Exhibit 2015
Zynga, Inc. v. Personalized Media Communications, LLC
Case IPR2013-00156 (SCM)

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ZYNGA, INC.

Petitioner

V.

PERSONALIZED MEDIA COMMUNICATIONS LLC

Patent Owner

_____

Case No. IPR2013-00156

U.S. Patent No. 7,860,131

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DECLARATION OF SAMUEL H. RUSS, PH.D.
PURSUANT TO 37 C.F.R. § 1.68

I, Dr. Samuel H. Russ, do hereby declare:

1.   I am making this declaration at the request of Patent Owner Personalized Media Communications, LLC ("PMC") in the matter of the Inter Partes Review, No. IPR2013-00156, of U.S. Patent No. 7,860,131 ("'131 Patent.")

I.   QUALIFICATIONS & ENGAGEMENT

2.   My qualifications for forming the opinions set forth in this Declaration are summarized here and explained in more detail in my *curriculum vitae*, which is attached as part of Exhibit 2019. Exhibit 2019 also includes a list of my publications and the cases in which I have testified at deposition, hearing, or trial during the past four years.

3.   I received a Bachelor's degree in Electrical Engineering from the Georgia Institute of Technology ("Georgia Tech") in 1986 and a Ph.D. in Electrical Engineering from Georgia Tech in 1991.

4.   From 2007 to the present, I have been a member of the faculty of the University of South Alabama as an Assistant and Associate Professor in the Department of Electrical and Computer Engineering. During that time, I have won awards for excellent teaching and have been actively publishing research in home networking and digital video recording (DVR) technologies. I am active in the Institute of Electrical and Electronic Engineers (IEEE) and am a Distinguished Lecturer for the IEEE Consumer Electronics Society. As a consultant, I have

conducted briefings for members of the financial community on technology trends

in the cable, satellite, and IPTV sectors. I teach classes in subjects including

encryption, digital system design, signal integrity, systems engineering, software

development, embedded system development, digital logic design, and computer

engineering.

5.   From 2000 to 2007, I worked for Scientific-Atlanta (now Cisco's

Service Provider Video Tech. Group), where I managed a cable set-top box (STB)

design group that designed four STB models, including the Explorer 4200 (non-

DVR) and 8300 (DVR) models. Set-top boxes contain numerous features relevant

to the Harvey patents, including networking, communications, interactivity, the

ability to download software, video and audio processing, and digital audio and

video. Both models sold several million units. As design-group manager, I was

responsible for managing the design and prototyping activities of the group and for

interfacing with other groups (especially integrated-circuit design, procurement,

software developers, the factory where prototypes were built, and product

managers) and for maintaining the hardware and mechanical development

schedule. Since the products were produced in extremely high volumes, the

projects had very high visibility in the company, and therefore carried a great deal

of responsibility. In order to manage the design of cable set-top boxes, I had to be

an expert in communications, signal processing, networking, distributed systems,

remote downloading of software, encryption/decryption, and software development including coding and testing.

6.   Also while at Scientific-Atlanta, I became a staff expert in home networking, conducting demonstrations of breakthrough wireless video-distribution technology and managing a group that developed a new coaxial home networking system. The coaxial system won a Technology and Engineering Emmy® Award in 2013. I became a staff expert in DVR reliability and led a team that improved the software, hardware, repair, manufacturing processes, and vendor qualifications of DVR set-tops and hard disk drives. I was a named inventor on forty-eight (48) patent applications that were filed while I was at Scientific-Atlanta, twenty five (25) of which have issued as patents as of the writing of this Declaration.

7.   From 1999 to 2000, I was a Staff Electrical Engineer and then Matrix Manager at IVI Checkmate (now Ingenico), where I managed the hardware design team that completed the design of the eN-Touch 1000 payment terminal. This terminal was in widespread use, for example, at the self-checkout at Home Depot.

8.   I also served on the faculty of Mississippi State University from 1994 to 1999 as an Assistant Professor in the Department of Electrical & Computer Engineering where I taught circuit board design and two-way interactive video classes, among other things. I managed the development of a distributed run-time

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