IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

REMBRANDT WIRELESS TECHNOLOGIES, LP,	§	
	§	
Plaintiff	§	
	§	
v.	§	**Case No. 2:19-CV-00025-JRG**
	§	
APPLE INC.,	§	
	§	
Defendant.	§	
	§	

REBUTTAL EXPERT REPORT OF DR. ROBERT MORROW REGARDING THE VALIDITY OF U.S. PATENT NOS . 8,023,580 & 8,457,228

[redacted]

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1. INTRODUCTION

1. I have been retained by Heim, Payne & Chorush, LLP and Ahmad, Zavitsanos, Anaipakos, Alavi & Mensing P.C., counsel for Plaintiff Rembrandt Wireless Technologies, LP (hereinafter "Rembrandt"), as an independent technical expert in this litigation. Among other things, I have been asked by counsel to opine on the validity of certain claims from U.S. Patent No. 8,023,580 ("the '580 Patent") and U.S. Patent No. 8,457,228 ("the '228 Patent) (collectively, the "Asserted Patents" or the "Patents-in-Suit"). Specifically, I have been asked by counsel to review the Opening Expert Report of Richard T. Mihran, Ph.D. on invalidity issues ("Mihran Report") and to offer rebuttal opinions when I disagree with the opinions expressed in the Mihran Report.

2. The statements made in this expert report are made on my own personal knowledge and opinion, and I can and will testify competently to the content of this expert report if called on to do so at trial. In forming my opinions, I reviewed many documents, including many documents previously submitted by Rembrandt and its experts. Where appropriate, I copied relevant excerpts from those prior documents that reflect my opinions into this report (rather than "reinvent the wheel," so to speak). I reserve the right to supplement or modify my opinions as the lawsuit develops or as new facts or other relevant information are uncovered and to testify in that regard, including testimony in rebuttal to opinions offered by experts representing Apple either prior to or during trial. I also intend to prepare demonstrative exhibits that are consistent with my opinions in this report for use at trial.

3. I am being compensated at my standard consulting rate of $550 per hour. My compensation is not dependent on the outcome of this case.

2. QUALIFICATIONS

4. My education and expertise qualify me to do the below analysis. I have summarized in this section my educational background, career history, and other relevant qualifications. More details are set forth in my *curriculum vitae*, attached as Exhibit A to this report.

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