UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., Petitioner,

v.

MPH TECHNOLOGIES OY, Patent Owner.

Case IPR2019-00823 Patent 9,712,494

EXHIBIT 2002

DECLARATION OF PROFESSOR GEORGE N. ROUSKAS, PH.D.



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I. INTRODUCTION

- 1. My name is George Rouskas. I have been retained as an expert witness to provide my independent opinion in regards with matters at issue in the *inter partes* review of U.S. 9,712,494 ("the '494 Patent") in the IPR2019-00823 proceeding. I have been retained by MPH Technologies Oy ("MPH"), the Patent Owner, in the above proceedings. Petitioner in this case is Apple Inc. ("Apple").
- 2. Unless otherwise noted, the statements made herein are based on my personal knowledge, and if called to testify about this declaration, I could and would do so competently and truthfully.
- 3. A detailed record of my professional qualifications including cases in which I was an expert is being submitted herewith as Exhibit 2003 and is summarized in Section II, *infra*.
- 4. I am not a legal expert and offer no opinions on the law. However, I have been informed by counsel of the various legal standards that apply, and I have applied those standards in arriving at my conclusions.

II. QUALIFICATIONS

5. I am an Alumni Distinguished Graduate Professor with Tenure in the Department of Computer Science at North Carolina State University (NC State), where I also serve as the Director of Graduate Programs. I am an experienced researcher and educator in the field of computer networking, with expertise in



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