

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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**ARKEMA FRANCE,**  
*Petitioner*

**v.**

**HONEYWELL INTERNATIONAL INC.**  
*Patent Owner*

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**Case IPR2015-00916**  
**U.S. Patent No. 8,710,282**

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**SUPPLEMENTAL DECLARATION OF BRUCE BRADFORD, ESQ.**  
**ADDRESSING CERTAIN EVIDENTIARY OBJECTIONS**

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Pursuant to 28 U.S.C. § 1746, I, Bruce Bradford, state of my personal knowledge as follows:

1. I understand the Arkema has raised certain evidentiary objections to my declaration and the exhibits attached thereto. After reviewing Petitioner's First Set of Objections to Patent Owner's Exhibits (hereinafter, "Arkema's objections"), I have been asked to provide this supplemental declaration addressing Arkema's objections.

2. I have personal knowledge of the facts and information set forth in my prior declaration, previously submitted in this proceeding as Exhibit 2041. Such knowledge is based on my personal observations and experiences as Intellectual Property ("IP") Counsel since joining the company in 2007. Since the fall of 2009 and continuing today, I have become familiar with the role of the Patent Committee, especially with respect to the Fluorocarbon Process Technology (4511) group, for which I am primarily responsible. In my role as IP counsel for the Fluorocarbon Process Technology (4511) group, I have accumulated extensive, personal knowledge of the invention protection process, the Patent Committee, and Honeywell's Worldwide Invention Disclosure System ("WIDS").

3. Therefore, I am competent to speak about, among other things, the WIDS system, the general role of the Patent Committee, and in this particular case,

the Patent Committee's review of and resulting decisions related to the filing of the invention claimed in the '282 patent.

4. As stated in my prior declaration, it is the regular practice of Honeywell for its employees to record information regarding their inventions in the WIDS system. In the WIDS system, invention disclosures are editable while in draft form before submission, but once submitted, no changes to the invention disclosure form can be made by anyone. As IP counsel for the Fluorocarbon Process Technology (4511) group, I am familiar with the WIDS system and Honeywell's record keeping of invention disclosures as set forth in my prior declaration. As such, I confirm that the document submitted as Exhibit 2029 in connection with these proceedings is a true and accurate copy, is a business record of Honeywell made at or near the time by or from an individual with knowledge of the matters set forth in it, and was generated and kept during the ordinary course of Honeywell's business. As indicated on Page 1 of Exhibit 2029, the H0024680 invention disclosure was created (i.e. submitted) on August 21, 2009 at 4:29:46 PM Server Time. As indicated on Page 2 of Exhibit 2029, Daniel C. Merkel is identified as a non-inventor who witnessed the conception of the invention and Angela Mazurkiewicz is identified as a non-inventor witness or participant to the reduction to practice. The WIDS system records are maintained electronically in

the ordinary course of business. As such, I confirm that Pages 4-11 of Exhibit 2029 constitute the “blue\_book\_CSTR\_236ea245eb.pdf” identified as the Supporting Documents on Page 2. Also, Pages 1 and 3 of Exhibit 2029 state that I am the attorney assigned to the H0024680 invention disclosure. As such, I and other members of the Fluorocarbon Process Technology (4511) Patent Committee automatically received an electronic copy of the submitted H0024680 invention disclosure form and attached supporting documentation from the WIDS system on or about August 21, 2009.

5. As further stated in my prior declaration, it is part of my duty and responsibility as IP counsel to oversee the invention disclosure and invention protection process for the Fluorocarbon Process Technology (4511) group. Moreover, as previously stated, it is regular practice of the Patent Committee for the Fluorocarbon Process Technology (4511) group in the invention protection process to request that the inventor(s) prepare a detailed description of the invention if the Patent Committee determines that an invention disclosure should be protected by a patent. As such, I can confirm that the document submitted as Exhibit 2030 in connection with these proceedings is a true and accurate copy, is a business record of Honeywell made at or near the time by or from an individual with knowledge of the matters set forth in it, and was generated and kept during

the ordinary course of Honeywell's business. Although Exhibit 2030 does not contain a date on the face of the document, I confirm that the filename of the document which constitutes Exhibit 2030 is "CSTR\_236ea\_245eb\_02102010.doc."

6. As further stated in my prior declaration, it is the regular practice of Honeywell to record and keep minutes of Patent Committee meetings. As IP counsel for the Fluorocarbon Process Technology (4511) group, I can confirm that the document submitted as Exhibit 2042 in connection with these proceedings is a true and accurate copy, is a business record of Honeywell made at or near the time by or from an individual with knowledge of the matters set forth in it, and was generated and kept during the ordinary course of Honeywell's business. As indicated on Page 1 of Exhibit 2042, Exhibit 2042 is the SBE 4511 – Fluorocarbon Process - PATENT COMMITTEE MEETING MINUTES from July 12, 2010, as prepared and kept by my paralegal, James "Jim" DePasque. Exhibit 2042 is dated July 23, 2010, which is within two weeks of the date of the meeting. As indicated on Page 1, I was an attendee of the July 12, 2010 Patent Committee meeting. As I conducted the Patent Committee meeting, I confirm that the entry for Invention Disclosure H0024680 on Page 6 indicating that "BRADFORD TO SEND TO

Supplemental Declaration of Bruce Bradford, Esq.  
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O/C” is a correct record of the PC meeting, wherein the PC requested that I send the invention disclosure form and detailed disclosure to outside counsel for filing.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that all statements made herein of my own knowledge are true and that all opinions expressed herein are my own; and further that these statements were made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

  
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Bruce Bradford, Esq.

2/12/16  
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Date