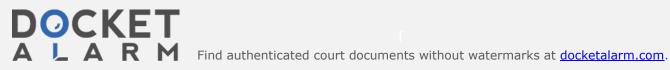
EXHIBIT DSS-2016



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 Lo Duty Cycle RF Bursts	
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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.



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- 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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