

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 DRAGO GREGOV IN SUPPORT OF PETITION FOR
INTER PARTES REVIEW OF UNITED STATES PATENT NO. 8,023,580**

I, Drago Gregov, make the following Declaration pursuant to 28 U.S.C. § 1746:

1. I am a Lead Litigation Paralegal Specialist at the law firm of Ropes & Gray LLP.

2. I provide this Declaration in support of the Petition for *Inter Partes* Review of United States Patent No. 8,023,580 that is being requested at the United States Patent and Trademark Office (“USPTO”) by Petitioner Apple Inc. Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Ex. 1101 is a true and correct copy of United States Patent No. 8,023,580, which was obtained from the United States Patent and Trademark Office’s Public Patent Application Information Retrieval system (USPTO Public PAIR) on September 30, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

4. Ex. 1102 is a true and correct copy of the entire prosecution Image File Wrapper of United States Patent No. 8,023,580, which was obtained from the USPTO’s Public PAIR system on September 30, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right

corner. However, no alterations, other than these noted markings, have been made to this document.

5. Ex. 1104 is a true and correct copy of United States Patent No. 6,075,814, which was obtained from the USPTO's Public PAIR system on September 30, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

6. Ex. 1105 is a true and correct copy of United States Patent No. 5,583,922, which was obtained from the USPTO's Public PAIR system on September 30, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

7. Ex. 1106 is a true and correct copy of United States Patent No. 4,549,293, which was obtained from the USPTO's Public PAIR system on September 30, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

8. Ex. 1110 is a true and correct copy of the entire prosecution Image File Wrapper of *Ex Parte* Reexamination No. 90/013,808 of United States Patent No. 8,023,580, which was obtained the USPTO's Public PAIR system on September 30,

2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

9. Ex. 1111 is a true and correct copy of the Claim Construction Memorandum and Order, Docket No. 114, from *Rembrandt Wireless Techs., LP v. Samsung Elecs. Co., Ltd.*, No. 2:13-cv-00213-JRG, (E.D. Tex. July 10, 2014), which was obtained from the United States Court's Public Access to Court Electronic Records (PACER) system on September 30, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

10. Ex. 1112 is a true and correct copy of the April 17, 2017 Federal Circuit Decision, Docket No. 66, from *Rembrandt v. Samsung*, United States Court of Appeals for the Federal Circuit, Case No. 16-1729, which was obtained from the PACER system on September 30, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

11. Ex. 1113 is a true and correct copy of the P.R. 4-3 Joint Claim Construction Statement, Docket No. 70, from *Rembrandt Wireless Technologies, LP v. Apple Inc.*, No. 2:19-cv-00025-JRG (E.D. Tex. Sept. 9, 2019), which was obtained

from the PACER system on September 30, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

12. Ex. 1114 is a true and correct copy of United States Provisional Patent Application No. 60/067,562, which was obtained from the USPTO's Public PAIR system on September 30, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

13. Ex. 1115 is a true and correct copy of the Final Written Decision, Paper 47, from *Samsung Elecs. Co. Ltd., et al. v. Rembrandt Wireless Techs., LP*, IPR2014-00518 (P.T.A.B. Sept. 17, 2015), which was obtained from PTAB E2E on September 30, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

14. Ex. 1116 is a true and correct copy of Rembrandt's Response in Opposition to Samsung Defendants' Rule 50(b) Renewed Motion for Judgment as a Matter of Law and/or Rule 59(a) Motion for a New Trial on Liability Issues, Docket No. 335, from *Rembrandt Wireless Techs., LP v. Samsung Elecs. Co., Ltd.*, No. 2:13-cv-00213-JRG-RSP (E.D. Tex. Sept. 7, 2015), which was obtained from the PACER

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