

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROKU, INC.,
Petitioner

v.

UNIVERSAL ELECTRONICS, INC.,
Patent Owner

Case IPR2019-01614
U.S. Patent No. 9,911,325

**DECLARATION OF DR. SAMUEL H. RUSS IN SUPPORT OF
PETITIONER ROKU, INC.'S REPLY TO PATENT OWNER'S RESPONSE**

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Declaration of Dr. Samuel H. Russ
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I, Dr. Samuel H. Russ, declare as follows:

I. INTRODUCTION

1. I am the same Dr. Samuel H. Russ who submitted a prior declaration (EX1003) in this matter, which I understand was filed on September 18, 2019. I have been retained on behalf of Roku, Inc. for the above-captioned *inter partes* review proceeding.

2. I understand that the Patent Owner has submitted a response in this case. I also understand that the Patent Owner's expert witness, Dr. Michael D. Sprenger, has submitted a declaration in support of Patent Owner's response. I have been asked to provide my technical review, analysis, and insight regarding both the Patent Owner's response and Dr. Sprenger's declaration in support thereof.

3. My background and qualifications were provided in paragraphs 3-10 of my previous declaration, and my CV was provided as EX1004. My statements in paragraphs 11 and 26-36 of my prior declaration regarding my review of U.S. Patent No. 9,911,325 ("325 patent") and related materials remain unchanged, as do my understandings of the relevant legal principles stated in paragraphs 12-25.

4. Since my prior declaration, I have reviewed and considered the following additional materials:

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Paper	Description
7	Decision Granting Institution
15	Patent Owner's Response

Exhibit	Description
1031	Deposition Transcript of Michael D. Sprenger, taken September 15, 2020 (IPR2019-01612).
1032	Deposition Transcript of Michael D. Sprenger, taken September 16, 2020 (IPR2019-01613).
1033	Deposition Transcript of Michael D. Sprenger, taken September 16, 2020 (IPR2019-01614).
1036	Decision Granting Institution of <i>Inter Partes</i> Review, Paper 12 (IPR2019-01613), April 1, 2020.
2003	Declaration of Michael D. Sprenger in Support of Patent Owner's Response to Petition for <i>Inter Partes</i> Review of U.S. Patent No. 9,911,325
2007	Prosecution History of U.S. Patent No. 7,589,642

5. I have also considered all other materials cited herein. My work on this case is being billed at my normal hourly rate, with reimbursement for actual expenses. My compensation is not contingent upon the outcome of this *inter partes* review proceeding.

6. In his declaration, Dr. Sprenger makes several statements regarding the '325 patent, the prior art references, and the relevant technology at issue in this

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