

DECLARATION OF JUNE ANN MUNFORD

I, June Ann Munford, do hereby declare:

1. My name is June Ann Munford. I am over the age of 18, have personal knowledge of the facts set forth herein, and am competent to testify to the same.
2. I have been retained on behalf of the Petitioners to investigate the web page printout entitled "World Debut: Starter Battery in Lithium-Ion Technology," identified as Ex. 1008 and Ex. 1009 in Petitioners' *inter partes* review petitions concerning U.S. Patent Nos. 9,412,994 and 9,954,207, respectively ("Porsche Press Release") to determine its authenticity and date of public availability. This declaration sets forth my findings, as well as the bases for those findings.
3. I am being compensated for my services in this matter at the rate of \$200.00 per hour plus reasonable expenses. My statements are objective, and my compensation does not depend on the outcome of this matter.

I. BACKGROUND AND QUALIFICATIONS

4. I earned a Master of Library and Information Science (MLIS) from the University of Wisconsin-Milwaukee in 2009. I have over ten years of experience in the library/information science field. Beginning in 2004, I have served in various positions in the public library sector including

Assistant Librarian, Youth Services Librarian and Library Director. I have attached my Curriculum Vitae as Appendix A.

5. During my career in the library profession, I have been responsible for materials acquisition for multiple libraries. In that position, I have cataloged, purchased and processed incoming library works. That includes purchasing materials directly from vendors, recording publishing data from the material in question, creating detailed material records for library catalogs and physically preparing that material for circulation. In addition to my experience in acquisitions, I was also responsible for analyzing large collections of library materials, tailoring library records for optimal catalog search performance and creating lending agreements between libraries during my time as a Library Director.

II. THE PORSCHE PRESS RELEASE AND THE INTERNET ARCHIVE

6. I am familiar with the Internet Archive, a digital library accessible to the general public. Among other services that the Internet Archive makes available to the general public is the Wayback Machine, an online archive of the web. The Internet Archive's Wayback Machine service archives webpages as of a certain capture date to track changes in the web over time. The Internet Archive has been in operation as a nonprofit library since 1996

and has hosted the Wayback Machine service since its inception in 2001.

During my time as a librarian, I frequently used the Internet Archive's Wayback Machine for research and instruction purposes. This includes teaching instructional classes on using the Wayback Machine to library patrons and using the Wayback Machine to research reference inquiries that require hard-to-find online resources. I consider the Internet Archive's recordskeeping to be as rigorous and detailed as other formal library recordskeeping practices such as MARC records, OCLC records and Dublin Core.

7. Attached hereto as Appendix B is a screen capture of the Internet Archive Wayback Machine entry for

<http://www.porsche.com:80/usa/aboutporsche/pressreleases/pcna/?lang=none&pool=international-de&id=2009-11-23-02>. I secured these screen captures myself from

<https://web.archive.org/web/20100914202320/http://www.porsche.com:80/usa/aboutporsche/pressreleases/pcna/?lang=none&pool=international-de&id=2009-11-23-02>. This record was captured as of September 14, 2010.

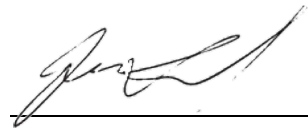
8. Appendix B is an Internet Archive capture of a web page entitled "World Debut: Starter Battery in Lithium-Ion Technology" as hosted on the Porsche website. In comparing Appendix B to the Porsche Press Release, it is my

determination that the Porsche Press Release is a true and correct copy of the "World Debut: Starter Battery in Lithium-Ion Technology" web page as hosted on the Porsche website. As the Internet Archive first captured this page as of September 14, 2010, it is my determination that "World Debut: Starter Battery in Lithium-Ion Technology" was first made available to the public as of September 14, 2010 via the Internet Archive and likely earlier via the original Porsche website.

III. CONCLUSION

9. I declare under penalty of perjury that the foregoing is true and correct. 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 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.

Dated: 3/21/2025



June Ann Munford

APPENDIX A

June A. Munford
Curriculum Vitae

Education

University of Wisconsin-Milwaukee - MS, Library & Information Science, 2009
Milwaukee, WI

- Coursework included cataloging, metadata, data analysis, library systems, management strategies and collection development.
- Specialized in library advocacy, cataloging and public administration.

