UNITED STATES PATENT AND TRADEMARK OFFICE
PATENT TRIAL AND APPEAL BOARD

Camel Manufacturing Company, LLC

Petitioner,

v.

DLX Enterprises, LLC,

Patent Owner.

Case No. PGR2024-_____

U.S. Patent No. 11,732,496

EXHIBIT 1015

DECLARATION OF SCOTT CAMPBELL

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1. My name is Scott Campbell. I am a resident of Duff, Tennessee.

2. All statements made in this Declaration are made on my personal knowledge.

3. I am the Program Manager for Camel Manufacturing Company, Caryville, Tennessee ("Camel"). In this position, I often design new products, including creating designs on SolidWorks and AutoCAD, creating patterns, and creating bills of materials.

4. In 2017, I was familiar with a company named Deployed Logix, or DLX. Camel was, at that time, manufacturing skins, or tent covers, for a model of DLX called ASAP. JJ Urhausen appeared to be the head of that company.

5. DLX's ASAP-style tent is a rectangular tent with sloping side walls and end walls in a quadrangular shape. The end walls are perpendicular to the ground when the ASAP tent is erected. An example of DLX's current ASAP-style tent can be found on the DLX website at https://deployedlogix.com/asap-rapid-shelter-systems/. Here is a true and correct copy of an image of an ASAP-style tent from that website:

6. Sometime prior to June 15, 2017, Mr. Urhausen asked Camel to develop a hub to join three or four ASAP tents.

7. I then developed a design for a "hub tent." It was called a "hub" because it had the capability to connect to up to four ASAP tents.

8. On June 15, 2017, I sent an email to Donald Bierman of DLX, with a copy to Mr. Urhausen regarding my conceptual design of the hub tent. A true and correct copy of my June 15, 2017, email, along with its three attachments, is in Exhibit 1016, pg. 1.

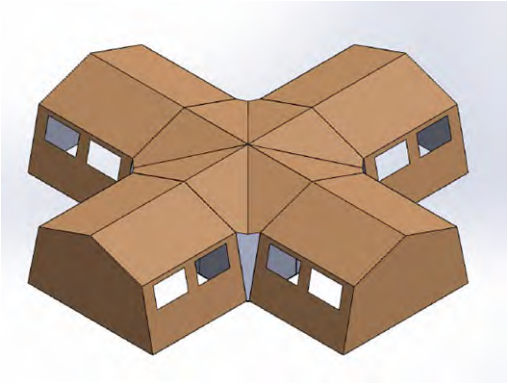
9. No one from DLX had any input into the design of the hub tent except for DLX's request that it connect three or four ASAP tents.

10. The first attachment, Exhibit 1016, pg. 2, shows a hub tent, with a skin on it, and three ASAP-style tents radiating outward from the hub tent.

11. The second attachment, Exhibit 1016, pg. 3, shows a hub tent, with a skin on it, and four ASAP-style tents radiating outward from the hub tent.

12. The third attachment, Exhibit 1016, pg. 4, is my basic concept of the frame for the hub tent.

13. Here is my conceptual design of the hub tent with four ASAP-style tents connected to it, as shown in my June 15, 2017 email (Ex. 1016 pg. 2):



14. Mr. Urhausen was pleased with the conceptual design. Mr. Urhausen asked me when he could get a prototype, by his June 15, 2017 email to me as shown in Ex. 1016, pg. 5 (middle of page). He related in that email that he had several prospective customers and was "prepared to buy a couple for demo units immediately."

15. We then built a prototype unit. I informed Mr. Urhausen that the "prototype HUB unit" was complete except for powder coating, by email dated July 13, 2017. Ex. 1016, pg. 7.

16. Mr. Urhausen responded, by email dated the same day, "That sounds awesome. Send pics please." Ex. 1016, pg. 8.

17. I then emailed Mr. Urhausen six pictures of the protype. My email, dated July 14, 2017, is Ex. 1016, pg. 8. The photographs are Ex. 1016, pgs. 9-14. These photographs show the prototype hub tent connected to an ASAP tent, erected in Camel's facility.

18. On July 19, 2017, I emailed Mr. Urhausen that the frame was back from powder coat and would be shipped in two days. Ex. 1016, pg. 7.

19. Camel then prepared and shipped a prototype to DLX. DLX was happy with the prototype and requested more. Camel thereafter manufactured and sold shelters based on this design to DLX.

20. In the fall of 2017, Mr. Urhausen requested Camel to bring a hub tent to an exhibition in North Carolina for first responders. I met Mr. Urhausen in Tennessee and drove to the exhibition. We erected a Pioneer hub tent there. Here are three true and correct copies of photographs of the hub tent we erected, attached to three ASAP tents:

Photo BB

Photo DD

Photo CC

21. Anyone present at this exhibition could see the hub tent we erected.

22. In July 2018 I and some employees of Camel erected one of our hub tents in the field outside the Camel facility. True and correct copies of the photographs taken at this time are shown in Ex. 1017. All hub tents manufactured and sold by Camel after this date had the same design as this one, except for size and labels.

23. At first, we called this hub tent the ASAP Hub tent. Eventually, we began using the term Alliance Hub and Pioneer Hub for tents we manufactured and sold to DLX. These tents bore DLX labels. Alliance Hub tents and Pioneer hub tents, once assembled, were identical in design except for size.

24. Expedition Hub tents were identical to Alliance Hub tents except they

bore Camel labels. Expedition Hub tents and Alliance Hub tents were identical in design.

25. I searched for design documents regarding the ASAP Hub tent. I found a set of drawings labeled "Pioneer Hub Assembly" and containing the Drawing Number PHB-000_CMC. A trued and correct copy of those drawings is attached as Exhibit 1018.

26. These drawings were prepared by Kevin Brown, who was, at the time, an engineer employed by Camel. Mr. Brown prepared these drawings in the scope of his employment at Camel. The drawings were prepared at or near the date shown on the drawings. The drawings are stored and retrievable within Camel's office. These drawings were kept in the ordinary course of business of Camel's manufacturing operations, and it was a regular practice of Camel to create those drawings.

27. The drawings attached as Exhibit 1018 show the design of Pioneer Hub tents the Camel manufactured and sold to DLX. The Alliance Hub tents that Camel manufactured and sold to DLX had the same design except the dimension were larger.

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

Executed on May 20, 2024.

Scott Campbell