

EXHIBIT 5F

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ARENDI S.A.R.L.,)	
Plaintiff,)	
)	
v.)	
)	C.A. No. 13-919-LPS
GOOGLE LLC,)	
Defendant.)	
)	
ARENDI S.A.R.L.,)	
Plaintiff,)	
)	
v.)	
)	C.A. No. 13-920-LPS
OATH HOLDINGS INC., and)	
OATH INC.,)	
Defendants.)	
)	
)	

DECLARATION OF JOHN LEVY, PH.D.

I, John Levy, Ph.D., hereby declare as follows:

I. INTRODUCTION

1. My name is John Levy, and I have been retained by Susman Godfrey L.L.P. on behalf of Arendi S.A.R.L (“Arendi”) to consult and provide expert opinion on certain issues raised by Dr. Edward A. Fox in his June 18, 2019 declaration submitted as an exhibit to the Opening Claim Construction Brief Regarding Claim Terms Particular to U.S. Patent No. 7,496,854 (“the ’854 patent”).

2. Specifically, I have been asked to consider Dr. Fox’s opinions with respect to the indefiniteness of certain claim terms in the ’854 patent. I have personal knowledge of the facts and opinions set forth in this declaration and believe them to be true. If called upon to do so, I would testify competently thereto. I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both.

3. I am being compensated for my time at my standard consulting rate. I am also being reimbursed for expenses that I incur during the course of this work. My compensation is not contingent upon the results of my study, the substance of my opinions, or the outcome of any proceeding involving the '854 patent. I have no financial interest in the outcome of this matter or in the pending litigation between Arendi and Defendants Google LLC and Motorola Mobility LLC (or any of the other Defendants in the related cases brought by Arendi S.A.R.L. in the District of Delaware and Western District of Washington).

4. My opinions are based on my years of education, research and experience, as well as my investigation and study of relevant materials, including those cited herein.

5. My analysis of the materials produced in this proceeding is ongoing, and I will continue to review any new material as it is provided. This declaration represents only those opinions I have formed to date. I reserve the right to revise, supplement, and/or amend my opinions stated herein based on new information and on my continuing analysis of the materials already provided.

II. QUALIFICATIONS

6. I am the sole proprietor of John Levy Consulting, a consulting firm that specializes in consulting on managing development of high-tech products, including computers and software. I earned a Bachelor of Engineering Physics degree from Cornell University in 1965, a Master of Science degree in Electrical Engineering from California Institute of Technology (Caltech) in 1966, and a Ph.D. in Computer Science from Stanford University in 1973.

7. From 1965 to 1966 at Caltech, my field of study was information processing systems. My coursework included systems programming, including the construction of compilers and assemblers. From 1966 to 1972, during my graduate study at Stanford, my field of study was

computer architecture and operating systems. My coursework included computer systems design, programming and operating systems. During my employment at Stanford Linear Accelerator Center while I was a graduate student at Stanford University, I was a programmer, and I participated in the design and implementation of a real-time operating system for use in data acquisition, storage and display. My Ph.D. thesis research related to computer systems organization and programming of multi-processor computers. I developed and measured the performance of several parallel programs on a simulated 16-processor system. I also studied file systems, disk and tape storage subsystems, and input/output.

8. I have been a technical employee and a consultant for over thirty years in the computer systems, software and storage industry. After earning my doctorate from Stanford University in Computer Science, I worked as an engineer at a number of leading companies in the computer industry, including Digital Equipment Corporation, Tandem Computer, Inc., Apple Computer, Inc., and Quantum Corporation.

9. From 1972 to 1974, at Digital Equipment Corporation, I supervised the development of an input/output channel for high-speed mass storage (disk, drum and tape), and its implementation for seven different peripheral units and three different computer systems. From 1974 to 1975, I was a project engineer leading the development of a new computer system. From 1975 to 1976, I supervised an operating system development group. During this time, I reviewed design changes and bug reports and fixes for two operating systems. While working for Digital Equipment Corporation, I wrote a long-term strategic plan for input/output buses and controllers and operating systems, including the conversion of most I/O buses to serial implementations. I am the author of a chapter on computer bus design in *Computer Engineering*, published in 1978 by Digital Press.

10. From 1977 to 1979, I was employed at Tandem Computer, Inc. where I worked on the design of future multiprocessor systems. I also worked on problems related to distributed (networked) systems including rollback and recovery of distributed databases.

11. From 1979 to 1982, I was employed at Apple Computer, Inc., where I worked on the design of a new computer system, the Lisa, which was a precursor to the Macintosh. I also supervised hardware and software engineers in the development of a new local area network.

12. In 1980-81, I taught an upper-division course at San Francisco State University titled "Input/Output Architecture" which dealt with design of I/O channels, controllers, storage devices and their associated software.

13. From 1982 to 1992, I consulted for a variety of client companies, including Apple Computer, Quantum Corporation and Ricoh Co., Ltd., on project management and product development. Consulting work for Quantum included working as a temporary supervisor of a firmware development team for a new hard disk drive. During this time, I co-authored a paper, cited in my attached CV, on the design of a file system for write-once optical disk drives, related to work I did for client Ricoh.

14. From 1993 to 1998, I was employed at Quantum Corporation, a manufacturer of hard disk drives, where I formed and managed a new group called Systems Engineering. While in this role I managed, among others, software and systems engineers who developed hard disk input/output drivers for personal computers and disk drive performance analysis and simulation software. I also became familiar with industry-standard techniques for disk drive design, including embedded servo, manufacturer-reserved cylinders (storage area on the hard disk), and microprocessor firmware related to control and management of read/write operations on hard disks.

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