Grand Valley State University - BA, English Language & Literature, 2008
Allendale, MI

- Coursework included linguistics, documentation and literary analysis.
- Minor in political science with a focus in local-level economics and government.

Professional Experience

Researcher / Expert Witness, October 2017 – present
Freelance ● Pittsburgh, Pennsylvania & Grand Rapids, Michigan

- Material authentication and public accessibility determination. Declarations of authenticity and/or public accessibility provided upon research completion. Experienced with appeals and deposition process.
- Research provided on topics of public library operations, material publication history, digital database services and legacy web resources.
- Past clients include Alston & Bird, Arnold & Porter, Baker Botts, Fish & Richardson, Erise IP, Irell & Manella, O'Melveny & Myers, Perkins-Coie, Pillsbury Winthrop Shaw Pittman and Slayden Grubert Beard.

Library Director, February 2013 - March 2015
Dowagiac District Library ● Dowagiac, Michigan

- Executive administrator of the Dowagiac District Library. Located in

Southwest Michigan, this library has a service area of 13,000, an annual operating budget of over \$400,000 and total assets of approximately \$1,300,000.

- Developed careful budgeting guidelines to produce a 15% surplus during the 2013-2014 & 2014-2015 fiscal years while being audited.
- Using this budget surplus, oversaw significant library investments including the purchase of property for a future building site, demolition of existing buildings and building renovation projects on the current facility.
- Led the organization and digitization of the library's archival records.
- Served as the public representative for the library, developing business relationships with local school, museum and tribal government entities.
- Developed an objective-based analysis system for measuring library services - including a full collection analysis of the library's 50,000+ circulating items and their records.

November 2010 - January 2013

Librarian & Branch Manager, Anchorage Public Library • Anchorage, Alaska

- Headed the 2013 Anchorage Reads community reading campaign including event planning, staging public performances and creating marketing materials for mass distribution.
- Co-led the social media department of the library's marketing team, drafting social media guidelines, creating original content and instituting long-term planning via content calendars.
- Developed business relationships with The Boys & Girls Club, Anchorage School District and the US Army to establish summer reading programs for children.

June 2004 - September 2005, September 2006 - October 2013

Library Assistant, Hart Area Public Library
Hart, MI

- Responsible for verifying imported MARC records and original MARC

cataloging for the local-level collection as well as the Michigan Electronic Library.

- Handled OCLC Worldcat interlibrary loan requests & fulfillment via ongoing communication with lending libraries.

Professional Involvement

Alaska Library Association - Anchorage Chapter

- Treasurer, 2012

Library Of Michigan

- Level VII Certification, 2008
- Level II Certification, 2013

Michigan Library Association Annual Conference 2014

- New Directors Conference Panel Member

Southwest Michigan Library Cooperative

- Represented the Dowagiac District Library, 2013-2015

Professional Development

Library Of Michigan Beginning Workshop, May 2008

Petoskey, MI

- Received training in cataloging, local history, collection management, children's literacy and reference service.

Public Library Association Intensive Library Management Training, October 2011

Nashville, TN

- Attended a five-day workshop focused on strategic planning, staff management, statistical analysis, collections and cataloging theory.

Alaska Library Association Annual Conference 2012 - Fairbanks, February 2012

Fairbanks, AK

- Attended seminars on EBSCO advanced search methods, budgeting, cataloging, database usage and marketing.

Depositions

2019 • Fish & Richardson

Apple v. Qualcomm (IPR2018-001281, 39521-00421IP, IPR2018-01282 and 39521-00421IP2)

2019 • Erise IP

Implicit, LLC v. Netscout Systems, Inc (Civil Action No. 2:18-cv-53-JRG)

2019 • Perkins-Coie

Adobe Inc. v. RAH Color Technologies LLC (Cases IPR2019-00627, IPR2019-00628, IPR2019-00629 and IPR2019-00646)

2020 • O'Melveny & Myers

Maxell, Ltd. v. Apple Inc. (Case No. 5:19-cv-00036-RWS)

2021 • Pillsbury Winthrop Shaw Pittman LLP

Intel v. SRC (IPR2020-1449)

