

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HYUNDAI MOTOR AMERICA,
Petitioner

v.

STRATOSAUDIO INC.,
Patent Owner.

**DECLARATION OF DR. KEVIN C. ALMEROOTH IN SUPPORT OF
PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,166,081**

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1. I, Dr. Kevin C. Almeroth, declare as follows:

I. INTRODUCTION

2. I have been retained by Hyundai Motor America. (“Hyundai” or “Petitioner”) 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 Hyundai Counsel (“Counsel”) to consider whether certain references disclose, teach, and/or suggest the features recited in Claims 9-11, 15, and 23 of U.S. Patent No. 8,166,081 (“the ’081 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 \$750 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.

II. BACKGROUND AND QUALIFICATIONS

5. All of my opinions stated in this Declaration are based on my own personal knowledge and professional judgment. In forming my opinions, I have

¹ Where appropriate, I refer to exhibits that I understand are attached to the petition for IPR of the ’081 Patent.

relied on my knowledge and experience in designing, developing, researching, and teaching the technology referenced in this Declaration.

6. I am over 18 years of age and, if I am called upon to do so, I would be competent to testify as to the matters set forth herein. I understand that a copy of my current curriculum vitae, which details my education and professional and academic experience, is being submitted as Ex-1003. The following provides a brief overview of some of my experience that is relevant to the matters set forth in this Declaration.

7. I am currently a Professor Emeritus in the Department of Computer Science at the University of California, Santa Barbara (UCSB). While active at UCSB, I held faculty appointments and was a founding member of the Computer Engineering (CE) Program, Media Arts and Technology (MAT) Program, and the Technology Management Program (TMP). I also served as the Associate Director of the Center for Information Technology and Society (CITS) from 1999 to 2012. I have been a faculty member at UCSB since July 1997.

8. I hold three degrees from the Georgia Institute of Technology: (1) a Bachelor of Science degree in Information and Computer Science (with minors in Economics, Technical Communication, and American Literature) earned in June 1992; (2) a Master of Science degree in Computer Science (with specialization in Networking and Systems) earned in June 1994; and (3) a Doctor of Philosophy

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