UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,
Petitioner

v.

STRATOSAUDIO, INC.,
Patent Owner

IPR2021-00721
U.S. Patent No. 8,166,081

DECLARATION OF DR. TODD K. MOON

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I. INTRODUCTION

1. I, Todd K. Moon, Ph.D., have been retained by Patent Owner StratosAudio, Inc. ("Patent Owner") as an independent expert witness in the above referenced *inter partes* review ("IPR") of United States Patent No. 8,166,081 ("the '081 patent") (EX1001). I understand that Volkswagen Group of America, Inc. ("Petitioner") has petitioned for *inter partes* review of the '081 patent and requests that the United States Patent and Trademark Office ("PTO") cancel as unpatentable certain claims of the '081 patent.

2. This declaration sets forth my analyses and opinions based on the materials I have considered thus far and the bases for my opinions. I understand that this declaration will be used in the above mentioned IPR2021-00721.

A. Background And Qualifications

3. My qualifications are set forth in my curriculum vitae, a copy of which is attached as Appendix A. As set forth in my curriculum vitae, I received my B.S. in Electrical Engineering and Mathematics (dual major) and M.S. in Electrical Engineering from Brigham Young University in 1988. I received my Ph.D. in Electrical Engineering from the University of Utah in 1991.

4. In 1991, I began teaching electrical and computer engineering at the Utah State University ("USU"). From 1991 to 1996, I was an Assistant Professor

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of Electrical Engineering, and from 1996 to 2002, I was an Associate Professor of Electrical Engineering. I currently serve as a Professor of Electrical and Computer Engineering and served as the department head from 2007 through 2016.

5. As further described in my CV, I have over thirty years of experience in electrical engineering, including extensive experience in signal processing and digital communications. I have taught numerous classes in the field of signals and systems. Some of the courses I have taught include digital communications, digital signal processing, circuits and signals/signals and systems, digital control systems, and digital systems design. I am a member of the IEEE Signal Processing Theory and Methods (SPTM) Committee and was the General Conference Chair of the IEEE Signal Processing/SP Education Workshop in 2015.

6. I have authored or co-authored four books: *Error Correction Coding: Mathematical Methods and Algorithms*, 1st Ed., Wiley, 2005, *Error Correction Coding: Mathematical Methods and Algorithms*, 2nd Ed., Wiley, 2021, *Mathematical Methods and Algorithms for Signal Processing*, Prentice-Hall, 2000, and *Advanced Signal Processing: A Concise Guide,* McGraw-Hill, 2020. I have authored or coauthored more than 50 journal papers and over 140 conference papers on topics including geolocation, remote sensing, signal processing, communication, filter design, and error correction coding.

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