certainly be something that would

1 be reasonable to conclude. That's another way one
2 could do it.

3 But it doesn't -- it doesn't specify
4 exactly how one would go about doing it; it just
5 states that it is done.

6 Q. Where else could a sensor be added to
7 measure the length of a loop in buffer 12?

8 A. Well, it depends on the application and
9 what -- what state of the loop you're trying to
10 measure.

11 If you're interested in the maximum extent
12 of the loop, a -- a lever switch of some type or some
13 other form of contacting sensor could be placed at
14 the -- at the bottom of the -- of where the loop hangs
15 so that the lever would be tripped when the loop comes
16 down to it.

17 It would have to be very lightweight, but
18 that's -- that's -- a microswitch of some type could
19 do that.

20 It could also be some type of a -- of a --
21 you know, depending on the material that's being used,
22 it could be some type of capacitive surface that would
23 detect the presence of the film as it -- as it
24 touches.

25 And, again, it would just be located

1 wherever it made sense and where -- and what state of
2 the loop you were trying to measure.

3 Q. And so if you were trying to measure the
4 length of the loop at multiple places on that contact
5 surface, where would a POSITA put a sensor or multiple
6 sensors?

7 A. Well, it's -- it's a bit of a hypothetical
8 question because it's not saying exactly what loop
9 states you're trying to -- to detect in M ller.

10 It's, again, leaving those -- those
11 implementation details to a POSA.

12 But what I would do as a -- as a designer
13 is observe that the loop in a pre-hanging state
14 typically forms a catenary or some type of a U-shape.

15 And that if you wanted to have contact with
16 that, you would have to have your sensors located
17 along where the loop position was predicted to be when
18 it was that particular length.

19 So you would arrive at that, first, by
20 calculating where the loop is and observing it in
21 prototype form and then adjusting the position of
22 those sensors as needed.

23 Q. And you go on to say that "buffer 12
24 'preferably buffers only as much interleaver as is
25 needed for the ejection of an interleaver.'"

1 Do you see that?

2 A. Are you -- in what paragraph?

3 Q. Still on 176.

4 A. In 176, I -- I quote that the "buffer 12
5 'preferably buffers only as much interleaver as is
6 needed for the ejection of an interleaver," and that
7 cites to paragraph 48 of M ller.

8 Q. "The ejection of an interleaver," meaning
9 one section of the interleaver paper; is that right?

10 A. I -- I don't know that I would limit it to
11 one. I think it's a dynamic system. And in a
12 high-speed system, you might need a bit more buffer to
13 cover high-speed ejection.

14 It all depends on the speeds that are
15 needed.

16 Q. And why would it be beneficial to buffer
17 only as much as needed for ejection?

18 A. Well, the idea here is -- is -- the --
19 and -- and if you look at the history of other
20 references that talk about these types of buffers, is
21 that they're designed to improve the reliability of
22 the web-handling system and to remove the risks of
23 imparting too much stress in the web.

24 It's really -- it's just really specific to
25 the application. If you're ejecting multiple times

1 per second, you need a certain amount of material that
2 doesn't have a lot of tension in it so that the
3 rollers can spit it out quick enough.

4 That's all it is. So it really just
5 depends on -- on the application as to how much buffer
6 you would need to rely -- to reliably perform.

7 Q. And still looking at paragraph 176, you
8 explain "A POSA would understand that M ller's
9 'control system' accepts an input signal from the
10 sensor and sends control signals to the drives to
11 determine the length of paper in the loop in order to
12 maintain the loop at this size."

13 Do you see that?

14 A. I do.

15 Q. And so the sensor helps determine if the
16 loop at buffer 12 is an appropriate size?

17 A. Well, what a -- what -- what a POSA would
18 understand in -- from M ller's disclosure is that the
19 contacting system roll -- the contacting sensor and
20 the roll system are what are needed to monitor the
21 length of the loop with the contact sensor.

22 So it -- you know, what I understand from
23 that disclosure is that the contact sensor -- in order
24 to control the length of the loop, you need to change
25 the speed of the -- of the -- of the -- of the web

1 being transported into the loop.

2 And you can control that by a variety of
3 means. But, ultimately, if the loop is getting too
4 short, you need to speed up the web that's coming in
5 to make it longer again. And that's really what
6 you're trying to detect.

7 And if it gets too long, of course, then
8 you run the risk of the loop bottoming out in the --
9 in the device and getting entangled.

10 So you're really trying to keep it within a
11 safe range that's determined experimentally.

12 Q. And so M ller's sensor helps do that?

13 A. Well, that's what it's -- that's what it's
14 disclosing.

15 And -- and, again, I don't go into a lot of
16 detail because, by the time of the M ller disclosure,
17 these techniques were well understood by persons of
18 ordinary skill in the art. They had been done for
19 decades.

20 Q. I'll have you turn back a couple of
21 paragraphs to paragraph 158.

22 A. Okay. We're still in Ground 1. And we're
23 still in the section that describes individual
24 elements.

25 Paragraph 158 is under the title "Contact

1 **Surface."**

2 Q. And looking at the next paragraph, 159, you
3 state "M ller's contact surface is a 'strip guide.'"

4 A. I see that.

5 Q. Are you referring to strip guide 13 here?

6 A. Yes.

7 Q. And where is strip guide 13 located in
8 M ller's loop?

9 A. The strip guide is illustrated in this
10 Figure 1 above paragraph 159 and at the exit portion
11 of the loop.

12 So this is just before the loop enters
13 the -- the interleaver sheet dispenser, the
14 intermittent driver.

15 It's supporting the loop as it -- as it is
16 coming up from its bottom extent and going out.

17 Q. And this strip guide is movable; right?

18 A. M ller talks about a rotating contact
19 surface, correct.

20 Q. And can you explain to me how that would
21 work?

22 A. Well, what they described in M ller, as I
23 recall, is that it pivots about the top radius, and it
24 rotates up to a -- to -- to different angles,
25 depending on the -- on the loop that is being

1 supported.

2 Q. How would the angles change with movable
3 strip guide 13?

4 A. They're showing it in two different states.
5 It's not particularly well visible in this
6 illustration. I can find another example that would
7 describe it better.

8 If we go back to the -- page 76 of the '013
9 declaration, Figure 1 is shown in a little bit --
10 well, it's shown fully instead of in detail.

11 And what you can see there is that the
12 contact surface, which I've highlighted in pink, is
13 shown in two different states.

14 You've got the blue material store, which
15 is shown in the operating state; and you've got the
16 white one, which is two locations over to the right,
17 which is shown in a loading state.

18 And here the strip guide is rotated up.
19 It's not quite horizontal. It -- it looks like the
20 strip is going up a -- up a ramp, and that's to
21 facilitate loading a new strip -- is my understanding
22 of how that works.

23 Q. How does that facilitate loading a new
24 strip?

25 A. I think that what M ller was -- part --

1 part of M ller's disclosure was making it easy to load
2 new -- new material, new web material to the
3 interleaver device.

4 So they have the -- the cartridge, which
5 contains the -- the material on a cart that gets
6 rolled up to the device, and then it gets locked into
7 place in a precision location.

8 And then there's some form of assistance to
9 the operator to facilitate the loading of the material
10 before the -- before the -- the slicing machine is
11 activated.

12 Q. And is this process the same as threading?

13 A. Threading would be a term that you could
14 use to -- again, you're threading the -- the -- the
15 paper or the strip material, the web, through the
16 various rollers and -- and -- and then locking it into
17 position so that when you start it up, it will run.

18 Q. And what are some of the benefits of being
19 able to move the contact surface?

20 A. What I recall from M ller and M ller's
21 disclosure was that they -- they have this contact
22 surface of being able to rotate up to facilitate the
23 loading or threading process, but that it rotates down
24 to support the buffer, the loop store, during
25 operation.

1 **So it's -- basically, it's moving down out**
2 **of the way to provide somewhere for the loop to -- to**
3 **hang. And that's what I see in Figure 1 particularly.**

4 Q. I'd like to discuss some components of
5 Waffner, which I understand to be the secondary
6 reference for your combination in Ground 1 for the
7 '013 patent. If you can turn to paragraph 168.

8 MR. THOMAS: Objection. Form.

9 **A. All right. Paragraph 168 is in Ground 1,**
10 **and it is under the heading of "Loop."**

11 Q. (By Ms. Canino) And here you mention that
12 "M ller's loop is a 'loop'" -- I think is the phrasing
13 that you use.

14 **A. The first sentence of 168 states that**
15 **"M ller's loop is a 'loop.'"**

16 **So I'm identifying that M ller is using the**
17 **same word as -- as the '013 reference in this case.**

18 Q. And you're referring to M ller's buffer 12
19 here?

20 **A. Well, yeah, the -- what I understand to be**
21 **the loop in M ller is buffer 12.**

22 Q. Okay. And moving into paragraph 170, you
23 state "Waffner's loop is 'loop' 35."

24 **A. Right. That's what I state in the first**
25 **sentence of paragraph 170.**

1 Q. And so it's your opinion that both M ller
2 and Waffner teach a loop?

3 A. Yes.

4 Q. And to better facilitate discussion, it
5 might be useful to turn back one page to page 87,
6 where you have an annotated figure of Waffner.

7 A. I see it.

8 Q. And so is this big blue U-shaped portion of
9 the material what you're referring to as Waffner's
10 loop?

11 A. Figure 3 at the left shows it most clearly.
12 There is a -- a material that's hanging
13 down and going over two rollers.

14 So, yes, the portion that's hanging down
15 and forming a U-shape is what I consider to be the
16 loop.

17 Q. And what is the purpose of Waffner's loop?

18 A. Waffner describes similar web-handling
19 issues as -- as we have seen in other references.

20 The loop in Waffner is modified to include
21 an air-permeable portion, which helps to attach the
22 loop and to stabilize it so that it can be used at
23 different angles. So it's not just a straight line.
24 It can be made to turn a bit as it's going through the
25 loop.

1 But, overall, the loop is using the same --
2 is providing the same benefits that it does in other
3 applications; that is, that it allows for accounting
4 for differences in speed or intermittent motion that
5 would be seen on one side of the loop compared to the
6 other side.

7 It's -- it's used for that same purpose to
8 help to introduce an area of low tension that will
9 have the effect of improving the reliability of the
10 web handling overall.

11 Q. And still looking at Figure 3 on page 87,
12 you annotate "vacuum chamber," indicated in purple?

13 A. I do.

14 Q. What is the purpose of the vacuum chamber
15 with respect to Waffner's loop?

16 A. Waffner describes a vacuum -- a series of
17 apertures on a rotating belt which are in contact with
18 a vacuum chamber.

19 So it's -- it's evacuating that vacuum
20 chamber with a fan or some other vacuum-producing
21 means and sucking air through those holes such that
22 when the web material of the loop is -- is -- is
23 turning back up, it basically sticks to the belt. It
24 sucks it to the belt. And it helps to prevent
25 unwanted motion of the loop as it's -- as it's -- in

1 this case, as it's turning a corner, but it also
2 allows you to change the orientation of the loop so
3 that gravity is not required to get it to function.

4 Q. And how does the vacuum chamber work with
5 that rotating belt and those apertures?

6 A. Well, there's -- there's a -- basically,
7 the suction holds the belt against the vacuum chamber
8 and then pulls the paper against the -- or the web
9 material against the belt.

10 So air is flowing in through those. It
11 provides its own negative pressure, which causes the
12 materials in that area to be sucked against the vacuum
13 chamber wall.

14 And -- and that's how it -- that's how it
15 achieves that -- the function.

16 Q. And so how is the belt able to rotate while
17 being sucked against the vacuum chamber?

18 A. The vacuum chamber has a smooth surface
19 with some -- with -- with -- it doesn't get into all
20 the detail, but the front face of it is open, and the
21 belt is sucked against the frame of that vacuum
22 chamber.

23 So there's enough airflow that the belt
24 is -- the belt's flexible enough that it -- that it
25 sucks to the vacuum chamber creating airflow through

1 the holes in the belt.

2 So you have to have enough airflow to
3 produce a net suction. And then that suction is
4 present in the holes, which causes the web material to
5 be attracted to it.

