

IPR2015-01146  
Patent 8,717,758  
Declaration of Robert Humphrey

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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ACCO Brands Corporation and  
ACCO Brands USA LLC  
Petitioners

v.

Think Products, Inc.  
Patent Owner

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Case IPR2015-01146  
Patent 8,717,758

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**DECLARATION OF ROBERT HUMPHREY**

**ACCO Brands**  
**Exhibit 1015**  
ACCO Brands v. Think Products  
IPR2015-01167

I, Robert Humphrey, declare as follows:

1. From 1994 to present, I have been employed by ACCO Brands Corporation and Kensington (which is part of ACCO Brands Corporation) and have held various positions of increasing responsibility concerning marketing and product management. My responsibilities have generally included managing marketing and sales activities, such as overseeing marketing and product development initiatives and managing the expense budgets and personnel required to support such initiatives.

2. From 2009 to 2011, I held the title of Director – Security Products, Global Business for Kensington. My responsibilities during this time included working with development and operational teams to launch the ClickSafe® line of computer lock products.

3. Kensington began the development of the ClickSafe Keyed Laptop Lock, the first of the ClickSafe line of computer lock products, in 2009 and officially launched it on October 12, 2010.

4. Kensington developed a ClickSafe website to promote the ClickSafe line of computer lock products, and this website was made available to the public at the URL *<http://www.clickittokeepit.com>* on October 12, 2010. This website contained a link to a ClickSafe product video (Ex. 1013) demonstrating the use and functionality of the ClickSafe® Keyed Laptop Lock. As corroborated by the

Internet Archive, the ClickSafe website was continuously available to the public from the launch date until at least September 3, 2011.

5. Ex. 1016 and Ex. 1017 are screenshots of the Internet Archive (<http://web.archive.org>) snapshots, taken on October 16, 2010 and September 3, 2011, respectively, of the ClickSafe website homepage (<http://www.clickittokeepit.com>). These two exhibits correctly depict the homepage of ClickSafe website as of these two dates, except that the link to the ClickSafe product video is not active on these archive pages, although those links were active to launch the linked video during the time that the website was in operation (from October 12, 2010 to at least September 3, 2011).

6. The first snapshot of the ClickSafe website taken by the Internet Archive was on October 16, 2010 as shown in Ex. 1016. This is consistent with my recollection of the ClickSafe website first being made available to the public a few days earlier, on October 12, 2010.

7. The ClickSafe product video is also available on YouTube at the URL <https://www.youtube.com/watch?v=CgdVMaOeNrQ>, and has been available from at least November 29, 2010 to the present.


8. Ex. 1018 is a screenshot of the current web page from YouTube that contains the ClickSafe product video (Ex. 1013).

9. Ex. 1013 is a true and correct copy of the ClickSafe product video that has been continuously available to the public through the ClickSafe website and/or YouTube since October 12, 2010.

10. Ex. 1014 is a true and correct depiction of still frames from the ClickSafe product video (Ex. 1013), with red annotations added.

11. All statements made herein of my own knowledge are true; all statements made on information and belief are believed to be true; and these statements were made with the knowledge that willful false statements and the like are punishable by fine or imprisonment or both under 18 U.S.C. § 1001.

Date: April 30, 2015

  
Robert Humphrey