

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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Intel Corporation  
Petitioner

v.

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

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Trial No. IPR2018-01334<sup>1</sup>

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

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<sup>1</sup> IPR2018-01335 and IPR2018-01336 have been consolidated with the instant proceeding.

IPR2018-01334  
Intel v. Qualcomm

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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 Declarations in support of the Petitions in IPR2018-01334, IPR2018-01335, and IPR2018-01336, dated July 2, 2018 and July 3, 2018 (Exs. 1002, 1102, and 1202). I understand that IPR2018-01335 and IPR2018-01336 have been consolidated with IPR2018-01334.

3. Since preparing my Declaration, I have reviewed Qualcomm’s Patent Owner’s Preliminary Responses (“POPRs”) in IPR2018-01334, IPR2018-01335, and IPR2018-01336, the Board’s Decision on Institution (“DOIs”) in IPR2018-01334, IPR2018-01335, and IPR2018-01336, Qualcomm’s Patent Owner Response (“POR”) in the consolidated IPR2018-01334 proceeding, Dr. Rinard’s declaration submitted in support of the POR (Ex. 2007), and the transcript of Dr. Rinard’s deposition on August 28, 2019 (Ex. 1022). I have been asked to review and respond to the POR, Dr. Rinard’s opinions and the Board’s Decisions on Institution.

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

5. In preparing this Declaration, I reviewed and considered the specification, claims, and file history of U.S. Patent No. 8,838,949 (“’949 patent”) (Ex. 1001). I have also reviewed and considered the documents cited by Dr. Rinard in his declaration (Ex. 2007). Additionally, I have reviewed the related Reply, which I understand Intel will file at the United States Patent and Trademark Office (USPTO) at the same time as this Declaration is filed at the USPTO.

6. I have also reviewed all of the documents I cite in this declaration

## **II. QUALIFICATIONS**

7. I describe my qualifications in my first Declarations. Ex. 1002, ¶¶2-12; Ex. 1102, ¶¶1-11; Ex. 1202, ¶¶1-12.

## **III. RELEVANT LAW**

8. In my first Declarations, I set forth the applicable principles of patent law that were provided to me by counsel. Ex. 1002, ¶¶16-27; Ex. 1102, ¶¶15-26; Ex. 1202, ¶¶16-27. As appropriate, I have continued to apply those principles in providing my opinions in this Declaration.

## **IV. PATENT OWNER’S PROPOSED CONSTRUCTIONS ARE INCORRECT**

### **A. “System Memory”**

9. Patent Owner asserts that the term “system memory” in independent claims 1, 10, 16, 18, 20, and 22 (and dependent claims 2, 4, 5, 8, and 12) should be interpreted to mean “memory that is addressable by the secondary processor.”

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