UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZTE (USA), INC.

Petitioner,

v.

FRACTUS, S.A.,

Patent Owner.

IPR No. IPR2018-01461 U.S. Patent No. 9,054,421 Issue Date: June 9, 2015

DECLARATION OF CHRIS G. BARTONE, Ph.D., P.E. **IN SUPPORT OF** PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 9,054,421

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			b.	[1.2] "comprising a plurality of geometric elements arranged to define empty spaces in the antenna element to provide at least first and second winding current paths through the antenna element, the at least first and second winding current paths circumventing the empty spaces and respectively corresponding to the at least first and second non-overlapping frequency bands to provide the antenna element with the multi-band behavior; and"	
			b.	[1.3] "a ground plane, the antenna element being electrically coupled to the ground plane;"	92
			c.	[1.4] "wherein the antenna element provides a substantially similar impedance level and radiation pattern in the at least first and second non-overlapping frequency bands;"	92
			e.	[1.5] "wherein the geometric elements are arranged such that the antenna element does not comprise a group of single band antennas that respectively operate in the at	

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		least first and second non-overlapping frequency bands; and"94
	f.	[1.6] "wherein the antenna element is not a fractal type antenna element."
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	a.	[2.1] "The apparatus of claim 1, wherein the antenna element does not incorporate a reactive element to achieve a multi-band behavior."
3. Claim 4		m 497
	a.	[4.1] "The apparatus of claim 1, wherein each of the geometric element has the same number of sides;"
	b.	[4.2] "each of the geometric elements is electromagnetically coupled to at least one other of the geometric elements either directly through at least one point of contact or through a small separation providing coupling;"
	C.	[4.3] "for at least 75% of the geometric elements, the region or area of contact between the geometric elements is less than 50% of the perimeter or area of the geometric elements;"
	d.	[4.4] "not all geometric elements have the same size; and the perimeter of the antenna element has a different number of sides than the geometric elements that compose the antenna element."
4.	Clain	m 5100
	a.	[5.1] "The apparatus of claim 1, wherein the geometric elements are electromagnetically coupled;"

	b.	[5.2] "each of the geometric elements has the same number of sides, the antenna element having a different number of sides than each of the geometric elements;"	
	c.	[5.3] "at least one of either a perimeter of contact or an area of overlap between the geometric elements is only a fraction of a total perimeter or a total area of the geometric elements, respectively, for a majority of the geometric elements; and"	
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8.	Claim	ı 9	105
	a.	[9.1] "The apparatus of claim 7, wherein the antenna element is concealed within the apparatus."	
9.	Claim	n 10	

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