

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

MAXELL, LTD.,
Patent Owner

IPR2020-00409
Patent 6,580,999

DECLARATION OF MICHAEL D. KOTZIN

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I, Dr. Michael D. Kotzin, hereby declare the following:

I. INTRODUCTION

1. My name is Michael D. Kotzin.
2. I am making this declaration at the request of Apple Inc. in the matter of the *Inter Partes* Review of U.S. Patent No. 6,748,317 (the “’317 Patent”), U.S. No. 6,430,498 (the “’498 Patent”), and U.S. No. 6,580,999 (“’999 Patent”) (collectively the “Challenged Patents”) each of which issued to Maruyama et al.¹
3. I am being compensated for my work in this matter at the rate of \$300/hour. My compensation in no way depends upon the outcome of this proceeding.
4. As part of my work and in forming my opinions in connection with this proceeding, I have reviewed the following materials, each of which I believe experts in my field would reasonably rely upon in forming opinions regarding the subject matter of this proceeding:

- U.S. Patent No. 6,580,999 (the “’999 Patent”) (Ex. 1001)
- File History for U.S. Patent 6,580,999 (the “’999 Patent File History”) (Ex. 1002)
- U.S. Patent 6,067,502 to Hayashida *et al.* (“*Hayashida*”) (Ex. 1004)
- Cyberguide: A Mobile Context-Aware Tour Guide by Abowd et al. (“*Abowd*”) (Ex. 1005)
- JPH09-311625 to Ikeda (Ex. 1006)
- English Translation of Ikeda (“*Ikeda*”) (Ex. 1007)
- CV of Michael D. Kotzin (Ex. 1008)

¹ Appendix A of this Declaration includes a roadmap for each patent showing which paragraphs discuss each limitation

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