

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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VOLKSWAGEN GROUP OF AMERICA, INC.,  
Petitioner

v.

ADVANCED SILICON TECHNOLOGIES, LLC,  
Patent Owner

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Case IPR2016-TBA  
Patent 8,933,945 B2

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**DECLARATION OF DR. DONALD S. FUSSELL**

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Patent Trial and Appeal Board  
U.S. Patent & Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

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I, Dr. Donald S. Fussell, declare as follows:

1. I have been retained as an expert witness by Sterne, Kessler, Goldstein & Fox PLLC to provide testimony on behalf of Volkswagen Group of America, Inc., for the above-captioned *inter partes* review proceeding. I understand that this proceeding involves U.S. Patent No. 8,933,945 (“’945 patent”), entitled “Dividing Work Among Multiple Graphics Pipelines Using a Super-tiling Technique” by Mark M. Leather and Eric Demers. I understand that the ’945 patent is currently assigned to Advanced Silicon Technologies, LLC (“AST”).

2. I understand that the ’945 patent was filed on June 12, 2003, and issued on January 13, 2015. I also understand that the ’945 patent claims priority to a provisional application (60/429,641) that was filed on November 27, 2002. For the purposes of this *inter partes* review, I assume that the November 27, 2002 filing date of the provisional application is the earliest possible priority date of the ’945 patent.

3. I have reviewed and am familiar with the specification of the ’945 patent. I understand that the ’945 patent has been provided as Exhibit 1001. I will cite to the specification using the following format (’945 patent, 1:1-10). This example citation points to the ’945 patent specification at column 1, lines 1-10.

4. I have reviewed and am familiar with the file history of the '945 patent. I understand that the file history has been provided as Exhibit 1002.

5. I have also reviewed and am familiar with the following prior art documents:

- U.S. Patent No. 6,778,177 to Furtner. I understand that Furtner has been provided as Exhibit 1004.
- U.S. Patent No. 5,794,016 to Kelleher. I understand that Kelleher has been provided as Exhibit 1005.
- U.S. Patent No. 6,864,896 to Perego. I understand that Perego has been provided as Exhibit 1006.
- U.S. Patent No. 5,408,606 to Eckart. I understand that Eckart has been provided as Exhibit 1007.
- U.S. Patent No. 5,757,385 to Narayanaswami et al. (“Narayanaswami”). I understand that Narayanaswami has been provided as Exhibit 1008.
- U.S. Patent No. 6,070,003 to Gove et al. (“Gove”). I understand that Narayanaswami has been provided as Exhibit 1009.

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