

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO. LTD., SAMSUNG ELECTRONICS
AMERICA, INC., AND APPLE, INC.,
Petitioner,

v.

NEONODE SMARTPHONE LLC,
Patent Owner.

Case IPR2021-00144
Patent 8,095,879

EXHIBIT 2042
DECLARATION OF PARHAM HENDIFAR

I, Parham Hendifar, declare the following:

1. I am an attorney at the law firm of Lowenstein & Weatherwax LLP, and am a member in good standing of, among other bars, the State Bar of California, and a registered practitioner in good standing before the Office, with the registration number of 71,470.

2. I provide this Declaration in connection with IPR2021-00144, in which I am counsel of record for Patent Owner Neocode Smartphone LLC.

3. Unless otherwise stated, the facts contained in this Declaration are based on my personal knowledge.

4. Exhibit 2008 is a true and accurate copy of a video, titled “Neocode N2 instructions film,” available at the following link as visited on or about March 24, 2022: <https://www.youtube.com/watch?v=Hq3S8Crx2s>.

5. Exhibit 2012 is a true and accurate copy of an article titled “NeoNode N1 Can a unique interface put this compelling smart phone on the map?” by Conrad H. Blickenstorfer available at the following link as visited on or about March 22, 2022: <http://pencomputing.com/WinCE/neocode-n1-review.html>.

6. Exhibit 2013 is a true and accurate copy of an article titled “NeoNode N2 A new version of the phone that pioneered touchscreens” by Conrad H. Blickenstorfer available at the following link as visited on or about March 22, 2022: <http://www.pencomputing.com/WinCE/neocode-n2-review.html>.

7. Exhibit 2014 is a true and accurate copy of an article titled “The Neonode N2” by Bill Hennessy available at the following link as visited on or about March 24, 2022: <https://www.trendhunter.com/trends/neonode-n2-phone>.

8. Exhibit 2015 is a true and accurate copy of the webpage titled “About Trend Hunter” available at the following link as visited on or about March 22, 2022: <https://www.trendhunter.com/about-trend-hunter>.

9. Exhibit 2016 is a true and accurate copy of an article titled “Neonode N1m first impressions” available at the following link as visited on or about March 24, 2022: <https://tnkgrl.com/2007/04/16/neonode-n1m-first-impressions/>.

10. Exhibit 2017 is a true and accurate copy of the webpage titled “tnkgrl Media” available at the following link as visited on or about March 22, 2022: <https://tnkgrl.com/tnkgrl-media/>.

11. Exhibit 2019 is a true and accurate copy of an article titled “If Android is a ‘stolen product,’ then so was the iPhone” by Timothy B. Lee available at the following link as visited on or about March 24, 2022: <https://arstechnica.com/tech-policy/2012/02/if-android-is-a-stolen-product-then-so-was-the-iphone/>.

12. Exhibit 2021 is a true and accurate copy of an article titled “Hunting the iPhone killer; Swedish Neonode generates buzz for device” available at the following link as visited on or about March 24, 2022:

<https://www.rcrwireless.com/20070407/archived-articles/hunting-the-iphone-killer>.

13. Exhibit 2029 is a true and accurate copy of a video titled “Neonode N1m review” available at the following link as visited on or about March 24, 2022: <https://www.youtube.com/watch?v=Tj-KS2kflr0>.

14. Exhibit 2030 is a true and accurate copy of a thread titled “Neonode N2 instructions film” available at the following link and printed on March 23, 2022: <https://www.youtube.com/watch?v=Hq3S8Crx2s>.

15. Exhibit 2031 is a true and accurate copy of a thread titled “Neonode N2 Overview” available at the following link and printed on March 23, 2022: <https://www.youtube.com/watch?v=vQNUQm3-qJA>.

16. Exhibit 2032 is a true and accurate copy of a thread titled “Neonode N2 unbox and review video” available at the following link and printed on March 24, 2022: https://www.youtube.com/watch?v=Ux_9tbioS_8.

17. Exhibit 2033 is a true and accurate copy of the webpage titled “iPhone” available at the following link and printed on March 23, 2022, 7:20 PM: <https://en.wikipedia.org/wiki/IPhone>.

18. Exhibit 2034 is a true and accurate copy of the webpage titled “Samsung Galaxy” available at the following link and printed on March 23, 2022, 7:19 PM: https://en.wikipedia.org/wiki/Samsung_Galaxy.

19. Exhibit 2036 is a true and accurate copy of a video titled “Neonode the only original” available at the following link as visited on or about March 24, 2022: <https://www.youtube.com/watch?v=D9N3H1rSxHk>.

20. Exhibit 2039 is a true and accurate copy of a webpage titled “US Inflation Calculator,” available at the following link as visited on or about March 24, 2022: <https://www.usinflationcalculator.com/>.

21. Exhibit 2040 is a true and accurate copy of a webpage titled “Euro Dollar Exchange Rate (EUR USD) - Historical Chart,” available at the following link as visited on or about March 24, 2022:
<https://www.macrotrends.net/2548/euro-dollar-exchange-rate-historical-chart>.

22. Exhibit 2041 is a true and accurate copy of a January 27, 2021 article titled “Smartphone Shipments Declined in the Fourth Quarter But 2021 Was Still a Growth Year with a 5.7% Increase in Shipments, According to IDC,” available at the following link as visited on or about March 24, 2022:
<https://www.idc.com/getdoc.jsp?containerId=prUS48830822>.

23. I certify 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 knowledge that willful false statements and the like are made punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

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