

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

American Axle & Manufacturing, Inc.

Petitioner

v.

Neapco Components, LLC,
Patent Owner

Case IPR2025-00090

U.S. Patent No. 11,434,958

Case IPR2025-00091

U.S. Patent No. 11,598,376

DECLARATION OF TODD HARRIS

I, Todd Harris, of Deschler, Ohio, declare as follows:

1. I am over the age of 21, and I have personal knowledge of the facts contained herein unless otherwise indicated.

2. I am a self-employed industrial controls engineer. I am not a automotive service professional or part of the Jeep® or Chrysler service network.

3. In early 2016, I purchased a 2015 Jeep® Renegade that had been wrecked so that I could re-build it as a “do-it-yourself” hobby.

4. In May 2016, I joined a forum community dedicated to Jeep Renegade owners and enthusiasts, www.renegadeforum.com (“Renegade Forum”).

5. I joined the Renegade Forum because I was looking for a 2015 Jeep® Renegade service manual that I could refer to as I re-built my 2015 Jeep® Renegade, and so that I could share my experience with and ask questions of others in the forum community.

6. I have reviewed a forum discussion that I started on May 18, 2016, entitled “New Owner, Service Manual, fuel Cut-off, more....” “https://www.renegadeforum.com/threads/new-owner-service-manual-fuel-cut-off-more.109/?post_id=441&nested_view=1&sortby=oldest#post-441” (last accessed March 18, 2025). A true and correct screenshot of this forum discussion is attached as Exhibit 1 to this declaration.

7. When I started the forum discussion, I explained that I was unable to locate a 2015 Jeep® Renegade service manual at that time. I had hoped that another member of the Renegade Forum would help me locate a service manual or otherwise help me solve a service-related issue that I had at the time. Exhibit 1 to this declaration includes a true and correct copy of my May 18, 2016, forum post.

8. On July 12, 2016, I responded to a reply from a member named “Cruiser,” which included a link to purchase a 2016 Jeep® Renegade service manual. Exhibit 1 to this declaration includes a true and correct copy of my July 12, 2016, forum post response to Cruiser.

9. As I stated in my July 12, 2016, forum post, in July 2016, I used the link provided by Cruiser, “<https://www.techauthority.com/en-us/products/81-370-16028-CD>,” to purchase a copy of the 2016 Jeep® Renegade service manual from TechAuthority.

10. Exhibit 2 to this declaration is a true and correct copy of a receipt that I received from TechAuthority for my purchase of the 2016 Jeep® Renegade service manual. The receipt was emailed to me from “noreply@techauthority.com” on July 10, 2016, and shows that I purchased a “2016 Jeep Renegade Service Information CD” for “\$134.99” (plus tax and shipping). The receipt is still in my e-mail inbox.

11. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be

true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code. I provide my opinions with a reasonable degree of professional certainty, based on information available to me at present, and I reserve the right to modify, amend, and/or supplement these opinions if more information is provided or becomes available.

Date: March 26, 2025

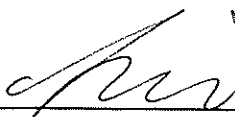


EXHIBIT 1

Home > Forums > Jeep Renegade Forum - General Discussion > Jeep Renegade General Discussion >

New Owner, Service Manual, fuel Cut-off, more....

→ Jump to Latest

fuel cut off

fuel cutoff

replace airbag

service manual

18K views

6 replies

3 participants

last post by Todd Harris Jan 17, 2025

Todd Harris

Discussion starter

4 posts · Joined 2016

#1 · May 18, 2016

I just purchased a 2015 Renegade Limited loaded, wrecked with just 2800 miles on it. I used to rebuild Liberties as a hobby but thought I'd get into these Renegades since they are new. I'll be rebuilding this one myself as well.

I saw another post about looking for a Service manual...I too am looking. Dealer said they access this information through web via Jeep headquarters; presently nothing available through techauthority.com, and I called to verify this. Neither can answer my question about if or when something will be available.

So other than "where can I locate service information", can anyone describe to me the procedure for resetting the "Fuel Shut-off triggered" condition?

