

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BROADCOM CORPORATION
Petitioner

v.

TELEFONAKTIEBOLAGET LM ERICSSON (PUBL)
Patent Owner

Case IPR2013-00602
Patent 6,466,568

Title: Multi-Rate Radiocommunication System and Terminals

**DECLARATION OF ROBERT AKL, D.Sc.,
IN SUPPORT OF PATENT OWNER'S RESPONSE**

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**DECLARATION BY ROBERT AKL, D.Sc.,
IN SUPPORT OF PATENT OWNER'S RESPONSE**

I, Robert Akl, D.Sc., hereby declare, affirm, and state the following:

INTRODUCTION

1. The facts set forth below are known to me personally and I have firsthand knowledge of them. I am a U.S. citizen over eighteen years of age. I am fully competent to testify as to the matters addressed in this Declaration. I understand that this Declaration is being submitted along with Patent Owner's response to the March 10, 2014 institution of Inter Partes Review of US Patent No. 6,466,568 (hereinafter, "the '568 Patent") by the United States Patent and Trademark Office ("USPTO") in IPR No. 2013-00602.

2. I was asked to give my opinion on whether claims 1-6 ("challenged claims") of the '568 Patent are anticipated by Adams or rendered obvious by Morley. As described further below, it is my opinion that Adams does not anticipate the challenged claims, nor does Morley render obvious the challenged claims. In particular, neither Adams nor Morley teaches or suggests (1) a "service type identifier" and (2) an "identifier which identifies a type of payload information provided in said at least one first field." Furthermore, Adams does not teach or suggest a transmitter for transmitting information.

QUALIFICATIONS AND COMPENSATION

3. My resume, including my qualifications, a list of the publications that I have authored during my technical career, and a list of the cases in which, during the previous four years, I have testified as an expert at trial or by deposition, is attached to this declaration as Attachment A.

4. I have summarized in this section my educational background, career history, and other relevant qualifications. A true and accurate copy of my curriculum vitae is attached hereto as Attachment A.

5. I earned my Bachelor of Science degrees in Electrical Engineering and Computer Science summa cum laude with a ranking of first in my undergraduate class from Washington University in Saint Louis in 1994. In 1996 I earned my Master of Science degree in Electrical Engineering from Washington University in Saint Louis. I earned my Doctorate of Science in Electrical Engineering from Washington University in Saint Louis in 2000, with my dissertation on “Cell Design to Maximize Capacity in Cellular Code Division Multiple Access (CDMA) Networks.”

6. After obtaining my Doctorate of Science degree, I worked as a Senior Systems Engineer at Comspace Corporation from October of 2000 to December of 2001. In this position, I designed, coded in MATLAB, and simulated Viterbi

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