2022 • Perkins-Coie

Realtek v. Future Link (IPR2021-01182)

2023 • Fish & Richardson

Neuroderm Ltd. v. Abbvie, Inc (Case No. PGR2022-00040)

2023 • Fish & Richardson

Nearmap US Inc. v. Pictometry International Corp. (IPR2022-00735)

2023 • Fish & Richardson

Samsung Electronics v. MemoryWeb LLC (Case No. 39843-0136PS1)

2023 ● Pillsbury Winthrop Shaw Whitman LLP

Gravel Rating Systems v. Costco Wholesale Corp. (Civil Action No. 4:21-cv-149-ALM)

2024 ● Willkie-Farr

Netflix, Inc. v. VideoLabs. Inc. (IPR2023-00628)

Limited Case and Clientele History

Alston & Bird

- Ericsson

v. Collision Communications (IPR2022-01233)

- Nokia

v. Neptune Subsea, Xtera (Case No. 1:17-cv-01876)

- Universal Electronics Inc

v. Roku Inc (IPR2022-00818)

Arnold & Porter

- Ivantis

v. Glaukos (Case No. 8:18-cv-00620)

- Samsung

v. Jawbone (Case No. 2:21-cv-00186)

Benesch Friedlander Coplan & Aronoff

- Voyis
 - v. Cathx (Case No. 5:21-cv-00077-RWS)

Deschert LLP

- Smaxtec Animal Care
 - v. ST Reproductive Technologies, LLC (IPR2024-00885)

Erise I.P.

- Apple
 - v. Ericsson Inc. (IPR2022-00715)
 - v. Future Link Systems (IPRs 6317804, 6622108, 6807505, and 7917680)
 - v. INVT (Case No. 20-1881)
 - v. Navblazer LLC (IPR2020-01253)
 - v. Qualcomm (IPR2018-001281, 39521-00421IP, IPR2018-01282, 39521-00421IP2)
 - v. Quest Nettech Corp (Case No. 2:19-cv-00118-JRG)
 - v. Telefonaktiebolaget LM Ericsson (IPR2022-00275)
 - v. Theta IP, LLC (IPR2024-00818)

- Fanduel
 - v. CGT (Case No. 19-1393)

- Garmin
 - v. Phillips North America LLC (Case No. 2:19-cv-6301-AB-KS)

- Netscout

- v. Longhorn HD LLC (Case No. 2:20-cv-00349)

- v. Implicit, LLC (Civil Action No. 2:18-cv-53-JRG)

- Sony Interactive Entertainment LLC

- v. Bot M8 LLC (IPR2020-01288)

- v. Infernal Technology LLC (Case No. 2:19-CV-00248-JRG)

- Unified Patents

- v. GE Video Compression (Civil Action No. 2:19-cv-248)

Fish & Richardson

- Apple

- v. AliveCor (3:21-cv-03958)

- v. LBS Innovations (Case No. 2:19-cv-00119-JRG-RSP)

- v. Koss Corporation (IPR2021-00305)

- v. Masimo (IPR 50095-0012IP1, 50095-0012IP2, 50095-0013IP1, 50095-0013IP2, 50095-0006IP1, 50095-0135IP1)

- v. Neonode (Case No. 21-cv-08872-EMC)

- v. Qualcomm (IPR2018-001281, 39521-00421IP, IPR2018-01282, 39521-00421IP2)

- Dell

- v. Neo Wireless (IPR2022-00616)

- Dish Network

- v. Entropic Communications, LLC (Case No. 2:2023-CV-01043)

- v. Realtime Adaptive Streaming (Case No. 1:17-CV-02097-RBJ)
 - v. TQ Delta LLC (Case No. 18-1798)
- Evapco Dry Cooling
 - v. SPG Dry Cooling (IPR2021-00688)
- Genetec
 - v. Sensormatic Electronics (Case No. 1:20-CV-00760)
- Huawei
 - v. Bell Northern Research LLC (IPR2019-01174)
- Kianxis
 - v. Blue Yonder (Case No. 3:20-cv-03636)
- LG Electronics
 - v. Bell Northern Research LLC (Case No. 3:18-cv-2864-CAB-BLM)
- Metaswitch
 - v. Sonus Networks (IPR2018-01719)
- Microsoft
 - v. Throughputer Inc (IPR2022-00757)
- Mom Enterprises
 - v. Ddrops Company (Case No. 1:22-cv-00332)
- MLC Intellectual Property

v. MicronTech (Case No. 3:14-cv-03657-SI)