6 Q. And how is the belt itself rotating while
7 being sucked against the vacuum chamber?

8 A. It's not shown in this figure, but my
9 understanding would be that at least one of those
10 rollers would be driven with a motor or with the belt
11 itself from another motor. And it would rotate in the
12 direction that you wanted to facilitate the movement
13 of the web material.

14 Q. And in Figure 3, you also annotate a
15 contact surface?

16 A. Figure 3 and Figure 4, the belt itself is
17 the contact surface that the web is -- is touching.

18 The belt has -- the belt in -- in -- well,
19 in collaboration with the vacuum chamber is forming
20 something that the -- that the belt -- that the web
21 is -- is contacting.

22 Q. And the opening and air-permeable region
23 that you have annotated, is that referring to the
24 apertures you discussed?

25 A. An opening or air-permeable region would

1 refer to the apertures with the holes in the belt.

2 And that's what I'm pointing to in Figure 4 and in
3 Figure 3 to the left of it.

4 Q. If we turn back to paragraph 154 --

5 A. Yeah.

6 Q. -- and here you're describing Waffner's
7 vacuum chamber; is that correct?

8 A. Correct.

9 Q. I'd like to go through each of these
10 components, starting with the conventional blower.

11 What would be an example of a conventional
12 blower, as discussed here in Waffner?

13 A. Waffner doesn't illustrate that here, but
14 one of ordinary skill in the art would understand a
15 conventional blower to be some type of fan,
16 typically -- typically a centrifugal fan, which would
17 have some form of involute shape.

18 So the fan could be either an axial fan, or
19 it could be a -- a -- a rotary -- like, a cylindrical
20 vane fan. And the rotation of that -- of those blades
21 causes air to be pushed and pulled through the device.
22 So -- it -- it -- it creates a vacuum or a suction.

23 As it's blowing air out the end of the
24 blower, it's sucking air in the inlet of the blower.

25 And so in order to create a vacuum in a

1 situation like this, you would attach a blower to the
2 vacuum chamber through some type of tube, typically.

3 Q. Would that be vacuum line 44?

4 A. "A" -- looking here, it says "A source of
5 vacuum, diagrammatically shown at 42 in Figure 1, is
6 preferably of the conventional blower
7 type...connected, through a vacuum line 44."

8 So vacuum line 44, though it's hard to read
9 in the figure above, I understand to be the pink tube
10 that's exiting the vacuum chamber. It's called
11 "Suction Device."

12 Q. And where is Waffner's vacuum chamber 50
13 located on the loop?

14 A. Well, the figure that is shown is -- is one
15 embodiment, certainly.

16 It's shown in a particular location at what
17 I understand to be the exit of the loop, the vertical
18 portion, just as it goes towards the next stage.

19 So in the illustration shown in Figure 3
20 above, the web is moving from right to left. And
21 the -- in this particular embodiment is -- the vacuum
22 chamber is located on the -- on the vertical wall of
23 that -- of that loop, near the exit of the loop.

24 Q. I think the next listed component in
25 paragraph 154 is "portion 95 of the belt 28"?

1 A. I see that.

2 Q. And what is the -- this portion of the
3 belt?

4 A. Just looking at the figure, I'm not seeing
5 it illustrated here. It's a little bit light.

6 The -- the text describes "vacuum chamber
7 50 disposed adjacent to a portion 95 of the belt and
8 the pulleys 32 and 34."

9 So it's talking about where the vacuum
10 chamber is located. It's located between the rollers
11 or the pulleys, 32 and 34. And it's located on the
12 portion of the belt between the pulleys that is in
13 contact with the web, as illustrated -- is my
14 understanding of the portion of 95 of belt 28.

15 Q. And what is the function of pulleys 32 and
16 34?

17 A. Pulleys 32 and 34 guide the belt and the --
18 and, also, in the case of the top pulley, the web,
19 they are located in a position that is near where the
20 loop is predicted to be so that when the vacuum
21 chamber is activated, the -- the web is attracted to
22 the belt.

23 So I think that's as complicated as it has
24 to be. It's just that they're supporting the belt,
25 allowing the belt to rotate in the right position.

1 Q. And I know we talked a little bit about
2 this, but what is the purpose of belt 28?

3 A. Well, this is described at length in
4 Waffner.

5 But my understanding is that belt is --
6 is -- and, frankly, I guess, the novelty of -- of
7 Waffner in this particular embodiment -- one of the
8 novel aspects is that instead of it being a sliding
9 surface over which the -- or a surface over which the
10 web slides and has vacuum chamber apertures, they're
11 going the next step and moving the belt at a
12 particular speed to -- to provide, in my view, more
13 friction that could be provided by rotating a pulley
14 alone at that location.

15 So it's a -- it's a -- it's a lower-stress
16 way of -- of guiding a web than a nip roller would be
17 in that application.

18 Q. What would be a downside to adding more
19 friction on the contact surface?

20 A. Well, I think you would look at that in
21 opposition to the upside.

22 By having the ability to change the amount
23 of vacuum and change the rotation speed of that belt,
24 you can account for different friction coefficients
25 that might be present on the web material.

1 A downside to having a -- a rotating belt
2 with -- with apertures and -- and a vacuum chamber, I
3 mean, none come to mind right away, but it's --
4 it's -- it's a little bit more complicated than a
5 stationary wall, for example.

6 Q. What additional components are necessary
7 for a rotating belt as opposed to a stationary one?

8 A. Well, a stationary wall with perforated
9 holes in a vacuum chamber is pretty easy to envision.
10 It's -- it's just a flat plate with holes
11 in it and a -- a little box on the back that forms the
12 vacuum chamber.

13 What they've done here is they've gone to
14 the next step. And -- and instead of having a
15 stationary wall, they have a rotating belt, which has
16 holes in it.

17 It's -- it's a -- it's a modification which
18 is -- which is being implemented for their particular
19 application, but one of ordinary skill certainly looks
20 at it and understands each of these components and --
21 and understands how it works.

22 Q. And what are some of the additional
23 components that are added to Waffner from a more
24 traditional stationary wall contact surface?

25 A. Well, it's -- I think it's pretty evident

1 that you've got the roller at the bottom, which the
2 belt travels around.

3 You've got the roller at the top, which is
4 often present in this type of -- of loop store anyway,
5 you know.

6 And not illustrated would be whatever
7 supports are necessary for those pulleys and whatever
8 motors or belts or other features would be necessary
9 to drive them. And then the belt itself, of course.

10 Q. Would a rotating belt take up more space
11 than a stationary wall?

12 A. I suppose it depends on the -- on the
13 application, but I can see a stationary wall could be
14 a thin sheet metal part, which could be probably a
15 little thinner than the rotating belt that's shown
16 in -- in Waffner, but it's not a significant factor.

17 It's still pretty small.

18 Q. Belt 28 has apertures 30; right?

19 A. I'm just looking for the number.

20 Apertures. Yeah, I think that 30 is
21 pointing to -- well, I'm not seeing it cited here, so
22 I'd have to check that number. But the belt does have
23 apertures in it.

24 Q. Would the belt otherwise be air permeable
25 without those apertures?

1 A. It depends on the belt material, I suppose.

2 Q. What's the function of the apertures on
3 contact belt 28?

4 A. Waffner describes the -- in paragraph 161,
5 Waffner, I cite "the 'belt 28 includes a plurality of
6 evenly spaced uniform diameter apertures 30 disposed
7 along its longitudinal center-line.'"

8 It says further that "'the degree of vacuum
9 in chamber 50 will depend upon the number of apertures
10 40 and the belt 28 which are covered by the downwardly
11 descending portion of the loop of the web 10."

12 So you size the holes according to the
13 amount of airflow that you're trying to achieve. And
14 then, depending on how many of those holes are
15 covered, you can determine the position of the loop.

16 Q. How so?

17 A. Well, the amount of air that's able to --
18 to enter the vacuum chamber depends on the number of
19 apertures that are open.

20 So if all of them are closed, then it's
21 going to pull more vacuum. So you're having a more
22 negative value below the ambient pressure.

23 If more of them are open, it's going to be
24 closer to ambient pressure. So you can -- you can --
25 depending on the number of holes is the number of

1 steps that you have in that chart.

2 Q. What happens when only, let's say, the top
3 aperture is covered?

4 A. Well, you can determine this
5 experimentally.

6 But based on my experience, if you have a
7 partial occlusion in your aperture, the -- depending
8 on the flow rate, the -- but generally what will
9 happen is that you'll have a slight change in pressure
10 from ambient.

11 So it'll -- it'll be something that you
12 would notice. But that would correspond in this
13 application to a higher position of the loop.

14 So it's -- it's -- it's like the first step
15 in a number of measurements that you could take.

16 Q. So if just the top aperture was covered,
17 what would happen to the flow rate?

18 A. I can't give you a number because it
19 depends on the apertures. It depends on the flow
20 rate.

21 But the flow rate overall would be reduced
22 slightly.

23 Q. And what happens when all of the apertures
24 are covered?

25 A. The flow rate overall would be reduced

1 significantly. There's still going to be some leakage
2 around the edges because we don't have a perfect seal,
3 but we have a -- a -- experimentally, we have a range
4 of pressures for flow rates that we're measuring, and
5 we can use that range -- and Waffner describes this in
6 great detail -- how they -- they -- they monitor that
7 pressure differential and adjust the speed of the
8 infeed to account for that and to correct for that
9 position.

10 Q. And would you be able to tell whether the
11 loop was covering all of the apertures just barely or
12 covered all of the apertures and carried on another
13 foot below the last aperture?

14 A. Well, it's something that you determine
15 experimentally.

16 But what you -- what you would do, from a
17 control perspective and as an engineer, is that you
18 would note that if all apertures are covered, and
19 you're -- and you're measuring a value that's at the
20 bottom of the range, you need to speed up the inflow
21 more until you've monitored the situation, which you
22 see it coming up again.

23 So you're -- you're -- you know, these
24 factors are tuned according to the dynamics of a
25 particular system so that if you ever get to that

1 maximum state, you correct aggressively enough that
2 you're getting up into the middle of the range.

3 The idea is to be in the middle of where
4 you're able to measure so that you don't get beyond
5 that; but if you do, you have to -- either control
6 loop has to respond more aggressively to correct it.

7 MS. CANINO: Why don't we take a quick
8 five-minute break?

9 MR. THOMAS: Sure.

10 (Recess.)

11 Q. (By Ms. Canino) I'd like to talk a little
12 bit more about your proposed combination between
13 M ller and Waffner for Ground 1 of the '013 patent.

14 If you can turn to paragraph 213 in your
15 declaration, you discuss "adding a vacuum chamber and
16 contact surface to M ller's strip guide..."

17 Do you see that?

18 A. So here we are in the "Motivation to
19 Combine" section for Ground 1 of the '013 patent.

20 And paragraph 213 talks about motivations
21 to combine Waffner's techniques, specifically related
22 to the vacuum chamber, with M ller's device.

23 Q. And you state "adding a vacuum chamber and
24 contact surface to M ller's strip guide..."

25 Do you see that?

1 **A. In the first sentence of paragraph 213,**
2 **yes.**

3 Q. Is your proposed combination retaining
4 strip guide 13 from M ller or no?

5 **A. I think what I've observed here is that the**
6 **strip guide itself is a good location to add the**
7 **vacuum chamber and contact surface as described in --**
8 **in Waffner.**

9 I mean, the key findings -- or the key
10 teachings that I see in Waffner that -- that jump out
11 were the use of that support surface and the apertures
12 and the vacuum chamber to attract the paper to it
13 and -- and -- and the measurement techniques that they
14 describe in Waffner.

15 So, really, while I'm not necessarily
16 required to create a physical embodiment, this would
17 be one way -- an obvious way that one of ordinary
18 skill would combine these disclosures.

19 Q. And I'm not asking you to create a physical
20 embodiment. I'm just asking for clarification on your
21 proposed combination.

22 Does -- are you saying a POSITA would have
23 added a vacuum chamber system from Waffner's teachings
24 to M ller's strip guide 13?

