# UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

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INTEL CORPORATION,
Petitioner

v.

PACT XPP SCHWEIZ AG, Patent Owner

DECLARATION OF DR. PINAKI MAZUMDER UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,471,593



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I, Pinaki Mazumder, Ph.D., do hereby declare as follows:

#### I. INTRODUCTION

- 1. I have been retained as an expert witness on behalf of Intel Corporation ("Intel") for the above-captioned Petition for *Inter Partes* Review ("IPR") of U.S. Patent No. 8,471,593 ("'593 patent"). I am being compensated for my time in connection with this IPR at my standard consulting rate of \$400 per hour. My compensation is not affected by the outcome of this matter.
- 2. I have been asked to provide my opinions regarding whether claims 1-2, 4-11, 14-17, and 19-27 of the '593 patent ("the Challenged Claims") are invalid as obvious to a person having ordinary skill in the art ("POSITA") at the time of the alleged invention.
- 3. In preparing my Declaration, I reviewed the '593 patent, the file history of the patent, prior art references, technical references and other publications from the time of the alleged invention.
- 4. The patent application that resulted in the '593 Patent, Application No. 13/289,296, was filed on November 4, 2011. Ex. 1003 ('593 Patent), Cover, Cert. of Correction. The '593 patent claiming priority, through multiple divisional and continuation patents, to U.S. Patent Application No. 60/238,855, filed on October 6, 2000. *Id*.



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