

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MICRON TECHNOLOGY, INC., AND MICRON MEMORY JAPAN, INC.,  
Petitioners

v.

MASSACHUSETTS INSTITUTE OF TECHNOLOGY,  
Patent Owner

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Case: IPR2015-01087  
U.S. Patent No. 6,057,221

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DECLARATION OF DAVID COOPEREHRG

I, David J. Cooperberg, hereby declare as follows:

1. I have been lead counsel for petitioners Micron Technology, Inc. (“Micron”) and Micron Memory Japan, Inc. (“Micron Memory Japan” or “MMJ”) (collectively “Petitioners”) in connection with IPR2015-01087. I have been an associate at the law firm of Kenyon & Kenyon LLP through December 4, 2015 and am registered to practice before the United States Patent and Trademark Office, as well as in the states of New York and New Jersey. I have personal knowledge of the facts set forth herein and if called upon to testify to them I can do so.

2. I downloaded a file containing the report marked Exhibit 1028 from the URL “[http://smithsonianchips.si.edu/ice/cd/9311\\_300.pdf](http://smithsonianchips.si.edu/ice/cd/9311_300.pdf)” prior to May 4, 2015. Exhibit 1028 is a true and correct copy of this report.

3. I downloaded a file containing the report marked Exhibit 1029 from the URL “[http://smithsonianchips.si.edu/ice/cd/9712\\_573.pdf](http://smithsonianchips.si.edu/ice/cd/9712_573.pdf)” prior to May 4, 2015. Exhibit 1029 is a true and correct copy of this report.

4. I downloaded a file containing the report marked Exhibit 1030 from the URL “[http://smithsonianchips.si.edu/ice/cd/9706\\_540.pdf](http://smithsonianchips.si.edu/ice/cd/9706_540.pdf)” prior to May 4, 2015. Exhibit 1030 is a true and correct copy of this report.

5. Exhibit 1031 is a true and correct copy of a printout I made of the web page available at the URL

“<http://www.intel.com/pressroom/archive/releases/1997/dp010897.htm>” on April 14, 2015.

6. Exhibit 1032 is a true and correct copy of a printout I made of the web page available at the URL

“<http://www.intel.com/pressroom/kits/quickreffam.htm#pentium>” on April 14, 2015.

7. I downloaded a file containing the report marked Exhibit 1033 from the URL “[http://smithsonianchips.si.edu/ice/cd/9709\\_551.pdf](http://smithsonianchips.si.edu/ice/cd/9709_551.pdf)” prior to May 4, 2015. Exhibit 1033 is a true and correct copy of this report.

8. I downloaded a file containing the report marked Exhibit 1034 from the URL “[http://smithsonianchips.si.edu/ice/cd/9702\\_524.pdf](http://smithsonianchips.si.edu/ice/cd/9702_524.pdf)” prior to May 4, 2015. Exhibit 1034 is a true and correct copy of this report.

9. On November 25, 2015, I visited the URL <http://whois.icann.org/en> and performed a lookup on the domain name “smithsonianchips.si.edu.” Exhibit 1048 is a true and correct copy of a printout I made on November 25, 2015 of the results contained in a webpage available at the URL

“<http://whois.icann.org/en/lookup?name=smithsonianchips.si.edu>” on that date.

10. On November 25, 2015, I visited the webpage located at <http://smithsonianchips.si.edu/> using Microsoft Internet Explorer. Petitioner’s Exhibit 1049 is a true and correct copy of the printout of that webpage that I

generated using the Adobe Acrobat webpage conversion program from within Microsoft Internet Explorer.

11. Also on November 25, 2015, I followed the link identified by “[ICE - Integrated Circuit Engineering Corporation](#)” on the webpage depicted in Ex. 1049. Exhibit 1050 is a true and correct copy of the webpage at that link that I generated using the Adobe Acrobat webpage conversion program from within Microsoft Internet Explorer.

12. Also on November 25, 2015, I followed the link identified by “[Series 4, Construction Analysis](#)” on the webpage depicted in Ex. 1050. Exhibit 1051 is a true and correct copy of the webpage at that link that I generated using the Adobe Acrobat webpage conversion program from within Microsoft Internet Explorer.

13. I hereby declare that all statements made herein of my own knowledge are true, and that all statements made on information and belief are believed to be true. I further declare that these statements were made with the knowledge that willful false statements are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "David J. Cooperberg", written over a horizontal line.

David J. Cooperberg

Dated December 7, 2015