The passenger side airbags deployed including the dash, side, and front seat. With regards to replacing the airbag in the seat, is there a method for this? Does it require replacing the complete seat back cover since it was torn when the airbag deployed, or can the seat cover be repaired by replacing a section?

I'm positive I'll be having more questions, but as I go through the process of rebuilding the Renegade I'll be gaining a lot of experience I'll be able to share with the forum community in the weeks and months ahead.

See more

Rachel P. Perryman

Reply

Like

Save

Share

Advertisement

The AutoAudio Show

Mike Schlee

Kyle Patrick

Things I missed

NEW PLAYING

WHY NOT RENEGADE?

Perfect Pickup?

NO MORE CASH

Brought to You by citymotors

Sort by

Oldest first

Cruiser

4 posts · Joined 2016

#2 · Jun 1, 2016

The fuel shut off triggered condition is covered on page 21 of my 2016 user guide. I would think it would be the same for the 2015. The owner's manual and the user guide can be downloaded free from www.jeep.com/en/owners/manuals. I got my Sport about 4 days ago so I'm certainly a newbie. Good luck with your rebuild.

Reply

Like

Save

Share

Cruiser

4 posts · Joined 2016

#3 · Jul 6, 2016

I recently found the service manual on disc at techauthority.com. It's for the 2016 model which is essentially the same as the 2015. Here's the link:

<https://www.techauthority.com/en-us/products/81-370-16028-CD>

Reply

Like

Save

Share

Todd Harris

Discussion starter

4 posts · Joined 2016

#4 · Jul 12, 2016

Excellent! Thanks Cruiser for following up with this and letting me know. I was just a few days away from signing up to an annual subscription to Mitchell in order to get service information at a cost of around \$80 per month. I just received the DVD from techauthority and the information looks very good, it even has how-to videos which is more than Mitchell had.

Reply

Like

Save

Share

Cruiser

4 posts · Joined 2016

#5 · Jul 12, 2016

Sounds like a good deal! Thanks for the mini review and I hope the DVD proves to be very useful to you.

Like

Save

Share

Robert Kappers

2 posts · Joined 2024

#6 · Oct 14, 2024

Cruiser said:

⓪

Sounds like a good deal! Thanks for the mini review and I hope the DVD proves to be very useful to you.

Hi Todd, and Cruiser - I am working on a research project relating to the 2016 Jeep Renegade Service Manual, and I am hoping that you can help me with a few things. Do either of you happen to have a copy of that CD? Or remember purchasing it?

Like

Save

Share

Todd Harris

Discussion starter

4 posts · Joined 2016

#7 · Jan 17, 2025

BRIGGS & RILEY

Jeep Renegade Forum

1.8K posts · 1.2K members · Since 2015

A forum community dedicated to Jeep Renegade owners and enthusiasts. Come join the discussion about performance, modifications, classifieds, troubleshooting, maintenance, and more!

Full Forum Listing →

Explore Our Forums

Jeep Renegade General Discussion

Jeep Renegade Chassis, Suspension, Wheels, Tires

Newbie Checkin!

Jeep Renegade Mechanical Problems and Questions

Off Topic Lounge

BRIGGS & RILEY

Recommended Communities

Jeep Forum

775K members

Jeep

Jeep Garage Forums

200K members

The Can-Am Origin

0 members

BRIGGS & RILEY

American Axle v. Neapco - IPR2025-00090

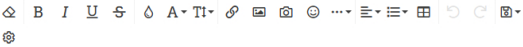
PET_AAM_1037-0006

Robert Kappers said: @
Hi Todd, and Cruiser - I am working on a research project relating to the 2016 Jeep Renegade Service Manual, and I am hoping that you can help me with a few things. Do either of you happen to have a copy of that CD? Or remember purchasing it?

I apparently did purchase it and I do have an email receipt from techauthority, but I don't recall using it but perhaps I did. It's been to many years ago. I don't have a clue where the DVD would be today if I had it.



Write your reply...



Post Reply

Related Threads

K

Jeep Renegade Recalls and TSB's
Kicker · May 22, 2015

Fuel top off, 10-20 wait!

