UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.

Petitioner,

v.

TRAXCELL TECHNOLOGIES, LLC

Patent Owner

IPR2022-00073
U.S. Patent No. 10,820,147

DECLARATION OF MICHAEL BRAASCH, PH.D., UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW

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I, Michael Braasch, do hereby declare:

1. I am making this Declaration at the request of Apple Inc., in the matter of the *Inter Partes* Review ("IPR") of U.S. Patent No. 10,820,147 ("the '147 patent").

2. I am being compensated for my work in this matter at my standard hourly rate. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this proceeding. My compensation is not contingent on the outcome of this proceeding or the specifics of my testimony.

3. I have been asked by Apple's counsel to provide my opinions regarding whether the subject matter of claims 1-9, 11-20, and 22-24 ("the Challenged Claims") of the '147 patent would have been obvious to a person having ordinary skill in the art ("POSITA") at the time of the alleged invention, in light of the prior art. It is my opinion that the Challenged Claims would have been obvious to a POSITA.

4. In the preparation of this declaration, I have studied:

a) the '147 patent, Ex. 1001,

b) the prosecution history of the '147 patent, Ex. 1002,

c) U.S. Patent 6,505,048 to Moles et al. ("Moles"), Ex. 1005;

d) WO2001/28270 to Sakarya ("Sakarya"), Ex. 1006;

e) U.S. Patent 6,716,101 to Meadows et al. ("Meadows"), Ex. 1007;

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