- Nearmap Inc

v. EagleView Technologies (IPR2022-01009)

- Neuroderm Ltd.

v. Abbvie, Inc (Case No. PGR2022-00040)

- Realtek Semiconductor

v. Future Link (IPR2021-01182)

- Quectel

v. Koninklijke Philips (Case No. 1:20-cv-01710)

- Samsung

v. Aire Technology (IPR2022-00877)

v. Bell Northern Research (Case No. 2:19-cv-00286-JRG)

v. Communication Technologies Inc (IPR2022-01221)

v. Jawbone Innovations (IPR2022-00865)

v. MemoryWeb LLC (IPR2022-00885)

v. Dodots Licensing Solutions (IPR2023-00701)

v. Telefonaktiebolaget LM Ericsson (IPR2021-00615)

- Texas Instruments

v. Vantage Micro LLC (IPR2020-01261)

- Xilinx

v. Sentient Sensors LCC (Case No. 1:22-cv-00173)

Groombridge Wu

- Nearmap

v. Eagle View Technologies Inc. and Pictometry International Corp.
(Case No. 2:21-cv-00283-TS-DAO)

Irell & Manella

- Curium

O'Melveny & Myers

- Apple

v. Maxell (Case No. 5:19-cv-00036-RWS)

- Disney Media & Entertainment Distribution LLC

v. Digital Media Technology Holdings, LLC (Case No. 2:22-cv-01642)

- Micron Technology Inc.

v. Besang Inc (IPR2023-00900)

- Samsung

v. Daedalus Prime LLC (1335 Investigation)

Perkins-Coie

- Amazon

v. Nokia (IPR2024-00847 and IPR2024-00848)

- Heru Industries
 - v. The UAB Research Foundation (IPR2022-01148)
- Intel Corporation
 - v. BeSang Inc. (IPR2023-00991)
 - v. BitMICRO (Case No. 5:23-cv-00625)
 - v. Telefonaktiebolaget L M Ericsson (IPR2024-00610)
- Realtek Semiconductor
 - v. Future Link (IPR2021-01182)
- Twitter Inc
 - v. VOIP-Pal.com (Case No. 3:20-cv-02397-JD)
- TCL Industries
 - v. Koninklijke Philips NV (IPR2021-00495, IPR2021-00496 and IPR2021-00497)

Pillsbury Winthrop Shaw Pittman

- Intel
 - v. FG SRC LLC (Case No. 6:20-cv-00315)
- Gravel Rating Systems
 - v. Costco (Case No. 4:21-cv-149)
 - v. Lowe's Home Centers (Case No. 4:21-cv-150)
 - v. T-Mobile USA (Case No. 4:21-cv-152)
 - v. Kohl's Inc. (Case No. 4:21-cv-258)
 - v. Under Armor (Case No. 4:21-cv-356)

Quinn Emanuel

- ServiceNow, Inc.
 - v. InQuisient, Inc. (Case No. 22-900-CJB)
- Wolfspeed
 - v. The Trustees of Purdue University (Case No. 1:2021-cv-00840)

Sheppard, Mullin, Richter & Hampton LLP

- Cadence Design Systems Inc.
 - v. Semiconductor Design Technologies (Case No. 3:23-cv-01001)

Stern, Kessler, Goldstein & Fox

- Preliminary Research

Willkie, Farr & Gallagher LLP

- Neurent
 - v. The Foundry, LLC (IPR2024-00669)
- Netflix, Inc.
 - v. VideoLabs, Inc. (IPR2023-00628)