25 **A. That's a -- I think that's a fair**

1 characterization of what I -- I stated in paragraph
2 13 -- is that one of ordinary skill would recognize
3 that adding a vacuum chamber and contact surface to
4 M ller's strip guide would allow the system to use
5 those components for benefits beyond sensing the loop,
6 so yes.

7 Q. So would the proposed combination include
8 adding all of the components of Waffner's vacuum
9 chamber that we previously discussed?

10 MR. THOMAS: Objection. Form.

11 A. I -- I don't -- I don't state anywhere here
12 that I'm proposing all of Waffner's teachings could be
13 integrated with M ller's.

14 What I'm understanding is that one of
15 ordinary skill would -- would learn from both of these
16 disclosures, and that understanding would render the
17 claims obvious as described elsewhere in my
18 disclosure -- in my --

19 (Overlapping, indiscernible dialogue.)

20 Q. (By Ms. Canino) Sorry. I'm sorry. I cut
21 you off.

22 A. That's okay.

23 I was just saying that -- that in my
24 declaration, I described elsewhere how the combination
25 of the teachings of Waffner and M ller would inform a

1 POSA, and -- and a POSA would arrive at a
2 determination that that were -- that those -- that
3 those particular claims were obvious.

4 In this case, what I'm -- what I'm getting
5 at is the motivation to combine certain teachings of
6 Waffner.

7 It's -- to a POSA, adding a vacuum chamber
8 to the strip guide is an easier -- is a -- is a simple
9 modification of that strip guide. It's drilling a
10 couple of holes in it and mounting the vacuum chamber
11 to the back. That's what I'm observing here.

12 Q. Okay. And what components of a vacuum
13 chamber would need to be added to M ller's strip guide
14 13?

15 A. Well, you've got -- as I recall, you've got
16 the box itself. So that's a little chamber that is
17 sealing the area behind the apertures.

18 So you've had holes in a contact plate.
19 You've got a box. And then you've got some type of
20 sensor in there to detect either flow rate or pressure
21 changes.

22 That's about it.

23 Q. And so what type of sensors could have been
24 mounted on strip guide 13?

25 MR. THOMAS: Objection. Form.

1 A. Well, one of ordinary skill in the art at
2 that time would -- would be able to pick from a wide
3 variety of -- of pressure sensors that are small,
4 lightweight, and good at measuring pressures in this,
5 you know -- in this particular area of a vacuum.

6 So we're talking about ambient pressure
7 down to about minus 1 atmosphere. So that range is
8 very commonly available with small, lightweight
9 components.

10 A person of ordinary skill would easily be
11 able to sense the pressure changes or the flow rate
12 changes in that vacuum chamber.

13 It's not something that even has to be
14 disclosed in any detail because it's so commonly
15 available and known at that time.

16 Q. (By Ms. Canino) And looking at M ller
17 without the addition of the vacuum chamber, what types
18 of sensors would be known to be mountable to strip
19 guide 13?

20 A. Well, you're asking a different question
21 here. You're talking about without the vacuum
22 chamber.

23 What web I'm stating is that the sensor
24 that you're developing here is integral with the strip
25 guide. It has apertures. It has an antechamber. And

1 it has a sensor that changes -- that senses the
2 changes in flow rate or pressure inside there.

3 All of those are required together, as I
4 understand, to measure the -- the flow of changes.

5 So you have to have that aperture plate.
6 That's part of the sensor here.

7 Q. I am asking a different question.

8 M ller without a vacuum chamber. So M ller
9 just on its own without a vacuum chamber.

10 What types of sensors would a POSITA
11 understand to be mountable to strip guide 13?

12 MR. THOMAS: Objection. Form.

13 A. It's not -- it's not something that I've
14 considered or -- or opined upon that I can recall in
15 my declarations.

16 I mean, there are bulkhead-mountable
17 pressure sensors. There are bulkhead-mountable or --
18 or surface-mountable contact sensors of various types,
19 either capacitive or photocells or conductivity
20 sensors.

21 It just depends on -- on what property
22 you're trying to measure at that location.

23 But any number of sensors can be mounted to
24 a plate.

25 Q. (By Ms. Canino) Going back to what you had

1 said previously.

2 You had mentioned the aperture plate. And
3 that would need to be added to strip guide 13 as well?

4 A. Well, the teachings of Waffner as applied
5 to M ller, a person of ordinary skill would take those
6 teachings and understand that apertures or holes could
7 be put into that support plate.

8 It's -- it's the same location. It
9 performs the same function. It's -- it's -- the only
10 thing that's not being taken from Waffner's teachings
11 is the -- is the sliding belt. It's a -- it's the --
12 Waffner in a stationary configuration.

13 Q. How many apertures would be added to
14 M ller's strip guide?

15 A. Well, the teachings of Waffner don't
16 specify any particular number.

17 I mean, they illustrate a -- an embodiment,
18 which implies a certain number. It really comes down
19 to the resolution that you're looking to achieve, how
20 many discrete measurement points do you need to give
21 you enough information to ascertain the position of
22 the belt relia- -- or the position of the web
23 reliably.

24 It's up to the -- up to the designer's
25 choice to decide how many is necessary. It's fairly

1 trivial experimental derivation.

2 Q. In your proposed combination here, does
3 strip guide 13 retain its ability to move?

4 A. I -- I haven't -- I haven't stated one way
5 or another. It certainly could. It depends on what
6 you're trying to achieve and what -- what the -- you
7 know, what you're -- basically what you're -- what you
8 needed to do in order to achieve its functions.

9 Here, the addition of a small vacuum
10 chamber to the back of that plate would not prevent it
11 from rotating, in my view.

12 Q. And so would the vacuum chamber move with
13 the strip guide?

14 A. I haven't considered that particular case;
15 but, yes, I think that it's logical that it would
16 since it's attached to the back of it.

17 Q. Does your proposed combination retain all
18 of the other components of buffer 12?

19 A. I haven't instructed a -- a specific
20 embodiment, but the buffer 12 and the components in
21 that area of M ller -- I'm really talking about adding
22 some of the teachings of Waffner to that component.
23 So I'm not talking about taking away from M ller.

24 I mean, you could choose to -- to make
25 that -- that plate fixed or not. I don't think it --

1 I think it just depends on the application.

2 I don't think that has any impact on its --
3 on -- on evaluating my opinions regarding obviousness,
4 but it seems like that's something that the addition
5 of the vacuum chamber doesn't prevent or require
6 significant modifications to -- to M ller.

7 Q. Would a conventional blower-type like the
8 one disclosed in Waffner need to be added in order to
9 make the vacuum chamber operational?

10 A. You need some type of a mode of force to
11 produce a vacuum in the vacuum chamber. So it could
12 be a blower, or it could be a Venturi nozzle. It
13 could be a pump.

14 But, yes, some -- some type of -- of blower
15 would be required. And that would be attached to the
16 vacuum chamber by a -- by a hose or a tube.

17 Q. And where would that conventional blower be
18 located?

19 A. I mean, it -- it depends on the -- on the
20 implementation. You would locate it in a spot where
21 it was rational to locate it.

22 I don't think that I've gone into that
23 level of detail in my analysis.

24 Q. Where would a rational location be for a
25 blower in this type of setting?

1 A. Again, because it's remote in -- in one --
2 in one embodiment, if it's attached by a tube or a
3 hose, it just needs to be located somewhere nearby
4 where the hose could account for any motion of that
5 plate -- would be how I would analyze it.

6 It could be attached directly to the back
7 plate as well, I suppose if it was small enough, but
8 it -- it depends on the application.

9 I mean, a fan and the electrical
10 connections required and the venting of the -- of the
11 air, you know, it -- if you look at how -- how this is
12 done in other embodiments, one can -- one of ordinary
13 skill has plenty of examples to guide them.

14 Q. If you turn to paragraph 217, you mentioned
15 that the combination would simplify threading and
16 eliminate the need for hand-threading.

17 Do you see that?

18 A. Yes, I see that.

19 Q. How does adding a vacuum chamber eliminate
20 the need for hand-threading?

21 A. Well, M ller already goes a long way
22 towards simplifying and enhancing the threading
23 operation.

24 And what Waffner's techniques describe
25 is -- especially if you're implementing their

1 embodiment with a rotating vacuum belt, is that that
2 alone can facilitate threading because as the paper or
3 web is coming in, it can be suctioned to that surface
4 and moved along in the direction that is intended.

5 So what I'm doing is observing what Waffner
6 talks about in terms of the web handling and what
7 M ller has already disclosed in terms of enhancing the
8 threading or the loading procedure.

9 A combination of those disclosures would --
10 would give a person of ordinary skill in the art
11 additional techniques or tools to simplify the loading
12 process -- is what I'm trying to state here.

13 Q. Does Waffner's system require any
14 hand-threading at all?

15 A. I'd have to review Waffner again with that
16 particular question in mind.

17 I don't recall it specifically talking
18 about eliminating hand-threading, but certainly, it --
19 its techniques, in combination with M ller, each is me
20 [phonetic], that it simplifies threading.

21 I -- I'd have to look at -- I'd have to
22 look at Waffner in more detail to be able to answer
23 that.

24 Q. How would the cleaning process change with
25 the introduction of a vacuum chamber to strip

1 guide 13?

2 A. Do you have a specific cleaning process in
3 mind? I'm not sure I understand the question.

4 Q. I'm just curious, generally, comparing
5 strip guide 13 without a vacuum chamber to strip guide
6 13 with a vacuum chamber, what the differences in
7 cleaning procedures would be for those two.

8 A. Well, we're talking about -- talking about
9 these types of web-handling equipment in the context
10 of -- of a slicing machine. That's different from
11 looking at them in isolation, of course.

12 I don't think there's a significant
13 difference.

14 The only thing you'd need to be careful
15 about is -- is -- is getting water into -- or a
16 cleaning solution into the vacuum holes.

17 I think that would -- some type of -- of --
18 of procedure to avoid that would be helpful, but
19 that's all that -- all that comes to mind at this
20 point.

21 Q. Would incorporating a vacuum chamber into
22 strip guide 13 increase or decrease tension in loop
23 12?

24 MR. THOMAS: Objection. Form. Foundation.

25 A. Generally speaking, a loop is a low-tension

1 portion of the web by design, but if you add,
2 essentially, a vacuum brake to one portion of it,
3 you're increasing friction because you've got an
4 air-pressure differential acting on the web, forcing
5 it against the surface that it's sliding along.

6 In the case of Waffner, where that surface
7 is moving, it wouldn't have any particular effect on
8 the tension.

9 In the case of an application where it's
10 sliding on the -- on the strip guide, I would think
11 that it would increase the tension in that area a bit,
12 which could be beneficial, depending on the
13 application.

14 Q. (By Ms. Canino) And in the same paragraph,
15 paragraph 217, where you discuss threading, you
16 mention "Converting M ller's strip guide to the vacuum
17 chamber and contacting belt used in Waffner would
18 simplify threading."

19 Do you see that?

20 A. I see that in the middle of paragraph 217,
21 yes.

22 Q. What do you mean by "converting"?

23 A. Well, we have a particular embodiment in
24 Waffner, which is two rollers and a belt and an
25 unspecified frame or support.

1 So "converting the strip guide" would imply
2 some substitution of those types of components in that
3 area of the mechanism.

4 So you already have a particular size, so
5 it would just be a similar size that would be located
6 in a similar spot.

7 I haven't designed it, and I can't point to
8 anything in particular, but it's a -- we're talking
9 about a relatively simple conveyer belt type of
10 mechanism with two cylinders and a belt and some
11 sort -- some sort of drive belt, presumably, to -- to
12 rotate it.

13 So that's -- that's something that -- that
14 one of ordinary skill in the art could accomplish very
15 easily.

16 Q. In your proposed combination, are you
17 suggesting implementing the teachings of Waffner,
18 including the rollers and belt, of belt 28 into
19 M ller's strip guide?

20 MR. THOMAS: Objection. Form. Foundation.

21 A. Well, here in this section, I'm enumerating
22 different factors which would influence or motivate
23 the combination of these references -- these prior art
24 references.

25 So one of ordinary skill in the art could

1 have a variety of different motivations, as I've
2 enumerated here.

