IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

SOLOMON TECHNOLOGIES, INC.., Plaintiff, v. TOYOTA MOTOR CORPORATION, TOYOTA MOTOR MANUFACTURING NORTH AMERICA, and TOYOTA MOTOR SALES, U.S.A., INC., Defendants.	Case No. 8:05-cv-01702-JDW-MAP

DECLARATION OF JONATHAN ROLLIN EDWARDS

I, Jonathan Rollin Edwards, declare as follows:

1. I am a fourth-generation inventor from a family full of inventors. My great-grandfather invented a machine to effectively manufacture lath (a base upon which plaster is laid). My grandfather invented a machine for rapidly laying railroad tracks, which was widely used in the United States during the late nineteenth and early twentieth centuries. My father is the inventor of over thirty United States patents, and invented, *inter alia*, an effective chaff dispenser used for deploying aluminum foil to confuse an enemy's radar, which was extensively used by the United States military in the Gulf War and continues to be used today.

2. Following in my family's tradition of creating innovation, I too am the inventor of numerous inventions. In particular, I am the inventor of several patents concerning innovations in the automotive industry.

3. In 1975, I passed a series of certification tests to become one of the world's first Certified General Auto Mechanics. Since 1976, I have run my own business involving the design, fabrication, and repair of automobiles. I consider myself to be one of skill in the art of automotive engineering, particularly with respect to electric motor transmission devices.

4. One of my patents is United States Patent No. 5,067,932 ("the '932 patent"), entitled "Dual-Input Infinite-Speed Integral Motor and Transmission Device," which is owned by Solomon Technologies, Inc. ("Solomon"). As the inventor of the '932 patent, I am intimately familiar with the disclosure and teachings of that patent.

5. Prior to Solomon's present lawsuit against Toyota, I (and others now associated with Solomon) had numerous meetings with engineers and executives at Toyota where we disclosed, in good faith to Toyota, the technology described and claimed in the '932 patent. We did so because we were led to believe by Toyota that they had a sincere interest in potentially licensing our technology and/or beginning a business relationship with us based on our technology. Over the course of those meetings with Toyota, we disclosed to Toyota detailed, technical aspects of the invention of the '932 patent, even showing Toyota actual prototypes of the invention and answering numerous questions by Toyota regarding the invention's manufacture, use, and potential applications. Ultimately, however, Toyota informed us that it had dropped out of a particular consortium and was no longer interested in pursuing our technology. Shortly thereafter, Toyota came out with its hybrid vehicles that are the subject of this action.

6. The '932 patent calls for, in claim 7, a "power conversion means" for converting electrical power to rotational mechanical power. I envisioned one such means as including (a) a mechanical power transmission unit, having two inputs and an output, and (b) two integral

combinations of an electric motor element and a transmission unit element, where in each such combination, one of either the motor element or transmission element is, to a large extent, within an envelope containing the other. In other words, I envisioned a compact structure for each of the integral combinations, where the two combinations would be located closely adjacent each other.

7. My vision of what the "power conversion means" would include (as described above) is set forth in claim 7. I believe that claim 7 more than adequately recites what structural components the claimed "power conversion means" includes and how those components are structurally related.

8. Toyota asserts that the use of shafts was disclaimed during prosecution of the '932 patent. It was not my intent to disclaim from the scope of my invention electric motor transmission devices having shafts (or shaft-like components) in the motor or transmission elements. To the contrary, I expressly envisioned such devices as being a part of my invention, as evidenced by Figure 5 of the '932 patent, shown below, and the fact that other claims of the '932 patent expressly recite the use of "shafts."

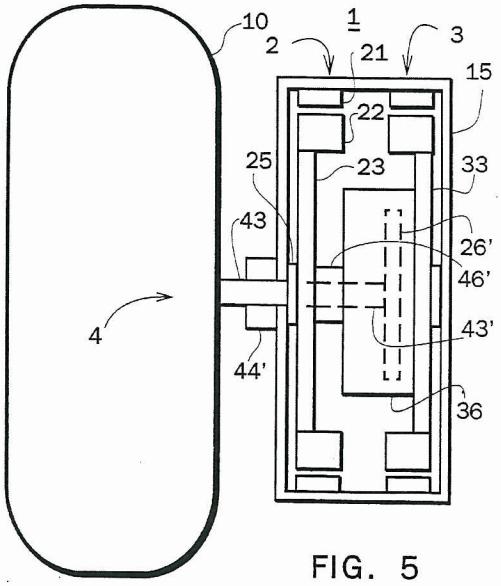


FIG. 5

9. In particular, as evident in Figure 5, above, a shaft (sun gear extension 46') is located between the first electric motor element (which includes field elements 21, armature elements 22 and disk 23) and a transmission unit element. The sun gear extension 46' connects the first electric motor assembly to the sun gear – an element of the transmission unit (note: the sun gear is not actually shown in Figure 5, as it is inside ring gear 36).

10. Figure 6 of the '932 patent shows another embodiment of the invention. As shown below, it includes a flywheel for power storage and delivery in a conventional vehicle.

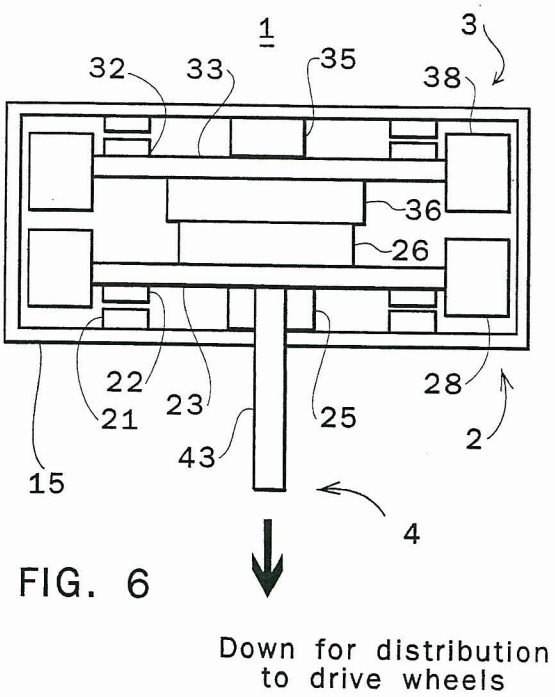
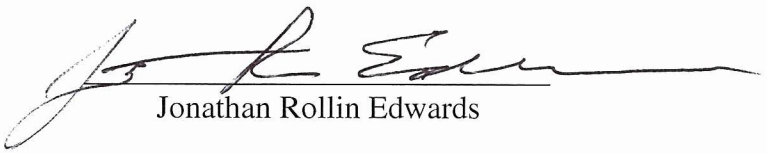


FIG. 6

11. Notably, in the Figure 6 embodiment, I included the use of heavy, cylindrical peripheral masses, depicted as 28 and 38, on disks 23 and 33. Those masses are used to increase the moments of rotational inertia and are plainly not electric motor elements. Because those masses are not electric motor elements, the space defined by the rotation of the motor elements 32 and 22 would ***not*** contain transmission elements 36 and 26.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on August 17, 2009



Jonathan Rollin Edwards