

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner,

v.

REMBRANDT WIRELESS TECHNOLOGIES, LP,

Patent Owner.

Case IPR2020-00034

U.S. Patent No. 8,023,580

**DECLARATION OF MARK R. LANNING
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF
UNITED STATES PATENT NO. 8,023,580**

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I, Mark R. Lanning, hereby declare under penalty of perjury:

I. INTRODUCTION

1. I have been retained on behalf of Apple to provide assistance regarding U.S. Patent No. 8,023,580 (“the ’580 patent,” Ex. 1101) in connection with Apple’s Petition for *Inter Partes* Review.¹ Specifically, I have been asked to consider the validity of Claims 2 and 59 of the ’580 patent (the “Challenged Claims”). I have personal knowledge of the facts and opinions set forth in this declaration, and, if called upon to do so, I would testify competently thereto.

2. I am being compensated for my time at my ordinary and customary consulting rate of \$550 per hour for my work. My compensation is based solely on the amount of time that I devote to activity related to this case and is in no way contingent on the nature of my findings, the presentation of my findings in testimony, or the outcome of this or any other proceeding. I have no other financial interest in this proceeding. My opinions are based on my years of education, research and experience, as well as my investigation and study of relevant materials, including those cited herein.

¹ Where appropriate, I refer to exhibits that I understand are filed with the Petition for *Inter Partes* Review of the ’580 Patent.

3. I may rely upon these materials, my knowledge and experience, and/or additional materials to rebut arguments raised by the Patent Owner. Further, I may also consider additional documents and information in forming any necessary opinions, including documents that may not yet have been provided to me.

4. My analysis of the materials produced in this proceeding is ongoing and I will continue to review any new material as it is provided. This declaration represents only those opinions I have formed to date. I reserve the right to revise, supplement, and/or amend my opinions stated herein based on new information and on my continuing analysis of the materials already provided.

5. A table of contents is included above and a list of exhibits referenced herein is attached at Appendix B.

II. BACKGROUND AND QUALIFICATIONS

6. All of my opinions stated in this declaration are based on my own personal knowledge and professional judgment. In forming my opinions, I have relied on my knowledge and experience in designing, developing, researching, and teaching the technology referenced in this declaration.

7. I am currently the President of three consulting companies: Telecom Architects, Inc., I.N. Solutions, Inc., and Reticle Consulting, LLC. All three companies provide professional consulting services and custom software development for one or more particular technical areas. Telecom Architects, Inc.

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