UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC. Petitioner

v.

UNILOC LUXEMBOURG, S.A. Patent Owner

Patent No. 8,872,646

DECLARATION OF DR. IRFAN ESSA

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	Declaration of Dr. Irfan Essa U.S. Patent No. 8,872,646
E.	U.S. Patent No. 7,028,220 ("Park") (Ex. 1014)24
	PRIOR ART DISCLOSES ALL OF THE FEATURES OF THE ALLENGED CLAIM OF THE '646 PATENT
A.	The Combination of Pasolini, Goldman, McMahan, and Mizell Discloses Every Feature of Claim 2025
	1. [20.a] "A system to wake up a mobile device comprising:"25
	2. [20.b] "a motion sensor to detect motion along three axes and generation [sic] motion data;"27
	3. [20.c] "a glitch corrector to determine whether the motion data includes one or more glitches and remove the one or more glitches from the motion data;"
	4. [20.d.1] "a dominant axis logic to determine an idle sample value,"
	5. [20.d.2.] "comprising an average of accelerations over a sample period along a dominant axis,"46
	6. [20.d.3] "the dominant axis defined as an axis with a largest effect of gravity among the three axes; and"49
	 [20.e] "a power logic to move the device from the inactive state to an active state upon detection of a change in the dominant axis which is the axis experiencing the largest effect of gravity."
B.	The Combination of Pasolini, Goldman, McMahan, Mizell, and Park Discloses Every Feature of Claim 2255
	1. "The system of claim 20, further comprising: a device state logic to restore the device to one of: a last active state, a preset customized state."
CON	ICLUSION
	THE CHA A.

I, Dr. Irfan Essa, declare as follows:

I. INTRODUCTION

1. I have been retained by Samsung Electronics Co., Ltd. ("Petitioner") as an independent expert consultant in this proceeding before the United States Patent and Trademark Office ("PTO") regarding U.S. Patent No. 8,872,646 ("the '646 patent") (Ex. 1001.) I have been asked to consider whether certain references disclose or suggest the features recited in claim 22 ("the challenged claim") of the '646 patent. Because claim 22 depends from claim 20, I have also been asked to consider whether certain references disclose or suggest the features recited in claim 20. My opinions are set forth below.

2. I am being compensated at my rate of \$625 per hour for the time I spend on this matter. My compensation is in no way contingent on the nature of my findings, the presentation of my findings in testimony, or the outcome of this or any other proceeding. I have no other interest in this proceeding.

II. QUALIFICATIONS

3. Below I summarize my qualifications, as set forth in more detail in my curriculum vitae, which I understand is provided as Exhibit 1011.

4. I am currently a Distinguished Professor in the School of Interactive Computing / College of Computing at the Georgia Institute of Technology, an Adjunct Professor in the School of Electrical and Computer Engineering at the Georgia Institute of Technology. I also serve as an Associate Dean of Research for the College of Computing and Director of Interdisciplinary Research Center of Machine Learning at Georgia Tech. Furthermore, I am a Senior Researcher/Consultant at Google Research, Mountain View, CA.

5. I hold a bachelor's degree (B.S.) in Engineering from the Illinois Institute of Technology earned in 1988. I also hold: (1) a Master of Science (S.M.) engineering degree from the Massachusetts Institute of Technology, earned in 1990, and (2) a Doctor of Philosophy (Ph.D.) degree from the Massachusetts Institute of Technology in Media Arts & Sciences, earned in 1995.

6. I am a Founding Director of the Computational Perception Laboratory at Georgia Tech, which was founded in 1996. Also, I am a Founding Member of the Aware Home Research Initiative at Georgia Tech, which was founded in 1999. Additionally, I am currently serving as the Founding Director of an Institute-wide Interdisciplinary Research Center of Machine Learning at Georgia Tech, which includes over 150 faculty from all over GA Tech, in the areas related to Artificial Intelligence, Machine Learning and Data Science.

7. My academic and research career has focused on research and teaching in the areas of data analysis and machine intelligence, including extracted information from sensory data and using it to provide actionable and intelligent information. I have researched, developed, tested, and deployed computer systems

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