UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO. LTD.; SAMSUNG ELECTRONICS AMERICA, INC.; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC; AND SAMSUNG AUSTIN SEMICONDUCTOR, LLC;
Petitioner

v.

REMBRANDT WIRELESS TECHNOLOGIES, LP
Patent Owner

Case IPR2015-00114
Patent 8,023,580

DECLARATION OF DAVID GOODMAN

IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,023,580

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I, David J. Goodman, declare:

I. INTRODUCTION

1. I previously submitted a declaration in the inter partes review proceeding brought by Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., Samsung Telecommunications America, LLC, and Samsung Austin Semiconductor, LLC ("Petitioners") regarding U.S. Patent No. 8,023,580 that was assigned Case No. IPR2014-00518 (Exhibit 1220). My opinions stated in that declaration remain unchanged.

2. The present declaration is provides additional opinions regarding the applicability of the prior art references I discussed in my previous declaration to certain claims for which the Patent Trial and Appeal Board declined to institute a trial. Therefore, I submit this declaration in support of Petitioner's petition for *inter partes* review of the `580 Patent.

3. I am being compensated for my work in this matter. My compensation in no way depends upon the outcome of this proceeding.

II. EXPERT QUALIFICATIONS AND CREDENTIALS

4. My qualifications and credentials are provided in paragraphs 4-17 of my prior declaration. Ex. 1220.

III. BASIS FOR OPINIONS AND MATERIALS REVIEWED

5. The opinions set forth in my declaration are based on my personal knowledge gained from my education, professional experience, and on the review of the documents and information described in this declaration.

6. In preparation of this declaration, I have studied

a. U.S. Patent No. 8,023,580 (Ex. 1201);

b. File History of U.S. Patent No. 8,023,580 and the patents from which the `580 patent claims priority, as well as the child patent;

c. U.S. Patent No. 5,706,428 to Boer et al. "Boer;"

d. *P802.11 Draft Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specification*, 23 May 1996;

e. *IEEE Std 802.11-1997(Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications)*, IEEE Standards Board, Approved Jun. 26, 1997;

f. Upender, "*Communication Protocols for Embedded Systems*," Embedded Systems Programming, Vol. 7, Issue 11, November 1994.

g. Joint Claim Construction Statement, *Rembrandt Wireless Technologies, LP v. Samsung Electronics Co. Ltd, et al*, No. 2:13-cv-00213 (E.D. Tex. 2013);

h. "*The IEEE Standard Dictionary of Electrical and Electronics Terms*," 6th Ed., 1996, p. 662;

i. "*Dictionary Of Communications Technology*," 1995, pp. 259, 404.

j. U.S. Patent No. 5,537,398 ("Siwiak");

k. Infringement Contentions, *Rembrandt Wireless Technologies, LP v. Samsung Electronics Co. Ltd, et al*, No. 2:13-cv-00213 (ED. Tex 2013) (July 25, 2013);

l. Rembrandt's Opening Claim Construction Brief, Rembrandt Wireless Technologies, LP v. Samsung Electronics Co. Ltd, et al, No. 2:13-cv-00213 (ED. Tex 2013) (April 17, 2014);

m. Tutorial presentation filed by Rembrandt, *Rembrandt Wireless Technologies, LP v. Samsung Electronics Co. Ltd*, et al, No. 2:13-cv-00213 (ED. Tex 2013) (April 17, 2014);

n. Institution Decision for IPR2014-00518;

o. Institution Decision for IPR2014-00519.

IV. SUMMARY OF MY OPINIONS

7. My opinions are in support of the *inter partes* review of the `580 patent claims 2, 19, 49, 52, 53, and 59.

8. It is my opinion that claims 2, 19, 49, 52, 53, and 59 are invalid because they are rendered obvious under 35 U.S.C. § 103 by Admitted Prior Art ("APA") in view of Boer (Ex. 1204).

V. THE PRIOR ART

A. Claims 2, 19, 49, 52, 53, and 59 Are Rendered Obvious Under 35 U.S.C. § 103 By Admitted Prior Art ("APA") In View Of Boer

9. I discuss the scope and content of the admitted prior art in paragraphs 51-53 and 80-81 of Ex. 1220, my prior declaration. Likewise, I discuss the scope and content of Boer in paragraphs 82-88 of my prior declaration. Finally, I discuss the motivation of a person having ordinary skill in the art to combine the APA with Boer in paragraphs 89-104 of my prior declaration.

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