

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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 1-3, 7-12, and 16-18 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.

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

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