

Filed on behalf of VF Outdoor, LLC

By: Kathleen E. Ott, Esq., Reg. No. 64,038  
Merchant & Gould P.C.  
1801 California Street, Suite 3300  
Denver, CO 80202  
Main Telephone: (303) 357-1204  
Main Facsimile: (612) 332-9081

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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VF OUTDOOR, LLC,  
Petitioner,

v.

COCONA, INC.,  
Patent Owner.

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Case No.: IPR2018-00190  
Patent No.: 8,945,287

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**DECLARATION OF KATHLEEN E. OTT IN SUPPORT OF  
PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE**

I, Kathleen E. Ott, hereby declarant as follows:

1. I am an attorney with the law firm of Merchant & Gould P.C., counsel for Petitioner VF Outdoor, LLC. I submit this declaration in support of VF Outdoor, LLC's Reply to Patent Owner's Response. I have personal knowledge of the facts stated herein.

2. Exhibit 1045 is a true and correct copy of the deposition transcript of Jeffrey Bowman dated December 4, 2018, along with an errata dated January 9, 2019, in IPR2018-00190.

3. Exhibit 1046 is a true and correct copy of the deposition transcript of Gregory W. Haggquist dated December 5, 2018, along with an errata dated January 10, 2019, and the affidavit of Sandra Bray dated December 27, 2018, in IPR2018-00190.

4. Exhibit 1047 is a true and correct copy of the deposition transcript of Dr. Charles A. Daniels dated December 7, 2018, along with an errata dated January 10, 2019, and the affidavit of Sarah Drown dated January 2, 2019, in IPR2018-00190.

5. Exhibit 1048 is a true and correct copy of the deposition transcript of Stephen J. Callan dated December 14, 2018, along with an errata dated January 8, 2019, in IPR2018-00190.

6. Exhibit 1049 is a true and correct copy of an article entitled “*Water Sorption in a Dextran Gel*,” by John A. Texter, published in the Journal Carbohydrate Research, Volume 41, 191-210 (1975).

7. Exhibit 1050 is a true and correct copy of “Technique 12 – Column Chromatography” from the textbook INTRODUCTION TO ORGANIC LABORATORY TECHNIQUES – A MICROSCALE APPROACH, by Donald L. Pavia, et al. (© 1990, Holt, Rinehart & Winston; Orlando, Florida).

8. Exhibit 1051 is a true and correct copy of an article entitled “*Micro-porous Layer with Composite Carbon Black for PEM Fuel Cells*,” by X.L. Wang, et al., published in the Journal Electrochimica Acta, Volume 51, 4909-4915 (2006).

9. Exhibit 1052 is a true and correct copy of Plaintiff’s Responses to Defendant VF Outdoor, LLC’s First Set of Interrogatories to Cocona, Inc., Civil Action No. 16-cv-02703 (D. Colo.).

10. Exhibit 1053 is a true and correct copy of “What is the Activated Carbon?” dated May 9, 2013, which is a publicly available document hosted at [www.jurassiccarbon.com/blogs/news/7842073-what-is-the-activated-carbon](http://www.jurassiccarbon.com/blogs/news/7842073-what-is-the-activated-carbon). A true and correct copy of the document was obtained on November 30, 2018.

11. Exhibit 1054 is a true and correct copy of, *Fluorescent-Based Genetic Analysis for a Microfluidics Device* (Abstract), by A. Marenco et al., dated March

1, 2004, which is a publicly available document hosted at <http://pubs.drdc-rddc.gc.ca/BASIS/pcandid/www/engpub/DDW?W%3DSYSNUM=530719&r=0>.

A true and correct copy of the document was obtained on November 15, 2018.

12. Exhibit 1055 is a true and correct copy of, “*Fluorescent-Based Genetic Analysis for a Microfluidics Device*,” by A. Marenco et al., dated March 2004, which is a publicly available document hosted at [http://cradpdf.drdc-rddc.gc.ca/PDFS/unc103/p530719\\_A1b.pdf](http://cradpdf.drdc-rddc.gc.ca/PDFS/unc103/p530719_A1b.pdf).

A true and correct copy of the document was obtained on November 15, 2018.

13. Exhibit 1056 is a true and correct copy of the Safety Data Sheet for Coconut Shell Activated Carbon, which is a publicly available document hosted at <https://asbury.com/sds/sdsopen.php?id=1966&grade=5564>, that was obtained November 19, 2018.

14. Exhibit 1057 is a true and correct copy of an excerpt from REMINGTON: THE SCIENCE AND PRACTICE OF PHARMACY, 21<sup>st</sup> Edition (© 2006; Lippincot Williams & Wilkins; Baltimore, Maryland).

Date: January 11, 2019

By: /s/ Kathleen E. Ott  
Kathleen E. Ott