

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.  
Petitioner

v.

NEODRON LTD.  
Patent Owner.

**DECLARATION OF DO-HYUNG KIM IN SUPPORT OF PETITION FOR  
*INTER PARTES* REVIEW OF U.S. PATENT NO. 8,749,251**

1. I, Do-Hyung Kim, declare as follows:
2. I am employed in the Device Solution (DS) IP Legal Department at Samsung Electronics Co., LTD. I provide this declaration in support of Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.'s (collectively, "Samsung") Petition for *Inter Partes* Review of U.S. Patent No. 8,749,251 ("’251 Patent"). If called as a witness, I could and would testify competently to the information set forth in this declaration.
3. I have worked in the licensing group of Device Solution Division since 2019, and had worked in the IP legal department before that. My job responsibilities are to interview engineers and review factual and legal materials, including technical documents and relevant agreements, in light of patent disputes.
4. I am informed that in U.S.I.T.C. Investigation No. 337-TA-1193, Complainant Neodron Ltd. accuses Samsung smartphones and tablets (the "Samsung Accused Products") of infringing certain of Neodron's Patents, including the '251 Patent.
5. Samsung did not collaborate with either Apple Inc. or Microsoft Corp. in developing the accused features (i.e., idle or low power mode in touch ICs) of the Samsung Accused Products.
6. I declare that all statements made herein of my knowledge are true, and that all statements made on information and belief are believed to be true, and

that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Date: September 07, 2020



Do Hyung Kim