UNITED STATES PATENT AND TRADEMARK OFFICE
_____

BEFORE THE PATENT TRIAL AND APPEAL BOARD
_____

LG ELECTRONICS, INC., LG ELECTRONICS U.S.A., INC., LG ELECTRONICS MOBILECOMM U.S.A. INC., LG ELECTRONICS MOBILE RESEARCH U.S.A. LLC, AND LG ELECTRONICS ALABAMA, INC.,

Petitioner,

v.

FUNDAMENTAL INNOVATION SYSTEMS INT'L, LLC

Patent Owner

_____

U.S. Patent No. 7,834,586
_____

DECLARATION OF INGRID HSIEH-YEE, Ph.D.

I.   INTRODUCTION

I, Ingrid Hsieh-Yee, declare as follows:

1.   I have been retained as an independent expert witness on behalf of LG Electronics, Inc., LG Electronics U.S.A. Inc., LG Electronics Mobilecomm U.S.A. Inc., LG Electronics Mobile Research U.S.A. LLC, and LG Electronics Alabama, Inc. (collectively "LGE") related to *Inter Partes* Review of U.S. Patent No. 7,834,586 ("the '586 Patent").

2.   I am being compensated for my work in this matter at my accustomed hourly rate. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the results of my study, the substance of my opinions, or the outcome of this matter.

3.   In the preparation of this declaration I have reviewed the exhibits referenced below, each of which is a type of material that experts in my field would reasonably rely upon when forming their opinions:

(1) Hart, D. W. (1997). Select pages from *Introduction to Power Electronics* ("Hart"), **Exhibit LGE-1014**;

(2) Bibliographic Record for "Hart" retrieved from the online catalog of Library of Congress at https://lccn.loc.gov/96041825, **Appendix B**; and

(3) MARC Record information for "Hart" retrieved from the online catalog of Library of Congress at

https://catalog.loc.gov/vwebv/staffView?searchId=14310&recPointer=8
&recCount=25&bibId=1164330, **Appendix C**.

4.   In forming the opinions expressed within this declaration, I have

considered:

(1) The documents listed above;

(2) The reference materials cited herein; and

(3) My own academic background and professional experiences, as
described below.

II.   QUALIFICATIONS

5.   My complete qualifications and professional experience are described

in my curriculum vitae, a copy of which is attached as **Appendix A**. The

following is a brief summary of my relevant qualifications and professional

experience.

6.   I am currently a Professor in the Department of Library and

Information Science at the Catholic University of America. I have experience

working in an academic library, a medical library, and a legislative library and

have been a professor for 27 years. I hold a Ph.D. in Library and Information

Studies from the University of Wisconsin-Madison and a Masters in Library and

Information Studies from the University of Wisconsin-Madison.

7.   I am an expert on library cataloging and classification and have

published two books on this subject, *Organizing Audiovisual and Electronic*

Resources for Access: *A Cataloging Guide* (2000, 2006). I teach a variety of

courses in the area of information organization and access, including "Cataloging

and Classification," "Advanced Cataloging and Classification," "Organization of

Internet Resources," "Internet Searches and Web Design," "Advanced Information

Retrieval and Analysis Strategies," "Digital Content Creation and Management,"

and "Information Literacy Instruction." My research interests cover cataloging and

classification, information organization, metadata, information retrieval,

information architecture, digital collections, scholarly communication, digital

scholarship, data management, user interaction with information systems, and

others.

III.   LIBRARY RECORDS

8.   I am fully familiar with a library cataloging encoding standard known

as the "**Ma**chine-**R**eadable **C**ataloging" standards, also known as "MARC." The

standards were developed by Henriette Avram in the 1960s for libraries to create

and share bibliographic records. MARC became the national standard for sharing

bibliographic data in the United States by 1971 and the international standard by

1973. It is the primary metadata transmission standard for the transfer and storage

of bibliographic metadata in libraries. Experts in my field would reasonably rely

upon MARC records when forming their opinions.

9.   The MARC standards define the field designation, structure and content designation of MARC records. A MARC bibliographic record consists of fields, and each field provides specific information, such as author, about the item represented by the record. MARC uses a simple three-digit numeric code to identify each field, and most fields have field-specific indicators and subfields. **Appendix D** is a copy of Parts 7 to 10 of "Understanding MARC Bibliographic" (http://www.loc.gov/marc/umb/) from the Library of Congress that explains commonly used MARC fields. For example, the personal author of a publication is recorded in Field 100, the title is recorded in Field 245, information about the place of publication and publisher is recorded in Field 260, the physical format and characteristics of a publication are recorded in Field 300, and topical information is recorded as subject headings in Field 650 (Field 650 can be repeated to encode multiple topics).

10.   Online Computer Library Center (OCLC) is a global nonprofit library cooperative that manages the largest bibliographic network of the world, with more than 380 million records and 16,964 member institutions (many of which are libraries of some type) in 122 countries. OCLC was created "to establish, maintain and operate a computerized library network and to promote the evolution of library use, of libraries themselves, and of librarianship, and to provide processes and products for the benefit of library users and libraries, including such objectives as

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.

fastcase®
Smarter legal research.