

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC.,
Petitioner,

v.

CORE WIRELESS LICENSING S.A.R.L.,
Patent Owner.

DECLARATION OF SCOTT A. DENNING

I, Scott A. Denning, hereby declare as follows:

I have been retained by Patent Owner Core Wireless Licensing S.A.R.L. to provide my opinions in support of their Responses to the Petitions for *Inter Partes* Review of U.S. Patent No. 8,434,020 (IPR2015-01984) and U.S. Patent No. 8,713,476 (IPR2015-01985), pursuant to the legal standards set forth in Section VII below. I am being compensated for my time at the rate of \$350 per hour for time spent on non-deposition tasks, and \$450 per hour for deposition time. I have no interest in the outcome of this proceeding.

I. BACKGROUND AND QUALIFICATIONS

1. I am currently employed as an independent computer technologies expert and consultant. My background and qualifications are set forth in my *curriculum vitae*, attached as Exhibit A.
2. As set forth in my *curriculum vitae*, I have a Bachelor of Science in Computer Science and over twenty-seven years of professional experience in hardware design and software engineering for embedded systems in the areas of security, digital video, robotics, navigation, communication, signals processing, high-performance computing, network computing, and many areas of desktop and workstation software design.

3. During this time, I have worked as a consultant, as an expert, as an engineer, as a software developer, as a manager, as a company executive, and as a forensic investigator. Specific cellular phone, mobile device and embedded graphical user interface technologies that I have designed and implemented include vehicle installed data collection equipment, military fire control devices, military signal direction finder, military signals processing including RADAR, SATCOM receiver/transmitters, menu driven emergency location communicators, PDA mobile mapping and tracking applications, embedded web user interfaces for GPS receivers and PC based video recorders. I have also created numerous text based menu driven user interfaces for devices with small LCD or LED displays including credit card writers/readers, personal communicators, video recorders, video controllers, robotic controls, lighting controls, and alarm systems. Additionally, I have designed and developed, as well as managed and assisted in the design and development of many computer hardware and software systems.

4. My experience includes decades of electronic packaging, circuit design, circuit board layout, and software development. It also includes consulting and providing expert experience in many aspects of the computer field, from microcomputers to supercomputers, and in all areas of programming. I have experience as a design engineer, systems architect, principal engineer, project

manager, and company executive, as well as experience in reverse engineering and forensic investigation. My additional experience is listed in my *curriculum vitae*.

II. MATERIALS CONSIDERED

5. In forming my opinions, in addition to my knowledge and experience, I have considered the following documents and things that I have obtained, or that have been provided to me, as well as any other references cited herein that may not be listed below:

- U.S. Patent No. 8,434,020 to Martyn (the ‘020 patent), and also aspects of its prosecution history before the U.S. Patent & Trademark Office
- U.S. Patent No. 8,713,476 to Martyn (the ‘476 patent)
- U.S. Patent No. 6,415,164 to Blanchard *et al.* (“Blanchard”)
- Petition for *inter partes* review against the ‘020 patent (IPR2015-01984) and the supporting Declaration of Dr. Rhyne (Ex. 1004 in IPR2015-01984) (“Rhyne ‘84”)
- Petition for *inter partes* review against the ‘476 patent (IPR2015-01985) and the supporting Declaration of Dr. Rhyne (Ex. 1004 in IPR2015-01985) (“Rhyne ’85)
- U.S. Patent No. 5,392,337 to Baals *et al.* (Ex. 2007) (“Baals”)
- U.S. Patent No. 6,993,328 to Oommen (Ex. 2009) (“Oommen”)

- U.S. Patent No. 6,781,611 to Richard (Ex. 2008) (“Richard”)

III. THE PERSON OF ORDINARY SKILL IN THE ART

6. In my opinion, a person of ordinary skill in the relevant art (“POSITA”) of the ‘020 and ‘476 patents has at least a bachelor’s degree in electrical engineering or computer science with two or more years of experience in graphical user interfaces. I understand that the Petitioner applied a substantially similar standard for a POSITA, and my opinions presented below are equally applicable under either standard.

7. Even if any opinion in this declaration is expressed in the present tense, my opinions are given from the perspective of a person of ordinary skill in the art at the time of the July 28, 2000 filing of the Great Britain Application No. 0019459.7, from which both the ‘020 and ‘476 patents claim priority and benefit. As of July 28, 2000, I satisfied the standard of a person of ordinary skill in the art described above in ¶9.

IV. BACKGROUND OF THE TECHNOLOGY

8. In July 2000, mobile telephone technology was in its relative infancy compared to the modern day. Windows CE had been released in or around 1998, but there were few commercially available products implementing Windows CE. I personally wrote GPS and communications related applications for the Compaq

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