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. ALMEROTH IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,688,028



TABLE OF CONTENTS

I.	INTRODUCTION			
II.	BACKGROUND AND QUALIFICATIONS			
III.	INFORMATION CONSIDERED			
IV.	RELEVANT LEGAL STANDARDS			
	A.	Claim Interpretation	14	
	B.	Perspective of One of Ordinary Skill in the Art	15	
	C.	Obviousness	15	
V.	LEV	EL OF ORDINARY SKILL IN THE ART	18	
VI.	SUMMARY OF MY OPINIONS1			
VII.	TECHNOLOGICAL BACKGROUND2			
VIII.	THE '028 PATENT AND ITS FILE HISTORY2			
IX.	OVERVIEW OF THE APPLIED PRIOR ART REFERENCES			
	A.	Curtin (Ex-1010)	27	
	B.	Crosby (Ex-1006)	29	
	C.	Alwadish (Ex-1011)	31	
	D.	Koerber (Ex-1012)	33	
X.	DETAILED EXPLANATION OF THE UNPATENTABILITY GROUNDS			
	A.	Grounds 1 and 2: Claims 11 and 13-20 are rendered obvious by Curtin (Ex-1010) alone or by Curtin in view of Crosby (Ex-1006);	35	



Declaration of Dr. Kevin C. Almeroth U.S. Patent No. 8,688,028

		1.	A POSITA would have been motivated to combine the teachings of Curtin and Crosby, and would have had a reasonable expectation of success in doing so	35	
		2.	Independent Claim 11	37	
		3.	Dependent Claims 13-20	47	
	B.	Ground 3: Claims 11, 14-15, and 18 are rendered obvious by Alwadish (Ex-1011);			
		1.	Independent Claim 11	55	
		2.	Dependent Claims 14, 15, and 18	63	
	C.	Grounds 4 and 5: Claims 12 and 16 are rendered obvious by Alwadish alone or by Alwadish (Ex-1011) in view of Koerber (Ex-1012);			
		1.	A POSITA would have been motivated to combine the teachings of Alwadish and Koerber and would have a reasonable expectation of success in doing so	67	
		2.	Dependent Claims 12 and 16	70	
XI.	CON	ICLUS	SION	74	



LIST OF EXHIBITS¹

Ex-1001	U.S. Patent No. 8,688,028
Ex-1002	Declaration of Dr. Kevin Almeroth
Ex-1003	Curriculum Vitae of Dr. Kevin Almeroth
Ex-1004	Prosecution History of U.S. Patent No. 8,688,028
Ex-1005	[INTENTIONALLY LEFT BLANK]
Ex-1006	U.S. Patent No. 6,628,928, Filed on December 10, 1999 ("Crosby)
Ex-1007	[INTENTIONALLY LEFT BLANK]
Ex-1008	[INTENTIONALLY LEFT BLANK]
Ex-1009	Email from Albright Clerk, dated May 4, 2021
Ex-1010	U.S. Patent No. 6,925,489, filed on November 22, 1999 ("Curtin")
Ex-1011	U.S. Patent No. 5,063,610, issued on November 5, 1991 ("Alwadish")
Ex-1012	European Patent No. 0 647 377, published on April 12, 1995 ("Koerber")
Ex-1013	[INTENTIONALLY LEFT BLANK]
Ex-1014	[INTENTIONALLY LEFT BLANK]
Ex-1015	[INTENTIONALLY LEFT BLANK]
Ex-1016	[INTENTIONALLY LEFT BLANK]
Ex-1017	[INTENTIONALLY LEFT BLANK]
Ex-1018	[INTENTIONALLY LEFT BLANK]

¹ Four-digit pin citations that begin with "0" are to the page stamps added by Hyundai in the bottom right corner of the exhibits. All other pin citations are to original page, column, paragraph, and/or line numbers.



-111-

Declaration of Dr. Kevin C. Almeroth U.S. Patent No. 8,688,028

Ex-1019	[INTENTIONALLY LEFT BLANK]
Ex-1020	Plaintiff's Preliminary Infringement Contentions, dated May 13, 2021, including Claim Chart for '028 Patent ("Infringement Contentions")
Ex-1021	Petitioner's Stipulation Letter to Patent Owner, dated July 22, 2021
Ex-1022	U.S. Patent No. 5,948,061 A, issued Sept. 7, 1999 ("Merriman")
Ex-1023	U.S. Patent No. 5,778,181 A, issued July 7, 1998 ("Hidary")
Ex-1024	U.S. Patent Application Ser. No. 09/953,335

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