UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,

Petitioners,

v.

TRAXCELL TECHNOLOGIES, LLC,

Patent Owner.

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

_____

DECLARATION OF ROBERT VAN ESSEN

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313-1450

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TABLE OF AUTHORITIES

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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
U.S. Patent No. 6,192,314 (Khavakh)	1010

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