APPENDIX B



WEB TEXTS VIDEO AUDIO SOFTWARE IMAGES

SIGN UP | LOG IN UPLOAD

Search

ABOUT BLOG PROJECTS HELP DONATE CONTACT JOBS VOLUNTEER PEOPLE

INTERNET ARCHIVE

DONATE

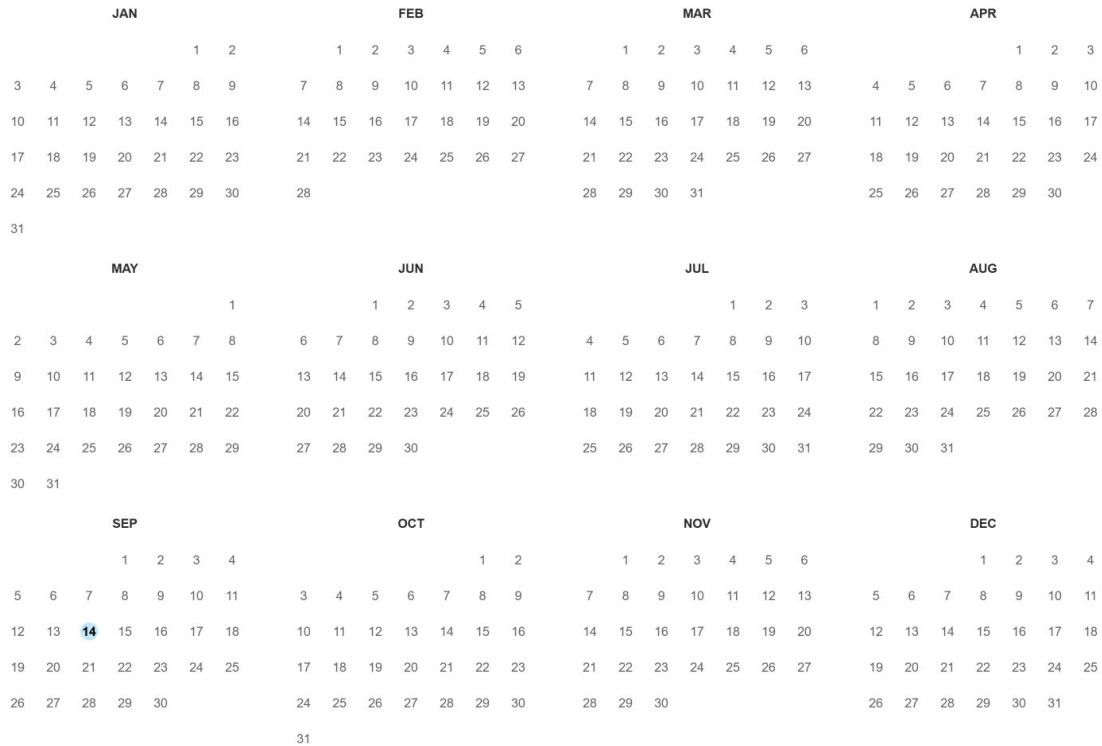
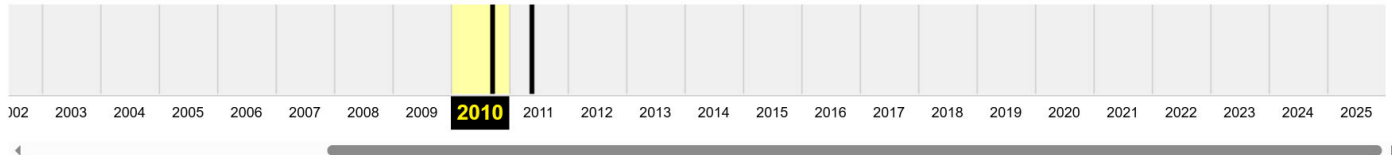


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http://www.porsche.com/usa/aboutporsche/pressreleases/pcna/?

Calendar Collections Changes Summary Site Map URLs

Saved 2 times between September 14, 2010 and May 11, 2011.



Note

This calendar view maps the number of times

<http://www.porsche.com/usa/aboutporsche/pressreleases/pcna/?>

lang=none&pool=international-de&id=2009-11-23-02 was crawled by the Wayback Machine, *not* how many times the site was actually updated. More info in the [FAQ](#).

[FAQ](#) | [Contact Us](#) | [Terms of Service](#) (Dec 31, 2014)



The Wayback Machine is an initiative of the Internet Archive, a 501(c)(3) non-profit, building a digital library of Internet sites and other cultural artifacts in digital form. Other projects include Open Library & archive-it.org.

