

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

BIZLINK TECHNOLOGY, INC.,
Petitioner,

v.

ANDERSON POWER PRODUCTS, INC.,
Patent Owner.

Case IPR2024-00687
Patent No. 8,808,017

**DECLARATION OF RONALD P. LOCATI
IN SUPPORT OF PATENT OWNER'S RESPONSE**



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XI. CONCLUSIONS 79

I, Ronald P. Locati, declare as follows:

I. INTRODUCTION

1. My name is Ronald P. Locati. I have been retained by counsel for Patent Owner Anderson Power Products, Inc. (“Patent Owner”) to provide my independent analysis regarding the patentability and validity of claims 1-4 and 7-12 (collectively, the “Challenged Claims”) of U.S. Patent No. 8,808,017 (“the ‘017 patent”). I reserve the right to supplement or amend my opinions to account for any additional information that subsequently becomes available to me, any matters subsequently raised by Petitioner BizLink Technology, Inc. (“Petitioner”), any opinions subsequently provided by Petitioner’s expert Dr. Eldering, and/or in light of any relevant orders or other developments in this matter.

A. My Background, Qualifications, Publications, and Testimony

2. My background, qualifications, and educational and employment history are set forth in my curriculum vitae, which is attached hereto as **Exhibit 1**.

3. I have a Bachelor of Science degree in Mechanical Engineering Technology from the University of Pittsburgh, and since graduating have been directly involved in engineering and designing electrical connectors for 45 years.

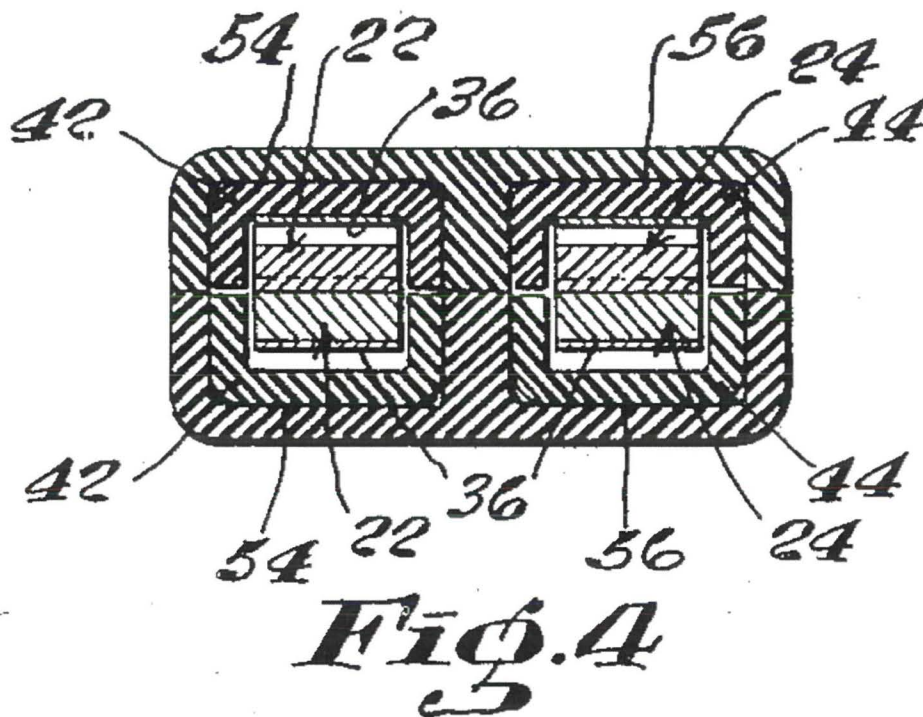
4. I am currently an independent Senior Consultant with APEX Electrical Interconnection Consultants, LLC, a firm which provides design, engineering, and technology solutions to both manufacturers and end-users of electrical

interconnection products. My personal consulting expertise with APEX includes the design of electrical connectors, contacts, and related electromechanical devices, the forensic examination, testing, and diagnosis of failed connectors, educating and training companies and individuals about the practical application of connection technologies, and "designing around" patented connectors and interconnection devices. As a result of my work I am named inventor on five electrical connector patents that issued during my association with APEX.

5. As Vice President and Engineering Director specializing in Product Design and Development from 1997 to 2002 with Stewart Connector Systems, I directed electrical and mechanical engineers responsible for the design of modular jack and plug connectors that are used in telecommunication and data equipment. I am named inventor on eleven different electrical connector patents that resulted from my work with Stewart Connector Systems.

