

# Exhibit B

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

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PATENT ASSET LICENSING, LLC,

Plaintiff,

v.

Case No. 3:15-cv-742-J-32MCR

BRIGHT HOUSE NETWORKS, LLC,

Defendant.

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PATENT ASSET LICENSING, LLC,

Plaintiff,

v.

Case No. 3:15-cv-743-J-32MCR

WIDEOPENWEST FINANCE, LLC  
and KNOLOGY OF FLORIDA, INC.,

Defendants.

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PATENT ASSET LICENSING, LLC,

Plaintiff,

v.

Case No. 3:15-cv-746-J-32MCR

BIRCH COMMUNICATIONS, INC.,

Defendant.

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PATENT ASSET LICENSING, LLC,

Plaintiff,

v.

Case No. 3:15-cv-747-J-32MCR

T3 COMMUNICATIONS, INC.,

Defendant.

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**OPENING CLAIM CONSTRUCTION EXPERT DECLARATION  
OF DR. ERIC BURGER**

## **I. INTRODUCTION AND QUALIFICATIONS**

1. My name is Eric Burger and I have been retained as a technical expert to address certain claim construction issues regarding U.S. Patent Nos. 7,764,777 (“the ’777 patent”); 8,457,113 (“the ’113 patent”); and 8,155,298 (“the ’298 patent”) (collectively the “patents-in-suit”). I understand the three patents-in-suit share an original parent patent, U.S. Patent No. 6,574,328 (“the parent ’328 patent”), and a continuation-in-part parent patent, U.S. Patent No. 7,324,635 (“the ’635 patent”). I understand that the plaintiff in this case is claiming that the three asserted patents are entitled to the same invention and priority date as the parent ’328 patent.

2. In this declaration I will set forth my opinions regarding how the claims of the patents-in-suit should be construed. This declaration contains a statement of my opinions formed in this case and provides the basis for those opinions. I make the following statements based on my own personal knowledge and, if called as a witness, I could and would testify to my opinions reflected in this declaration.

3. I am being compensated for the time I have spent on this litigation at my customary rate of \$750 per hour. No part of my compensation is dependent, in any way, upon the opinion I provide or the outcome of this litigation.

### **A. Qualifications**

4. A copy of my current curriculum vitae (“CV”), including references to the publications I have authored and a list of all cases for which I have testified as an expert at trial or at deposition in the past five years is attached hereto.

5. I am presently a Research Professor of Computer Science at Georgetown University. I have been with Georgetown since 2010. In addition to my duties as a Professor, I am the Director of the Georgetown Center for Secure Communications and Director of the Georgetown site of the NSF-sponsored Security and Software Engineering Research Center (S<sup>2</sup>ERC).<sup>1</sup> As of the time of this writing, the Georgetown site of the S<sup>2</sup>ERC has two main programs. The first program focuses on cyber threat intelligence information sharing. The second program, of relevance to the present case, focuses on the transition of the legacy public switched telephone network (PSTN) to the all-Internet Protocol (all-IP) telecommunications network.<sup>2</sup>

6. I have a PhD with Highest Honors in Computer Science, with a thesis relating to using Voice-over-Internet Protocol (VoIP) protocols for device control from the Illinois Institute of Technology. VoIP is a technology that allows you to make voice calls using packet networks, particularly using the Internet Protocol (IP). VoIP Internet services use a broadband Internet connection instead of a regular (or analog) phone line. My dissertation for this work won the IIT Exemplary Research Award.

7. I hold an MBA with Distinction from the Catholic University of Leuven and a SBEE from the Massachusetts Institute of Technology. I am a Senior Member of the Institute of Electronics and Electrical Engineers (IEEE) and a Senior Member of the Association for Computing Machinery (ACM). In 2012, I was awarded the IEEE-USA Professional Achievement for Individuals Award for my work in communications

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<sup>1</sup> See <https://s2erc.georgetown.edu>

<sup>2</sup> See <https://www.fcc.gov/general/voice-over-internet-protocol-voip>

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