

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Inventor: Hair	§	Attorney Docket No.:
United States Patent No.: 5,966,440	§	104677-5005-804
Formerly Application No.: 08/471,964	§	Customer No. 28120
Issue Date: October 12, 1999	§	
Filing Date: June 6, 1995	§	Petitioner: Apple Inc.
Former Group Art Unit: 380	§	
Former Examiner: Hoa T. Nguyen	§	

For: System and Method for Transmitting Desired Digital Video or Digital Audio Signals

MAIL STOP PATENT BOARD  
Patent Trial and Appeal Board  
United States Patent and Trademark Office  
Post Office Box 1450  
Alexandria, Virginia 22313-1450

**DECLARATION OF MEGAN F. RAYMOND IN SUPPORT OF  
PETITION FOR COVERED BUSINESS METHOD PATENT REVIEW OF  
UNITED STATES PATENT NO. 5,966,440  
PURSUANT TO 35 U.S.C. § 321, 37 C.F.R. § 42.304**

I, Megan F. Raymond, make the following Declaration pursuant to 28 U.S.C. § 1746:

1. I am an attorney at the law firm of Ropes & Gray LLP.
2. I provide this Declaration in connection with the above-identified

Covered Business Method Patent Review proceeding that is being requested at the United States Patent and Trademark Office by Apple Inc. under 35 U.S.C. § 321, 37 C.F.R. § 42.304. Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Exhibit 1310 hereto is a true and correct copy of an article entitled “Audio/digital interface for the IBM PC?” from the From the News Desk section of the June 4, 1984 issue of InfoWorld published by the InfoWorld Media Group, which was downloaded from LexisNexis at my request. Page numbers have been added to the bottom of this document and an exhibit label has been added to the top of this document but no other alterations have been made.

4. Exhibit 1317 hereto is a true and correct copy of a presentation entitled “A High Speed Telecommunications Interface for Digital Audio Transmission and Reception,” which bears the name Hyun Heinz Sohn and a reference to its presentation at the 76<sup>th</sup> Convention 1984 October 8-11 New York AES and which was retrieved from the Audio Engineering Society’s AES Convention Papers Forum at (<https://secure.aes.org/forum/pubs/conventions/?elib=11612> at my request. Page numbers have been added to the bottom of this document and an exhibit label has been added to the top of this document but no other alterations have been made.

5. Exhibit 1324 hereto is a true and correct copy of an article entitled “The Search For The Digital Recorder” from the November 12, 1984 issue of Fortune, which was retrieved at my instruction from the Science, Industry and Business Library located at 188 Madison Avenue, New York, NY 10016. Page numbers have been added to the bottom of this document and an exhibit label has been added to the top of this document but no other alterations have been made.

6. Exhibit 1327 hereto is a true and correct copy of an article entitled “Spec Sheet” from the March 1987 issue of Keyboard, which was retrieved at my instruction from the United States Library of Congress, 101 Independence Avenue SE, Washington, DC 20540. The article bears a Music Division Library of Congress. Page numbers have been added to the bottom of this document and an exhibit label has been added to the top of this document but no other alterations have been made.

7. Exhibit 1341 hereto is a true and correct copy of the Declaration of Dr. John P.J. Kelly in *SightSound Techs., LLC v. Apple Inc.*, No. 11-01292, before the District Court of the Western District of Pennsylvania, signed by John P.J. Kelly and dated September 7, 2012, which was downloaded from the Public Access to Court Electronic Records (“PACER”) website at my direction and is a record of the aforementioned District Court (Dkt. No. 93) to which all parties have access. The Declaration contains markings at the top of each page indicating the PACER filing information. Page numbers have been added to the bottom of this document and an exhibit label has been added to the top of this document but no other alterations have been made.

8. Exhibit 1342 hereto is a true and correct copy of an article entitled “New Telerecording Method for Audio” from the October 1985 issue of Broadcast Management Engineering, which was produced by counsel for SightSound Techs., LLC, the law firm of Arnold & Porter LLC, to counsel for Apple Inc., the law firm of Ropes & Gray LLP, during discovery relating to *SightSound Techs., LLC v. Apple Inc.*,

No. 11-01292, before the District Court of the Western District of Pennsylvania. The document, as produced, bears identification numbers CDN027185 – CDN027186 and a stamp from Stamford University Libraries dated November 12, 1985. The document, as produced, also bears an image of a sticker marking the document as “Exhibit &, Wt: M. Sohn, Date: 2.23.01, Frances A. Weinrob CSR, CRR..” Page numbers have been added to the bottom of this document and an exhibit label has been added to the top of this document but no other alterations have been made.

9. I make this declaration of my own personal knowledge. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

10. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of May, 2013 in Washington, DC.



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Megan F. Raymond