UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORPORATION

Petitioner

v.

BLITZSAFE TEXAS, LLC

Patent Owner

Patent No. 8,155,342
Issued: Apr. 10, 2012
Filed: Jun. 27, 2006

Inventor: Ira Marlowe
Title: MULTIMEDIA DEVICE INTEGRATION SYSTEM

Inter Partes Review No.: Unassigned

DECLARATION OF THOMAS G. MATHESON, Ph.D.

IN SUPPORT OF PETITIONER'S REQUEST FOR *INTER PARTES* REVIEW

TABLE OF CONTENTS

EXHIBITS AND ATTACHMENTS

I may refer to the folowing Exhibits that I understand were submitted by Petitioner in connection with the Inter Partes Review petition:

Exhibit	Description
1001	U.S. Patent No. 8,155,342 (“the ‘342 patent”)
1002	U.S. Patent Application Publication No. 2006/0181963 ("Clayton")
1003	U.S. Provisional Application No. 60/651,963 ("Clayton Provisional")
1004	U.S. Patent No. 6,559,773 ("Berry")
1005	U.S. Patent Application Publication No. 2003/0215102 ("Marlowe")
1006	U.S. Patent No. 6,421,305 ("Gioscia")
1007	Claim Construction Ruling in Marlowe Patent Holdings LLC v. DICE Electronics, LLC et al., 3:10-cv-01199 (D. NJ) and Marlowe Patent Holdings LLC v. Ford Motor Company, 3:10-cv-07044 (D. NJ)
1008	U.S. Patent Application No. 11/475,847 ("the '847 application")
1009	U.S. Patent Application No. 11/071,667 ("the '667 application")
1010	U.S. Patent Application No. 10/732,909 ("the '909 application")
1011	U.S. Patent Application No. 10/316,961 ("the '961 application")
1012	Highlighted ‘342 Patent (Showing the New Matter)
1013	Plaintiff's Disclosure of Asserted Claims and Infringement Contentions, served in Blitzsafe Texas, LLC v. Toyota Motor Corp. et al., 2-15-cv-01277 (E.D. TX)
1014	File History of the ‘342 Patent
1015	1999 ID3v2.3 Metadata Standard (1999)
1016	Declaration of Dr. Thomas Matheson
1017	Canadian Patent Application Publication No. CA 2347648 ("Kandler")
1018	International Publication No. WO 01/67266 A1 ("Lau")
1019	U.S. Patent Application Publication No. 2001/0028717 ("Ohmura")
1020	Bluetooth ESDP for UPnP (2001)
1021	Universal Plug and Play Device Architecture (2000)

ATTACHMENT A: Curriculum Vitae of Thomas G. Matheson, Ph.D.

I. INTRODUCTION

1. I have been retained by counsel for Toyota Motor Corporation ("Toyota" or "Petitioner"), and asked to review and provide my opinion on the patentability of claims 49-57, 62-64, 66, 68, 70, 71, 73-80, 94, 95, 97, 99-103, 106, 109-111, 113, 115, and 120 of U.S. Patent No. 8,155,342 (Ex. 1001, "the '342 Patent"). I am being compensated for my time at my normal consulting rate of $350 per hour. My compensation is not contingent on the outcome of this proceeding or the content of my opinions.

II. BACKGROUND AND QUALIFICATIONS

A. Educational Background

2. In 1974, I received a B.S. in Physics from Abilene Christian University. In 1976, I received an M.A. in Physics from the University of Oregon. In 1980, I received a Ph.D. from the University of Oregon in Physics. In 1998, I received an M.B.A. from The Wharton School of Business at the University of Pennsylvania.

B. Relevant Professional Experience

3. While working on my technical degrees I taught laboratory courses in Electronics and Instrumentation and published papers on applications of microcomputers to signal processing. The experimental apparatus that I developed as part of my thesis research in experimental Solid State Physics was a highly automated, multiple-computer instrumentation system capable of controlling

laboratory equipment (including 100-amp currents through a superconducting solenoid) while automatically measuring and analyzing low-frequency electromagnetic signals from Silicon ICs under vacuum, near zero Kelvin, and in a high magnetic field.

4. While working at AT&T Bell Laboratories most of my work focused on the design of large digital systems, including investigation of both low-bandwidth and high-bandwidth networks. As part of that work, I designed network-interface integrated circuits that were fabricated and used in prototype network systems. I also researched and built an automated system that automatically designed fabrication-ready single-chip microcomputers/controllers starting from a high level specification.

5. In 1984, I founded Silicon Design Labs (later named Silicon Compiler Systems), an IC CAD company that commercialized "Silicon Compilation." (Silicon Compilation is the application of language compiler and related programming techniques to IC design and layout.) We also provided custom IC design services and sold libraries of standardized IC circuit designs and layouts. I performed marketing and engineering functions, managing groups that developed IC layout, analysis, extraction, and Silicon Compilation tools. During this period, I published several technical papers on our IC design tools. Although our tools were general-purpose electronic- and IC-design tools, most of our customers focused on

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