

*Inter Partes Review of USPN 6,807,524
Declaration of Oded Gottesman, Ph.D. (Exhibit 2004)*

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC.
Petitioner

v.

SAINT LAWRENCE COMMUNICATIONS LLC
Patent Owner

Case: IPR2017-01244
Patent No. 6,807,524

DECLARATION OF ODED GOTTESMAN, PH.D.

Exhibit 2004

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TABLE OF CONTENTS

I. INTRODUCTION..... 1
 A. Background..... 1
 B. Qualifications..... 2
II. LIST OF DOCUMENTS CONSIDERED IN FORMULATING MY
 OPINIONS 6
III. TECHNICAL BACKGROUND AND THE ‘524 PATENT 11
IV. PERSON OF ORDINARY SKILL IN THE ART..... 23
V. THE CLAIMS OF THE ‘524 PATENT 24
VI. LEGAL STANDARDS..... 25
 A. Requirements of a Method and System Patent..... 25
 B. Obviousness 26
VII. CLAIM CONSTRUCTION 31
VIII. SUMMARY OF PRIOR ART TO THE ’524 PATENT ALLEGED IN
 THIS PETITION..... 31
IX. THE PETITIONER FAILED TO DEMONSTRATE THAT IT IS
 REASONABLY LIKELY TO PREVAIL ON ANY OF ITS
 PROPOSED OBVIOUSNESS REJECTIONS 44
X. BIBLIOGRAPHY 67
DR. ODED GOTTESMAN..... 69

I, Oded Gottesman, hereby declare as follows:

I. INTRODUCTION

A. Background

1. My name is Oded Gottesman. I am a researcher and consultant working in areas related to speech and audio coding and enhancement, digital signal processing, telecommunications, networks, and location and positioning systems.

2. I have been retained to act as an expert witness on behalf of SAINT LAWRENCE COMMUNICATIONS Inc. (“Patent Owner”) in connection with the above captioned Petition for Review of U.S. Patent No. 6,807,524 (“Petition”) submitted by APPLE, INC. (“Petitioner”). I understand that this proceeding involves U.S. Patent No. 6,807,524 (“the ‘524 Patent”), titled “Perceptual weighting device and method for efficient coding of wideband signals.” The ‘524 Patent is provided as Exhibit 1001.

3. I understand that Petitioner challenges the validity of Claims 1-21 and 29-42 of the ‘524 Patent (the “challenged claims”).

4. I have reviewed and am familiar with the ‘524 Patent as well as its prosecution history. The ‘524 prosecution history is provided as Exhibit 1003. Additionally, I have reviewed materials identified in Section III.

*Inter Partes Review of USPN 6,807,524
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5. As set forth below, I am familiar with the technology at issue as of the effective filing date of the '524 patent. I have been asked to provide my technical review, analysis, insights, and opinions regarding the prior art references that form the basis for the Petition. In forming my opinions, I have relied on my own experience and knowledge, my review of the '524 Patent and its file history, and of the prior art references cited in the Petition.

6. My opinions expressed in this Declaration rely to a great extent on my own personal knowledge and recollection. However, to the extent I considered specific documents or data in formulating the opinions expressed in this Declaration, such items are expressly referred to in this Declaration.

7. I am being compensated for my time in connection with this covered patent review at my standard consulting rate, which is \$525 per hour. My compensation is not contingent upon and in no way affects the substance of my testimony.

B. Qualifications

8. I am a citizen of the United States, and I am currently employed as the Chief Technology Officer (“CTO”) of Compandent, Inc.

9. My curriculum vitae, including my qualifications, a list of the publications that I have authored during my career, and a list of the cases in which, during the previous four years, I have testified as an expert at trial or by deposition,

*Inter Partes Review of USPN 6,807,524
Declaration of Oded Gottesman, Ph.D.*

is attached to this report as Attachment A. I expect to testify regarding my background, qualifications, and experience relevant to the issues in this investigation.

10. I earned my Bachelor of Science degree in Electrical Engineering from Ben-Gurion University in 1988.

11. In 1992, I earned my Master of Science degree in Electrical and Computer Engineering from Drexel University, which included performing research at AT&T Bell Labs, Murray Hill, at the time considered the world “holy grail” of speech processing research. My research was in the area of wideband speech coding, and titled “Algorithm Development and Real-Time Implementation of High-Quality 32kbps Wideband Speech Low-Delay Code-Excited Linear Predictive (LD-CELP) Coder”. The work continued a prior research by E. Ordentlich, and Y. Shoham who was also my M.Sc. research advisor. As a part of my work, I have also implemented that algorithm in DSP Assembly Language on two DSPs running in parallel. I subsequently co-authored and published two articles about this work.

12. I earned my Doctorate of Philosophy in Electrical and Computer Engineering from the University of California at Santa Barbara in 2000.

13. I have worked in the field of digital signal processing (“DSP”) for over 25 years, and have extensive experience in DSP research, design, and

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