3 It -- it goes towards showing the
4 compatibility, in my view, of these -- of these
5 particular references, how different techniques that
6 are taught can be applied by one of ordinary skill.

7 So, in this particular case, I'm talking
8 about the design goal of simplifying loading. And
9 this -- this is something that a POSA could do in
10 light of the teachings of Waffner and M ller in this
11 case.

12 Q. (By Ms. Canino) Does the combination you
13 have analyzed incorporate Waffner's con- --
14 contact- -- contacting belt or not?

15 MR. THOMAS: Objection. Form and
16 foundation.

17 A. Well, it's -- it's not -- it's not clear to
18 me that it matters either way.

19 I think that the combination renders the
20 claims obvious, as I've described elsewhere in this
21 declaration, in either case.

22 What I'm showing here is that there's a
23 multiple number of reasons why one would be motivated
24 to combine these references.

25 How one ultimately does so, I think,

1 depends a little on the application and the
2 preferences of the person of ordinary skill doing it
3 at the time.

4 Q. (By Ms. Canino) We're going to move into
5 your declaration for the '823 patent now, if you want
6 to set your declaration for the '013 aside and pull up
7 Exhibit Number 1003 for the '823 patent.

8 A. Okay. I've got Exhibit 1003, which is the
9 same number as the other declaration, but this one is
10 to -- is -- is directed at the '823 patent.

11 Q. And starting with Ground 1 for the '823
12 patent, you rely on M ller as your primary reference
13 again?

14 A. Ground 1 is -- is describing a combination
15 of M ller and GEA438. And if we analyze the various
16 elements, a great number of those elements are present
17 in M ller, and so I would characterize that as
18 "M ller in view of GEA438."

19 Q. If you can turn to paragraph 153, I want to
20 talk a little bit about GEA438's vacuum chamber that
21 you relied on.

22 A. Paragraph 153?

23 Q. Yes.

24 A. All right. So we're in Ground 1 in the
25 section that is describing the -- the various

1 elements. And paragraph 153 is under the heading
2 "Vacuum Chamber."

3 Q. You discuss that GEA438's vacuum chamber is
4 delay unit 1; is that correct?

5 A. Yes. I state that at the beginning of
6 paragraph 153.

7 Q. And it looks like there's a number of
8 components as a part of GEA438's delay unit 1; is that
9 correct?

10 A. Yes. I go on to list several components
11 that comprise delay unit 1.

12 Q. I'd like to go through each of these
13 components, starting with the suction plate.

14 A. Sure.

15 Q. And, actually, I'd like to back up just a
16 little bit.

17 And can you explain to me what is the
18 function of GEA438's vacuum chamber?

19 A. Well, GEA438 describes a vacuum brake,
20 which is a means of -- of controlling the tension in
21 the web as it exits the loop store and before it
22 enters the cutting region.

23 So it goes into some detail, but it's
24 essentially describing a means by which you can
25 reliably and very accurately control the amount of

1 braking in that web -- that's b-r-a-k-i-n-g -- to
2 retard and prevent the web from traveling and
3 wrinkling as it is stopped and started abruptly in the
4 discontinuous manner that is necessary for interleave
5 delivery.

6 Q. And so just to clarify, when you state
7 "vacuum chamber" or "vacuum brake," for each of those
8 components, you are relying on GEA438's delay unit?

9 A. I identify delay unit 1 as a vacuum chamber
10 as I understand that term from my review of the '823
11 specification.

12 Q. If you turn to page 61 of your
13 declaration --

14 A. Page 61, go ahead.

15 Q. -- it looks like you're also relying on
16 GEA438's delay unit 1 for the vacuum brake claim
17 element?

18 A. Yes. I -- I list it in this table as a
19 disclosure of -- of several different claim elements,
20 including the vacuum brake and the vacuum chamber.

21 Q. I just want to make sure we have our
22 terminology consistent moving forward.

23 If we turn back to paragraph 153 and get
24 back to those components, starting with the suction
25 plate, can you explain to me what the role of the

1 suction plate is?

2 A. So in paragraph 154, I cite GEA438,
3 paragraph 32 of GEA.

4 And, basically, what it talks about is that
5 the suction plate is a -- is a plate that has openings
6 in it, and you have a fan that is, in this case,
7 nearby that is pulling air through those openings.
8 And that basically -- that negative pressure attracts
9 the web to that surface of that plate as it's going
10 by.

11 That's what it describes in paragraph 32 of
12 GEA438.

13 Q. And what about the suction openings? What
14 are those used for?

15 A. Well, in order to -- in order for the
16 vacuum to be able to -- to touch the web, you have to
17 have the -- the web has to -- the air has to have
18 somewhere to go.

19 If you had an entirely sealed vacuum
20 chamber, it wouldn't have any impact on -- on the web.

21 Here, we've got a perforated plate, suction
22 plate 6 with openings 7, and the airflow that's
23 generated by that blower or fan influences the -- the
24 web that is in the vicinity to attach to the plate as
25 it goes by.

1 Q. Do you have a copy of GEA438 in front of
2 you?

3 A. I can pull one up.

4 Q. That would be great.

5 A. GEA438 could also be referenced as Bader,
6 B-a-d-e-r. That's Exhibit 1005.

7 Q. Yes. And thank you for calling out the
8 exhibit number.

9 A. Okay. I've got GEA438, Exhibit 1005, open
10 in front of me.

11 Q. And can you please turn to Figure 1?

12 A. Got it.

13 Q. And here it looks like suction plate is
14 labeled with the number 6?

15 A. 6, yes.

16 Q. Is it your understanding that the small
17 circles drawn on suction plate 6 would represent the
18 suction holes?

19 A. Although they don't call it out in this
20 particular figure, suction holes or suction openings 7
21 I understand to be the holes that are illustrated in
22 that plate.

23 Q. And it looks like the separating material
24 is labeled "2"?

25 (Reporter clarification.)

1 MS. CANINO: Two the number, yes.

2 A. It's pointing to the -- to the loop. I'd
3 have to look to see what it terms Item 2 to be. One
4 moment.

5 It's calling 2 "separating material." So
6 that would be akin to the web or the -- the
7 interleaver material. It's just a different word for
8 it.

9 Q. (By Ms. Canino) And it looks like suction
10 plate and the suction holes sit on top of the
11 separating material.

12 Do you see that?

13 MR. THOMAS: Objection. Form and
14 foundation.

15 A. I don't see that.

16 I read GEA. And it's very specific about
17 the function of the -- of the suction plate and the
18 openings sucking the paper to that surface, as -- and
19 it's not particularly well drawn, that's why I've
20 highlighted it in Figure 1 on page 74 of my
21 declaration.

22 But there's multiple cites throughout
23 GAE438 that inform a person of ordinary skill in the
24 art as to how that vacuum brake functions.

25 Q. (By Ms. Canino) What is the function of

1 fluid line 8?

2 A. What we have here is a chamber,
3 essentially. It's a vacuum box.

4 9 is a -- is a fan. And that fan is
5 attached to a chamber or reservoir that is in -- in
6 sort of a vacuum chamber, essentially, is what 8
7 really is.

8 It's called a -- a "line." It's a -- I
9 guess you could call it a linear form that's attached
10 to the fan. Perhaps it's poorly translated to the
11 English word.

12 But my understanding of 8 is that we're
13 looking at a sheet metal enclosure that -- that is
14 attached to the fan. So it's a vacuum chamber.

15 Q. But you were relying on GEA438's delay unit
16 1 as the vacuum chamber claim element; correct?

17 A. Well, you can see that the one in Figure 1
18 has a curved arrow. It's pointing to that assembly as
19 a whole.

20 And as quoted in paragraph 153, the "Delay
21 unit 1 comprises suction plate 6, suction openings 7,
22 fluid line 8 and negative-pressure-generating unit 9."

23 So all of those numbers, including suction
24 openings 7, which are not called out in this figure,
25 are -- are comprising delay unit 1.

1 So I understand all of that to be the
2 vacuum chamber or the unit that produces the -- the
3 braking force.

4 Q. And what is the function of the
5 negative-pressure-generating unit?

6 A. Well, they're using a term
7 "negative-pressure-generating unit" to be more
8 specific than the term "fan" or "blower."

9 They're telling you that the component
10 that's identified as -- by callout number 9 is
11 generating negative pressure or vacuum inside that
12 box.

13 So it just is additional clarification to
14 help you understand what it's doing.

15 It's not blowing air into the box or
16 pressurizing it, but rather, it's pulling air out of
17 the box or creating a vacuum.

18 Q. And where is GEA438's vacuum chamber
19 located?

20 A. Well, it's -- the vacuum chamber is
21 embodied in this delay unit assembly.

22 That -- "vacuum chamber" is a term that is
23 used in the '823 specification. And I understand that
24 term and identify this assembly as a vacuum chamber
25 that we're pointing to now in GEA438.

1 Q. And where is that delay unit 1 located in
2 GEA438's system?

3 MR. THOMAS: Objection. Foundation.

4 A. I think I've been pretty clear, and I don't
5 know any other way to say it other than how I've
6 described it in words in paragraph 153.

7 In my opinion, the vacuum chamber, which is
8 a term coming from and the specification of '823, I
9 understand delay unit 1 to be a vacuum chamber.

10 Q. (By Ms. Canino) And where is that located
11 relative to, let's say, the roll in GEA438?

12 A. When you say "the roll," you're -- you're
13 talking about 11? The --

14 Q. Yes.

15 A. -- the -- the roll of separating material?

16 GEA438 describes an intermittent dispensing
17 application for interleaver material or separating
18 material, and it describes the desire for this vacuum
19 brake, a delay unit just upstream of that dispensing
20 or intermittent dispensing mechanism.

21 So, as shown, it's downstream from the
22 supply roll and just before the intermittent
23 dispensing mechanism.

24 It's fo- -- this particular patent is
25 focused on this delay unit as the novel feature.

1 Q. We have just discussed the roll, also
2 called "tape roll." I think it's Element 11 in
3 Figure 1.

4 Do you see that?

5 A. I see that.

6 Q. How is paper driven off the roll in GEA438?

7 MR. THOMAS: Objection. Foundation.

8 A. Well, the bulk of the disclosure in GEA438
9 is focused on the -- on the so-called delay unit or
10 vacuum chamber and the -- the means for using that.

11 The roll is described elsewhere. I'd have
12 to pull up GEA to point to a specific paragraph, but
13 it's -- you know, it -- you know, this is the --
14 the -- GEA is the same company as the inventor in
15 M ller, and so they're -- they're addressing the same
16 types of issues.

17 This particular illustration is a bit
18 diagrammatical. It doesn't show all of the details
19 necessary to implement because a lot of that is well
20 characterized and well understood by a POSA at the
21 time of the -- of the invention for '823.

22 Q. (By Ms. Canino) And so how would the POSA
23 understand material to be removed from the roll in
24 GEA438?

25 A. Well, I think that I would point to

1 Figure 2 and the descriptions for Figure 2 therein in
2 the disclosure for GEA438. And so I'm just going to
3 those paragraphs now.

4 So there's an unrolling device. And it
5 doesn't go into detail as to how it's driven.

6 One would understand that there are a
7 couple of different ways it could be driven. It could
8 be axle-driven. It could be friction-driven. It
9 could be driven in cooperation with the roller
10 identified as Item Number 4 in Figure 2, the
11 deflection roller.

12 So you've got, you know, different
13 embodiments that are possible here, but the -- in my
14 view and understanding, the focus of the disclosure is
15 on the -- is on the delay unit.

16 Q. Where would a POSA understand the drive,
17 any of the examples that you gave, to be located in
18 GEA438 system to remove material from the web?

19 MR. THOMAS: Objection. Form. Foundation
20 and a -- and scope.

21 A. Well, I'm looking back here at the table on
22 page 61 in my '823 declaration.

23 And I'm not relying on GEA438 for
24 disclosure of a removal device. That's -- that's
25 something that I've identified in M ller.

1 Q. (By Ms. Canino) I understand that.
2 I'm just asking about GEA438 for now,
3 independent of the formal combination. And I'm just
4 curious how a POSA would understand the material to be
5 driven off the web -- off --

6 MR. THOMAS: Can you point to somewhere?
7 Can you point to somewhere in Mr. Jobin's testimony
8 that makes this line of questions relevant, Counsel?

