UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMERICAN NATIONAL MANUFACTURING INC.,
Petitioner,

v.

SLEEP NUMBER CORPORATION
f/k/a SELECT COMFORT CORPORATION,
Patent Owner.

Case No. IPR2019-00497
Patent No. 8,769,747

Case No. IPR2019-00500
Patent No. 9,737,154

DECLARATION OF MATTHEW R. LYNDE, Ph.D. IN SUPPORT OF PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

January 22, 2020

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I. Qualifications

1. My name is Matthew R. Lynde. I am an economist and a Senior Vice President of Cornerstone Research, an economic and financial consulting firm with offices in San Francisco; Silicon Valley; Los Angeles; Chicago; Washington, D.C.; New York; Boston; and London. My work address is Two Embarcadero Center, San Francisco, CA, 94111.

2. I have over 35 years of experience as a practicing applied economist in academia, government, and business. I earned both a B.A. and a Ph.D. in economics from the University of California at Berkeley. As an undergraduate at UC Berkeley, I studied electrical engineering as well as economics. I also studied at the Université de Poitiers in France. During the interval between degrees, I worked in the federal government in Washington, D.C., attached to the President's Council on Wage and Price Stability, and at the Brookings Institution.

3. At Brookings, I worked on studies of small business formation and its importance to innovation and employment growth. My dissertation research for my Ph.D. at UC Berkeley concerned an empirical, econometric investigation of the impact of technological innovation on international competition. At that time, and continuing to today, UC Berkeley was a center for research on the economics of innovation, and on the interaction of industrial organization and patent system public policies.

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4. Following my doctorate, I was on the faculty of the City University of New York where I continued my research on innovation economics as well as teaching microeconomics, trade, corporate finance, and econometrics courses. I also taught intersession courses at the Universidad Interamericana de Puerto Rico.

5. In 1992, I joined Price Waterhouse in New York as a senior economist. I worked on litigation support assignments, including coordinating valuation matters across practices and with the London office. As a partner in the firm, I was responsible for leading the intellectual property practice in San Francisco and Menlo Park.

6. In 2001, I joined Cornerstone Research as the founding partner for its San Francisco office. I have served the firm as head of that office and in various managerial functions, as well as heading up the intellectual property practice for a number of years. I have served on the advisory boards of both UC Berkeley Law's Center for Law and Technology and Stanford Law's Program in Law, Science, and Technology. I spearheaded the firm's research efforts as one of the founding supporters of the Stanford Intellectual Property Clearinghouse in conjunction with Professor Mark Lemley, and serve as an advisor to its primary descendant, the LexMachina intellectual property database firm.

7. As a consultant and expert witness, I specialize in the applied economic, financial, and statistical analyses of complex business and regulatory matters. Since

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