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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

CYPRESS SEMICONDUCTOR CORP.  
Patent Owner

**DECLARATION OF GEERT KNAPEN**  
in Support of Petition for *Inter Partes* Review of  
U.S. Patent No. 6,493,770

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P.O. Box 1450  
Alexandria, VA 22313-1450

EXHIBIT 1013

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I, Geert Knapen, hereby declare as follows:

## **I. INTRODUCTION**

1. I am currently a consultant at Design & Advice L.L.C.
2. I have been retained in this matter by Rothwell, Figg, Ernst & Manbeck, P.C. (“Rothwell Figg”) to provide various opinions regarding U.S. Patent No. 6,493,770 (the “770 patent”). I am being compensated for my work in this matter. My compensation in no way depends upon the outcome of this proceeding.
3. I have been advised that Rothwell Figg represents LG Electronics, Inc. (“LGE”), LG Electronics U.S.A.,Inc. (“LGE USA”), and LG Electronics Mobilecomm U.S.A.,Inc. (“LGE MOBILECOMM”) (collectively “LG”) in this matter. I have no financial interest in LGE, LGE USA, nor LGE MOBILECOMM.
4. I have been advised that Cypress Semiconductor Corp. owns the ‘770 Patent. I have no financial interest in the ‘770 patent.

## **II. QUALIFICATIONS**

5. I received a Master of Science in Electrical Engineering in 1981 from Vrije Universiteit Brussel (V.U.B.) (Brussels Free University) at the Department of Applied Sciences.

6. From 1981 to 1983, I was an Assistant Professor in the Department of Electrical Engineering at Brussels Free University, where I was involved in the field of non-destructive testing, such as through time-domain reflectometry.

7. From 1983-1985, I was responsible for Industrial Consulting and External Industrial Contacts at the Brussels Free University.

8. In 1985, I co-founded the company Signal Processing Innovations N.V. (SpinnoV) in Brussels. The company focused on development and sale of digital signal processing boards and complete measurement systems. My responsibilities included research and development and product management. I was also responsible for designing a high-end Fast Fourier Transform (FFT) Spectrum Analyzer for Sound and Vibration markets.

9. In 1990, I started another company called Ling Dynamic Systems N.V. in Brussels. Ling was also focused on the signal processing market. From 1990 to 1991, I was a Director at Ling and was responsible for R&D and product management.

10. In 1991, I started a company called Design & Advice C.V. in Belgium. While there, I began consulting for Philips International Technology Center Leuven (ITCL) in DSP hardware and software. In 1995, while still a consultant at Design & Advice C.V., I became involved in the creation of the USB standard. I represented Philips in the USB Device Working Group (DWG) and

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