

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent of Conley:

U.S. Patent No. 7,818,490

Issued: October 19, 2010

Title: PARTIAL BLOCK DATA  
PROGRAMMING AND  
READING OPERATIONS IN A  
NON-VOLATILE MEMORY

Petition for *Inter Partes* Review

Attorney Docket No.:  
337722-000080.490

Customer No.: 26379

Petitioner: Apple Inc.

Real Party in Interest: Apple Inc.

**DECLARATION OF DR. VIVEK SUBRAMANIAN**

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## EXHIBITS

| <u>Exhibit Number</u> | <u>Description</u>   |
|-----------------------|--|
| 1201                  | U.S. Patent 7,818,490 to Conley  |
| 1202                  | File History for U.S. Patent 7,818,490   |
| 1204                  | CV for Dr. Vivek Subramanian   |
| 1205                  | U.S. Patent No. 5,822,781 to Wells (“Wells”)                                   |
| 1206                  | U.S. Patent No. 5,457,658 to Nijima (“Nijima”)                                 |
| 1208                  | Flash Memories, edited by Cappelletti, et al (1999)<br>(“Cappelletti”)         |
| 1209                  | PC Card Standard, Volumes 1 and 3 (1999) (“PC<br>Card Standard”)               |
| 1210                  | PCT WO 99/35650 (“Hazen”)  |
| 1211                  | Designing With Flash Memory, Brian Dipert and<br>Markus Levy (1994) (“Dipert”) |

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**A. Introduction**

1. I, Vivek Subramanian, declare as follows:
2. I am making this Declaration at the request of Petitioner Apple Inc. regarding its Petitions for *Inter Partes* Review of U.S. Patent No. 7,818,490 (the “490 patent”).
3. I am being compensated for my work at my standard rate of \$550 per hour. My compensation does not depend on the outcome of this proceeding.
4. As part of my analysis, I reviewed the following materials:
  - Exhibit 1201 U.S. Patent 7,818,490 to Conley
  - Exhibit 1202 File History for U.S. Patent 6,818,490
  - Exhibit 1205 U.S. Patent No. 5,822,781 to Wells (“Wells”)
  - Exhibit 1206 U.S. Patent No. 5,457,658 to Nijima (“Nijima”)
  - Exhibit 1208 Flash Memories, edited by Cappelletti, et al (1999) (“Cappelletti”)
  - Exhibit 1209 PC Card Standard, Volumes 1 and 3 (1999) (“PC Card Standard”)
  - Exhibit 1210 PCT WO 99/35650 (“Hazen”)
  - Exhibit 1211 Designing With Flash Memory, Brian Dipert and Markus Levy (1994) (“Dipert”)

**B. Relevant Background and Experience**

5. My background and experience is summarized in my curriculum vitae, a true and correct copy of which is submitted as Exhibit 1204. Some of the relevant points are described below as well.

6. I received a B.S. in electrical engineering from Louisiana State University in 1994, an M.S. in electrical engineering from Stanford University in 1996, and a Ph.D. in electrical engineering from Stanford University in 1998.

7. In 1998, I co-founded Matrix Semiconductor, Inc. to develop high density memory technology.

8. I have been teaching in the Electrical Engineering and Computer Sciences Department at the University of California, Berkeley since 2000. I was an Assistant Professor from 2000 to 2005, an Associate Professor from 2005 to 2011, and a Professor from 2011 to the present.

9. I have been an adjunct professor at the Sunchon National University in Sunchon, Korea since 2009, leading research in printed electronics.

10. I have been an independent consultant in the semiconductor industry since 2000, focusing on memory technology, flexible electronics, and RFID technology.

11. I have published more than 200 technical papers in journals and at conferences.

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