

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARKEMA FRANCE,
Petitioner

v.

HONEYWELL INTERNATIONAL INC.
Patent Owner

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

DECLARATION OF BRUCE ROSE, ESQ.

I, Bruce Rose, hereby declare under penalty of perjury:

1. I am an attorney with the law firm of Alston & Bird LLP (“Alston”).

I have been a practicing attorney since 1993.

2. I provide this Declaration in connection with the Patent Owner’s Response for Case No. IPR2015-00916. The facts stated in this Declaration are based on my personal knowledge.

3. Exhibit 2002 is a true and correct copy of the Declaration of Robert E. Lousenberg, Ph.D. Page numbers and an exhibit label have been added to the bottom of this document but no other alterations have been made.

4. Exhibit 2003 is a true and correct copy of the curriculum vitae of Robert D. Lousenberg, Ph.D. Page numbers and an exhibit label have been added to the bottom of this document but no other alterations have been made.

5. Exhibit 2004 is a true and correct copy of the Transcript for the Video Deposition of Leo E. Manzer, Ph.D., dated January 7, 2015. Page numbers and an exhibit label have been added to the bottom of this document but no other alterations have been made.

6. Exhibit 2005 is a true and correct copy of the Transcript for the Continued Video Deposition of Leo E. Manzer, Ph.D., dated January 8, 2015. Page numbers and an exhibit label have been added to the bottom of this document but no other alterations have been made.

7. Exhibit 2006 is a true and correct copy of the Declaration of Hsueh Sung Tung, Ph.D. Page numbers and an exhibit label have been added to the bottom of this documents but no other alterations have been made.

8. Exhibit 2007 is a true and correct copy of the March 26, 2008 email from Haluk Kopkalli. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

9. Exhibit 2008 is a true and correct copy of the Project Permit Change Form to Permit# 626 dated July 10, 2008. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

10. Exhibit 2009 is a true and correct copy of the Project Permit Change Form to Permit# 626 dated May 16, 2008. Confidential business information has been redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

11. Exhibit 2010 is a true and correct copy of the July 2008 Monthly Technology Report of Dr. Bektesevic. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

12. Exhibit 2011 is a true and correct copy of the July 16, 2008 Instructions. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

13. Exhibit 2012 is a true and correct copy of the July 29-30, 2008 Instructions. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

14. Exhibit 2013 is a true and correct copy of the August 2008 Monthly Technology Report of Dr. Bektesevic. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

15. Exhibit 2014 is a true and correct copy of the August 2008 Monthly Highlights Report of Dr. Tung. Confidential business information has been redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

16. Exhibit 2015 is a true and correct copy of the September 15, 2008 Instructions. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

17. Exhibit 2016 is a true and correct copy of the September 2008 Monthly Technology Report of Dr. Bektesevic. In addition, page numbers, an

exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

18. Exhibit 2017 is a true and correct copy of the September 2008 Monthly Highlights Report of Dr. Tung. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

19. Exhibit 2018 is a true and correct copy of the October 2008 Monthly Technology Report of Dr. Bektsevic. Confidential business information has been redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

20. Exhibit 2019 is a true and correct copy of the November 2008 Monthly Technology Report of Dr. Bektsevic. Confidential business information has been redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

21. Exhibit 2020 is a true and correct copy of the November 2008 Monthly Highlights Report of Dr. Tung. Confidential business information has been redacted from this document. In addition, page numbers, an exhibit label, and

a protective order designation have been added to this documents but no other alterations have been made.

22. Exhibit 2021 is a true and correct copy of the December 2008 Monthly Technology Report of Dr. Bektesevic. Confidential business information has been redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

23. Exhibit 2022 is a true and correct copy of the January 2009 Monthly Technology Report of Dr. Bektesevic. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

24. Exhibit 2023 is a true and correct copy of the January 2009 Monthly Highlights Report of Dr. Tung. Confidential business information has been redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

25. Exhibit 2024 is a true and correct copy of the February 2009 Monthly Technology Report of Dr. Bektesevic. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

26. Exhibit 2025 is a true and correct copy of the February 2009 Monthly Highlights Report of Dr. Tung. Confidential business information has been redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

27. Exhibit 2026 is a true and correct copy of the March 2009 Monthly Technology Report of Dr. Bektesevic. Confidential business information has been redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

28. Exhibit 2027 is a true and correct copy of the March 2009 Monthly Highlights Report of Dr. Tung. Confidential business information has been redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

29. Exhibit 2028 is a true and correct copy of the PowerPoint entitled "Apollo Technology Review Dehydrofluorination" and dated May 13, 2009. Confidential business information has been redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

30. Exhibit 2029 is a true and correct copy of the Invention Disclosure entitled “Integrated Continuous Process for Dehydrofluorination of 236ea and 245eb” and dated August 21, 2009. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

31. Exhibit 2030 is a true and correct copy of the Detailed Disclosure dated February 10, 2010. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

32. Exhibit 2031 is a true and correct copy of the Email and certain attachments dated August 19, 2010 from James DePasque. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

33. Exhibit 2032 is a true and correct copy of the Email dated September 29, 2010 from Eric Sumner. Attorney Client Privileged Information has been redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

34. Exhibit 2033 is a true and correct copy of the Email dated October 1, 2010 from Dr. Selma Bektesevic. Attorney Client Privileged Information has been

redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

35. Exhibit 2034 is a true and correct copy of the Email dated October 12, 2010 from Dr. Bektesevic. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

36. Exhibit 2035 is a true and correct copy of the Email dated October 12, 2010 from Eric Sumner. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

37. Exhibit 2036 is a true and correct copy of the Declaration of Thomas Morris. Page numbers and an exhibit label have been added to the bottom of this document but no other alterations have been made.

38. Exhibit 2037 is a true and correct copy of the Declaration of Angela Goodie. Page numbers and an exhibit label have been added to the bottom of this document but no other alterations have been made.

39. Exhibit 2038 is a true and correct copy of the Declaration of Daniel Merkel. Page numbers and an exhibit label have been added to the bottom of this document but no other alterations have been made.

40. Exhibit 2039 is a true and correct copy of pages from Dr. Selma Bektesevic's laboratory notebook dated August 21, 2009. Page numbers, an exhibit label, and a protective order designation have been added to these documents but no other alterations have been made.

41. Exhibit 2040 is a true and correct copy of the Declaration of Diana Overton. Page numbers and an exhibit label have been added to the bottom of this document but no other alterations have been made.

42. Exhibit 2041 is a true and correct copy of the Declaration of Bruce Bradford, Esq. Page numbers and an exhibit label have been added to the bottom of this document but no other alterations have been made.

43. Exhibit 2042 is a true and correct copy of the Meeting Minutes from PC Meeting held July 12, 2010. Attorney Client Privileged Information has been redacted from this document. In addition, page numbers, an exhibit label, and a protective order designation have been added to this documents but no other alterations have been made.

44. Exhibit 2043 is a true and correct copy of the Declaration of Joseph F. Posillico, Esq. Page numbers and an exhibit label have been added to the bottom of this document but no other alterations have been made.

45. Exhibit 2044 is a true and correct copy of Proposed Protective Order in this matter. Page numbers and an exhibit label have been added to the bottom of this document but no other alterations have been made.

46. Exhibit 2045 is a true and correct copy of the Proposed Protective Order in this matter and reflecting the changes as compared to the Standing Protective Order. Page numbers and an exhibit label have been added to the bottom of this document but no other alterations have been made.

Declaration of Bruce Rose
IPR2015-00916

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.



Bruce Rose

January 22, 2016
Date