

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Panasonic Avionics Corp.,
Petitioner

vs.

Linksmart Wireless Technology, LLC,
Patent Owner

Case IPR2018-00043

U.S. Patent No. RE46,459

**DECLARATION OF DR. BILL LIN,
UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION FOR
INTER PARTES REVIEW OF U.S. PATENT NO. RE46,459**

Ex. 1003

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Declaration of Dr. Lin under 37 C.F.R. § 1.68 in support of
Petition for *Inter Partes* Review of U.S. Patent No. RE46,459

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I, Dr. Bill Lin, do hereby declare as follows:

I. INTRODUCTION

1. I have been retained as an independent expert witness on behalf of Panasonic Avionics Corp. (“Panasonic” or “Petitioner”) for the above-captioned Petition for *Inter Partes* Review (“IPR”) of U.S. Patent No. RE46,459 (“the ’459 Patent”).

2. I am being compensated for my work in this matter at my standard hourly rate. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this matter. 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 91-99, 108-120, and 122-125 (“the Challenged Claims”) of the ’459 Patent are unpatentable as they would have been obvious to a person having ordinary skill in the art (“POSITA”) at the time of the alleged invention. It is my opinion that all of the limitations of these claims would have been obvious to a POSITA after reviewing U.S. Patent No. 5,983,270 to Abraham *et al.* (“Abraham”), U.S. Patent No. 6,247,054 to Malkin (“Malkin”), and European Patent No. EP0762707A2 to Telia (“Telia”), as discussed further below.

4. In preparing this Declaration, I have reviewed:

- a) the '459 Patent, Ex. 1001;
- b) the prosecution history of the '459 Patent, Ex. 1002;
- c) U.S. Patent No. 5,983,270 to Abraham *et al.* ("Abraham"), Ex. 1005;
- d) U.S. Patent No. 6,247,054 to Malkin ("Malkin"), Ex. 1006;
- e) European Patent No. EP0762707A2 to Telia ("Telia"), Ex. 1007;
- f) The prosecution history of Pat. No. 6,779,118, surrendered for RE46,459, Ex. 1008;
- g) The prosecution history of *Ex Parte Reexam* control no. 90/009,301, Ex. 1009;
- h) The prosecution history of *Ex Parte Reexam* control no. 90/011,485, Ex. 1010;
- i) The prosecution history of *Ex Parte Reexam* control no. 90/012,149, Ex. 1011;
- j) The prosecution history of *Ex Parte Reexam* control no. 90/012,342, Ex. 1012;
- k) The prosecution history of *Ex Parte Reexam* control no. 90/012,378, Ex. 1013; and
- l) The prosecution history of *Inter Partes Reexam* control no. 95/002,035, Ex. 1014.

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