

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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ZTE (USA) INC.,  
Petitioners,

v.

FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC,  
Patent Owner.

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IPR2018-00111  
Patent No. 8,624,550

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**DECLARATION OF DR. H. ANNITA ZHONG**

***Mail Stop "PATENT BOARD"***  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

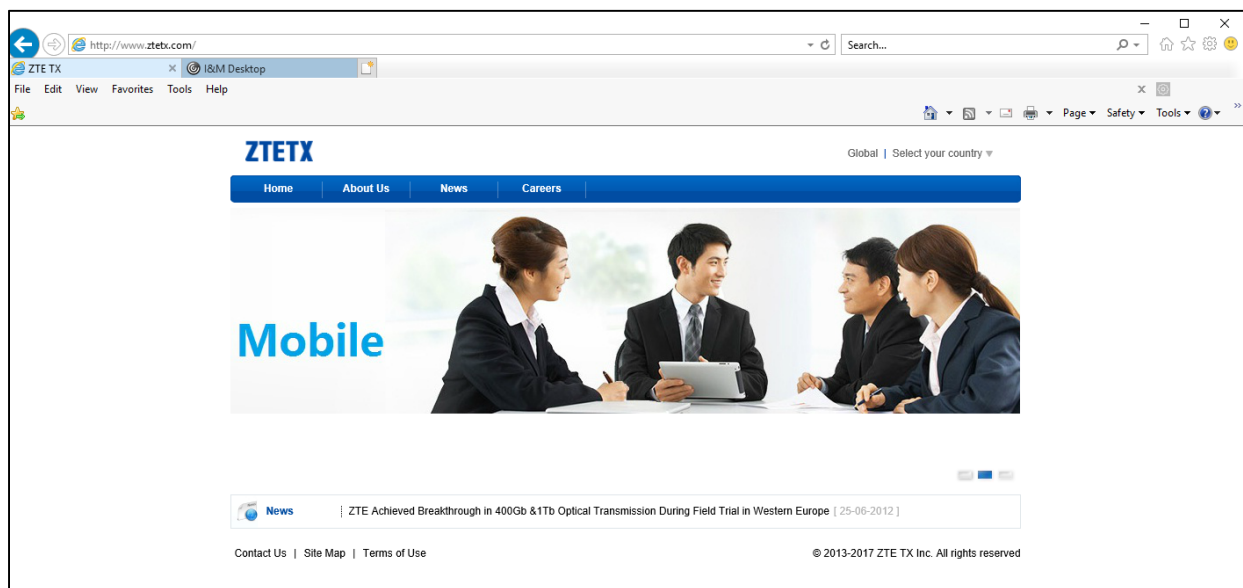
I, H. Annita Zhong, declare as follows:

1. I am more than twenty-one years of age, am competent to present this affidavit, and have personal knowledge of the facts set forth herein.

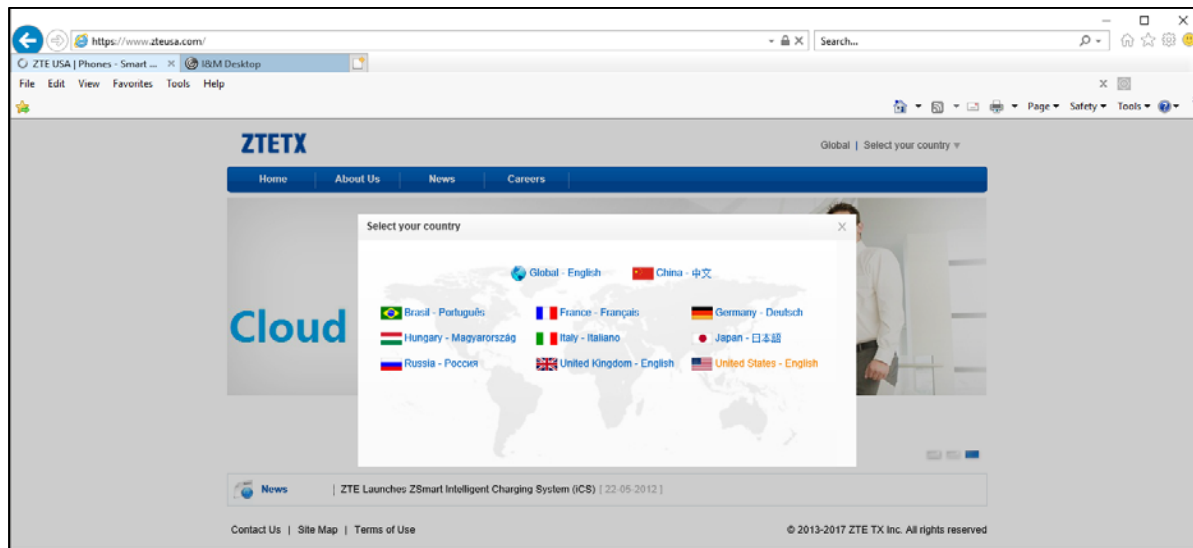
2. This affidavit is given in support of the Patent Owner Fundamental Innovation Systems International LLC's Opposition to Petitioner's Motion to Retroactively Add a Real Party-in-Interest.

