

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BMW OF NORTH AMERICA, LLC,

Petitioner,

v.

BLITZSAFE TEXAS, LLC,

Patent Owner.

Patent No. 8,155,342

Filing Date: June 27, 2006

Issue Date: April 10, 2012

Title: MULTIMEDIA DEVICE INTEGRATION SYSTEM

DECLARATION OF RICHARD STERN, PH.D.

Case No. IPR2018-00927

Patent Owner Blitzsafe Texas, LLC – Exhibit 2001
BMW of North America v. Blitzsafe IPR2018-00927

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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 April 25, 2018 Petition for *Inter Partes* Review filed by BMW of North America, LLC (“Petitioner”) and the Declaration of James T. Geier in support thereof (“Geier Declaration,” Ex. 1015).

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 49–64, 66, 68–88, 94–97, 99–111, 113, 115–16, and 119–20 of the ’342 Patent (collectively, the “Challenged Claims”) are obvious as asserted by Petitioner and Dr. Geier in view of:

- U.S. Patent Application No. 2003/0215102 A1 to Ira Marlowe (“Marlowe,” Ex. 1005);

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- U.S. Patent No. 7,870,142 to Mark Michmerhuizen, *et al.*
 (“Michmerhuizen,” Ex. 1002); and
- ID3.org, *ID3v2 made easy* (bearing URL “http://id3.org/easy.html” and date “5/12/2003”) and M. Nilsson, *ID3 tag version 2.3.0* (bearing URL “http://id3.org/id3v2.3.0.html and dates “3rd February 1999” and “5/12/2003”) (collectively, “the ID3v2 References,” Ex. 1004).

4. As set forth in detail below, in my expert opinion, the Challenged Claims are not obvious as asserted by Petitioner and Dr. Geier in view of Michmerhuizen, the ID3v2 References, and Marlowe.

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.

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7. I received an S.B. in Electrical Engineering from the Massachusetts Institute of Technology (MIT) in 1970; an M.S. in Electrical Engineering and Computer Sciences from the University of California, Berkeley in 1972; and a Ph.D. in Electrical Engineering and Computer Science from MIT in 1977.

8. While I was a student, I worked as a Teaching and Research Assistant in the Department of Electrical Engineering at MIT, from 1973 to 1976. My teaching experience was in the area of signal processing under the direct supervision of Professors Alan Oppenheim and Alan Willsky, and in the area of acoustics under the direct supervision of Professor Amar Bose. My research at MIT had been in the area of auditory perception.

9. I am a Professor of Electrical and Computer Engineering at Carnegie Mellon University (CMU), where I have taught and carried out research since 1977. While my primary appointment is with the Department of Electrical and Computer Engineering, I am also a Professor by Courtesy in the Language Technologies Institute and Computer Science Department. I have also been a Lecturer in CMU's School of Music since 2008, and I was a Professor in CMU's Biomedical Engineering Department from 1977 to 1995. From 1995 to 2003, I was Associate Director of the CMU Information Networking Institute, where I was responsible for every aspect of its Master of Science in Information Networking, including admissions, curricular development and support, and student life. In

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