

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD;
SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioners,

v.

AFFINITY LABS OF TEXAS, LLC,

Patent Owner.

Case IPR2014-01181

Patent No. 8,532,641 B2

**DECLARATION OF CINDY D. KUCHESKA IN SUPPORT OF PATENT
OWNER'S RESPONSE TO *INTER PARTES REVIEW* OF UNITED
STATES PATENT NO. 8,532,641**

I, Cindy D. Kucheska make the following Declaration pursuant to 28 U.S.C. §

1746:

1. I am currently the Word Processing Manager at the law firm of Robins Kaplan LLP.
2. I provide this Declaration in connection with the above-identified *inter partes* review proceeding.
3. Attached hereto as Exhibit 2004A is a true and correct copy of the document containing a comparison of the specifications (not including the figures or claims) of U.S. Patent No. 7,187,947 to U.S. Patent No. 8,532,641. I created this document on April 30, 2015 using the Workshare Compare software. On May 12, 2015, I formatted the content to fit on a full-size page. The text from '947 patent served as the original document. The text of the '641 patent served as new document. Changes from the text of the '947 patent to the text of the '641 patent are represented by the following markings: the blue underlined text indicates an insertion; the ~~red strike-through~~ text indicates a deletion; the ~~green strikethrough~~ text indicates that text was moved from that location; the green underlined text indicates that text was moved to that location.
4. Attached hereto as Exhibit 2004B is a true and correct copy of the document containing a comparison of the specifications (not including the figures or claims) of U.S. Patent No. 7,778,595 to U.S. Patent No. 8,532,641. I created this document on May 12, 2015 using the Workshare Compare software. The text

from '595 patent served as the original document. The text of the '641 patent served as new document. Changes from the text of the '595 patent to the text of the '641 patent are represented by the following markings: the blue underlined text indicates an insertion; the ~~red strike-through~~ text indicates a deletion; the ~~green strikethrough~~ text indicates that text was moved from that location; the green underlined text indicates that text was moved to that location.

5. I make these declarations on my own personal knowledge. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

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

Executed this 13th day of May, 2015.


Cindy D. Kucheska