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**UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

In Re: U.S. Patent No. 7,916,781: Attorney Docket No. 082944.0102

Inventor: Jin, Hui, *et al.* :

Filed: June 30, 2008 :

Issued: March 29, 2011 : IPR No. Unassigned

Assignee: California Institute of Technology

Title: Serial Concatenation of Interleaved Convolutional Codes Forming Turbo-Like Codes

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*Submitted Electronically via the Patent Review Processing System*

**DECLARATION OF HENRY D. PFISTER**

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I, Henry D. Pfister, declare as follows:

1. I make this declaration based upon my own personal knowledge and, if called upon to testify, would testify competently to the matters contained herein.

2. I have been asked to provide technical assistance in the *inter partes* review of U.S. Patent No. 7,916,781 ("the '781 Patent").<sup>1</sup> I have also reviewed and analyzed U.S. Patent Nos. 7,116,710 ("the '710 Patent");<sup>2</sup> 7,421,032 ("'032 patent");<sup>3</sup> and 8,284,833 ("the '833 Patent").<sup>4</sup>

3. This declaration is a statement of my opinions on issues related to the patentability of claims 1, 2, 3, 4, 5, 6, 7, 13, 14, 15, 16, and 19 of the '781 Patent.

## **I. Background and Qualifications**

4. My qualifications are stated more fully in my curriculum vitae. Here I provide a brief summary of my qualifications. I was an active contributor and collaborator in the community that included the inventors

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<sup>1</sup> Ex. 1006.

<sup>2</sup> Ex. 1001.

<sup>3</sup> Ex. 1004.

<sup>4</sup> Ex. 1008.

and subject matter of the '710; '032; '781; and '833 patents before and after May 2000. From 1997-2003, I was a graduate student at the University of California, San Diego (UCSD) studying electrical engineering. During 1998-1999, I took my first sequence of courses on error-correcting codes and my course project for the 1999 winter quarter was on repeat-accumulate codes. This work led to my first conference paper, which was entitled "The serial concatenation of rate-1 codes through uniform random interleavers," was presented at the Allerton conference in 1999 and may be referred to herein as "Pfister & Siegel."<sup>5</sup> This paper generalized the idea of repeat-accumulate codes to include arbitrary outer codes and multiple inner accumulate codes. I continued my studies and eventually became a professor. Now, I am an associate professor in the Department of Electrical and Computer Engineering at Duke University. Before this appointment, I taught in the Department of Electrical and Computer Engineering of Texas A&M University, College Station from 2006-2014. I received my Ph.D. in electrical engineering from the University of California, San Diego (UCSD) in 2003 and then spent two years in R&D at Qualcomm, Inc., and one year as a post-doctoral researcher at the Swiss Federal Institute of Technology, Lausanne (EPFL). I am a co-author on more than 60 peer-reviewed

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<sup>5</sup> Ex. 1057.

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