

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.
Petitioner

v.

SIGHTSOUND TECHNOLOGIES, LLC
Patent Owner

Case CBM2013-00023
Patent 5,966,440

Before the Honorable MICHAEL P. TIERNEY, JUSTIN T. ARBES, and
GEORGIANNA W. BRADEN,
Administrative Patent Judges.

DECLARATION OF ARTHUR RANGEL

I, Arthur Rangel, declare as follows:

1. Unless stated otherwise, I have personal knowledge of the facts set forth below, and if called as a witness, could and would competently testify thereto.

2. I am employed as a Sr. Director of Market Research and Analysis at Apple Inc. ("Apple"). I work in Apple's office in Cupertino, California. I have been employed by Apple since Jan. 5, 2004. I provide this declaration in support of Apple's Opposition to SightSound's Motion for Additional Discovery. Unless otherwise indicated below, the statements in this declaration are based upon my personal knowledge or corporate records maintained by Apple in the ordinary course of business.

3. Apple gathers information and feedback from customers reflecting their desires and preferences in numerous ways, ranging from formal studies to informal feedback [REDACTED]

4. Various different types of materials are generated in connection with a formal study relating to Apple products and services. [REDACTED]

[REDACTED]

[REDACTED] Materials other than the formal survey reports frequently amount to thousands of pages of material.

5. Third parties generally conduct Apple's formal studies. The raw data the third parties collect is not typically supplied to Apple. Such raw data would generally need to be obtained from the third party survey provider.

6. Apple conducts certain formal studies [REDACTED]
[REDACTED]

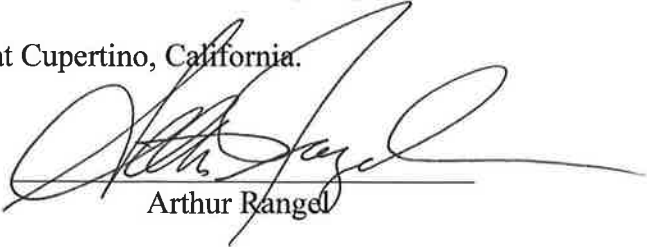
7. [REDACTED]
[REDACTED]

8. [REDACTED]
[REDACTED]

9. Between [REDACTED], materials relating to Apple's studies [REDACTED]
[REDACTED] exceed tens of thousands of pages in volume.

10. Studies showing cause and effect relationships must be designed in a specific way. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on the 21st day of November 2013 at Cupertino, California.


Arthur Rangel