UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,
Petitioner,

v.

UNILOC Luxembourg S.A.,
Patent Owner

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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 Apple Inc. in the matter of the *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 $500/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.

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.

7.   As shown in my curriculum vitae, I have devoted my career to various

fields of physical, electrical, and computer science with more than two decades

focused on embedding sensing, including wearable and wireless sensors. I have

twenty years of experience in wearable devices and computing, during which I

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