9 And I guess I'm -- I'm objecting to form
10 and scope and foundation.

11 Q. (By Ms. Canino) Mr. Jobin, you rely on
12 GEA438 in your combination in Ground 1; correct?

13 A. **GEA438 in combination with M ller, correct.**

14 Q. And so you were using GEA438 as one of two
15 references in your proposed grounds for the '823
16 patent?

17 A. **I have identified two prior art references**
18 **in this ground: M ller and GEA438. Correct.**

19 Q. So in relying on GEA438, I'm assuming
20 you've read GEA438?

21 A. **I've read GEA438. And I've summarized my**
22 **understanding of the elements of 438 that one of**
23 **ordinary skill in the art would identify in the**
24 **context of all of the elements that I've described in**
25 **that table as discussed previously.**

1 If we go to paragraph 138 of my '823
2 declaration, it discusses the removal device in some
3 detail, but I'm only discussing it as it refers to
4 M ller because I don't identify it in -- I haven't
5 identified it in GEA423.

6 Q. Does GEA438's operation depend on material
7 being removed from the roll?

8 MR. THOMAS: Objection. Form.

9 A. GEA438 generally refers to an unrolling
10 device. It doesn't go into detail, as I recall, as to
11 exactly how that functions. That's left to one of
12 ordinary skill in the art to determine, to implement
13 how they see fit.

14 So I think that the disclosure is focused
15 on other areas. There's just not a lot to go on other
16 than these figures. And I think earlier in one of my
17 answers, I described some of the potential ways that a
18 removal device -- or a -- or the unrolling device as
19 described in 438 could operate, but it doesn't -- it's
20 not clear exactly how it does.

21 That -- that's not the -- the focus of this
22 specification.

23 Q. (By Ms. Canino) Does the operability of
24 delay unit 1 depend on material being removed from the
25 roll?

1 MR. THOMAS: Objection. Form. Scope.
2 Foundation.

3 A. The operability of the braking unit is
4 shown in the context of a particular application.

5 It's titled "Delay Unit Unrolling Device
6 Cutting Machine and Method for Providing Separating
7 Material."

8 So it is -- it is cutting the web in an
9 interleaver application, and it's located generally
10 very close to the slicer, as illustrated in Figures 1
11 and 2.

12 And the unrolling device is shown. They
13 don't go into a lot of detail about how it operates,
14 but the provision of a continuous supply of tape or
15 interleaver material is, of course, important to the
16 function of the delay unit.

17 Q. (By Ms. Canino) Earlier you had mentioned
18 the deflection rollers 4 as being one of the potential
19 ways of driving material off the loop?

20 MR. THOMAS: Object to form and foundation
21 and scope.

22 A. I identified 4 as a -- as a possible means.
23 I identified the axle of drive as -- as --
24 as another potential means for providing material.

25 Whether that constitutes a removal device,

1 I have not identified that because I don't have enough
2 information in this disclosure to arrive at that
3 conclusion.

4 Q. (By Ms. Canino) And I'm not asking if it's
5 a removal device. I'm actually just curious what the
6 function of rollers 4 in function 438 are?

7 MR. THOMAS: Objection to scope.

8 A. I -- I have not -- I have not opined on the
9 function of that particular element. I'd have to
10 review this again and -- with that particular element
11 in mind.

12 But it's -- it's -- it's shown in the
13 context of the -- of the web. It's present at the --
14 I guess you could call it as part of a loop or a loop
15 store. And it provides a certain amount of
16 compliance, which -- which is inherent or necessary in
17 this particular embodiment, but it doesn't go into a
18 lot of detail about it.

19 Q. (By Ms. Canino) If we turn to Figures 1
20 and 2 of GEA438, they should be on the same page...

21 A. Yes.

22 Q. And looking at Figure 2, it looks like
23 "Incorporates Deflection Rollers 4."

24 A. I see 4 pointing in Figure 2 to two
25 different deflection rollers.

1 Q. Without those deflection rollers, what
2 would the path of the separating material look like?

3 A. There's no way to know without more
4 information.

5 Q. What additional information would you need?

6 A. Well, the path of the web depends upon
7 components that are in its path.

8 So whether they're rollers, whether they're
9 surfaces, or whether -- and it also depends on the
10 relative speeds at different stations and the tension
11 in the web.

12 I mean, all of these are variables that --
13 that you can't discuss without more information.

14 Q. Are the deflection rollers part of your
15 proposed combination with M ller?

16 A. I have not identified them as such.

17 What I'm focused on and what I pull, what
18 disclosure I, as one of ordinary skill in the art,
19 would -- would serve in reviewing GEA438 is the
20 relevance of the delay unit 1 in combination with
21 M ller.

22 Q. Would the delay unit 1 operate any
23 differently whether or not deflection rollers are used
24 in GEA438?

25 MR. THOMAS: Objection. Form.

1 A. I have not evaluated the function of the
2 delay unit in the context of the presence or lack of
3 presence of these rollers.

4 All I will cite is that they're not
5 illustrated in Figure 1. At least one of them is
6 completely missing. It's a loose loop.

7 So I think that it's dangerous to take too
8 much from these figures because I think that they're
9 diagrammatical in some sense, and not all of the
10 details are present to enable one to answer that
11 question accurately.

12 (Reporter clarification.)

13 **THE WITNESS: "Loose loop."**

14 Q. (By Ms. Canino) Can you turn to pages 80
15 to 81 of your declaration?

16 A. Okay. I'm at pages 80 to 81, which is
17 under the section for Ground 1. And it is in the
18 section that's describing specific elements that are
19 present in this combination.

20 Q. And looking at the element device for
21 determining a size of a loop, under heading 20, do you
22 see that?

23 A. Yes.

24 Q. And here you're relying exclusively on
25 M ller's teachings for determining a loop size?

1 **A. Here I'm relying on M ller for this**
2 **element, correct.**

3 Q. And you are not relying upon GEA438 for
4 this element?

5 **A. I go back to my table. And this element is**
6 **not cited in my table, nor is it cited here as**
7 **something that I'm relying on for this particular**
8 **element.**

9 Q. And you'd agree that GEA438 does not
10 contain disclosures about determining the size of a
11 loop?

12 MR. THOMAS: Objection. Scope. Form.

13 **A. I don't recall a finding on GEA438 having**
14 **that function or that element.**

15 Q. (By Ms. Canino) And looking at the next
16 element, "Position Determination."

17 You are relying exclusively on M ller here
18 as well?

19 **A. Right. I'm citing to M ller paragraph 48,**
20 **and I rely upon that in identifying this element.**

21 Q. And you are not relying on GEA438?

22 **A. I'm -- I'm citing only here to paragraph 48**
23 **of M ller but not to GEA.**

24 Q. And you'd agree with me that GEA438 does
25 not contain any disclosures about position

1 determination?

2 MR. THOMAS: Objection. Scope and form.

3 A. I've not opined that it does.

4 I identify that feature in M ller. And
5 it's, therefore, present in the combination of M ller
6 and GEA.

7 Q. (By Ms. Canino) Does GEA438 disclose any
8 contacting sensors?

9 MR. THOMAS: Objection. Form.

10 A. Well, to the extent that a contacting
11 sensor is a device for determining the size of the
12 loop, I have not identified a feature in GEA that
13 performs this function or that -- that discloses this
14 element.

15 Q. (By Ms. Canino) And GEA438 does not
16 measure pressure; correct?

17 MR. THOMAS: Objection. Form. Foundation.

18 A. That is not correct, in my view.

19 One of ordinary skill would understand that
20 you need to be able to set a pressure or a vacuum
21 level according to the particular needs of the device.
22 And different settings may be necessary.

23 I think one of ordinary skill would
24 understand that if you're -- if you have a vacuum
25 plate, it's very useful and necessary to know what the

1 pressure is inside there.

2 I don't think that I recall it being
3 disclosed explicitly. But one of ordinary skill would
4 understand that that pressure measurement is implied,
5 certainly.

6 Q. (By Ms. Canino) But GEA438 does not use
7 any pressure sensing to determine the size of the
8 loop?

9 A. I -- I think I already answered that --
10 that GEA is not measuring or determining the size of
11 the loop using -- using a -- a contacting sensor or a
12 pressure sensor.

13 I've identified that element. In this
14 combination, I identified that element to M ller
15 alone.

16 Q. What happens in GEA438 when there's a
17 sudden stop in consumption?

18 MR. THOMAS: Objection. Form.

19 A. Well, GEA438 is designed to enable the web
20 in the interleaver mechanism to start and stop very
21 rapidly.

22 And so the idea is that you set the
23 negative pressure to allow reliable, intermittent
24 stop/start of the interleaver and slicing of the
25 sheet.

1 So they talk about -- for example, in my
2 paragraph 176 of the '823 declaration, I'm citing to
3 GEA paragraph 12.

4 And there, we're talking about setting the
5 negative pressure by way of modifying of the spe- --
6 the fan speed in order to -- to -- basically to
7 optimize or control the -- the function.

8 So, you know, this -- this -- this
9 up-and-down setting of a fan is something that one can
10 do -- that one would do. And I'm just explaining
11 about what's being disclosed in GEA; that necessarily,
12 by the context of this device, means that the braking
13 unit is able to facilitate the rapid stop/start of the
14 web material. That's what it's designed to do -- is
15 to improve the reliable delivery of the -- of the
16 sheet to the -- to the cutting.

17 Q. (By Ms. Canino) And so what happens if
18 there's a sudden stop of production in GEA438?

19 MR. THOMAS: Objection. Form.

20 A. Well, GEA -- GEA438 goes into more detail
21 in this particular section that I've cited in
22 paragraph 176.

23 It says, down in the middle, "fan is
24 preferably controlled by way of a closed-loop control
25 circuit in which the rotating speed of the fan wheel

1 is incorporated as a manipulated variable and the
2 unrolling or transporting speed is incorporated as a
3 regulating and feedback variable."

4 If there -- so with that understanding in
5 mind, one of ordinary skill would understand that if
6 there were a sudden stop in production, it would be
7 detected, and it would -- it would be -- and then
8 because we have this vacuum present, it keeps the
9 sheet from -- from moving along in -- and creating a
10 mess.

11 So it -- it -- it's being sensed -- if --
12 if the central control unit shuts down the system,
13 then the vacuum brake functions to prevent the sheet
14 from continuing to feed by momentum, for example.

15 So that's how I think that particular
16 element of GEA would behave in that scenario.

17 Q. (By Ms. Canino) And what would happen to
18 the roll preceding the delay unit?

19 MR. THOMAS: Objection. Form.

20 A. Well, they're talking about --
21 (Overlapping, indiscernible dialogue.)

22 Q. (By Ms. Canino) Sorry.

23 A. What -- what they're talking about in GEA
24 here, in this paragraph that I've cited, is that
25 the -- the -- there's a control which can be used as

1 a -- in which one can -- can infer the speed of the --
2 of the web.

3 It says "When an actual speed falls short
4 of the nominal range, the rotating speed of the fan is
5 reduced until the actual speed lies within the nominal
6 range again."

7 So it's talking about -- about control over
8 the vacuum level and the speed in that region.

9 It doesn't talk about specifically sending
10 that back to the drive or the unrolling system. But
11 it's -- it does say further up in that paragraph that
12 "The unrolling and transporting speed is automatically
13 maintained in a predetermined nominal range."

14 So if your speeds go outside that range,
15 the control -- depending on how you program the
16 control -- software control, you could tell those
17 unrolling devices to stop feeding. And that would be
18 a logical thing for one to do.

19 It doesn't go that far, but it's talking
20 about controlling the whole system based on monitoring
21 the fan speed.

22 Q. Are there any other types of braking
23 present in 438 aside from the delay unit?

24 MR. THOMAS: Objection. Form and scope.

25 A. What I -- what I recall is that the braking

1 that's discussed in GEA438 is centered upon this
2 Module 1. And I don't recall there being other
3 braking discussed.

