UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INCORPORATED
Petitioner,
v.

REMBRANDT WIRELESS TECHNOLOGIES, LP
Patent Owner.

Case IPR2020-00510
U.S. Patent No. 8,023,580

DECLARATION OF DR. JOSE LUIS MELENDEZ IN SUPPORT OF PATENT OWNER'S PRELIMINARY RESPONSE RELATED TO *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,023,580

Rembrandt Exhibit 2002
Qualcomm v. Rembrandt
IPR2020-00510

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I, Dr. Jose Luis Melendez, declare as follows:

I. INTRODUCTION

1. I have been retained by Rembrandt Wireless Technologies, LP ("Patent Owner") in Case IPR2020-00510 as a technical expert.

2. I have been asked to study and provide my opinions concerning U.S. Patent No. 8,023,580 ("the '580 Patent") and the arguments and exhibits in the Petition For *Inter Partes* Review of the '580 Patent filed in Case IPR2020-00510 concerning the patentability of Claims 2 and 59 of the '580 Patent ("Challenged Claims").

3. I have also been asked to provide my opinions concerning the state of the relevant art prior to December 5, 1997, and the level and knowledge of one having ordinary skill in the art in the December 1997 time frame.

4. My opinions and views set forth in this declaration are based on my education, training, and experience in the field of imaging, computing, and communications technologies, as well as the materials I reviewed in this case. In this declaration, I will address certain aspects of the petition along with its relevant exhibits that I believe will be of particular benefit to the Patent Trial and Appeal Board ("PTAB") in evaluating the Petition, in light of the record and totality of stakeholder arguments, in coming to its decisions regarding the '580 Patent.

II. BACKGROUND AND QUALIFICATIONS

5. I am a professor of Computer Science and Engineering, and also Special Assistant to the Chancellor, at the University of Puerto Rico at Mayaguez, Puerto Rico, where I reside. My responsibilities include developing and teaching specialized courses and seminars, serving on graduate committees including PhD programs, defining and conducting research including students related generally to Computer Science and Engineering, and supporting university relationships with industry.

6. I hold a Doctor of Philosophy in Electrical Engineering from Stanford University (awarded January 6, 1994) with a Grade Point Average of 4.0/4.0. I have a Bachelor of Science in Electrical Engineering from the Massachusetts Institute of Technology (awarded June 4, 1990) and graduated with a Grade Point Average of 5.0/5.0. I also obtained a Master of Science in Electrical Engineering and Computer Science from the Massachusetts Institute of Technology (awarded February 20, 1991) with a Grade Point Average of 4.8/5.0.

7. My doctoral thesis involved the definition, solution and validation of a stiffly coupled differential equation model for the formation of high performance imaging systems. In performance of my doctoral thesis I developed novel algorithms for the solution of the complex equations and implemented those algorithms in computer code. I verified the models and algorithms through

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