

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioners,

v.

TRAXCELL TECHNOLOGIES, LLC,

Patent Owner.

IPR2022-00073 (Patent No. 10,820,147)

DECLARATION OF ROBERT VAN ESSEN

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I, Robert van Essen, do hereby declare as follows:

I. INTRODUCTION

1. I have been retained as an expert on behalf of Patent Owner Traxcell Technologies LLC (“Patent Owner” or “Traxcell”) in this *inter partes* review (“IPR”) proceeding of U.S. Patent No. 10,820,147 (“the ‘147 Patent”). I understand this proceeding was initiated by Petitioner Apple LLC (“Petitioner” or “Apple”).

2. I have set forth my professional qualifications and relevant experience in Section II of this Declaration, and a copy of my curriculum vitae is available at Attachment A.

3. I have been asked to provide my expert opinions regarding the validity or invalidity of claims 1-24 of the ‘147 Patent.

4. I understand that Petitioner has asserted invalidity based on the following references:

Reference	Exhibit
U.S. Patent No. 6,505,048 (Moles)	1005
International Pub. No. WO 0128270 (Sakarya)	1006
U.S. Patent No. 6,738,808 (Zellner)	1008
U.S. Patent No. 7,010,306 (Tanibayashi)	1009
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