3. On or about December 8, 2018, I accessed [www.ztetx.com](http://www.ztetx.com) in China.

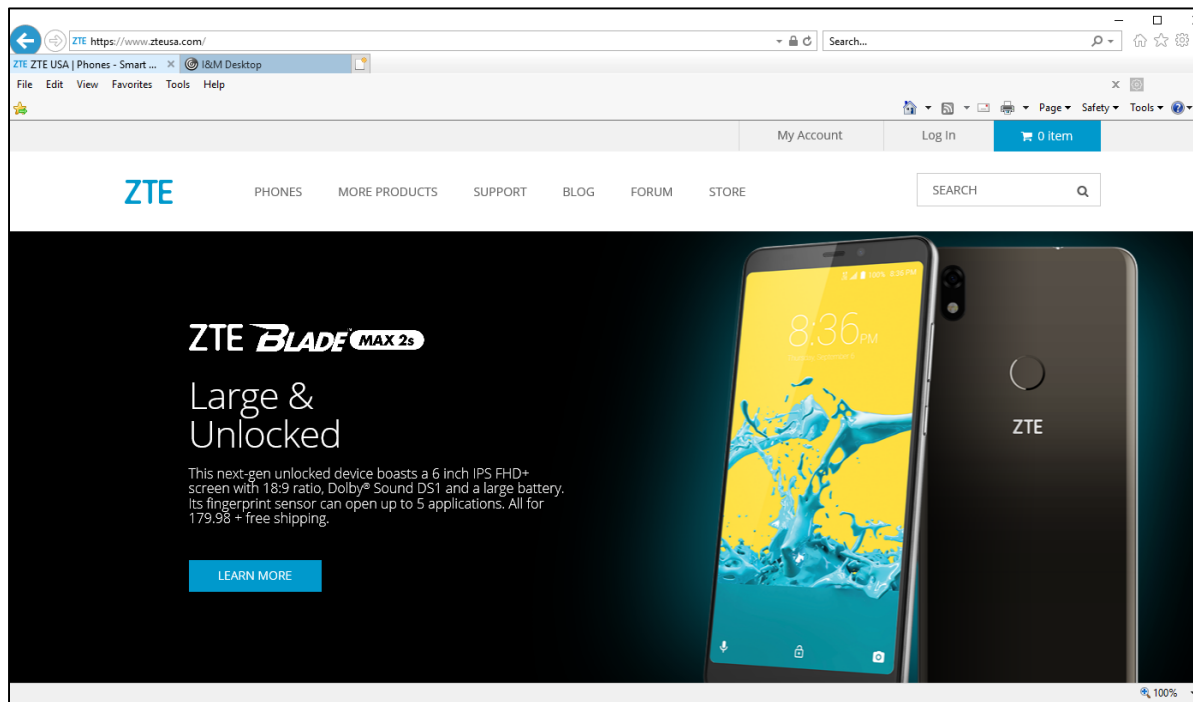
A screen shot of the web site is as follows:



4. I clicked on the "Select your country" link in the upper right corner of the web page and selected "United States – English" in the resulting pop-up screen, as shown in the screen capture below:



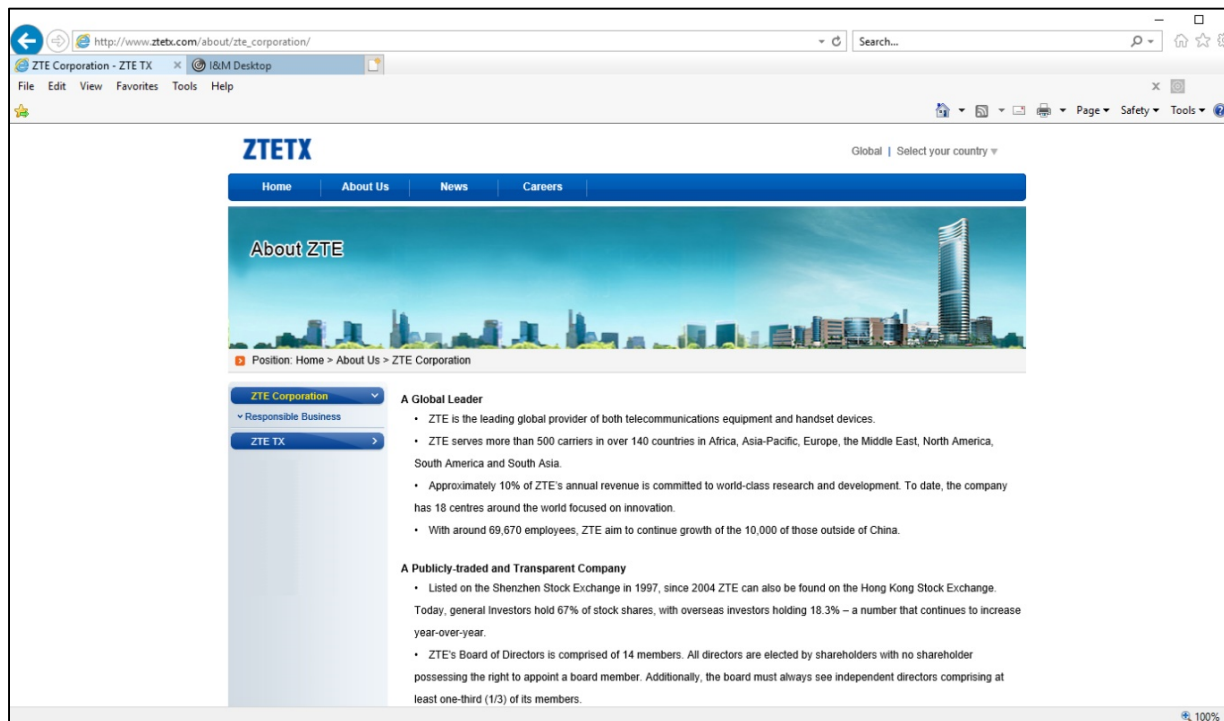
5. I was subsequently redirected to [www.zteusa.com](http://www.zteusa.com), as shown in the screen capture below:



