UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROCHIP TECHNOLOGY INC.,
Petitioner,
v.

APTIV TECHNOLOGIES AG,
Patent Owner.

Inter Partes and *Post Grant* Review Nos. IPR2024-00228, IPR2024-00229, IPR2024-00230, IPR2024-00495, PGR2024-00011

DECLARATION OF MICHAEL DREON

I, Michael Dreon, declare as follows:

1. Prior to my departure in 2022, I spent more than 30 years working at Aptiv, including seven years serving as the Global Product Director for Consumer Connectivity and Media Modules. During that time, I oversaw the product strategy and marketing of Aptiv's dual-role hub.

2. In 2016, Aptiv received a PACE award for its dual-role hub. The PACE award is granted annually by Automotive News and Ernst & Young to automotive suppliers who have introduced an innovative solution to the marketplace.

3. The PACE award is widely regarded by those in the automotive industry as the most prestigious award available for automotive suppliers. Previous innovations that have received PACE awards include the technology behind adaptive cruise control and keyless push-to-start.

4. The criteria for selecting an innovation as a PACE award winner are that the innovation must (1) have been developed primarily by an automotive supplier, (2) have been new to the automotive industry, (3) be in use in a production vehicle, and (4) "change the rules of the game."

5. The selection of PACE award finalists from the pool of nominees is performed by a panel of independent judges from the automotive industry, finance, research & development, and academia. These judges then conduct site visits to

learn more about the innovation and evaluate its importance to the industry. Afterwards, the judges select the award winners for that year.

6. I am personally familiar with the selection process for PACE awards because I was responsible for preparing the nomination and for presenting Aptiv's dual-role hub to the judges' panel during their site visit. Attached hereto as **Exhibit A** is a true and correct copy of the presentation made to the judges' panel during that visit.

7. Attached hereto as **Exhibit B** is a true and correct copy of the judges' citation, as retrieved from the Automotive News website, explaining why the dual-role hub was selected for the 2016 PACE award.

8. A copy of the video presented at the PACE awards ceremony describing the innovations behind the winners is publicly available at https://www.autonews.com/article/20160411/VIDEO/304119865/2016-pace-award-winners. Attached hereto as **Exhibit C** is a true and correct transcription of the portion of that video describing the dual-role hub.

9. Based on my conversations with the judges, as well as from the judges' citation and award video, it is my understanding that the feature driving their selection of the dual-role hub was its ability to allow persistent downstream USB connectivity to non-CarPlay devices while CarPlay was active without altering the head unit hardware to add a second upstream connection.

10. As the Global Product Director overseeing the dual-role hub from its commercial introduction through 2022, I am familiar with its substantial commercial success. Within one year of its announcement, all three major U.S. automakers had committed to use the dual-role hub in their model year 2016 vehicles. Over the next six years, Aptiv would sell more than 45 million dual-role hubs—an unquestionable success for a new product launch in the automotive industry.

11. I hereby declare under penalty of perjury under the laws of the United States of America that the statements made herein of my own knowledge are true and correct, and all statements made on information and belief are believed to be true. I affirm 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 Sec. 1001 of Title 18 of the United States Code.

DATED this 18th day of October 2024.

Michael Dreon