

Declaration of Dr. Ingrid Hsieh-Yee In Support Of  
Petition for *Inter Partes Review* of USP 8,155,342

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re *Inter Partes* Review of:            )  
U.S. Patent No. 8,155,342                )  
Issued: April 10, 2012                    )  
Application No.: 11/475,847               )  
Filing Date: June 27, 2006               )

For: **Multimedia Device Integration System**

**FILED VIA E2E**

**DECLARATION OF INGRID HSIEH-YEE, PH.D,  
UNDER 37 C.F.R. § 1.68**

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I, Ingrid Hsieh-Yee, Ph.D., do hereby declare as follows:

1. I have been retained as an independent expert witness on behalf of Jaguar Land Rover North America, LLC and Jaguar Land Rover Ltd. (“JLR”) for *Inter Partes Review* (“IPR”) of U.S. Patent No. 8,155,342 (the “’342 patent”).

2. I am being compensated for my work in this matter at my accustomed hourly rate of \$180. 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 these is a type of material that experts in my field would reasonably rely upon when forming their opinions:

- (1) Ekström, P., & Hoel, F. (2002). Audio over Bluetooth and MOST. (“Ekström”), Master Thesis, Dept. of Science and Technology, Linköping University, obtained from DiVA, a digital archive, at <http://www.diva-portal.org/smash/get/diva2:18370/FULLTEXT01.pdf> on Jan. 16, 2018, **Exhibit-1**;

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- (2) DiVA record for “Ekström”, obtained from DiVA at <http://www.diva-portal.org/smash/record.jsf?pid=diva2:18370> on Jan. 16, 2018, **Exhibit-2**;
- (3) Linköping University record for “Ekström”, obtained from the Library of Linköping University at <http://liu.diva-portal.org/smash/record.jsf?pid=diva2:18370> on Jan. 16, 2018, **Exhibit-3**;
- (4) Rector’s Policy on Electronic Publishing, accessed at [http://www.ep.liu.se/authorinf/pdf/rectors\\_policy\\_on\\_electronic\\_publishing.pdf](http://www.ep.liu.se/authorinf/pdf/rectors_policy_on_electronic_publishing.pdf) on Jan. 16, 2018, Appendix B;
- (5) Policy for Electronic Publishing at Linköping University Electronic Press, accessed at <http://www.ep.liu.se/authorinf/pdf/policyen.pdf> on Jan. 16, 2018, Appendix C.
- (6) Suber, P. (2004; last revised 2015). Open access overview. <https://legacy.earlham.edu/~peters/fos/overview.htm>, accessed Jan. 22, 2018, Appendix D.

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

- (1) The documents listed above;

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(2) The reference materials cited herein; and

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

5. My complete qualifications and professional experience are described in my curriculum vitae, a copy of which is provided 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 more than 25 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). My specialization is information organization and access and I have taught a variety of courses on how to organize information to facilitate access to and usage of information resources, including “Cataloging and Classification,” “Internet Searches and Web Design,” “Advanced Cataloging and Classification,” “Organization of Internet

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Resources,” “Advanced Information Retrieval and Analysis Strategies,”  
“Information Literacy Instruction,” and “Digital Content Creation and  
Management.” My research interests cover cataloging and classification, Web  
search behavior, information organization, metadata, information retrieval,  
information architecture, digital collections, scholarly communication, user  
interaction with information systems, and others.

8. I am fully familiar with library cataloging standards and practices. I  
am also familiar with common practices in creating digital contents, and indexing  
information resources to ensure user access to the content, especially digital  
scholarly materials. In my courses I cover various information systems, such as  
library catalogs, union catalogs, proprietary databases, open access databases,  
institutional repositories, subject repositories, and portals on the Web; and help  
students develop strategies to find and access information resources in these  
systems and on the open Web. I am familiar with trends in scholarly  
communication, cover these trends in my teaching, and conducted research in this  
area.

**Exhibit-1**

9. **Exhibit-1** is a true and correct copy of Ekström, P., & Hoel, F.  
(2002). Audio over Bluetooth and MOST. (“Ekström”), Master Thesis, Dept. of  
Science and Technology, Linköping University. When I was originally asked to

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