

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners

v.

NEODRON LTD.

Patent Owner.

**DECLARATION OF LEE HILL IN SUPPORT OF PETITIONS FOR *INTER*
PARTES REVIEW OF U.S. PATENT NO. 8,749,251**

1. I, Lee Hill, declare as follows:
2. I am employed by Sony Corporation of America in the United States.

I provide this declaration in support of the Petitions for *Inter Partes* Review of U.S. Patent No. 8,749,251 (“’251 Patent”) filed by Samsung Electronics Co., Ltd.; Samsung Electronics America, Inc.; Sony Corporation; and Sony Mobile Communications Inc. I refer to Sony Corporation and Sony Mobile Communications Inc. collectively as “Sony.” 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 Intellectual Property Division of Sony Corporation of America since 2019 and had worked in the Legal Department of Sony Mobile Communications before that. My job responsibilities include overseeing patent disputes and in conjunction therewith the collection and review of factual and legal materials, including technical documents and relevant agreements, in light of such patent disputes.

4. I am informed that in U.S.I.T.C. Investigation No. 337-TA-1193, Complainant Neodron Ltd. accuses certain Sony smartphones (the “Sony Accused Products”) of infringing certain of Neodron’s Patents, including the ’251 Patent.

5. Sony did not collaborate with either Apple Inc. or Microsoft Corp. in developing the accused features (i.e., touch recognition features) of the Sony Accused Products.

Declaration of Lee Hill

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 23, 2020

Lee Hill
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