

UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GEP Power Products, Inc.  
Petitioner

v.

Arctic Cat Inc.  
Patent Owner

Patent No. 7,072,188  
*Inter Partes* Review No. 2016-01385

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**PATENT OWNER'S RESPONSE TO PETITIONER'S OBJECTIONS TO  
EVIDENCE SERVED WITH PATENT OWNER'S RESPONSE**

Pursuant to 37 C.F.R. § 42.64(b)(2), Patent Owner hereby timely provides supplemental evidence in response to Petitioner's Objections to Evidence served with Patent Owner's Response.

Respectfully submitted,

Dated: April 21, 2017

By: /Jason S. Jackson/  
Jason S. Jackson  
Reg. No. 56,733  
Counsel for Patent Owner

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Patent Owner's Response to Petitioner's Objections to Evidence Served with Patent Owner's Response was served on April 21, 2017 via e-mail to counsel for Petitioners at the following:

Michael Griggs  
[mtg@boylefred.com](mailto:mtg@boylefred.com)  
Eric Lalor  
[ejl@boylefred.com](mailto:ejl@boylefred.com)  
Sarah Wong  
[smw@boylefred.com](mailto:smw@boylefred.com)  
Boyle Fredrickson  
840 North Plankinton Ave.  
Milwaukee, WI 53203

Dated: April 21, 2017

/Jason S. Jackson/  
Jason S. Jackson  
Reg. No. 56733  
Attorney for Patent Owner

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**SECOND DECLARATION OF DARREL JANISCH**

I, Darrel Janisch, declare as follows:

1. I have personal knowledge of the matters set forth herein, and if I am called to testify, I could testify competently thereto.
2. Patent Owner's Exhibit 2004 is a true and correct copy of an email that I sent to Ken Boyd and others at Tyco Electronics, Inc. ("Tyco") on May 30, 2001 regarding the power distribution model ("PDM") I designed at Arctic Cat, Inc. ("Arctic Cat").
3. Patent Owner's Exhibit 2005 is a true and correct copy of an email that I sent to Ken Boyd and others on June 29, 2001 regarding my PDM design.
4. Patent Owner's Exhibit 2006 is a true and correct copy of an email that I sent to Ken Boyd and others on June 29, 2001 regarding my PDM design.
5. Patent Owner's Exhibit 2007 is a true and correct copy of an email thread I initiated on August 20, 2001 regarding my PDM design.
6. Patent Owner's Exhibit 2008 is a true and correct copy of a quote I received from Tyco dated October 10, 2001 reflecting my PDM design.
7. Patent Owner's Exhibit 2009 is a true and correct copy of a quote I received from Tyco dated October 17, 2001 reflecting my PDM design.
8. Patent Owner's Exhibit 2010 is a true and correct copy of drawings from Tyco I reviewed dated January 16, 2002 showing my PDM design.

9. Patent Owner's Exhibit 2011 is a true and correct copy of drawings from Tyco I reviewed dated February 6, 2002 showing my PDM design.
10. Patent Owner's Exhibit 2012 is a true and correct copy of notes reflecting my PDM design that existed at least as early as April 1, 2002.
11. Patent Owner's Exhibit 2013 is a true and correct copy of an email that I sent to employees of Tyco and others on April 1, 2002 regarding my PDM design.
12. Patent Owner's Exhibit 2014 is a true and correct copy of drawings from Tyco I reviewed dated April 2, 2002 showing my PDM design.
13. Patent Owner's Exhibit 2015 is a true and correct copy of an email that I received from an employee of Tyco on April 29, 2002 regarding my PDM design.
14. Patent Owner's Exhibit 2016 is a true and correct copy of an email that I sent to employees of Tyco on June 29, 2001 regarding my PDM design.
15. Patent Owner's Exhibit 2017 is a true and correct copy of an email that I sent to employees of Arctic Cat on May 17, 2002 regarding my PDM design.
16. Patent Owner's Exhibit 2018 is a true and correct copy of an email that I received from an employee of Tyco on May 21, 2002 regarding my PDM design.

17. Patent Owner's Exhibit 2019 is a true and correct copy of an email thread I participated in regarding my PDM design.
18. Patent Owner's Exhibit 2020 is a true and correct copy of an email that I sent to employees of Tyco on June 26, 2002 regarding my PDM design.
19. Patent Owner's Exhibit 2021 is a true and correct copy of an email that I sent to employees of Tyco on August 16, 2002 regarding my PDM design.
20. Patent Owner's Exhibit 2022 includes a true and correct copy of a quote I received from Tyco dated October 18, 2002 reflecting my PDM design.
21. Patent Owner's Exhibit 2023 is a true and correct copy of an email that I received from an employee of Tyco on October 28, 2002 regarding my PDM design.
22. Patent Owner's Exhibit 2024 is a true and correct copy of an email that I sent to employees of Tyco on November 04, 2002 regarding my PDM design.
23. Patent Owner's Exhibit 2025 is a true and correct copy of an email thread I participated in regarding my PDM design.
24. Patent Owner's Exhibit 2026 is a true and correct copy of an email that I received from an employee of Tyco on January 27, 2003 regarding my PDM design.

25. Patent Owner's Exhibit 2027 is a true and correct copy of an email that I received from an employee of Tyco on January 30, 2003 regarding my PDM design.
26. Patent Owner's Exhibit 2028 is a true and correct copy of an email that I received from Ken Boyd on March 12, 2003 regarding my PDM design.
27. Patent Owner's Exhibit 2029 is a true and correct copy of an email that I sent to employees of Tyco on March 26, 2003 regarding my PDM design.
28. Patent Owner's Exhibit 2030 is a true and correct copy of an email thread that I participated in regarding my PDM design.
29. Patent Owner's Exhibit 2031 is a true and correct copy of an email thread that I participated in regarding my PDM design.
30. Patent Owner's Exhibit 2032 is a copy of an email thread between Arctic Cat and Tyco that is consistent with my understanding of discussions regarding Tyco's permission to use my PDM design.
31. Patent Owner's Exhibit 2033 is a true and correct copy of an email that I sent on September 25, 2001 regarding my PDM design.
32. I declare that all statements made herein of my own knowledge are true, that all statements made on information and belief are believed to be true, and further that these statements were made with the knowledge that willful false



statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 or Title 18 of the United States Code.

By Darrel Janisch: 

Date: 20 APR 2017

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Second Declaration of Darrel Janisch was served on April 21, 2017 via e-mail to counsel for Petitioners at the following:

Michael Griggs  
[mtg@boylefred.com](mailto:mtg@boylefred.com)  
Eric Lalor  
[ejl@boylefred.com](mailto:ejl@boylefred.com)  
Sarah Wong  
[smw@boylefred.com](mailto:smw@boylefred.com)  
Boyle Fredrickson  
840 North Plankinton Ave.  
Milwaukee, WI 53203

Dated: April 21, 2017

/Jason S. Jackson/  
Jason S. Jackson  
Reg. No. 56733  
Attorney for Patent Owner