

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ZTE (USA) Inc.,  
Samsung Electronics Co., Ltd., and  
Samsung Electronics America, Inc.,

Petitioner

v.

Fundamental Innovation Systems International LLC,

Patent Owner

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DECLARATION OF JAMES T. GEIER

Case No. IPR2018-00276

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## **I. Introduction**

1. My name is James T. Geier. I submit this declaration on behalf of ZTE (USA) Inc., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (“Petitioner”), which I understand are challenging the validity of claims 1-3, 6-8, 12, and 14-18 (“the challenged claims”) of U.S. Patent No. 7,239,111 B2 (“the 111 patent”) in a petition for inter partes review.

2. I have been asked to provide an opinion on the validity of the challenged claims. In my opinion, claims 1-3, 6-8, 12, and 14-18 of the 111 patent are obvious based on the following grounds:

- Ground 1: U.S. Patent No. 5,925,942 (“Theobald”) and U.S. Patent No. 6,625,738 (“Shiga”) render obvious claims 1-3, 6-8, and 16-18 of the ’111 patent.
- Ground 2: Theobald, Shiga, and U.S. Patent No. 6,049,192 (“Kfoury”) render obvious claim 15 of the ’111 patent.
- Ground 3: U.S. Patent No. 7,360,004 (“Dougherty”), U.S. Patent No. 5,973,948 (“Hahn”), and U.S. Patent No. 5,884,086 (“Amoni”) render obvious claims 12 and 14 of the ’111 patent.

## **II. Background/Qualifications**

3. Appendix A to this declaration is my curriculum vitae, which sets forth my qualifications.

4. I received a B.S. degree in Electrical Engineering from California State University in 1985. In 1990, I received an M.S. degree in Electrical Engineering from the Air Force Institute of Technology.

5. I have 30 years' experience in the communications industry designing, analyzing, and implementing communications systems, wireless networks, and mobile devices. I have authored over a dozen books on mobile and wireless topics, including *Designing and Deploying 802.11 Wireless Networks* (Cisco Press), *Implementing 802.1X Security Solutions* (Wiley), *Wireless Networking Handbook* (New Riders) and *Network Re-engineering* (McGraw-Hill). I have been an active participant within standards organizations, such as the IEEE 802.11 Working Group and the Wi-Fi Alliance. I have served as Chairman of the IEEE Computer Society, Dayton Section, and various conferences.

6. I have significant experience with USB, which includes reviewing and analyzing USB specifications and designing and integrating corresponding USB interfaces within various applications. Since 1998, I have been analyzing the operation and limitations of USB in relation to mobile devices that I have designed. For example, during 1998-1999, I analyzed and tested the integration of USB into Monarch Marking Systems bar code scanners and printers. Also, during 2008-2009, I integrated USB into a microcontroller-based monitoring and control system, which involved writing software drivers to interface the microcontroller to

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