Your use of the Wayback Machine is subject to the Internet Archive's Terms of Use.



Porsche Cars North America

Archive 2009
Archive 2008
Archive 2007
Archive 2006
Archive 2005
Archive 2004
Archive 2003

Build Your Porsche
Compare Models
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Current Press releases

World Debut: Starter Battery in Lithium-Ion Technology

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▶ Newsletter
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New Lightweight Battery Option for the Porsche 911 GT3, 911 GT3 RS, and Boxster Spyder

Stuttgart. Dr. Ing. h.c. F. Porsche AG, Stuttgart, is the first car maker in the world to offer a starter battery in lithium-ion technology. Weighing less than 6 kg or 13 lb, the new battery is more than 10 kg or 22 lb lighter than a conventional 60 Ah lead battery.

The new lithium-ion battery will be available as of January 2010 for the 911 GT3, 911 GT 3 RS, and Boxster Spyder as an option delivered with the car, selling at a price in the German market of Euro 1,904 including 19 per cent value-added tax.

The battery is delivered as a separate unit together with the car and may subsequently be fitted as an alternative to the regular, conventional starter battery.



The cars are delivered with both batteries, therefore they are ready for use throughout the whole year. Since, while the lightweight battery offers a very high standard of everyday driving qualities, its starting capacity is limited at temperatures below 0o C or 32o F due to its specific features.

The primary reason for developing and introducing the new battery was its lower weight. In sports cars built consistently for superior driving dynamics such as the two versions of the 911 GT3 and the Boxster Spyder, less weight naturally means even greater agility and driving dynamics.

In its length and width the lithium-ion battery comes in the same dimensions as the regular battery, but is approximately 70 millimetres or 2.8" lower. The fastening points, electrical connections and voltage range are fully compatible with the respective models, allowing simple and quick replacement of the standard lead battery by the lightweight unit, for example when racing on the track.

With its nominal capacity of 18 Ah, the lithium-ion battery, through its specific features, offers a level of practical output and performance not only comparable to that of a 60 Ah lead battery, but rather even better in many cases.

On a conventional car battery only about 30 per cent of the total capacity is actually available for practical use due to the configuration of the system, while this restriction does not apply to the lithium-ion battery. On the contrary, through its characteristic structure – and, in particular, the independence of the chemical composition of the electrolytes from the charge status – a lithium-ion battery consistently offers almost 100 per cent of its capacity.

Delivery of power by the lithium-ion battery throughout its useful charge range is likewise significantly better, providing its full power, for example, when starting the engine almost independently of the current charge level.

After the engine has started, the new Porsche battery shows further benefits in the charge process, being able through its smaller internal resistance to take up more power than a conventional battery and thus re-charge more quickly.

Yet a further benefit is that a lithium-ion battery allows a significantly greater number of charging and discharging cycles, plus the two further advantages that the self-discharging effect is lower and the service life of the battery longer.

The lithium-ion battery being introduced by Porsche as the pioneer in this area is made up of wound film of carbon and iron phosphate with a ceramic film moisturised by the electrolyte serving as a separating layer in between. Compared with other types of lithium-ion batteries using a combination of manganese oxide, cobalt oxide or nickel, this lithium-iron-phosphate battery, as it is called, offers advantages when used as a starter battery. It is robust and consistently guarantees the usual voltage of 12 V in the car's on-board network.

The lightweight battery is made up of four cells and integrated control electronics. This battery management system protects the battery from major discharge and guarantees a consistent charge level within the individual cells. Once battery voltage drops below a certain threshold, a warning signal reminds the driver to re-charge the battery either simply by driving the car through the power of the engine running or by means of a conventional battery charger.

The new lithium-ion battery will also be available for retrofitting from February 2010 on the three models mentioned from Porsche Tequipment. The sales price in Germany when retrofitted after delivery of the car is Euro 2,499 including 19 per cent value-added tax.

GO

Note: Images of the lithium-ion battery are available to accredited journalists in the Porsche Press Database at <http://presse.porsche.de/>.

11/23/2009