

UNITED STATES PATENT AND TRADEMARK OFFICE

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

Intel Corporation  
Petitioner

v.

Qualcomm Incorporated  
Patent Owner

U.S. Patent No. 8,698,558  
Claims 10, 11

---

Case IPR2018-01240

---

**DECLARATION OF ALYSSA APSEL, PH.D.  
ON BEHALF OF PETITIONER**

INTEL 1202

## TABLE OF CONTENTS

I.	BACKGROUND .....	1
II.	MATERIALS CONSIDERED .....	4
III.	LEGAL PRINCIPLES.....	6
	A. Claim Construction .....	6
	B. Anticipation .....	8
	C. Obviousness.....	8
	D. Means-Plus-Function Claims .....	11
IV.	SUMMARY OF OPINIONS.....	11
V.	BRIEF DESCRIPTION OF THE TECHNOLOGY .....	11
	A. Radio Frequency (RF) Power Amplifiers .....	12
	B. Power Supply Generators/Modulators for Power Amplifiers.....	13
	1. Envelope Amplifiers .....	14
	2. Switchers.....	16
	3. Hybrid Supply Generators .....	17
	4. Boost Converters.....	21
	C. Multiplexers.....	24
VI.	OVERVIEW OF THE '558 PATENT .....	26
	A. Summary of the Alleged Invention of the '558 Patent .....	26
	B. Prosecution History .....	32
VII.	OVERVIEW OF THE PRIOR ART REFERENCES .....	34
	A. Chu .....	34
	B. Choi 2010 .....	39
VIII.	CLAIM CONSTRUCTION .....	41
	A. “envelope signal” (claim 11).....	41
	B. “means for generating a boosted supply voltage based on a first supply voltage” (claim 10).....	42
	C. “means for generating a second supply voltage based on the envelope signal and the boosted supply voltage” (claim 10).....	45

D.	“means for generating the second supply voltage based on an envelope signal and either the boosted supply voltage or the first supply voltage” (claim 11).....	48
IX.	LEVEL OF ORDINARY SKILL IN THE ART.....	50
X.	SPECIFIC GROUNDS FOR CHALLENGE.....	51
A.	Ground I: Claim 10 is obvious in view of Chu combined with Choi 2010 and Hanington .....	51
1.	Claim 10.....	51
B.	Ground II: Claim 11 is obvious over Chu combined with Choi 2010, Hanington, and Myers .....	88
1.	Claim 11 .....	88
XI.	AVAILABILITY FOR CROSS-EXAMINATION .....	107
XII.	RIGHT TO SUPPLEMENT.....	107
XIII.	JURAT .....	107

I, Alyssa Apsel, declare as follows:

## **I. BACKGROUND**

1. I am currently a professor of electrical and computer engineering at Cornell University in Ithaca, New York, and a visiting professor at Imperial College in London, England.

2. I have also been the Chief Technology Officer for AlphaWave IP Corporation, a multinational private equity-backed company that provides high-end analog silicon IP related to high-end Multi Standard SerDes (MSS) and Multi Standard Radio (MSR) solutions for a wide range of markets.

3. My qualifications are stated more fully in my curriculum vitae, which is attached as Appendix A. I briefly summarize my education, work experience, and other qualifications below.

4. I received a Bachelor of Science degree in Electrical Engineering from Swarthmore College in 1995. I then earned a Master of Science degree in Electrical Engineering from the California Institute of Technology in 1996. I received my Ph.D. in Electrical Engineering from the Johns Hopkins University in 2002, where the focus of my program was electrical and computer engineering. My doctoral studies included analog and mixed signal circuit design for optoelectronic and highspeed communication systems. My dissertation, titled “Optoelectronic Receivers in Silicon on Sapphire CMOS: Architecture and Design

for Efficient Parallel Interconnects,” included the study of integrated interface circuits for high-speed chip-to-chip communications.

5. By 2000, I had completed all of my coursework at Johns Hopkins, including approximately 2-3 years of graduate courses in circuits and devices, passed the Ph.D. Comprehensive Exam (required to advance in the Ph.D. program and equivalent of a Master Degree), completed significant independent research on optical receiver circuits in CMOS, and published six conference papers.

6. By 2002, I had completed my Ph.D. at Johns Hopkins, published 3 journal papers, 10 conference papers, and had 5 years of experience in wireless communications that included working at the Army Research Laboratory.

7. I was a consultant for Intel Research from January 2009 to June 2009. In that role, I developed process invariant calibration blocks for high speed I/O circuits. These circuits were designed to monitor and maintain good operating conditions, despite imperfections and flaws in the manufacturing process, of the high-speed receivers and transmitters that enable computers to send and receive data over long wires.

8. From June 2008 to October 2015, I was an Associate Professor of Electrical and Computer Engineering at Cornell University. During that time, I worked on research regarding low-power radio design and networking, systems and circuit co-design for efficient low power networks, design in presence of

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.