

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HTC CORPORATION, HTC AMERICA, INC., and LG ELECTRONICS, INC.,
Petitioners,

v.

UNILOC 2017 LLC,
Patent Owner

Declaration of Joseph A. Paradiso, PhD
under 37 C.F.R. § 1.68

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I. INTRODUCTION

1. I am making this declaration at the request of HTC Corporation and HTC America, Inc. (together “HTC”), as well as LG Electronics, Inc. (“LG”) in the matter of this *inter partes* review of U.S. Patent No. 7,881,902 (“the ’902 Patent”) to Kahn, *et al.*

2. I am being compensated for my work in this matter at the rate of \$600/hour. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the outcome of this matter or the specifics of my testimony. I hold no interest in LG Electronics, Inc., LG Electronics U.S.A., Inc., LG Electronics MobileComm USA, Inc., HTC Corporation, HTC America, Inc., or the Patent Owner Uniloc 2017 LLC.

3. I have been asked to provide my opinions regarding whether claims 1–6 and 9-10 of the ’902 Patent are unpatentable, either because they are anticipated or would have been obvious to a person having ordinary skill in the art (“POSITA”) at the time of the alleged invention, in light of the prior art. It is my opinion that all of the limitations of claims 1-6 and 9-10 would have been obvious to a POSITA.

4. In the preparation of this declaration, I have studied:

a) The ’902 Patent, Ex. 1001;

- b) The prosecution history of the '902 Patent, Ex. 1002;
 - c) U.S. Patent No. 7,463,997 to Fabio Pasolini et al. (“Pasolini”), Ex. 1005;
 - d) U.S. Patent No. 7,698,097 to Fabio Pasolini et al. (“Fabio”), Ex. 1006;
 - e) U.S. Publication No. 2006/0084848 to Mitchnick (“Mitchnick”), Ex. 1007;
 - f) U.S. Patent No. 6,469,639 to Tanenhaus et al. (“Tanenhaus”), Ex. 1008; and
 - g) U. S. Patent No. 5,957,957 to Sheldon (“Sheldon”), Ex. 1009.
5. In forming the opinions expressed below, I have considered:
- a) The documents listed above, and
 - b) My own knowledge and experience based upon my work in the field of MEMS (micro-electro-mechanical systems) devices and body motion sensing systems, as described below.

II. QUALIFICATIONS AND PROFESSIONAL EXPERIENCE

6. My complete qualifications and professional experience are described in my *Curriculum Vitae*, a copy of which can be found in Ex. 1004. The following is a brief summary of my relevant qualifications and professional experience.

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