

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

United States Patent No.: 5,915,210	§	Attorney Docket No.:
Inventors: Dennis Wayne Cameron, et al.	§	109109-0017-651
Formerly Application No.: 08/899,476	§	Customer No. 28120
Issue Date: Jun. 22, 1999	§	
Filing Date: Jul. 24, 1997	§	Petitioners: Aruba Networks,
Former Group Art Unit: 2649	§	Inc.; Hewlett Packard
Former Examiner: Thanh Cong Le	§	Enterprise Co.; HP Inc.; ARRIS
	§	Group, Inc.; Juniper Networks,
	§	Inc.; Brocade Communications
	§	Systems, Inc.; Ruckus Wireless,
	§	Inc.

For: METHOD AND SYSTEM FOR PROVIDING MULTICARRIER
SIMULCAST TRANSMISSION

MAIL STOP PATENT BOARD
Patent Trial and Appeal Board
United States Patent and Trademark Office
Post Office Box 1450
Alexandria, Virginia 22313-1450

**DECLARATION OF SHARON LEE IN SUPPORT
OF PETITION FOR INTER PARTES REVIEW OF
UNITED STATES PATENT NO. 5,915,210**

I, Sharon Lee, make the following Declaration pursuant to 28 U.S.C. § 1746:

1. I am an associate at the law firm of Ropes & Gray LLP.
2. I provide this Declaration in connection with the above-identified

Inter Partes Review proceeding that is being requested at the United States Patent and Trademark Office (“USPTO”) by Aruba Networks, Inc., Hewlett Packard Enterprise Company, HP Inc., ARRIS Group, Inc., Juniper Networks, Inc.,

Brocade Communications Systems, Inc., and Ruckus Wireless, Inc. (collectively “Petitioners”). Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Exhibit 1004 is a true and correct copy of the Declaration of Gerard P. Grenier, Senior Director of Publishing Technologies at the IEEE, dated December 12, 2016, with Exhibit A thereto, including an article titled “The coded orthogonal frequency division multiplexing (COFDM) technique, and its application to digital radio broadcasting towards mobile receivers” by J.C. Rault, D. Castelain, and B. Le Floch, which I obtained from the IEEE on December 12, 2016. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

4. Exhibit 1012 is a true and correct copy of the Declaration of Gerard P. Grenier, Senior Director of Publishing Technologies at the IEEE, dated January 9, 2017, with Exhibit A thereto, including an article titled, “256 QAM Modem for Multicarrier 400 Mbit/s Digital Radio” by Yasuhisa Nakamura and Yoichi Saito, which I obtained from the IEEE on January 9, 2017. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

5. Exhibit 1013 is a true and correct copy of a certificate from the United States Library of Congress, dated December 23, 2016, with excerpts from IEEE Journal on Selected Areas in Communications (April 1987, Volume SAC-5, Number 3) thereto, including an article titled “256 QAM Modem for Multicarrier 400 Mbit/s Digital Radio” by Yasuhisa Nakamura and Yoichi Saito, which was retrieved from the United States Library of Congress and scanned at my request. The document includes a copyright page, which bears a stamp that states “LIBRARY OF CONGRESS COPYRIGHT OFFICE MAY 14 1987 COPY 1.” This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document. The article contained in Exhibit 1012 (pages 6-12) and the article contained in Exhibit 1013 (pages 4-10) were compared at my direction and they were determined to contain the same substance, including the same text and figures.

6. Exhibit 1014 is a true and correct copy of a certificate from the United States Library of Congress, dated December 23, 2016, with excerpts from IEEE Global Telecommunications Conference & Exhibition (Dallas, Texas, November 27-30, 1989, Vol. 1 of 3) thereto, including an article titled “The coded orthogonal frequency division multiplexing (COFDM) technique, and its application to digital radio broadcasting towards mobile receivers” by J.C. Rault, D. Castelain, and B.

Le Floch, which was retrieved from the United States Library of Congress and scanned at my request. The document includes a page bearing a stamp that states "LIBRARY OF CONGRESS CIP OCT 25 1990 COPY." This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document. The article contained in Exhibit 1004 (pages 7-11) and the article contained in Exhibit 1014 (pages 23-27) were compared at my direction and they were determined to contain the same substance, including the same text and figures.

7. 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; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

8. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of January, 2017, in Washington, D.C.



Sharon Lee