UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC.,
LG ELECTRONICS U.S.A., INC., and
LG ELECTRONICS MOBILECOMM U.S.A., INC.,
Petitioner

v.

CYPRESS SEMICONDUCTOR CORPORATION
Patent Owner

Case IPR2014-01405
Patent 6,493,770

DECLARATION OF JOHN GARNEY

EXHIBIT 2020
LG Elecs. v. Cypress Semiconductor
IPR2014-01405, U.S. Pat. 6,493,770

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I, John Garney, declare and state as follows:

I. INTRODUCTION

1. I have been retained by Kaye Scholer LLP at the rate of $275 per hour to provide opinions in connection with the *Inter Partes* review of U.S. Patent Nos. 6,493,770 (the "`770 patent"). My compensation is not affected by the outcome of this proceeding.

2. I have no financial interest in any of the parties, or the `770 patent.

II. QUALIFICATIONS

3. I received a Bachelor's of Science in Mathematics and a Bachelor's of Science in Computer Science from Purdue University in 1978. I received a Master's of Science in Computer Science from Purdue University in 1980.

4. I was employed by Intel Corporation from 1980 through 2007 with two years (1988-1989) spent in a joint venture (BiiN) spun off by Intel/Siemens. I held a variety of positions while at Intel, starting as a Software Evaluation Engineer and finally as a Senior Staff Systems Architect in the Research and Development part of the Corporate Technology Group.

5. While employed at Intel Corporation as a software architect in 1991, I was Intel's software representative to the Personal Computer Memory Card International Association ("PCMCIA"). As part of my responsibilities as Intel's representative, I extensively reviewed the pre release 2.0 specification and discussed and debated clarifications and corrections to the specification in several full membership meetings.

6. I co-defined the Socket Services and Card Services portions of the

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PCMCIA Release 2.01 (November 1992) and 2.1 (July 1993) specifications (200+ pages)). I presented and defended the technical details of those specifications during PCMCIA working group meetings and incorporated feedback from the working meetings through several releases from 1991 thru 1993. I worked with Microsoft and got their support of Card Services in the Windows Operating System. I was the only non-Microsoft member of the Windows Chicago (aka Windows 95) Plug and Play team and ensured Microsoft support for dynamically removable, configurable PCMCIA memory and IO cards.

7. I wrote and promoted the Intel Exchangeable Card Architecture (ExCA) subset specification of PCMCIA that allowed interchangeable use of cards in PC systems manufactured by different companies. This specification was subsequently adopted by the PC Industry.

8. I was the software architect for two different Intel hardware product teams building two different PCMCIA host adapter chips, incorporated in 3rd party OEM laptops. I was a member of the Intel PC Enhancements Division (PCED) product group that developed the first PCMCIA modem and LAN cards and ensured these cards adhered to the PCMCIA standards.

9. I built and demonstrated prototype PCMCIA Execute-In-Place (XIP) tools and drivers for converting commonly available Windows 3.x applications (such as MS Word and Powerpoint) so that the applications could be executed directly from a PCMCIA flash memory card, without needing to be loaded into DRAM.

10. I provided technical leadership with the Intel Flash memory product

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