

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

FUNDAMENTAL INNOVATION SYSTEMS
INTERNATIONAL LLC,

Plaintiff,

v.

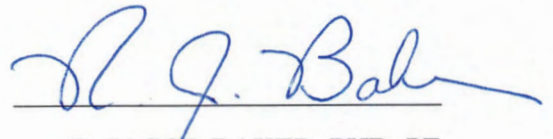
TCT MOBILE (US), INC.; TCT MOBILE
(US) HOLDINGS, INC.; HUIZHOU TCL
MOBILE COMMUNICATION CO. LTD.;
and TCL COMMUNICATION, INC.,

Defendants.

C.A. No. 1:20-CV-00552-CFC

**EXPERT REPORT OF R. JACOB BAKER, PH.D., P.E., AS TO THE
INVALIDITY OF U.S. PATENTS**

For the reasons discussed in this Report, which expressly includes the Appendices and Exhibits, in my opinion, all asserted claims of the Asserted Patents are invalid due to at least the reasons detailed in this Report. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



R. JACOB BAKER, PH.D., PE

MARCH 15, 2022

Date

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APPENDIX A - List of Materials Considered

APPENDIX B - CV

APPENDIX C-1 – C-6 - Invalidity Analysis

1. I have been retained in this matter as an expert witness by Defendants TCT Mobile (US), Inc.; TCT Mobile (US) Holdings, Inc.; Huizhou TCL Mobile Communication Co. Ltd.; and TCL Communication, Inc. (collectively “Defendants” or “TCL”) as to validity of U.S. Patent Nos. 6,936,936 (the “’936 Patent”), 7,239,111 (the “’111 Patent”), 8,624,550 (the “’550 Patent”), 7,834,586 (the “’586 Patent”), 8,232,766 (the “’766 Patent”) and 8,169,187 (“’187 Patent”).

2. I am being compensated for my work in this matter at an hourly rate of \$615, which has been my standard rate at the time I was retained. My compensation in no way depends upon the outcome of this proceeding.

3. The opinions expressed in this Report are my own and are based on my personal knowledge, my education, experience, and training, and on my understanding of the information and documents referenced in this Report. In forming the opinions expressed herein, I have considered the materials listed in the attached **Appendix A** as well as my knowledge and experience based upon my work in this area as described below. I also considered, and incorporate here by reference to them, any other materials referenced in this report, the materials included in my List of Materials Considered that was attached to any of my previously served declarations related to any of the asserted patents addressed herein, and any other materials referenced in my declarations filed with petitions for *inter partes* review and requests for reexamination of the asserted patents.

4. I reserve the right to supplement or amend this Report after the receipt of any additional information or documents that I may receive after the date of my Report, or may be produced by Plaintiff, their experts (including their opening reports, rebuttal reports, or depositions), or third parties, or any other information that affects my opinions, including, but not

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