

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,  
Petitioner

v.

LBT IP I LLC,  
Patent Owner

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*Inter Partes* Review Case No. IPR2020-01189

U.S. Patent No. 8,497,774

**DECLARATION OF SCOTT ANDREWS**

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I, Scott Andrews, declare as follows:

**I. BACKGROUND AND QUALIFICATIONS**

1. My name is Scott Andrews, and I am over 21 years of age and otherwise competent to make this Declaration. I make this Declaration based on facts and matters within my own knowledge and on information provided to me by others, and, if called as a witness, I could and would competently testify to the matters set forth herein.

2. I have been retained as a technical expert witness in this matter by Counsel for the Petitioner, Apple Inc. (“Petitioner”) to provide my independent opinions on certain issues requested by Counsel for Petitioner relating to the accompanying Petition for Inter Partes Review of U.S. Patent No. 8,497,774 (“the ’774 Patent”). I am being compensated at an hourly rate of \$650.00. My compensation in this matter is not based on the substance of my opinions or on the outcome of this matter. I have been informed that LBT IP I LLC is the purported owner of the ’774 Patent. I note that I have no financial interest in LBT IP I LLC or Petitioner, and I have no other interest in the outcome of this matter.

3. I have summarized in this section my educational background, career history, and other qualifications relevant to this matter. I have also included a current version of my curriculum vitae, attached as Ex. 1035.

4. I have over 30 years of professional experience in the field of mobile devices and technologies and systems, including handheld communications and navigation devices, vehicle information systems and vehicle safety and control systems, and the sensor system that are used in these devices. Further, I have authored numerous published technical papers and am a named inventor on 13 U.S. and foreign patents.

5. I received a Bachelor of Science degree in Electrical Engineering from University of California, Irvine in 1977 and a Master of Science degree in Electronic Engineering from Stanford University in 1982.

6. From 1977 to 1979, I worked at Ford Aerospace where I designed, tested and delivered microwave radar receiver systems.

7. From 1979 to 1983, I worked at Teledyne Microwave, where I developed high reliability microwave components and developed CAD tools.

8. From 1983 to 1996, I worked at TRW, Inc., having held various positions. From 1983 to 1985, I was a Member of the technical staff and a Department Manager in the Space Electronics sector. Between 1985 and 1990 I was a project manager working on various communications systems projects including the US DoD Advanced Research Projects Administration (ARPA) MIMIC Program. Between 1990 and 1993 I was the Manager of MMIC (monolithic-microwave-integrated-circuit) Products Organization. In this role, I developed business strategy and

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