

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ERICSSON INC. AND
TELEFONAKTIEBOLAGET LM ERICSSON
Petitioners

v.

INTELLECTUAL VENTURES I LLC
Patent Owner

Patent No. 7,412,517

Title: METHOD FOR PROVIDING DYNAMIC BANDWIDTH ALLOCATION
BASED ON IP-FLOW CHARACTERISTICS IN A WIRELESS POINT TO
MULTI-POINT (PTMP) TRANSMISSION SYSTEM

**DECLARATION OF DR. ZYGMUNT HAAS IN SUPPORT OF PETITION
FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,412,517**

Intellectual Ventures I LLC

Exhibit 2016

ERICSSON v. IV I

IPR2018-00727

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Declaration of Zygmunt Haas

I, Zygmunt Haas, declare as follows:

1. I make this declaration based on my own personal knowledge and, if called upon to testify, would testify competently to the matters contained herein.

2. I have been asked to provide technical assistance in the *inter partes* review of U.S. Patent No. 7,412,517 (“the ’517 Patent”).

3. This declaration is a statement of my opinions on issues related to the unpatentability of claims 1, 2, 4, 12, 13, and 15 of the ’517 Patent.

I. BACKGROUND AND QUALIFICATIONS

4. In forming my opinions, I have relied upon my knowledge, training, and experience in the relevant art. While my qualifications are stated more fully in my curriculum vitae (EX. 1002), here I provide a summary of my qualifications:

5. I am a Professor and Distinguished Chair in Computer Science at the University of Texas at Dallas. I am also Professor Emeritus at the School of Electrical and Computer Engineering at Cornell University. In addition, I have provided technical consulting services in intellectual property matters, during which I have written expert reports, provided depositions, and given trial testimony involving wireless communication technologies.

6. My academic credentials include a Bachelor of Science in Electrical Engineering, *summa cum laude*, from Technion (IIT), Israel, in 1979 and a Master

of Science in Electrical Engineering, *summa cum laude*, from Tel-Aviv University, Israel, in 1985. I subsequently authored the thesis titled “Packet Switching in Fiber-Optic Networks” as part of earning my Ph.D. in Electrical Engineering from Stanford University in 1988.

7. I am being compensated at a rate of \$450.00 per hour, with reimbursement for actual expenses, for my work related to this *Inter Partes* Review. My compensation is not dependent on, and in no way affects, the substance of my statements in this Declaration.

8. I have worked or consulted for about 35 years in the field of Electrical Engineering. My primary focus has been on communication and networking systems, with an emphasis on wireless communication networks. I have authored and co-authored numerous technical papers and book chapters related to wireless communication networks. I hold twenty patents in the fields such as high-speed networking, wireless networks, and optical switching.

9. My employment history following my graduation from Stanford University began at the Network Research Department of AT&T Bell Laboratories in 1988. At AT&T Bell Laboratories, I pursued research on wireless communications, mobility management, fast protocols, optical networks, and optical switching. During my tenure at AT&T, I also worked for the AT&T



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