4 MS. CANINO: Do you guys want to take
5 another quick break?

6 MR. THOMAS: Yeah. I think that works for
7 me.

8 THE WITNESS: Yeah.

9 MS. CANINO: Do you want to meet back at
10 11:55?

11 MR. THOMAS: Sure. Let's -- do you want a
12 lunch?

13 THE WITNESS: That's fine.

14 MR. THOMAS: Perfect.

15 (Recess.)

16 Q. (By Ms. Canino) Mr. Jobin, I'd like to
17 discuss your combination of M ller with GEA438 in a
18 little bit more detail.

19 If you can, turn to paragraph 190.

20 A. All right. Paragraph 190 is in the
21 "Motivation to Combine" section under Ground 1.

22 I am ready.

23 Q. And here you, again, discuss adding a
24 vacuum chamber and contact surface to M ller's strip
25 guide?

1 A. Yes.

2 Q. So is your proposed combination retaining
3 this strip guide 13 from M ller?

4 A. Well, what I state here is that "A POSA
5 would recognize that adding a vacuum chamber and
6 contact surface to M ller's strip guide would allow
7 the system to use those same components for
8 some other" -- or "for other benefits."

9 So, yes, the strip guide remains in M ller
10 in this particular combination, but additional
11 functionality is provided.

12 Q. And of that additional functionality, do
13 you mean delay unit 1?

14 MR. THOMAS: Objection. Form.

15 A. Here we're talking about -- what I'm
16 talking about here in subsection b is that "A POSA
17 would be motivated to combine GEA438's techniques with
18 M ller's apparatus to realize additional advantages of
19 a vacuum chamber."

20 And in -- in paragraph 191, I -- I discuss
21 some of the possible benefits of a vacuum chamber, and
22 that includes that the vacuum chamber has the
23 tension-control element for web material leaving the
24 loop and that it produces "complexity, decrease costs,
25 and simplify maintenance by using one component (a

1 vacuum chamber, air-permeable contact surface, and
2 sensor) for several functions."

3 So integrating those functions together is
4 viewed as a benefit.

5 Q. (By Ms. Canino) Does the combination
6 you've analyzed incorporate GEA438's suction plate?

7 A. Well, I'm identifying the combination as
8 including GEA438's vacuum chamber.

9 So that comprises the suction plate and the
10 holes and the vacuum-generating unit and the vacuum
11 chamber itself. All of those are parts of the vacuum
12 chamber.

13 Q. And this will be added to strip guide 13?

14 A. In this particular combination, I am
15 stating that a POSA would recognize that adding a
16 vacuum chamber and contact surface to the strip guide
17 would allow the system to use the same components for
18 other benefits.

19 So, yes, we're -- we're modifying M ller's
20 strip guide to include the -- the vacuum chamber
21 components as described in GEA438.

22 Q. And can you turn to paragraph 194?

23 A. I see paragraph 194.

24 Q. Here you state that "Converting M ller's
25 strip guide to the vacuum chamber used in GEA438 would

1 simplify threading"?

2 A. Yes.

3 I mean, what I'm merely stating is that in
4 a threading mode, you could use the vacuum to hold the
5 material without needing to clamp or otherwise
6 restrain it.

7 So while you're threading it, you could lay
8 that material down on the strip guide, for example,
9 and it wouldn't go anywhere.

10 So it's just a -- it envisions additional
11 benefits to the -- to the user in the threading or
12 loading of the strip material.

13 Q. But in your -- analy- -- in the combination
14 that you've analyzed, you are not suggesting removing
15 strip guide 13 and replacing it with delay unit 1;
16 correct?

17 A. I don't think I termed it that way. I
18 thought about -- about combining the teachings of
19 M ller and GEA438 in this particular area to enhance
20 the functionality of M ller with the vacuum chamber
21 benefits.

22 So I don't think I'm necessarily replacing
23 the strip guide with that. I'm integrating them based
24 on the teachings of both disclosures.

25 Q. And so would you need to add suction

1 openings to strip guide 13?

2 **A. I think that's a -- a reasonable thing you**
3 **need to do, yes, because -- because the strip guide is**
4 **in contact with the web to -- to get the vacuum plate**
5 **functionality. And those holes would be formed in**
6 **that plate. That makes sense.**

7 **Q. And in the combination that you've**
8 **analyzed, does strip guide 13 retain its ability to**
9 **move?**

10 **A. Well, we're talking about the -- the**
11 **benefits described by M ller's disclosure, rotating**
12 **that strip guide during the threading process to help**
13 **facilitate threading.**

14 **So I think that -- that it's possible that**
15 **it makes sense to keep that. It just depends on**
16 **what the -- what the ultimate application requires.**

17 **Q. Would all of the other components of**
18 **M ller's buffer 12 be retained in the combination that**
19 **you've analyzed?**

20 **A. Could you repeat that question? I think I**
21 **missed it.**

22 **Q. Yes.**

23 **Would all of the other components of**
24 **M ller's buffer 12 be retained in the combination that**
25 **you've analyzed?**

1 MR. THOMAS: Objection. Foundation.

2 A. I -- I don't know that I've gone to that
3 level of detail in evaluating this combination.

4 The teachings of both of these are being
5 discussed here under the "Motivations to Combine"
6 section.

7 This additional functionality that the
8 techniques that GEA438 teaches would be attractive,
9 potentially, to a person of ordinary skill in the art.

10 One would understand that loading of the
11 material would be simplified by combining these
12 teachings.

13 That's all that I'm getting at in this
14 particular section. The details of how -- how that
15 would be implemented are -- are not discussed in here.

16 Q. (By Ms. Canino) How does adding the
17 teachings of delay unit 1 from GEA438 eliminate the
18 need for hand-threading, as you've stated in
19 paragraph 194?

20 A. Well, what I mentioned in -- in my previous
21 answer was that having a vacuum brake function during
22 threading would have a conceivable benefit of allowing
23 the strip material to be held in place while you were
24 doing other things.

25 Remember, we're -- we're looking at loading

1 multiple units, multiple webs, and so threading them
2 and then having it temporarily hold in that position
3 while you do the others is something that comes to
4 mind.

5 And then you can go back and insert that
6 sheet into -- into the -- the -- the interleaver
7 mechanism, for example.

8 There's -- there's -- there's different
9 benefits that -- that -- that you could infer. That's
10 something that comes to mind and what I was thinking
11 of when I was talking about simplifying loading of new
12 material.

13 Q. Would hand-threading still be needed
14 throughout the system?

15 A. Well, the teachings of M ller imply that a
16 certain amount of automated loading is feasible.

17 I don't know how true that is or isn't. I
18 haven't evaluated or tested that system.

19 But looking at things that they discuss in
20 M ller, those wouldn't necessarily be diminished by --
21 they -- they would be either enhanced or neutral in
22 combination with features of GEA438.

23 You wouldn't have to apply the vacuum
24 during the treading process; you would just have what
25 essentially would be the strip guide with a couple

1 holes it, but it would be essentially the same
2 function.

3 Q. Can a new roll be loaded in GEA438 without
4 any hand-threading?

5 A. I have not evaluated whether that's the
6 case. I don't remember the disclosure of GEA438
7 mentioning that capability.

8 Q. How would the cleaning process change with
9 the introduction of a delay unit into M ller's strip
10 guide?

11 A. Both of these disclosures are silent as to
12 cleaning issues and any impact that they would have.

13 It's not something I've considered in the
14 context of GEA438 in this declaration.

15 I think that ultimately would -- you'd --
16 you'd just want to make sure to choose materials that
17 are compatible with your cleaning process and modify
18 your cleaning process, as necessary, to protect the
19 sensors.

20 Q. Would incorporating GEA438's teachings
21 increase or decrease the tension in M ller's buffer
22 12?

23 MR. THOMAS: Objection. Foundation.

24 A. GEA is teaching the addition of a vacuum
25 brake functionality, which adds a very precise,

1 controllable amount of tension to the web at
2 specific -- at a specific location. It's helpful.

3 So I would say that it increases it
4 slightly, but it's very adjustable.

5 Q. (By Ms. Canino) I'd like to move on to the
6 second ground you proposed in the '823 declaration,
7 where you rely on DePoi as your secondary reference.

8 A. Okay. Do you have a particular page or
9 paragraph?

10 Q. I do.

11 And DePoi is Exhibit 1006 for the '823
12 patent, but I'll direct you to paragraph 302 of your
13 declaration.

14 MR. THOMAS: Counsel, are you introducing
15 Exhibit 1006 in this deposition or sticking with the
16 report?

17 MS. CANINO: No. Sticking with the report.
18 Just clarifying the exhibit that I'll be referring to
19 is DePoi -- is Exhibit 106 [sic] as used in the '823
20 petition.

21 (Reporter clarification.)

22 MS. CANINO: D-e-P-o-i.

23 Q. (By Ms. Canino) Mr. Jobin, let me know
24 when you're at paragraph 302.

25 A. Paragraph 302 is under Ground 2 in the

1 section in which the individual elements are described
2 under the heading "Vacuum Chamber."

3 Q. You explain that DePoi's vacuum chamber is
4 Vacuum Box 26; is that right?

5 A. In paragraph 303, I cite "DePoi's vacuum
6 chamber is 'vacuum box' 26."

7 Q. And if you turn to the next page, there are
8 a number of components, it looks like, associated with
9 DePoi's vacuum box that I'd like to go through.

10 Do you see the top of page 140?

11 A. I -- I see that. In this context, it would
12 be quite helpful for me to have a copy of DePoi in
13 front of me.

14 Q. Right. Do you need me to email that your
15 way, or do you have one handy?

16 A. I should have a copy present in my folder
17 on this computer.

18 Okay to grab that?

19 Q. Yes. Please do. Thank you.

20 A. Yep.

21 Okay. Okay. Got it. I've got DePoi in
22 front of me now.

23 Q. Starting with "fans 36" --

24 A. Yes.

25 Q. -- what is the function of these fans?

1 A. If you look at Figure 2 of DePoi, you'll
2 see three fans 36 arrayed along the bottom of a -- of
3 the box, a sheet metal box. And this box forms the --
4 a guide for the loop store of the web to descend into.

5 So these fans create a pressure
6 differential across the web, which sucks the web into
7 the box and forms the loop store.

8 Q. And it looks like "loop" is labeled number
9 32. And it might not be in Figure 2.

10 A. Figure 3 shows loop 32. And, yes, 32 is
11 the loop. Yeah.

12 Q. And what's the point of loop 32 in DePoi?

13 A. Well, it says that the loop store -- loop
14 32 -- in paragraph 299, I cite DePoi. In paragraph 26
15 of DePoi.

16 It states "The vacuum box 26 is located
17 between the drives 24 and 30 to provide tension in the
18 web 18 between the drives 24 and 30. So during steady
19 state cutter operation, the upstream first drive moves
20 with relatively constant velocity feeding the web into
21 the vacuum box creating a loop 32, as shown in
22 Figure 3."

23 And so this loop can lengthen and shorten
24 inside the box based on differences in the speed of
25 the two drives, 24 and 30.

1 And it prevents a condition in which a
2 difference in speed would cause too much tension in
3 the web causing a break in the web or other problems
4 with delivery. So it's a buffer.

5 Q. How does it achieve that buffer between the
6 inlet and the outlet?

7 A. Well, the -- the function of the loop store
8 is well characterized in the prior art. And I show
9 several examples in my declarations where it's been
10 used over the decades for this purpose.

11 In this context, you can increase the size
12 of the loop by speeding up the -- the -- the drive 24
13 to add material faster than it is being removed by
14 drive 30.

15 So it's all about the relative speeds of
16 the in- -- inflow and outflow.

17 And the reason it's important is because,
18 in this application, DePoi is talking about a
19 paper-cutting device, and so it's discontinuous in its
20 output speed. It's stopping and starting very
21 rapidly.

22 So you need to adjust the speed of the
23 inflow so that you're never putting the web into a
24 tension condition where it could break.

25 Q. And where is the vacuum chamber located

1 relative to the loop?

2 MR. THOMAS: Objection. Form.

3 A. If you go further down in my -- in my
4 declaration, you'll see that I talk about the vacuum
5 chamber in DePoi, starting in paragraph 302.

