UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SONY CORPORATION, AND
SONY MOBILE COMMUNICATIONS INC.,
Petitioners

v.

NEODRON LTD.
Patent Owner.

**DECLARATION OF DR. BENJAMIN B. BEDERSON IN SUPPORT OF
PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,749,251**

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1.   I, Dr. Benjamin B. Bederson, declare as follows:

I.   INTRODUCTION

2.   I have been retained by Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Sony Corp., and Sony Mobile Communications Inc. (collectively, "Petitioners") as an independent expert consultant in this *inter partes* review ("IPR") proceeding before the United States Patent and Trademark Office ("PTO").

3.   I have been asked by Petitioners' counsel ("Counsel") to consider whether certain references teach or suggest the features recited in Claims 6 and 15 of U.S. Patent No. 8,749,251 ("the '251 Patent") (Ex-1001)[1]. My opinions and the bases for my opinions are set forth below.

4.   I am being compensated at my ordinary and customary consulting rate for my work, which is $600 per hour. My compensation is in no way contingent on the nature of my findings, the presentation of my findings in testimony, or the outcome of this or any other proceeding. I have no other financial interest in this proceeding.

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[1] Where appropriate, I refer to exhibits that I understand are attached to the petition for IPR of the '251 Patent.

II.   BACKGROUND AND QUALIFICATIONS

5.   All of my opinions stated in this declaration are based on my own personal knowledge and professional judgment. In forming my opinions, I have relied on my knowledge and experience in designing, developing, researching, and teaching the technology referenced in this declaration.

6.   I am over 18 years of age and, if I am called upon to do so, I would be competent to testify as to the matters set forth herein. I understand that a copy of my current curriculum vitae, which details my education and professional and academic experience, is being submitted as Ex-1003. The following provides a brief overview of some of my experience that is relevant to the matters set forth in this declaration.

7.   I am currently Professor Emeritus of Computer Science at the University of Maryland ("UMD"). From 2014 to 2018, I was the Associate Provost of Learning Initiatives and Executive Director of the Teaching and Learning Transformation Center at the UMD. I am a member and previous director of the Human-Computer Interaction Lab ("HCIL"), the oldest and one of the best known Human-Computer Interaction ("HCI") research groups in the country. I was also co-founder and Chief Scientist of Zumobi, Inc. from 2006 to 2014, a Seattle-based startup that is a publisher of content applications and advertising platforms for smartphones. I am also co-founder and co-director of the

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