UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

VOIP-PAL.COM, INC., Plaintiff, v. GOOGLE LLC, Defendant.	Case No. 3:22-CV-3199-JD **DECLARATION OF VOJIN OKLOBDZIJA, PH.D.**
VOIP-PAL.COM, INC., Plaintiff, v. META PLATFORMS INC., et. al. Defendants.	Case No. 3:22-CV-3202-JD
TWITTER, INC., Plaintiff, v. VOIP-PAL.COM, INC., Defendant.	Case No. 3:21-CV-9773-JD

I, Vojin Oklobdzija, declare as follows:

I. INTRODUCTION

1. I have personal knowledge of the facts contained in this declaration and, if called as a witness, I could and would competently testify to those facts. I am being compensated at my normal consulting rate. My compensation does not depend on and in no way affects the substance of my statements in this Declaration.

II. QUALIFICATIONS

2. I am an independent consultant with Integration Corp. I reside in Berkely, California, and my place of business is at 855 Marina Bay Pkwy, Suite 130, Richmond, CA 94804. I am over the age of eighteen, and I am a citizen of the United States.

3. I have over 50 years of commercial, industrial, and university experience in all aspects of Electrical Engineering such as: Electronics (Analog and Digital), Telecommunication (Radio and Signal Processing), Computer Science (Computer Architecture and Computer Arithmetic), Computer Design (Hardware) and Semiconductor Integrated Circuits.

4. I received a Dip. Ing. degree (MSc EE equivalent) in Electronics and Telecommunications from the University of Belgrade, Yugoslavia in 1971, a Master of Science degree in computer science from the University of California, Los Angeles in 1978, and a Doctor of Philosophy (Ph.D.) degree in computer science from the University of California, Los Angeles in 1982.

5. Since 1997, I have been the owner and Principal Researcher at Integration Corp., which provides services to the electronics industry including consulting, research, product development, design, and testing. My previous industry experience includes employment at Xerox Corp., IBM T. J. Watson Research Center, Sun Microsystems, AT&T Bell Laboratories, Fujitsu Ltd., Hitachi Ltd., Sony Corp., Siemens/Infineon Corp., Intel Corp., Samsung Corp., and several startup companies, such as Skyera Inc., Wave Semi Inc., Esperanto Technologies Inc., SambaNova System Inc., and including my own, now defunct, startup company Silicon Analytics Inc.

6. In addition to my work at Integration, I have been a Professor of Engineering at University of California, Davis since 1991, and University Professor Emeritus since 2006. I was also a professor at University of California, Berkeley from 1988 to 1990, Sydney University (Australia), Ecole Politechnique Federal du Lausanne (Switzerland), University of Texas, and University of New Mexico.

7. From 1991 to 2006, I was a tenured Full Professor at the University of California, Davis. While there, I established a Computer Engineering ("CE") program in the Electrical Engineering Department, which later became the Electrical and Computer Engineering Department to reflect the addition of Computer Engineering. I taught all the critical courses in the CE curriculum, such as Digital Systems I and Digital Systems II, Computer Architecture, Assembly Language and Computer Organization, and Digital Integrated Circuits, as well as graduate courses, such as Advanced Logic Design, Computer Architecture, High- Performance Computer Architecture and Computer Arithmetic. During my tenure at other universities, I also taught courses in VLSI Design, Low-Power VLSI Circuits Design, and Digital Logic Design, and at UC Berkeley Extension in Silicon Valley. I started the Advanced Computer System Engineering Laboratory ("ACSEL") at the University of California, Davis in 1992. ACSEL consisted of my graduate students, professors associated with the group, industrial researchers, and past doctoral students. ACSEL has been working on solving important problems associated with computer and electronic/VLSI systems.

8. Upon my retirement as a university professor in 2012, I returned to work full-time in the industry. I joined Skyera Inc. ("Skyera"), a startup in San Jose, California, where I had the title of Senior Director, Processor Design. At Skyera, I managed a group of engineers involved in designing a proprietary processor for Skyera. The Skyera processor consisted of many CPUs on the chip with two levels of cache hierarchy and DRAM memory.