6 There's a vacuum box 26, which is a box
7 which bounds the region in which the loop store is
8 forming.

9 So it's sort of controlling -- so the loop
10 store isn't flopping around, it's controlling the
11 vertical orientation of the loop in a more controlled
12 manner. And so that's what -- that's what the vacuum
13 box comprises.

14 Q. (By Ms. Canino) And where is vacuum box 26
15 located?

16 A. Well, if you look at, for example,
17 Figure 3, you'll see that the vacuum box is the
18 enclosure of the sidewall.

19 And -- and if you look, for example -- just
20 looking at another figure -- that's also shown on the
21 front page, which is a replica of Figure 3.

22 26 is also called out in Figure 4, but my
23 understanding is that it comprises other elements.

24 "The vacuum box 26" -- according to my
25 declaration paragraph 303 -- "comprises a frame 34

1 containing several fans 36 and its base."

2 And the length -- "The loop 32 can lengthen
3 and shorten inside vacuum box 26 due to the motion
4 differential between the two drives 24 and 30."

5 So the vacuum box is not just the
6 enclosure, but it's the assembly of the frame 34, the
7 fans at the bottom, and that provides a box into which
8 the loop can descend.

9 Q. And so do both sides of the loop go inside
10 of that vacuum box?

11 A. Well, the loop is formed inside the box.
12 And as one can see in Figure 3, for example, of DePoi,
13 the -- the web material enters and goes down the
14 side -- the inner sidewall of the vacuum box and makes
15 a loop and goes up the other sidewall of the box and
16 exits at the other side.

17 So that vacuum box 26 is, again, sort of
18 defining the left and right extent of the loop.

19 Q. It looks like feeder 6 [sic] is also
20 included in your description of the vacuum chamber on
21 the top of page 140?

22 A. I see feeder 16.

23 Q. Sorry. 16. Thank you.

24 A. "Feeder 16 includes an entrance support
25 surface or deck into the vacuum box 26 for the web 18

1 to slide along."

2 So feeder 16 is sort of a curved -- if I'm
3 reading it correctly -- let me just look again.

4 No. It's not -- it's not called out in the
5 figures, but based on my understanding, feeder 16
6 includes an entrance support surface for deck 38.

7 So deck 38 in Figure 3 -- no Figure --
8 Figure 3 is pointing to that curved surface at the top
9 of the box.

10 So that -- the web feeds around that radius
11 and down into the box is what that's saying.

12 Q. So --

13 A. So both 38 and 40 -- 40 is the exit curve,
14 and 38 is the input.

15 Q. Do you consider decks 38 and 40 to be
16 contact surfaces?

17 A. Well, "contact surface" and "air-permeable
18 contact surface" are terms that are used in the '823
19 specification.

20 And one of ordinary skill in the context of
21 that specification would understand what is being
22 disclosed there.

23 I view and have identified deck section 40
24 in that region as a contact surface because it's in
25 the vicinity of the vacuum slots 50 that form the

1 brake -- the vacuum brake.

2 Q. If you turn to page 137 of your
3 declaration, it looks like you do not rely at all on
4 M ller for any portion of the contact surface claim
5 element; is that right?

6 MR. THOMAS: Objection. Form.

7 A. Well, here, in the '823 specification and
8 in the context of the claims, they're talking about
9 this -- this vacuum brake feature and hereto,
10 identified in DePoi, the contact surface or the
11 air-permissible contact surface, because that's
12 described in the spec in DePoi explicitly.

13 So I have not identified that here in this
14 combination of M ller. I'm -- I'm focusing on the
15 element as described in DePoi.

16 Q. (By Ms. Canino) Turning back to
17 paragraph 304, you state DePoi disclosed a second
18 vacuum chamber as well?

19 A. Yes. Manifold 44 is a smaller chamber,
20 which is associated with the vacuum brake slots, which
21 are 50.

22 So it is a -- is -- you have the primary
23 vacuum box, which affects the formation of the loop,
24 and then you have this secondary vacuum chamber, or
25 manifold 44, which applies the suction to the web near

1 the exit of the box.

2 Q. And what is the function of vacuum slot 50?

3 A. In my declaration in paragraph 310,
4 "DePoi's opening is 'vacuum slots' 50. 'The slots
5 50'" -- this is quoting DePoi -- "'form a vacuum
6 inlet. The manifold 44 is attached to the outside of
7 the frame at the slots 50.'"

8 Those slots allow the vacuum to affect
9 and -- to affect the -- the -- the web. As it's -- as
10 it's moving past, it sucks the web to the sidewall and
11 provides a vacuum braking, b-r-a-k-i-n-g,
12 functionality.

13 Q. And what is brake 28?

14 A. You're referring to paragraph 317 of my
15 declaration '823?

16 Q. I was looking at it in the context of
17 paragraph 304, but wherever you want to point to
18 works.

19 A. It says here -- and I'm quoting DePoi, and
20 this is -- this is the foundation of my understanding.

21 It says "The brake 28 is located proximate
22 to the exit from the vacuum box 26."

23 And if you look at Figure 3, you have an
24 arrow that says "28," and then there's an arrow
25 pointing directly towards 50, where the slots are

1 located.

2 That region, 50, and that curved surface
3 towards 40, that region surrounding the manifold 44,
4 that little vacuum chamber behind the wall there, is
5 what I understand to be the vacuum brake of this
6 assembly.

7 They have the slots 50. They've got the
8 vacuum pulling air through those slots and the web
9 traveling over those.

10 And DePoi goes into great detail, which
11 I've summarized, paragraphs 316 through -- well, quite
12 a ways, actually, but starting at 316 and going
13 through 322 of my declaration, talking about how DePoi
14 discloses and references the function of the vacuum
15 brake.

16 Q. And what is vacuum source 48?

17 A. Vacuum source 48 is -- it could be
18 different things.

19 Here, it's called a -- in paragraph 317,
20 I'm citing to paragraph 34 of DePoi. It's called
21 "vacuum generator 48."

22 In my understanding, one of ordinary skill
23 would understand a vacuum generator to be a Venturi,
24 where you've got pressurized air flowing through a
25 nozzle and an inlet on the side of that nozzle where

1 air is sucked in. And that forms a vacuum, which is
2 pulling air through the manifold 44.

3 So a vacuum generator is what I would
4 understand that to be in combination with a valve to
5 turn it on and off as necessary.

6 Q. If you can, turn to page 137 of your
7 declaration.

8 A. All right. I'm on page 137.

9 Q. And looking towards the bottom of the chart
10 on page 137, do you see the claim element "Device for
11 determining a size of the loop"?

12 A. Yes.

13 Q. And here, it looks like you're relying on
14 M ller again?

15 A. I think I've previously cited that element
16 to M ller. It's got explicit disclosure, which
17 discusses the control system and contacting sensor.

18 Q. And DePoi does not include disclosures for
19 a device for determining the size of a loop?

20 MR. THOMAS: Objection. Form.

21 A. DePoi doesn't go into detail on that aspect
22 of the vacuum brake's functionality.

23 It's focused more on the control of the
24 vacuum brake, turning it on and off, as needed, to
25 affect function.

1 I don't recall and haven't cited here in
2 this table that DePoi is disclosing a device for
3 determining the size of the loop.

4 But one of ordinary skill looking at it
5 would assume that they must have some control because
6 the loop is -- is bounded in this box, so you'd have
7 problems if the inlet speed wasn't regulated.

8 So I -- while I don't see explicit
9 disclosure, I certainly see it in M ller and,
10 therefore, in the combination.

11 Q. (By Ms. Canino) But you're not relying on
12 any teachings from DePoi for a device for determining
13 the size of a loop?

14 A. To my recollection, I haven't cited it. I
15 certainly haven't cited it here and -- but certainly
16 could rely on M ller for that element.

17 Q. And looking at "Position determination," it
18 looks like you rely exclusively on M ller here as
19 well?

20 A. Well, again, M ller has explicit
21 disclosure, which enables me to clearly identify that
22 element, that type of functionality in DePoi.

23 While one of ordinary skill could
24 potentially understand it to be there, I've relied on
25 M ller in this case because this is -- the disclosure

1 is more specific.

2 Q. So you're not relying on any teachings from
3 DePoi for position determination?

4 A. Well, once again, the -- the inquiry in the
5 obviousness context is that I'm looking at the
6 combination of these references.

7 I've identified the element in M ller as an
8 example where it's present in combination, but I don't
9 recall specifically calling out the element in DePoi.

10 But looking at the combination, certainly,
11 it's present.

12 Q. Does the combination you've analyzed rely
13 on any teachings from DePoi for position
14 determination?

15 A. I think that's another way of asking the
16 same question.

17 What I have stated is that position
18 determination is an element that I have identified
19 explicitly in M ller, and I have not called it out
20 here in this table in DePoi.

21 My recollection is that M ller has the more
22 explicit disclosure, which would inform one of
23 ordinary skill about this element.

24 And, certainly, in combination, one would
25 understand it to be present.

1 Q. You can turn to paragraph 335 of your
2 declaration.

3 A. All right. I see paragraph 335 under an
4 "Additional motivation to combine related to
5 additional advantages of a vacuum chamber combined
6 with M ller."

7 Q. And here you again state "A POSA would
8 recognize that adding a vacuum chamber and contact
9 surface to M ller's strip guide..."

10 Do you see that?

11 A. I do.

12 Q. Is your proposed combination with DePoi
13 relying on adding a vacuum chamber to M ller's strip
14 guide?

15 A. Well, a combined disclosure of M ller and
16 DePoi would inform one of ordinary skill that a vacuum
17 chamber in that context provides the additional
18 benefits of the brake, as previously described.

19 While I haven't considered the detailed
20 configuration of those two, it's evident to a person
21 of ordinary skill that one could add that feature to
22 the strip guide without much difficulty.

23 Mechanically, it's quite simple to do.

24 Q. Does the combination you've analyzed retain
25 M ller's strip guide 13?

1 A. It certainly could. And it really depends
2 on the ultimate application in what one of ordinary
3 skill would do in the context of the disclosure
4 present in these two references.

5 I feel that it's very straightforward to
6 combine the functions that are disclosed here and add
7 the vacuum chamber functionality to the strip guide,
8 but I wouldn't go so far as to say that it's a
9 requirement or that it has to be present.

10 I think that you could follow the teachings
11 of DePoi and integrate it into M ller without the
12 strip guide.

13 It's just up to the -- up to the -- to the
14 application and the requirements and what a POSA would
15 do with that.

16 Q. What does the analysis that you've provided
17 do?

18 MR. THOMAS: Objection. Form.

19 A. Well, what I state in 335 implies that the
20 strip guide is still present.

21 It said "A POSA would recognize that adding
22 a vacuum chamber and contact surface to M ller's strip
23 guide would allow the system to use those same
24 components for other benefits."

25 So the functionality of the strip guide

1 enhances the performance of -- of DePoi, and the --
2 the functionality that's described in DePoi enhances
3 the -- the performance of M ller.

4 We're talking about, here, motivations to
5 combine and what a POSA would see in light of these
6 two references to what one would understand here.

7 Combining the vacuum chamber with a strip
8 guide is certainly feasible, given what I understand
9 the mechanical requirements to be.

10 Q. (By Ms. Canino) And does the combination
11 that you've analyzed in your declaration retain
12 M ller's strip guide 13 or not?

13 MR. THOMAS: Objection. Form.

14 A. What I have just stated is that both --
15 that the strip guide is present in combination.

16 I don't know that it's a requirement, but
17 it's certainly compatible.

18 The -- the -- what I'm -- what I'm
19 observing here in "Motivations to Combine" is that
20 these references are compatible in the sense that one
21 can combine and take the teachings of DePoi and apply
22 them to M ller without great difficulty.

23 It's straightforward from the point of view
24 of a person of ordinary skill.

25 Q. (By Ms. Canino) And so in the analysis

1 that you have provided, the proposed combination would
2 add the components of DePoi's vacuum chamber to
3 M ller's strip guide?

4 MR. THOMAS: Objection. Form. Foundation.
5 Misstates.

6 A. I'm not sure how to answer any differently.
7 It's the same question worded slightly differently, as
8 far as I understand it.

