

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioner

v.

Fundamental Innovation Systems International LLC

Patent Owner

Case IPR2018-00111
Patent 8,624,550

DECLARATION OF MR. STEVEN ROGERS

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

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1. My name is Steven Rogers. I am the sole inventor on U.S. Pat. No. 6,556,564 (“Rogers”), which I understand was raised as a prior art reference against U.S. Pat. No. 8,624,550.

2. I have experience with the creation of numerous networking, security telephony, and interface products, in a number of areas. I have founded and led several technology-based companies. These include Cryptek, Inc. (secure terminals), Objective Communications, Inc. (video switching), Cetacean Networks, Inc. (advanced routers). and Rivulet Communications, Inc. (real-time video networks).

3. I currently serve as the CEO of Centripetal Networks, Inc., which is developing the first strategic technology solution for cyber security. I previously provided analysis and development services for Unisys, American Satellite Corporation, Harris Government Systems, and COMSAT. I earlier served in the USAF, where I worked on new secure communications systems including the AWACS, National Military Command Center, various space-based systems, and Air Force One.

4. I have a Bachelor of Science degree in Electrical Engineering from Virginia Tech. I have over 10 US Patents and my current company has many more patents.

5. Over my career, my work has involved various interface designs. As a result, I am familiar with many types of network and component

interfaces, including the USB interface. In fact, I have been familiar with the USB Specifications, Revisions 2.0, since at least April 2000. Additionally, because of my work and my interaction with other engineers and scientists, I am familiar with the general knowledge that a person with a master's degree in electrical engineering, computer science, or a related field, plus 2-3 years of experience with Universal Serial Bus ("USB") might possess in the 2000-2002 time frame.

6. I have been asked by Fundamental Innovation Systems International LLC ("Fundamental") to provide factual background regarding the inventions described in the Rogers patent.

I. Current Supplied on the VBUS Pin of the Power Supply System

7. The LAN telephone's power supply system depicted in Figures 6 and 7(a) of the Rogers patent was designed to increase the maximum output voltage but comply with the USB specification's current supply limits. In particular, the LAN telephone would output either 48V or 5V DC power on the VBUS pin (Pin 1) of the USB connector as depicted in Figure 7(a).

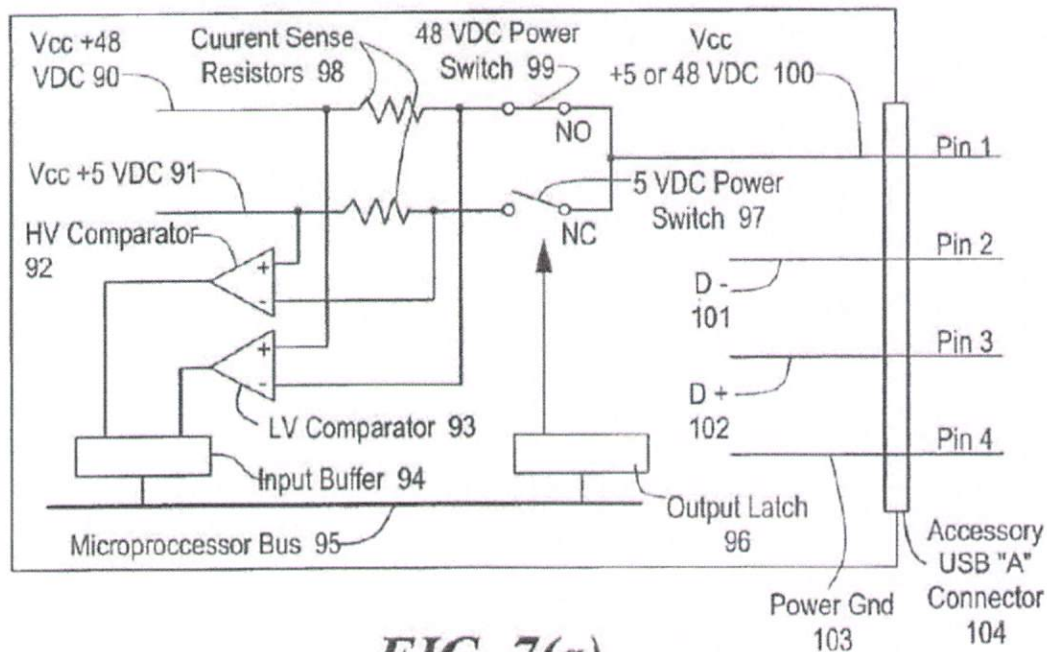


FIG. 7(a)

8. The current on the VBUS pin, however, would need to comply with the current limit for cables and connectors specified in the USB specification. At the time, that limit was a maximum of 500 mA, after device configuration. (By configuration, I mean the last step of the USB bus enumeration step where the host selects a configuration for use by the device. See USB 2.0 at 243-244). The combination of a 5V supply, with a 500mA current limit, means that a USB device would be limited to about 2.5 watts.

9. As explained in my patent, a USB standardized interface was chosen “for future expansion.” Ex. 1005, 10:59-64. In the 2000-2002 time frame, most USB cables used to connect the base station with the accessories

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