

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

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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 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);

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- 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.

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