UNITED STATES PATENT AND TRADEMARK OFFICE
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BEFORE THE PATENT TRIAL AND APPEAL BOARD
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SAMSUNG ELECTRONICS CO., LTD and SAMSUNG ELECTRONICS
AMERICA, INC.,
Petitioners

v.

AFFINITY LABS OF TEXAS, LLC
Patent Owner
_____

Case IPR2014-01181[*]
Patent 8,532,641 B2
_____

Before the Honorable KEVIN F. TURNER, LYNNE E. PETTIGREW, and
JON B. TORNQUIST, *Administrative Patent Judges*.

DECLARATION OF HAYAN YOON

I, Hayan Yoon, make the following Declaration pursuant to 28 U.S.C. §1746:

  1. I am an attorney at the law firm of Ropes & Gray LLP.

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[*]Case Nos. IPR2014-01182 and IPR2014-01184 have been consolidated with the

instant proceeding. *See* IPR2014-01181, Paper 15; IPR2014-01182, Paper 15; and

IPR2014-01184, Paper 15.

2. I provide this Declaration in connection with the above-identified *Inter Partes* Review proceeding and Petitioners' Reply to Patent Owner Affinity Labs of Texas, LLC's Response. Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Exhibit 1026 hereto is a true and correct copy of an excerpt from "Microsoft Computer Dictionary, Fourth Edition," published by Microsoft Press, and dated 1999. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

4. Exhibit 1027 hereto is a true and correct copy of European Patent Application Publication No. EP 1675309 filed by Gorman, which was downloaded from the European Patent Office ("EPO") Espacenet website and which is a record of the EPO to which all parties have access. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

5. Exhibit 1028 hereto is a true and correct copy of an excerpt from "Webster's II New College Dictionary," published by the Houghton Mifflin Company and dated 1995. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no

alterations, other than these noted markings, have been made to this

document.

6. Exhibit 1029 hereto is a true and correct copy of an excerpt from

   "Dictionary of Computing, Fourth Edition" published by the Oxford

   University Press and dated 1997. This document has been marked with an

   exhibit label and page numbers on each page at the bottom right corner.

   However, no alterations, other than these noted markings, have been made to

   this document.

7. Exhibit 1036 hereto is a true and correct copy of an excerpt from "Merriam-

   Webster's Collegiate Dictionary, Tenth Edition" published by Merriam-

   Webster, Inc. and dated 1997. This document has been marked with an

   exhibit label and page numbers on each page at the bottom right corner.

   However, no alterations, other than these noted markings, have been made to

   this document.

8. Exhibit 1037 hereto is a true and correct copy of United States Patent No.

   6,633,932 to Bork et al., which was downloaded from the USPTO PAIR

   website and which is a record of the USPTO to which all parties have access.

   This document has been marked with an exhibit label and page numbers on

   each page at the bottom right corner. However, no alterations, other than

   these noted markings, have been made to this document.

9. Exhibit 1050 hereto is a true and correct copy of United States Patent No. 5,884,269 to Cellier, which was downloaded from the USPTO PAIR website and which is a record of the USPTO to which all parties have access. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

10. Exhibit 1051 hereto is a true and correct copy of an excerpt from "Comprehensive Dictionary of Electrical Engineering," published by the CRC Press and IEEE Press and dated 1999. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

11. Exhibit 1055 hereto is a true and correct copy of the file history of Reexamination Control No. 90/011,982 (ex parte reexamination of U.S. Patent No. 7,634,228) from February 14, 2013 until June 10, 2014, which was downloaded from the USPTO PAIR website and which is a record of the USPTO to which all parties have access. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

12. Exhibit 1056 hereto is a true and correct copy of the Non-Final Action

    issued on June 14, 2010 in Reexamination Control Nos. 90/010,333,

    95/001,223 and 95/001,264 (Ex Parte and Inter Partes Reexaminations of

    U.S. Patent No. 7,324,833), which was downloaded from the USPTO PAIR

    website and which is a record of the USPTO to which all parties have access.

    This document has been marked with an exhibit label and page numbers on

    each page at the bottom right corner. However, no alterations, other than

    these noted markings, have been made to this document.

13. Exhibit 1058 hereto is a true and correct copy of United States Patent No.

    6,928,468 to Leermakers, which was downloaded from the USPTO PAIR

    website and which is a record of the USPTO to which all parties have access.

    This document has been marked with an exhibit label and page numbers on

    each page at the bottom right corner. However, no alterations, other than

    these noted markings, have been made to this document.

14. Exhibit 1059 hereto is a true and correct copy of Exhibit 2008 in IPR2014-

    00209 (Universal Serial Bus Specification, Revision 2.0, April 27, 2000,

    Compaq, Hewlett-Packard, Intel, Lucent, Microsoft, NEC, Philips), which

    was downloaded from the USPTO PTAB Trials website and which is a

    record of the USPTO to which all parties have access. This document has

    been marked with an exhibit label and page numbers on each page at the

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