

Declaration of Jamie Pace – U.S. Patent Nos. 11,434,958 and 11,598,376

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 JAMIE PACE

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I, Jamie Pace, of Trento Mi, 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 Senior Engineering Technician at American Axle & Manufacturing, Inc. I have been employed there since 1/12/22. Among other things, I am responsible for Benchmarking Requests and Activities.

3. Original equipment manufacturers (“OEM”) (such as Chrysler, now owned by Stellantis) release vehicles to dealerships the fall before their model year. For example, a 2016 model year Jeep® vehicle manufactured by Chrysler would have been released to dealerships in the Fall of 2015.

4. OEMs distribute information on how to service their vehicles to dealerships and customers. This information includes service manuals.

5. Mopar Tech Authority is well known in the automotive industry as an established organization that publishes and distributes service information, including service manuals, for Chrysler vehicles, including the Jeep® brand vehicles.

6. Dealerships and customers may have a need for service manuals once a vehicle is released by an OEM. It is therefore custom in the automotive industry for OEMs to distribute service information shortly after releasing the vehicles to dealerships.

7. Based on this customary practice in the automotive industry, for a 2016

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model year Jeep® Renegade vehicle, I expect that Chrysler published and distributed service information, including service manuals, for that vehicle shortly after its release in the Fall of 2015, that is, around the 2016 time frame.

8. 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.

Date: _____ 10/28/24 _____


