

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC.
Petitioner

v.

UNILOC LUXEMBOURG, S.A.
Patent Owner

Patent No. 7,535,890

DECLARATION OF DR. ZYGMUNT J. HAAS

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I, Dr. Zygmunt J. Haas, declare as follows:

I. INTRODUCTION

1. I have been retained as an independent expert consultant on behalf of Samsung Electronics America, Inc. (“Petitioner”) in this proceeding before the United States Patent and Trademark Office (“PTO”) regarding U.S. Patent No. 7,535,890 (“the ’890 Patent”) (Ex. 1001). I have been asked to consider whether certain references disclose or suggest the features recited in claims 1-6, 9, 14, 15, 17-20, 23, 40-43, 51-54, and 57 (“the challenged claims”) of the ’890 Patent. My opinions are set forth below.

2. I am being compensated at my rate of \$450 per hour for the time I spend on this matter. My compensation is in no way contingent on the nature of my findings, the presentation of my findings in testimony, or the outcome of this or any other proceeding. I have no other interest in this proceeding.

II. QUALIFICATIONS

3. I am a Professor and Distinguished Chair in Computer Science at the University of Texas in Dallas. I am also Professor Emeritus at the School of Electrical and Computer Engineering at Cornell University. In addition, I provide technical consulting services in intellectual property matters, including matters involving computer networks and wireless communication technologies.

4. I received my Bachelor of Science Degree in Electrical Engineering,

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