

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZTE (USA), INC.

Petitioner,

v.

CYWEE GROUP LTD.

(record) Patent Owner.

IPR No. IPR2019-00525

U.S. Patent No. 8,552,978

DECLARATION OF ANDREA SHOFFSTALL

I, Andrea Shoffstall, declare as follows:

1. I am an attorney at Brinks Gilson & Lione. I am licensed to practice law in the state of Illinois.

2. I am over 18 years of age and I make this declaration based upon my own knowledge, personal experience, and belief. If called upon, I can competently testify to the facts stated in this declaration.

3. I assisted with the collection and assembly of the documents included as Exhibits supporting Petitioner's Petition for *Inter Partes* Review of U.S. Patent No. 8,552,978, bearing *Inter Partes* Review number IPR2019-00525, to be filed on January 10, 2019.

4. Exhibit 1001, as submitted with Petitioner's Petition, is a true and accurate copy of Exhibit 1001 from the IPR2018-01257, *Google LLC v. Cywee Group Ltd.*, obtained from the Patent Trial and Appeal Board End to End Portal.

5. Exhibit 1002, as submitted with Petitioner's Petition, is a true and accurate copy of Exhibit 1002 from the IPR2018-01257, *Google LLC v. Cywee Group Ltd.*, obtained from the Patent Trial and Appeal Board End to End Portal.

6. Exhibit 1003, as submitted with Petitioner's Petition, is a true and accurate copy of Exhibit 1003 from the IPR2018-01257, *Google LLC v.*

Cywee Group Ltd., obtained from the Patent Trial and Appeal Board End to End Portal.

7. Exhibit 1004, as submitted with Petitioner's Petition, is a true and accurate copy of Exhibit 1004 from the IPR2018-01257, *Google LLC v. Cywee Group Ltd.*, obtained from the Patent Trial and Appeal Board End to End Portal.

8. Exhibit 1005, as submitted with Petitioner's Petition, is a true and accurate copy of Exhibit 1005 from the IPR2018-01257, *Google LLC v. Cywee Group Ltd.*, obtained from the Patent Trial and Appeal Board End to End Portal.

9. Exhibit 1006, as submitted with Petitioner's Petition, is a true and accurate copy of Exhibit 1006 from the IPR2018-01257, *Google LLC v. Cywee Group Ltd.*, obtained from the Patent Trial and Appeal Board End to End Portal.

10. Exhibit 1007, as submitted with Petitioner's Petition, is a true and accurate copy of Exhibit 1007 from the IPR2018-01257, *Google LLC v. Cywee Group Ltd.*, obtained from the Patent Trial and Appeal Board End to End Portal.

11. Exhibit 1008, as submitted with Petitioner's Petition, is a true and accurate copy of Exhibit 1008 from the IPR2018-01257, *Google LLC v.*

Cywee Group Ltd., obtained from the Patent Trial and Appeal Board End to End Portal.

12. Exhibit 1009, as submitted with Petitioner's Petition, is a true and accurate copy of Exhibit 1009 from the IPR2018-01257, *Google LLC v. Cywee Group Ltd.*, obtained from the Patent Trial and Appeal Board End to End Portal.

13. Exhibit 1010, as submitted with Petitioner's Petition, is a true and accurate copy of Exhibit 1010 from the IPR2018-01257, *Google LLC v. Cywee Group Ltd.*, obtained from the Patent Trial and Appeal Board End to End Portal.

14. Exhibit 1011, as submitted with Petitioner's Petition, is a true and accurate copy of Exhibit 1011 from the IPR2018-01257, *Google LLC v. Cywee Group Ltd.*, obtained from the Patent Trial and Appeal Board End to End Portal.

15. Exhibit 1050 as submitted with Petitioner's Petition, is a true and accurate redlined comparison between the current petition and the petition filed by Google in IPR2018-001257, *Google LLC v. Cywee Group Ltd.*

16. Exhibit 1051 as submitted with Petition's Petition is a true and accurate copy of the claim construction order in *Cywee Group Ltd. v. Motorola Mobility LLC*, 17-cv-00780 (Jan. 4, 2019), obtained from PACER.

I hereby declare that all statements made in this declaration are of my own knowledge and are true, that all statements made on information and belief are believed to be true, and that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001.

The contents of this declaration are true under penalty of perjury of the laws of the United States.

Dated: January 10, 2019

/s/ Andrea Shoffstall
Andrea Shoffstall