6. From 1994 to 1997, I held the position of Engineering Director at LRC Electronics. There I directed the design, development, and testing activities of mechanical and electrical engineers and technicians responsible for creating new coaxial cable connector designs. CATV connectors are used to power and distribute high-fidelity signals within the outdoor wiring infrastructure that enables the long-distance transmission of cable signals to an end user. I obtained seven electrical

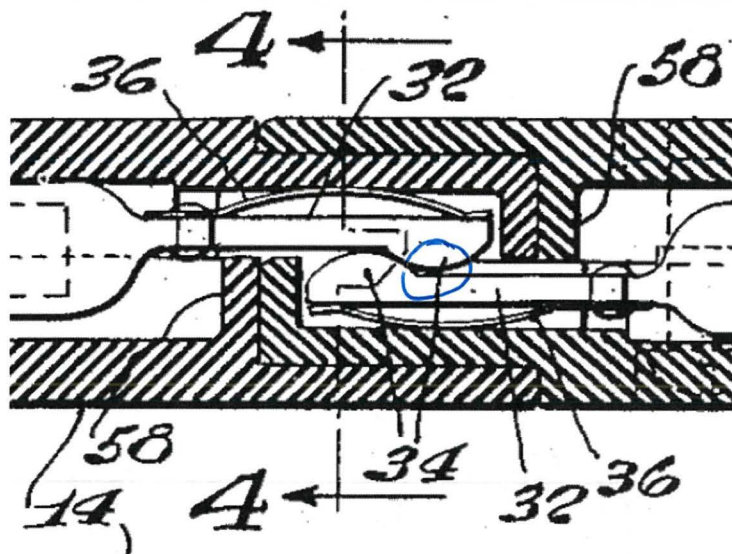
34, 3:14-27.) Winkler's Figure 4 shows that the convex end portions 34 are in "hooked or interlocked" engagement with each other at an approximately 45-degree angle. (*Id.*) Winkler's Figure 4 does not have a reference numeral 32, does not depict the elongated flat portion 32 of the first electrical contact, and does not disclose that the elongated flat portion 32 of the first electrical contact engages or is in contact with the second electrical contact. (*Id.*)



(*Id.* at FIG. 4.)

79. Like Winkler's Figure 4, none of Winkler's other figures disclose that the elongated flat portion 32 of the first electrical contact engages or is in contact with the second electrical contact. Winkler's Figure 2 discloses the opposite.

Winkler's Figure 2 shows a gap between the elongated flat portion 32 and the convex end portion 34 of the opposing electrical contact. (EX1004, Winkler, at FIG. 2.)



(*Id.*)

80. I have been informed that patent drawings do not define the precise proportions of the elements. I have also been informed that ambiguity in a patent drawing is insufficient to show anticipation. I note that nothing in Winkler indicates its figures are drawn to scale. (*See generally* EX1004, Winkler.) When viewed in isolation, Winkler's Figure 2 is at least ambiguous as to whether the elongated flat portion 32 of the first electrical contact engages or is in contact with the second electrical contact. (*Id.* at FIG. 2.) When viewed in the context of Winkler's other disclosures, it is clear to me that the elongated flat portion 32 of the first electrical

contact does not engage or contact the second electrical contact. (*Id.* at 2:10-14, 2:27-32, 3:14-27, claim 4.)

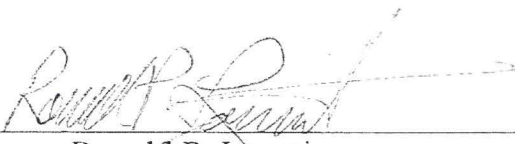
81. Petitioner and Dr. Eldering assert that Winkler's "flat elongated portion 32" is the claimed "connecting surface." (Petition at 23-25; EX1003, Eldering Declaration, ¶¶ 67-70.) Petitioner and Dr. Eldering do not assert that Winkler's "convex end portion 34" is the claimed "connecting surface." (*Id.*) I understand, however, that Dr. Eldering refused to confirm during his deposition that he is not reading Winkler's "convex end portion 34" on the claimed "connecting surface."

82. I have been informed that Petitioner and Dr. Eldering are precluded from asserting for the first time in their Reply that Winkler's "convex end portion 34" is the claimed "connecting surface" because any such argument and opinion was not included in the Petition and Dr. Eldering's declaration, respectively. Nonetheless, to the extent Petitioner and Dr. Eldering attempt to change their position in Petitioner's Reply, Petitioner and Dr. Eldering still cannot show that Winkler anticipates Challenged Claim 1.

83. Limitation 1[c] expressly recites "the first electrical contact having a connecting surface that is substantially parallel with a longitudinal axis of the insulating housing." (EX1001, '017 patent, at claim 1.) If Petitioner and Dr. Eldering were to change their position and assert that Winkler's "convex end portion 34" is the claimed "connecting surface," then Petitioner and Dr. Eldering would be

I have prepared this Declaration based upon my review of the materials referenced, and my own personal knowledge, education, skill and experience. I declare, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Dated: March 7, 2025



Ronald P. Locati