

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,
Petitioner

v.

STRATOSAUDIO, INC.,
Patent Owner

IPR2021-00716
U.S. Patent No. 8,688,028

**DECLARATION OF DR. VIJAY MADISETTI IN SUPPORT OF
PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE**

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I, Dr. Vijay Madiseti, declare as follows:

I. INTRODUCTION

1. I am the same Dr. Vijay Madiseti who submitted a prior declaration (EX1003) in this matter, which I understand was filed on April 16, 2021. I have been retained on behalf of Volkswagen Group of America, Inc. for the above-captioned *inter partes* review proceeding.

2. I understand that the Patent Owner has submitted a response in this case. I also understand that the Patent Owner's expert witness, Dr. John C. Hart, has submitted a declaration in support of the Patent Owner's response. I have been asked to provide my technical review, analysis, and insight regarding both the Patent Owner's response and Dr. Hart's declaration in support thereof.

3. My background and qualifications were provided in paragraphs 5-17 of my previous declaration, and my CV was provided as an appendix to EX1003. My statements in paragraphs 18-19 of my prior declaration regarding my review of U.S. Patent No. 8,688,028 ("028 patent") and related materials remain unchanged, as do my understandings of the relevant legal principles stated in paragraphs 20-28.

4. Since my prior declaration, I have reviewed and considered the following additional materials:

Paper	Description
16	Decision Granting Institution
28	Patent Owner's Response

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Exhibit	Description
1019	Deposition Transcript of Dr. John C. Hart, taken March 31, 2022
2019	Declaration of Dr. John C. Hart dated January 24, 2022
2020	Excerpt from Random House Webster's Unabridged Dictionary (2 nd ed. 1998)
3001	Claim Construction Order, <i>StratosAudio Inc. v. Volkswagen Group of America, Inc.</i> , No. 6:20-cv-01131-ADA (W.D. Tex. September 22, 2021), ECF No. 60.

5. I have also considered all other materials cited herein. My work on this case is being billed at my normal hourly rate, with reimbursement for actual expenses. My compensation is not contingent upon the outcome of this *inter partes* review proceeding.

6. In preparing this declaration, I have reviewed and am familiar with all the references cited herein. I have reviewed and am familiar with the '028 patent and its prosecution history. I confirm that to the best of my knowledge the accompanying exhibits are true and accurate copies of what they purport to be, and that an expert in the field would reasonably rely on them to formulate opinions such as those set forth in this declaration.

7. In his declaration, Dr. Hart makes several statements regarding the '028 patent, the prior art references, and the relevant technology at issue in this proceeding, which I believe to be inaccurate and misleading. My responses to these statements are detailed below.

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