

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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MICROSOFT CORPORATION,

Petitioner,

v.

SAINT REGIS MOHAWK TRIBE,

Patent Owner.

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IPR2018-01601 (Patent 7,225,324 B2)

IPR2018-01602 (Patent 7,225,324 B2)

IPR2018-01603 (Patent 7,225,324 B2)

IPR2018-01605 (Patent 7,620,800 B2)

IPR2018-01606 (Patent 7,620,800 B2)

IPR2018-01607 (Patent 7,620,800 B2)

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**DECLARATION OF DR. HOUMAN HOMAYOUN**

I, Houman Homayoun, I declare that all statements made herein are true and that these statements were made with knowledge that willful false statements are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: January 15, 2018

A handwritten signature in black ink, consisting of a large, sweeping loop on the left and a vertical stroke on the right, with a horizontal line extending from the bottom of the vertical stroke.

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Houman Homayoun

## I. ENGAGEMENT

1. I have been retained by counsel for Patent Owner as an expert witness in the above-captioned proceedings. I have been asked to provide my opinions about the validity of U.S. Patent Nos. 7,225,324 (the 324 patent) and 7,620,800 (the 800 patent) and my opinions about what certain references disclose.

2. All of the opinions stated in this report are based on my personal knowledge and professional judgment. If called as a witness during the trial in this matter, I am prepared to testify competently about them. I am over the age of eighteen.

## II. QUALIFICATIONS

3. My *curriculum vitae* is attached as Exhibit A. A summary of my qualifications relevant to this case is provided below.

4. I am an Associate Professor of Electrical and Computer Engineering at George Mason University (GMU). I am the director of GMU's Accelerated, Secure, and Energy-Efficient Computing Laboratory (ASEEC). Prior to joining GMU, I spent two years at the University of California, San Diego, as NSF Computing Innovation (CI) Fellow awarded by the CRA-CCC working with Professor Dean Tullsen.

5. I am currently conducting research in big data computing, heterogeneous computing and hardware security and trust, which spans the areas of computer design and embedded systems, where I have published more than 80 technical papers in the prestigious conferences and journals on the subject.

6. I am also currently leading six research projects funded by DARPA, AFRL and NSF on the topics of hardware security and trust, big data computing, heterogeneous architectures, and biomedical computing.

7. I have successfully completed four projects on “Hybrid Spin Transfer Torque-CMOS Technology to Prevent Design Reverse Engineering”, “Persistence and Extraction of Digital Artifacts from Embedded Systems”, “Inter-core Selective Resource Pooling in a 3D Chip Multiprocessor”, and “Enhancing the Security on Embedded Automotive Systems” funded by DARPA, NIST, NSF and General Motors.

8. I received the 2016 Great Lakes Symposium on VLSI (GLSVLSI) conference best paper award for developing a manycore accelerator for wearable biomedical computing.

9. I am currently serving as Member of Advisory Committee, Cybersecurity Research and Technology Commercialization (R&TC) working group in the Commonwealth of Virginia.

10. Since 2017 I have been serving as an Associate Editor of IEEE Transactions on VLSI. I served as TPC Co-Chair for GLSVLSI 2018.

11. I am currently the general chair of GLSVLSI 2019.

### III. COMPENSATION AND PRIOR TESTIMONY

12. I am being compensated \$445 per hour for my research and report preparation in this matter but my compensation does not depend on the opinions I render or the outcome of these proceedings. I do not have a personal interest in the outcome of this proceeding.

13. I have only previously testified in the co-pending district cases against Microsoft and Amazon and that was by deposition. Those cases are listed below:

(a) *SRC Labs, LLC et al v. Microsoft Corporation*, No. 2:18-cv-00321-JLR (W.D. Wash.).

(b) *SRC Labs, LLC et al v. Amazon Web Services, Inc et al*, No. 2:18-cv-00317-JLR (W.D. Wash.).

### IV. INFORMATION CONSIDERED

14. My opinions are based on my years of education, research, and experience, as well as my review of the IPR petitions, the materials cited by Microsoft in the IPR petitions, Dr. Stone's declaration, and materials cited in Dr. Stone's declaration. In forming my opinion, I have considered the materials I identify in this report.

15. I may rely on these materials and additional materials to respond to arguments raised by the Petitioner. I may also consider additional documents and information as required to form any necessary opinions in this proceeding, including materials that I have not yet found or been provided.

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