9. After Skyera was acquired in 2014 by Hitachi, I commenced working as a consultant for Wave Semi Inc. on multi-CPU chip design. My work was on the CPU and arithmetic elements of the processor, which was later tailored towards machine learning.

10. In December of 2015, I switched to Esperanto Technologies Inc. ("Esperanto Tech."), a startup company working on a "machine-learning" chip. During my work at Esperanto Tech., I personally worked on CPU and memory design.

11. In April of 2018, I joined SambaNova Systems Inc. ("SNS Inc."), a Palo Alto based startup that is one of the two leading companies in machine learning, having received over one billion dollars in funding. At SNS Inc., I designed specialized CPUs tailored for machine learning.

12. As detailed in my curriculum vitae, in addition to my industry, private consulting, and research work, I have published numerous articles in industry journals and proceedings, presented papers at industry technical and professional meetings, and participated in electronics and computer science industry professional meetings, conferences, trade groups, and professional organizations.

13. Since 1995, I have been a Fellow of the Institute of Electrical and Electronic Engineers ("IEEE"), a professional organization with over 400,000 members in more than 160 countries. IEEE states: "IEEE Fellow is a distinction reserved for select IEEE members whose extraordinary accomplishments in any of the IEEE fields of interest are deemed fitting of this prestigious grade elevation." No more than 0.1% of the IEEE voting membership on record may be elevated to Fellow in a year. Since 2014, I have been "Life Fellow of IEEE." From 2014 to 2016, I served as President of IEEE Circuits and Systems Society (IEEE's oldest and founding society), Vice President of the IEEE Circuits and Systems from 2012 to 2014, and Chair of Vision Committee of IEEE Circuits and Systems Society prior to 2014. In addition, during this time, I served on the Board of Governors of the IEEE from 2012-2016.

14. I am the named inventor on 20 U.S. patents and four currently pending patents, all of which are directed in general to computers, electronic circuits, and integrated circuits.

15. My experience as it specifically relates to networking dates to 1999-2000 and the work on network encryption processors, for two companies Blue Steel Networks Inc. and Digital Archways Inc. Blue Steel Networks Inc. was successfully sold to Broadcom Corp and became part of Broadcom, owned by Avago. The processor was an ad-on network card which handled encrypted network traffic. The second company related to network processors was Digital Archways Inc, which dealt with the same secure network processor. The company failed and went out of business due to the lack of funds.

16. I have provided a copy of my complete curriculum vitae as an attachment to this declaration as Exhibit A.

III.TASK

17. I have been asked to provide testimony regarding the understanding of a person of ordinary skill in the art ("POSITA") at the time of invention regarding the technology disclosed and claimed in VoIP-Pal's patents in general, and U.S. Patent Nos. 8,630,234 ("the '234 patent") and 10,880,721 ("the '721 patent") in particular. This declaration is not the first time I have provided testimony for VoIP-Pal. I provided expert reports in *VoIP-Pal.com, Inc. v. Amazon.com, Inc.*, 6:21-cv-00668 (WDTX); *VoIP-Pal.com, Inc. v. Verizon Communications, Inc.*, 6:21-cv-00672 (WDTX); *VoIP-Pal.com, Inc. v. T-Mobile USA, Inc.*, 6:21-cv-00674 (WDTX) relating to the '234 and '721 patents. I also have submitted declarations in *VoIP-Pal.com, Inc. v. Meta Platform, Inc.*, 3:22-cv-4279 (NDCAL) and *VoIP-Pal.com, Inc. v. Google LLC*, 3:22-cv-5479 (NDCAL) relating to U.S Patent No. 10,218,606. While I am not a lawyer and have no formal legal training, I am a prolific inventor with issued Patents, and have worked at the intersection of patents and computer technology for the past several years. In making the statements in this declaration, I have relied on my education in computer

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