

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Intel Corporation
Petitioner

v.

Qualcomm Incorporated
Patent Owner of U.S. Patent No. 8,838,949

Trial No. IPR2018-01334¹

**REMAND DECLARATION OF BILL LIN, PH.D.
ON BEHALF OF PETITIONER**

¹ IPR2018-01335 and IPR2018-01336 have been consolidated with the instant proceeding.

**IPR2018-01334
Intel v. Qualcomm
INTEL 1026**

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	QUALIFICATIONS	2
III.	RELEVANT LAW	2
IV.	CLAIMS 1-9, 12 AND 16-17 ARE OBVIOUS.....	2
A.	Construction of “Hardware Buffer”	4
1.	The “hardware buffer” is physically separate from the claimed system memory.	6
2.	The “hardware buffer” can be located within another system memory or any other location separate from the claimed “system memory”.....	10
3.	The “hardware buffer” can be a temporary buffer.....	13
4.	The prosecution history supports my construction of “hardware buffer”.	20
B.	The Intermediate Storage Area of Bauer and Svensson Is a “Hardware Buffer”	22
1.	The intermediate storage area is separate from the system memory set forth in Bauer and Svensson.	25
2.	The intermediate storage area would meet the “hardware buffer” limitation even under a narrower construction.	31
C.	Structure for Means-Plus-Function Limitations of Claims 16 and 17	33
V.	CONCLUSION	34
VI.	AVAILABILITY FOR CROSS-EXAMINATION	34

VII. RIGHT TO SUPPLEMENT35
VIII. JURAT35

1. I, Bill Lin, Ph.D. declare as follows:

I. INTRODUCTION

2. I have been retained by Intel Corporation (“Intel” or “Petitioner”) as an independent expert consultant in this proceeding before the United States Patent and Trademark Office. I previously prepared and submitted my Opening Declarations in support of the Petitions in IPR2018-01334, IPR2018-01335, and IPR2018-01336, dated July 2, 2018 and July 3, 2018 (Exs. 1002, 1020, and 1021). I also submitted my Reply Declaration in IPR2018-01334², which has been consolidated with IPR2018-01335 and IPR2018-01336, on September 27, 2019. I submit this Declaration in support of Petitioner’s Opening Brief on Remand.

3. Since preparing my Opening and Reply Declarations, I have also reviewed the following materials:

- Petitioner’s Sur-Reply (Paper 25);
- Final Written Decision (Paper 30);

² Because IPR2018-01335 and IPR2018-01336 have been consolidated with IPR2018-01334, I have cited to exhibits from IPR2018-01334 throughout, unless noted otherwise.

- Federal Circuit Opinion (*Intel Corp. v. Qualcomm Inc.*, 21 F.4th 801 (Fed. Cir. 2021));
- Scheduling Order on Remand (Paper 34); and
- Any other document cited in this Declaration.

4. I am being compensated for my work on this matter, but my opinions are based on my own views of the patent and the prior art. My compensation in no way depends on the outcome of this proceeding or the content of my testimony.

II. QUALIFICATIONS

5. I described my qualifications in my Opening Declarations. Ex. 1002 (Lin Op. Decl.) at ¶¶ 1-12; Ex. 1020 (Lin Op. Decl. in IPR2018-01335) at ¶¶ 1-11.

III. RELEVANT LAW

6. In my first Declarations, I set forth the applicable principles of patent law that were provided to me by counsel. Ex. 1002 (Lin Op. Decl.) at ¶¶ 16-27; Ex. 1020 (Lin Op. Decl. in IPR2018-01335) at ¶¶ 15-26. As appropriate, I have continued to apply those principles in providing my opinions in this Declaration.

IV. CLAIMS 1-9, 12 AND 16-17 ARE OBVIOUS

7. In its Final Written Decision, the Board found unpatentable claims 10, 11, 13-15, and 18-23 of the '949 patent, but did not find unpatentable claims 1-9,

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.