

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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HYUNDAI MOTOR AMERICA  
Petitioner

v.

STRATOSAUDIO, INC.,  
Patent Owner

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IPR2021-01267  
U.S. Patent No. 8,166,081

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**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 Hyundai Motor America (“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 IPR2021-01267.

### 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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