Make sure that when fueling with the "no cap" filler, you wait 20-30 seconds with the pump still in the tank before removing. DO NOT TOP OFF! Had mine 5 days, the are replacing the tank, carbon canister...

Q 6

9K

Bamajeeep replied Sep 17, 2016

Jeep Renegade General Discussion
Sandycart1 · Jan 28, 2016

Manual rear entry

The biggest gripe I have so far is there is no remote rear entry into the renegade trailhawk. Does anyone know why??? Is this true of all renegade models?

Q 2

2.6K

cojjeep replied Feb 7, 2016

J

Jeep Renegade General Discussion
Jack Kuykendall · Dec 1, 2015

Service manual

Does anyone know how I can get a service manual for the 2015 Jeep Renegade ? I have been told that it is currently web-based and accessible by dealer and other authorized service people. Is this true? Jac...

Q 4

11K

jeepren replied Feb 18, 2021

E

Oil Change - Lubrication - Fluids
E. Conley · Nov 15, 2015

Maunual/auto oil differences

The manual transmission works off standard conventional oil. Most dealer tanks are actually a blended conventional/synthetic 50:50. Depending on driving habits blended oils hold up for 3-5,000 miles. The...

Q 3

3.4K

Bamajeeep replied Sep 17, 2016

Jeep Renegade General Discussion
Brian · Feb 2, 2017

Service Engine light....

Has anyone had a problem with the "Service Engine" light coming on? From what the Dealer/Service tells me is that is giving them "Codes" and that they are working the Codes (I don't know the exact...

Q 14

46K

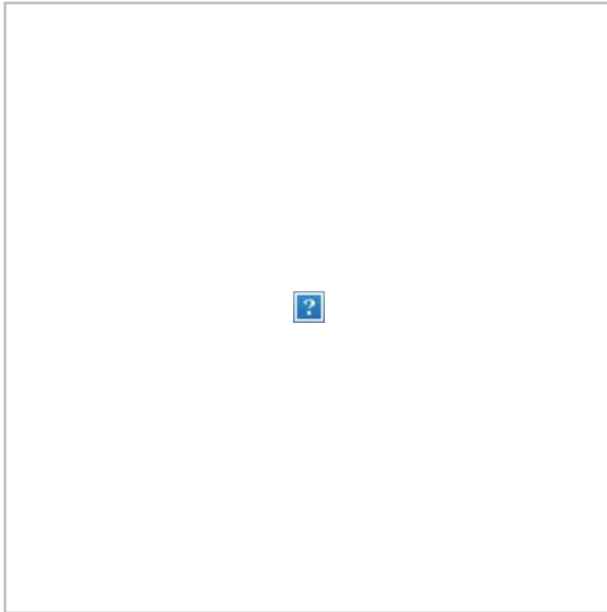
Traildude replied Jan 9, 2018

EXHIBIT 2

From: [Todd Harris](#)
To: [Kappers, Robert](#)
Subject: [EXTERNAL] FW: TechAuthority Order Confirmation - #MTA08048724
Date: Thursday, March 13, 2025 5:04:14 PM

-----Original Message-----

From: noreply@techauthority.com
Sent: Sunday, July 10, 2016 1:16am
To: todd@toddwharris.com
Subject: TechAuthority Order Confirmation - #MTA08048724



TechAuthority

Attention: Chrysler Client Services
13700 Oakland Ave
Highland Park, MI 48203
Phone: (800) 890-4038

Thank you for your order Todd Harris,

Your order with number [MTAo8048724](#) was successfully created.

Order Details

Billing Address:

Todd Harris
419-278-2866
3018 County Road E
Deshler OH US
43516

Shipping Address:

Todd Harris
419-278-2866
3018 County Road E
Deshler OH US
43516

Payment Information

Credit card
Todd W Harris
*****1874
3/2019
USD \$157.95

Shipping Information

Ups Ground

Products List

2016 Jeep Renegade Service Information CD	1	USD \$134.99
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SubTotal:	\$134.99
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Shipping Fee:	\$12.28
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Estimated Tax:	\$10.68
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Total: \$157.95

For more information about your order, please check [your account section](#) on **TechAuthority.com**.