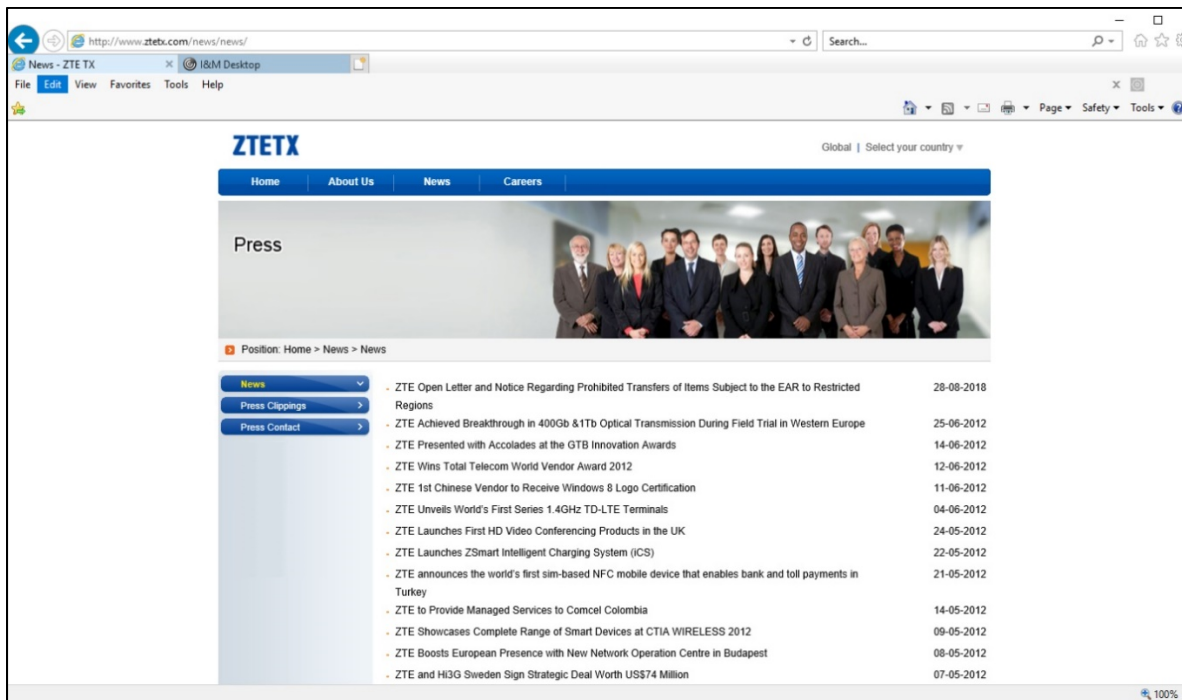
6. I then returned to [www.ztetx.com](http://www.ztetx.com) and clicked on the "About Us" tab on the page. This led me to the web page captured below with an url address,

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[www.ztetx.com/about/zte\\_corporation/](http://www.ztetx.com/about/zte_corporation/), which appears to describe ZTE Corporation and ZTE brand as a whole.



7. I then clicked on the "News" tab at the [www.ztetx.com](http://www.ztetx.com) site, and this led to the page as captured below. The news page ([www.ztetx.com/news/news](http://www.ztetx.com/news/news)) again appear to relate to ZTE Corporation in general rather than ZTE (TX), Inc. specifically.



8. I verified that the above pages may be accessed in the United States on December 12, 2018.

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 are made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Date: December 13, 2018

/Hong Zhong/  
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