BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,
Petitioner,

v.

MPH TECHNOLOGIES OY,
Patent Owner.

———————

Case IPR2019-00823
Patent 9,712,494

———————

EXHIBIT 2010

DECLARATION OF MICHAEL S. BORELLA

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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 can be found in Exhibit 2009 and is summarized in Section II, *infra*.

4.   In addition to being a technical expert, I am a practicing patent attorney. In this proceeding, however, I am serving as a fact witness and a technical expert witness, not submitting testimony as an expert on the law.

5.   All statements in this declaration are in my opinion, and to the best of my knowledge and understanding. Some of these opinions are based, in part, on my recollection of events surrounding the development of technologies at issue in this proceeding. All statements regarding the understanding of one of ordinary skill in the art have been made to reflect that understanding at the time of invention of the '494 Patent.

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II. QUALIFICATIONS

7.   I am an experienced researcher, educator, software engineer, manager, and executive, serving in a variety of roles in industry and academia. My areas of technical expertise include computer networking, telecommunications, Internet protocols, network security, operating systems, wireless networks, and mobile applications.

8.   I have over twenty-eight years of experience in computer networking since I received by bachelor's degree in computer science in 1991. I have twelve years of industry software and networking experience at 3Com Corporation, Commworks (a subsidiary of 3Com Corporation), UTStarcom, and Fastmobile since receiving my Ph.D. in computer science in 1995. This time period overlaps in part with my ten years as a professor / instructor at Northwestern University and DePaul University in electrical engineering and computer science, respectively. In 2007, I became a technical advisor with McDonnell Boehnen Hulbert and Berghoff, LLP (MBHB) focused on advising entities of various sizes in regard to computer networking, telecommunications, Internet protocols, network security,

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