I, Geoffrey O. Thompson, hereby declare as follows:

1. **INTRODUCTION**

2. I am presently a Member Emeritus of the IEEE 802 LAN/MAN Standards Executive Committee and the Principal at GraCaSI Standards Advisors, which has its principal place of business at 158 Paseo Court, Mountain View, CA 94043-5286.

3. I have prepared this Declaration on behalf of Sony Corporation of America in connection with the Petition for *Post-Grant* Review of U.S. Patent No. 6,218,930 (the "'930 patent"), which is to be filed concurrently with this Declaration.

4. **BACKGROUND AND QUALIFICATIONS**

A. **Educational Background and Employment**

5. I was awarded a bachelor's degree in electrical engineering from Purdue University in 1964.

6. From 1964 to 1965, I worked at the Walbridge Test Center of Ohio Bell Telephone as a Manager. My responsibilities included managing and supervising operation of a local telephone test and repair center for 1/3 of a metropolitan area comprising approximately 300,000 people.

7. I became employed by Xerox Corporation beginning in 1965. My first position at Xerox was Associate Engineer. Between 1965 and 1973, I was

promoted to Engineer and to Senior Engineer. In 1973, I became a Senior Member

of the Research Staff at Xerox PARC and held that title until 1981, when I became

a Consulting Member of the Engineering Staff for Systems Development at Xerox.

8.   Beginning in 1998, I held various staff positions at SynOptics

Communications, Bay Networks, and Nortel Networks. In these positions I was

responsible for working with the IEEE 802.3 standards and providing technical

analyses relating to the standards. I became a Distinguished Member of the

Technical Staff at Nortel Networks in 2008.

9.   In 2009, I left Nortel Networks to begin work at GraCaSI Standards

Advisors as the Principal.

A.   Standards Work

10.   I have worked with the IEEE 802.3 standards Working Group since

1983. My early work included promoting the Ethernet standard as a U.S. delegate

in international standards forums. Beginning in 1983, I also served as a technical

contributor and chairperson of various task forces for IEEE 802.3 standards

projects, including the Chair of the Maintenance Task Force.

11.   From 1991 to 1993, I served as Vice Chairman of the IEEE 802.3

Working Group and was responsible for procedures, membership, technical

maintenance, and working group management assistance, in addition to technical

contributions.

12.   From 1993 to 2002 I was the Chair of the IEEE Working Group responsible for Ethernet standards in Layer 1 and the Media Access Controller portion of Layer 2 (per the ISO 7 layer reference model). In this position, I supervised 14 standards projects covering the development of Ethernet using speeds from 100 Mb/s, 1 Gb/s, and 10 Gb/s, as well as various other projects such as switching/full duplex, auto-negotiation, management, virtual local area networks, Power over Ethernet, and link aggregation.

13.   In 2002, I became the 1st Vice Chairman of the IEEE 802 LAN/MAN Standards Executive Committee. In this role, I supported the Chair of the Committee and assisted in governance of the Committee. I also advocated IEEE 802.3 standards in interactions with IEEE Standards Association staff and higher level governance.

14.   From 2010 to 2011, I was the Chair of the 802.23 Emergency Services Working Group.

15.   I became a Member Emeritus of the IEEE 802 LAN/MAN Standards Executive Committee in 2002. I returned to that position in 2011 and continue to hold this title today. I also remain a voter and active participant in the IEEE 802.3 Working Group.

A.   Patents Awarded

16.   Through my years of work in the communications and networking industry, I have been awarded at least 12 U.S. patents.

17.   Several of these patents deal with local area networks, Ethernet implementations, indicating power over Ethernet connections, data switching in network environments and techniques for virtual LAN identification.

A.   Other Awards

18.   At Nortel, I received the title of Distinguished Member Technical Staff in 2008. Also at Nortel, I received the Significant Patent Award in September 2000.

19.   Through my work with the IEEE, I received the IEEE-SA Standards Board Distinguished Service Award in 2006. I also received the IEEE Standards Medallion in 1996.

A.   Qualifications

20.   Based on my industry experience and key roles in various IEEE 802.3 standards projects as described above, including the project that standardized Power over Ethernet as IEEE 802.3af (2003), I consider myself to be an expert in the field of networking systems and equipment.

21.   I believe that I am qualified to provide an opinion as to what a person having ordinary skill in the art would have understood, known, or concluded

during the timeframe of 1998-2000 (hereinafter, a "PHOSITA"). Such a person would have (i) a bachelors degree in electrical or electronics engineering, including studies related to the field of communications or (ii) 3-5 years of comparable work experience.

22.   **MATERIALS CONSIDERED**

23.   In the course of preparing this Declaration, I have reviewed the '930 patent and its file history, the previous ex parte reexamination proceeding (control no. 90/012,401), as well as the prior art references and related documents discussed below.

24.   I have also reviewed the Petition for *Post-Grant* Review of the '930 Patent ("the Petition") and claim charts that are being submitted concurrently with this Declaration.

25.   In addition, I have reviewed the Decision on Institution of *Inter Partes* Review in Case IPR2013-00092 dated May 24, 2013 ("the Sony-Axis IPR Decision"), Decision on Institution of *Inter Partes* Review in Case IPR2013-00386 dated July 29, 2013 ("the Sony-Axis-Hewlett-Packard IPR Decision"), the Decision on Institution of *Inter Partes* Review in Case IPR2013-00071 dated May 24, 2013 ("the Avaya IPR Decision"), the Final Written Decision of *Inter Partes* Review in Case IPR2013-00071 dated May 22, 2014 ("the Avaya Final Written Decision").

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