9 I -- I am -- I am going on and talking
10 about the benefits of the strip guide that's taught by
11 M ller and how that functionality is retained, even
12 with the addition of the vacuum chamber.

13 They are compatible in that sense because
14 you can integrate the teachings of these two without
15 great difficulty. It's very simple to -- to envision
16 how one would approach it.

17 I have not specified a particular
18 embodiment, but what I'm doing is taking the teachings
19 of both references and looking at it through the lens
20 of a person of ordinary skill and evaluating
21 obviousness in that context.

22 Q. (By Ms. Canino) When you state that
23 "adding a vacuum chamber and contact surface to
24 M ller's strip guide would allow the system to use
25 those same components for other benefits," does that

1 include the entirety of vacuum box 26 from DePoi?

2 MR. THOMAS: Objection. Form and
3 foundation.

4 A. I have not proposed a specific combined
5 embodiment, nor am I required to do so under the
6 obviousness analysis.

7 What I'm doing is taking the teachings of
8 both of these references and applying them and
9 understanding them, and then making a determination as
10 to whether the particular claims are obvious.

11 Here, I'm evaluating whether one of
12 ordinary skill would be motivated to combine them and
13 identifying reasons why one would be motivated to
14 combine.

15 Q. (By Ms. Canino) And what specific
16 teachings are you relying on from DePoi in the
17 combination that you've analyzed?

18 A. Well, I go into great detail in this
19 section, multiple pages which describe the various
20 disclosure in DePoi and add the disclosure in M ller
21 and how that influences one's motivation.

22 Is there a particular section of this
23 article -- my declaration that you'd like to discuss?

24 Q. Are there particular sections of your
25 declaration in the Motivation to Combine in which you

1 discuss the specific teachings of DePoi that you rely
2 on?

3 A. DePoi and M ller necessarily are discussed
4 throughout the Motivation to Combine section in great
5 detail.

6 Q. If you look at paragraph 339, you again
7 discuss "Converting M ller's strip guide to the vacuum
8 chamber used in DePoi..."

9 Which vacuum chamber in DePoi are you
10 referring to?

11 A. Well, we discussed earlier, at some length,
12 in reference to the figures of DePoi, what I
13 understood the vacuum chamber to comprise. We can go
14 back to that testimony.

15 But DePoi is depicting a -- I think if I go
16 back to the vacuum chamber section, there were two
17 different features, which -- which are included.

18 So are you talking about -- are you talking
19 about the larger vacuum box, or are you talking about
20 the vacuum brake?

21 Q. Yes. I'm wondering which you are referring
22 to in paragraph 339 of your declaration.

23 A. Well, I think that the disclosure in DePoi,
24 which is different from the disclosure in M ller and,
25 therefore, beneficial in combination here, is the

1 vacuum braking portion.

2 We're talking about the slots 50 and the --
3 the vacuum manifold 44. That feature that we're
4 adding to M ller in combination is that -- is the
5 vacuum braking function.

6 The overall vacuum box and the way that
7 the -- that the loop is formed is -- is helpful in
8 that regard, but the most important aspect is the --
9 is the vacuum braking functionality that DePoi
10 discloses.

11 Q. So in paragraph 339 of your declaration,
12 when you discuss "Converting M ller's strip guide to
13 the vacuum chamber used in DePoi," which vacuum
14 chamber of the two that you have relied on are you
15 referring to in paragraph 339?

16 A. Right. And I just answered that. And I'll
17 try to answer it again to be more clear, if that's
18 helpful.

19 My understanding here is that the
20 functionality that's being discussed in this section
21 regarding simplification of loading new material is
22 that M ller would benefit from the vacuum brake
23 functionality of DePoi.

24 That functionality is conferred by the
25 vacuum chamber associated with the Element 44 and 50

1 and 40, collectively 28 in Figure 3 of DePoi.

2 So we're talking about the vacuum brake
3 functionality, not so much the loop -- or the loop
4 store, if that makes sense.

5 That's -- here in this section is what I'm
6 talking about. Other references elsewhere could --
7 could be broader, but here, I'm focused on that vacuum
8 brake functionality that's enhancing loading material.

9 Q. And so if we turn back to paragraph 335
10 again, where you mention adding a vacuum chamber to
11 M ller's strip guide, which vacuum chamber are you
12 referring to in this paragraph?

13 A. I think that the last sentence of paragraph
14 34 helps to clarify that.

15 It says "And for further example, a POSA
16 would understand that the vacuum chamber could be used
17 as a tension-control element for web material leaving
18 the loop."

19 So "leaving the loop" is at that -- that
20 outside curve, that -- proximate to the exit that we
21 talked about earlier. That's associated with the
22 vacuum chamber that creates the vacuum braking
23 functionality in DePoi.

24 So I previously identified that as the
25 manifold 44, slots 50, and the surface 40.

1 That whole area is the disclosure that I'm
2 relying on and -- and discussing in the context of
3 motivations to combine here.

4 Q. And both of these paragraphs fall under the
5 heading "A POSA would be motivated to combine DePoi's
6 techniques with M ller's apparatus to realize
7 additional advantages of a vacuum chamber."

8 Do you see that?

9 A. Yes.

10 Q. And which vacuum chamber are you referring
11 to for this section?

12 A. Once again, this heading is over the
13 paragraph that I just described.

14 We're talking about the vacuum chamber,
15 which -- which confers the vacuum braking functions
16 that are disclosed in great detail in DePoi where
17 that -- that vacuum braking functionality is kind of
18 the essence of DePoi, in a way. And those are the
19 disclosures that I'm relying on.

20 It's not just this very specific feature;
21 it's all of the techniques for how they're used and
22 employed in managing the web.

23 Those teachings is what I'm applying in
24 combination with M ller.

25 Q. How would the cleaning process change with

1 the introduction of DePoi's vacuum chamber components?

2 A. I think that we -- we discussed that
3 previously.

4 Again, it's not something that I've covered
5 in my report -- or in my declarations. It's something
6 that would be dependent upon what the cleaning
7 requirements are for the application.

8 I think that the main thing that you'd want
9 to do is to protect any sensors and to make sure that
10 any cleaning solutions were -- were blown out or -- or
11 not present in the vacuum chamber before you start it
12 up again.

13 Q. And would incorporating DePoi's teachings
14 increase or decrease tension in M ller's loop 12?

15 MR. THOMAS: Objection. Foundation.

16 A. What DePoi is all about is very precise
17 control over the tension in that loop and the ability
18 to turn that on and off very precisely in the correct
19 timing to facilitate reliable paper cutting.

20 So it's very much about a -- a very precise
21 control over the tension of the web at the exit where
22 it's most important for that particular application.

23 Q. (By Ms. Canino) So would that increase or
24 decrease the tension in M ller's buffer 12?

25 MR. THOMAS: Objection. Foundation.

1 **A. As I discussed previously with other vacuum**
2 **brakes, I think that it would slightly increase, but**
3 **it would be controlled, and it's very -- able to be**
4 **turned off very quickly.**

5 **It's -- it gives the -- it gives the -- the**
6 **device the opportunity to control the tension in the**
7 **web more accurately -- or more precisely.**

8 **MS. CANINO: I'm going to take one more**
9 **quick break. I should, hopefully, be able to wrap up**
10 **and be out of here before lunch.**

11 **THE WITNESS: That sounds -- I mean, it**
12 **depends on how long you need. I could -- I could**
13 **definitely go for a lunch. We're almost 1:00 here.**

14 **MS. CANINO: I don't anticipate needing**
15 **much more time at all after this break.**

16 **MR. THOMAS: Let's -- let's -- can we go**
17 **off the record and just chat for a second on that?**

18 **MS. CANINO: Sure.**

19 **(Recess.)**

20 **MS. CANINO: No further questions from me,**
21 **Mr. Jobin.**

22 **THE WITNESS: Okay.**

23 **MR. THOMAS: No questions from me either.**
24 **Thank you for your time today.**

25 **THE WITNESS: Thank you, everyone.**

1 (Reporter inquires about rough drafts.)

2 MS. CANINO: Yes, please.

3 MR. THOMAS: Yes, please. Thank you.

4 THE REPORTER: Okay. And then when do you
5 guys need this one? A specific date is ideal. Then I
6 make sure I hit exactly what you need.

7 MR. HART: Is -- is Thursday reasonable for
8 you?

9 THE REPORTER: Is when?

10 MR. HART: Thursday of this week. Is a
11 two-day turnaround reasonable, or is -- is Friday more
12 reasonable, given the length of the depo?

13 THE REPORTER: Yeah. I think I can
14 definitely shoot for Thursday if that's ideal for you
15 guys. And, then, if you're okay with -- you know, if
16 it needs a little extra time, is Friday okay, then, if
17 I can't do Thursday?

18 MR. HART: Yep.

19 THE REPORTER: Okay.

20 MR. HART: Yep. That's perfect.

21 THE REPORTER: Then we will plan on that.
22 And then the same thing for you,

23 Mr. Thomas?

24 MR. THOMAS: Yeah. Whenever it's ready.
25 No preference for me.

1 THE REPORTER: Read and sign?

2 MR. THOMAS: We'll reserve, sure.

3 (Deposition concluded at 12:55 p.m.)

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I, Lauren N. Lawrence, Registered

Professional Reporter, Missouri Certified Court

Reporter #1368, Kansas Certified Court Reporter #1690,

do hereby certify that the witness whose testimony

appears in the foregoing proceedings was duly sworn by

me; that the testimony of said witness was taken by me

to the best of my ability and thereafter reduced to

typewriting under my direction; that I am neither

counsel for, related to, nor employed by any of the

parties to the action in which this proceeding was

taken, and further, that I am not a relative or

employee of any attorney or counsel employed by the

parties thereto, nor financially or otherwise

interested in the outcome of the action.



Lauren N. Lawrence

RPR, CCR-MO #1368, CCR-KS #1690

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August 29, 2024

Mr. Henry Thomas
WILLKIE, FARR & GALLAGHER, LLP
300 North LaSalle Drive, 50th Floor
Chicago, Illinois 60654

In Re: PROVISUR TECHNOLOGIES, INC. vs. WEBER FOOD
TECHNOLOGY GMBH

Dear Mr. Thomas:

Please find enclosed your copy of the deposition of
MICHAEL JOBIN taken on August 27, 2024, in the
above-referenced case. Also enclosed is the original
signature page and errata sheet.

Please have the witness read your copy of the
transcript, indicate any changes and/or corrections
desired on the errata sheet, and sign the signature
page before a notary public.

Please return the errata sheet and notarized signature
page to the Production Department at Alaris Litigation
Services, 1608 Locust Street, Kansas City, Missouri
64108 for filing prior to trial date.

Thank you for your attention to this matter.

Sincerely,

Lauren N. Lawrence, RPR, MO CCR, KS CCR
Missouri Notary Public
Enclosures
cc: Ms. Canino

1 STATE OF)
2 COUNTY OF)

3
4 I, MICHAEL JOBIN, do hereby certify:
5 That I have read the foregoing deposition;
6 That I have made such changes in form and/or
7 substance to the within deposition as might be
8 necessary to render the same true and correct;
9 That having made such changes thereon, I hereby
10 subscribe my name to the deposition.
11 I declare under penalty of perjury that the
12 foregoing is true and correct.

13
14
15 MICHAEL JOBIN

16 Executed this day of ,
17 2024, at .

18
19
20 Notary Public:
21 My Commission Expires:
22
23
24
25

WITNESS ERRATA SHEET

1
2 Witness Name: MICHAEL JOBIN
3 Case Name: PROVISUR TECHNOLOGIES, INC. vs. WEBER FOOD
4 TECHNOLOGY GMBH
5 Date Taken: AUGUST 27, 2024
6 Page #_____ Line #_____
7 Should Read: _____
8 Reason for Change: _____
9 Page #_____ Line #_____
10 Should Read: _____
11 Reason for Change: _____
12 Page #_____ Line #_____
13 Should Read: _____
14 Reason for Change: _____
15 Page #_____ Line #_____
16 Should Read: _____
17 Reason for Change: _____
18 Page #_____ Line #_____
19 Should Read: _____
20 Reason for Change: _____
21 Witness Signature: _____
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