

EXHIBIT

DSS-2016

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC.,
Petitioners,

v.

DSS TECHNOLOGY MANAGEMENT, INC.,
Patent Owner.

Case: IPR2015-00369
IPR2015-00373
U.S. Patent No. 6,128,290

DECLARATION OF ROBERT DEZMELYK

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A. Natarajan in view of Neve does NOT Teach a Server Transmitter Energized in Low
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I, Robert Dezmelyk, declare as follows:

I. INTRODUCTION

1. I have personal knowledge of the facts set forth in this Declaration. I am competent to testify as to all matters stated, and I am not under any legal disability that would in any way preclude me from testifying.

2. I have been retained by Smith & Hopen, P.A. on behalf of DSS Technology Management, Inc. (“Patent Owner”) as a technical expert to provide information and my opinion regarding U.S. Pat. No. 6,128,290 (the ‘290 Patent).

3. I understand that the Patent Trial and Appeal Board (“the Board”) issued a decision (“Decision”) instituting trial with respect to claims 1-4, 6, 7, 9, and 10 of the ‘290 Patent on the following grounds:

(1) IPR2015-00369: obviousness of claim 1-4 under 35 U.S.C. §103(a) based on U.S. Patent No. 5,241,542 (“Natarajan”) (APL-1003) in view of U.S. Patent No. 4,887,266 (“Neve”) (APL-1004); and

(2) IPR2015-00373: obviousness of claims 6, 7, 9, and 10 under 35 U.S.C. § 103(a) as based on Natarajan in view of Neve.

II. QUALIFICATIONS

4. I received a bachelor’s degree from Massachusetts Institute of Technology, where I was enrolled in a special program for the study of computer-based control systems.

5. For the past 35 years, I have concentrated my career and education on the interface between computers and humans and have developed a breadth of expertise in personal computer input devices as well as the signaling technologies used to interface peripheral devices to personal computers and other similar devices.

6. I am currently the President and CEO of LCS/Telegraphics (“LCS”) where I principally engage in software and product development, consulting, and licensing.

7. Through LCS, I have helped to provide leading edge product design concepts with a particular focus on USB device design, firmware, and driver software. Since 2007 I have provided controller designs, internal operating firmware, and PC user interface and control software for a line of radio frequency test instruments that includes frequency synthesizers, attenuators, phase shifters, and computer controlled RF switches. In 2013 and 2014, I designed and implemented the internal operating firmware for a Bluetooth based input device used in a medical system.

8. Additionally, I have provided expert services including investigating technologies such as game controller technology, input device controller technology, remote controller technology, USB interface and connector technology, and Bluetooth network technology.

9. Further, from 1996 to 1998 I chaired the USB Human Input Device (HID) standards committee.

10. Because of my background, training, and experience, I am qualified as an expert to opine on the Patent-in-Suit.

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