

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JAGUAR LAND ROVER NORTH AMERICA, LLC AND JAGUAR LAND ROVER LTD.
Petitioners,

v.

BLITZSAFE TEXAS, LLC
Patent Owner.

Case IPR2018-00544
Patent No. 8,155,342

**DECLARATION OF RICHARD STERN, PH.D.
IN SUPPORT OF PATENT OWNER'S PRELIMINARY RESPONSE**

Patent Owner Blitzsafe Texas, LLC – Exhibit 2001
Jaguar Land Rover v. Blitzsafe IPR2018-00544

TABLE OF CONTENTS

I.	Introduction.....	4
II.	Qualifications.....	5
III.	Materials Considered.....	9
IV.	Legal Principles	10
V.	Background.....	11
A.	Technical Background.....	11
B.	The '342 Patent	17
C.	Level of Ordinary Skill	18
D.	Claim Construction.....	19
E.	The Cited References	20
1.	Simonds.....	20
2.	Ekström	22
3.	MOST Specification	24
VI.	The Cited References Do Not Disclose or Render Obvious All of the Limitations of the Challenged Claims	25
A.	The Cited References Do Not Disclose or Render Obvious an Integration Subsystem Instructing a Portable Device to Play an Audio File in Response to a User Selecting the Audio File Using the Controls of a Car Audio/Video System.....	25
1.	Simonds Does Not Disclose a User Issuing a Command From a Car Audio/Video System to Play an Audio File From a Portable Device	29
2.	The MOST Specification Does Not Disclose any Missing “Implementation Details” to Enable a User Issuing a Command From a Car Audio/Video System to Play an Audio File From a Portable Device	33
3.	Ekström Does Not Disclose any Missing “Implementation Details” to Enable a User Issuing a Command From a Car Audio/Video System to Play an Audio File From a Portable Device	36

Stern Declaration

B.	The Cited References Do Not Disclose or Render Obvious an Integration Subsystem Receiving Audio Generated by a Portable Device for Playing on a Car Audio/Video System.....	44
1.	Simonds Does Not Disclose a Portable Device Generating Audio for Playing on a Car Audio/Video System.....	47
2.	Ekström Does Not Disclose any Missing “Implementation Details” to Enable a Portable Device Generating Audio for Playing on a Car Audio/Video System.....	51
3.	The MOST Specification Does Not Disclose any Missing “Implementation Details” to Enable a Portable Device Generating Audio for Playing on a Car Audio/Video System.....	53
VII.	Conclusion.....	55

Case IPR2018-00544

Patent No. 8,155,342

I, Richard Stern, declare as follows:

I. INTRODUCTION

1. I have been retained by Blitzsafe Texas, LLC (“Patent Owner”) to provide my opinion regarding the validity of certain claims of U.S. Patent No. 8,155,342 (“the ’342 Patent,” Ex. 1001) in response to the January 29, 2018 Petition for *Inter Partes* Review filed by Jaguar Land Rover North America, LLC and Jaguar Land Rover Ltd. (collectively, “Petitioners”) and the Declaration of Dr. John M. Strawn in support thereof (“Strawn Declaration,” Ex. 1003).

2. I am being compensated at my customary rate of \$450 per hour. My compensation is not dependent upon the substance of the opinions I offer below, the outcome of this petition, or any issues involved in or related to the ’342 Patent. I have no financial interest in, or affiliation with, any of the real parties-in-interest or Patent Owner.

3. In particular, I have been asked to review and provide my opinion regarding whether claims 49–57, 62–64, 66, 68, 70–71, 73–80, 83, 86–88, 94–95, 97, 99–103, 109–11, 113, 115, and 120 of the ’342 Patent (collectively, the “Challenged Claims”) are obvious as asserted by Petitioners and Dr. Strawn in view of:

- U.S. Patent Application Publication No. 2004/0093155 A1 to Craig John Simonds, *et al.* (“Simonds,” Ex. 1005);

Stern Declaration

Case IPR2018-00544

Patent No. 8,155,342

- Peter Ekström, *et al.*, *Audio over Bluetooth and MOST* (“Ekström,” Ex. 1006); and
- *Media Oriented System Transport (MOST) Specification Rev. 2.2* (Nov. 2002) (the “MOST Specification,” Ex. 1007) (collectively, the “Cited References”).

4. As set forth in detail below, in my expert opinion, the Challenged Claims are not obvious as asserted by Petitioners and Dr. Strawn in view of Simonds, Ekström, and the MOST Specification.

II. QUALIFICATIONS

5. Ex. 2002 is a copy of my curriculum vitae that summarizes my education, work history and publications.

6. I have over 40 years of experience in the fields relevant to multimedia device integration. In that time, I have studied and researched signal processing, audio, and acoustics, including the creation of a signal, the communication of data through the signal from one device to another, and the interpretation of that signal by a human listener. While my main areas of current professional activity are primarily in signal processing for robust speech recognition and auditory perception, I have additionally studied and performed research in a wide range of related fields of audition, acoustics, signal processing, and instrumentation.

Stem Declaration

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.