

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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VOLKSWAGEN GROUP OF AMERICA, INC.,  
Petitioner

v.

STRATOSAUDIO, INC.,  
Patent Owner

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Case No. IPR2021-00721  
Patent No. 8,166,081

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**DECLARATION OF TIM A. WILLIAMS, PhD  
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT NO. 8,166,081**

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I, Tim A. Williams, declare as follows:

## **I. INTRODUCTION**

1. I have been retained by Volkswagen Group of America, Inc. (“Volkswagen” or “Petitioner”) as an independent expert consultant in this proceeding before the Patent Trial and Appeal Board (“PTAB”) of the United States Patent and Trademark Office.

2. Specifically, Volkswagen has asked me to provide technical assistance in this *inter partes* review (“IPR”) of U.S. Patent No. 8,166,081 (“the ’081 Patent”).

3. This declaration is a statement of my opinions on issues related to the unpatentability of Claims 9–11 and 23 of the ’081 Patent.

4. I am being compensated by Volkswagen at the rate of \$700 per hour for my work in this case, including time spent testifying. This rate is my standard hourly rate for engagements of this nature. I am being reimbursed for reasonable fees and expenses, including hotel and travel expenses, incurred as a result of my work on this case. My compensation does not depend on the outcome of the case, and the fact that I am being compensated has not altered the opinions that I have or will give in this case.

## **II. BACKGROUND AND QUALIFICATIONS**

5. I am an independent consultant. All of my opinions stated in this

declaration are based on my own personal knowledge and professional judgment. In formulating my opinions, I have relied upon my knowledge, training, and experience in the relevant art.

6. I am over 18 years of age, and, if I am called upon to do so, I would be competent to testify as to the matters set forth herein. While my qualifications are stated more fully in my curriculum vitae, attached hereto as Appendix A, I provide below a brief summary of my qualifications.

7. I earned a Bachelor of Science degree in Electrical Engineering (BSEE) from Michigan Technological University in 1976. In 1982, I earned a Master's degree, also in Electrical Engineering (MSEE), from the University of Texas at Austin. I earned a Doctor of Philosophy (Ph.D.), also from the University of Texas at Austin, in 1985. My doctorate dissertation was "Digital Signal Processing Techniques for Acoustic Log Data." In 1991, I earned a Master of Business Administration degree from the University of Texas at Austin as well.

8. I have over 40 years of professional experience in wireless communications and telecom technology, including roles in large corporations as well as start-ups and consulting work.

9. For example, from 1979 through 1991, I held the positions of Senior Engineer, Senior Member of the Technical Staff, and Member of the Technical Staff at Motorola, Inc. My work at Motorola, Inc. included serving as business

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