

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

YITA LLC,
Petitioner

v.

MACNEIL IP LLC,
Patent Owner

Case IPR2020-01139
U.S. Patent No. 8,382,186

**DECLARATION OF PAUL E. KOCH, PH.D. IN SUPPORT OF
PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE**

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I, Paul E. Koch, Ph.D., declare as follows:

I. INTRODUCTION

1. I have been retained as an expert in this proceeding by counsel for Yita LLC (“Yita”). I previously submitted declarations (EX1003 in each proceeding) in support of the petitions for *inter partes* review of U.S. Patent No. 8,382,186 (“the ’186 patent”) in IPR2020-01139 and of U.S. Patent No. 8,833,834 (“the ’834 patent”) in IPR2020-01142. This declaration is in support of Petitioner’s Replies to Patent Owner’s Responses in the same proceedings, IPR2020-01139 and IPR2020-01142.

2. My background and qualifications were provided in paragraphs 4-15 of my original declarations, Exhibit 1003, and my CV was submitted as Exhibit 1032 in each proceeding. My statements in my original declaration regarding my review of the ’186 patent, the ’834 patent, and related materials remain unchanged. In reaching my opinions here, I reviewed the Patent Owner Responses, the Petitions, my original declarations, and the materials reviewed as part of my original declarations.

3. I have also reviewed all other materials cited herein.

4. I am being compensated for my work on this case at my standard rate of \$375 per hour, with reimbursement for actual expenses. My compensation is not dependent upon my opinions, my testimony, or the outcome of this case.

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