IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZTE (USA) Inc.,
Petitioner,

v.

Papst Licensing GmbH & Co. KG,
Patent Owner.

Case No. To Be Assigned
Patent No. 6,895,449

DECLARATION OF KEVIN ALMEROTH IN SUPPORT OF PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 6,895,449: CLAIMS 1, 16 AND 17

TABLE OF CONTENTS

I, Kevin C. Almeroth, hereby declare and state as follows:

1.   I have been retained as a technical consultant on behalf of ZTE (USA) Inc. I understand that the Petitioner in the present proceeding is ZTE (USA) Inc. I understand that the petition also names ZTE Corporation as one of the real parties-in-interest. I have no financial interest in, or affiliation with, the Petitioner, real parties-in-interest, or the patent owner, which I understand to be Papst Licensing GmbH & Co. KG. My compensation is not dependent upon the outcome of, or my testimony in, the present *inter partes* review or any litigation proceedings.

2.   I have drafted, reviewed or provided from my own files each of the documents in the following table (which I am informed are also identified in the Petition):

PETITIONER'S EXHIBIT LIST

Exhibit	Description
Ex. 1001	U.S. Pat. No. 6,895,449 to Tasler ("the '449 Patent")
Ex. 1002	File History for U.S. Pat. No. 6,895,449
Ex. 1004	Curriculum vitae of Kevin C. Almeroth
Ex. 1005	U.S. Patent No. 5,758,081 to Aytac ("Aytac")

Ex. 1006	Am. Nat'l Standard Inst., Inc., *Am. Nat'l Standard for Info. Sys's, Small Computer System Interface-2, ANSI X3.131-1994* (1994) (the "SCSI Specification")
Ex. 1007	Ray Duncan, The MS-DOS Encyclopedia (1988)
Ex. 1008	*In re Papst Licensing Dig. Camera Pat. Litig.*, 778 F.3d 1255, 1265 (Fed. Cir. 2015)
Ex. 1009	Papst's Opening Claim Constr. Brief and Appendix 8 of Papst's Opening Claim Constr. Brief, *Papst Licensing GmbH & Co., KG v. Apple, Inc., et al.*, No. 6:15-cv-01095-RWS (E.D. Tex. Nov. 22, 2016)
Ex. 1010	*Papst's Opening Claim Constr. Brief and Decl. of Robert Zeidman, In re Papst Licensing Dig. Camera Pat. Litig., MDL No. 1880, No. 1:07-mc-00493 (D.D.C. June 3, 2016)*
Ex. 1011	As-Filed Filed German priority document Patent Application *197 08 755.8*
Ex. 1012	'399 German Application *Publication (DE 197 08 755)*
Ex. 1013	Certified Translation of Published '399 German Application (DE 197 08 755)
Ex. 1014	English Translation of PCT Application PCT/EP98/01187 (published as PCT Pub. No. WO98/39710)

Ex. 1015	U.S. Patent No. 4,589,063 to Shah
Ex. 1016	U.S. Patent No. 5,038,320 to Heath
Ex. 1017	U.S. Patent No. 5,787,246 to Lichtman
Ex. 1018	Rufus P. Turner et al., *The Illustrated Dictionary of Electronics* (1991)
Ex. 1019	Decision, *Institution of Inter Partes Review*, Paper No. 8, IPR 2016-01200
Ex. 1020	File History for U.S. Pat. No. 5,758,081 to Aytac
Ex. 1021	Papst's Brief, *In re Papst Licensing Digital Camera Patent Litig.*, No. 2014-1110 (Fed. Cir., February 20, 2014)
Ex. 1022	U.S. Pat. No. 6,470,399 to Tasler ("the '399 patent")
Ex. 1023	File History for U.S. Pat. No. 6,470,399

3.   I understand that the application leading to U.S. Patent No. 6,895,449 ("the '449 patent") was Application No. 10/219,105, which was filed on August 15, 2002. The '105 application claims priority to U.S. Patent Application No. 09/331,002, filed June 14, 1999 (now U.S. Patent No. 6,470,399) (Ex. 1022), which claims priority to Patent Cooperation Treaty (PCT) Application No. PCT/EP98/01187 filed March 3, 1998. (Ex. 1002, at 8.) The '449 patent purports to also claim priority to German Application No. 197 08 755.8 (Ex.

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