

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,
Petitioner

v.

STRATOSAUDIO, INC.,
Patent Owner

Case No. IPR2021-00716
Patent No. 8,688,028

**DECLARATION OF VIJAY MADISETTI, PhD
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 8,688,028**

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I, Vijay Madiseti, 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. 8,688,028 (“the ’028 Patent”).

3. This declaration is a statement of my opinions on issues related to the unpatentability of Claims 11, 14–16, and 18 of the ’028 Patent.

4. I am being compensated by Volkswagen at the rate of \$600 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 Technology (Honors) in Electronics & Electrical Communications Engineering from the Indian Institute of Technology (IIT) in Kharagpur, India, in 1984. I earned my Ph.D. in Electrical Engineering and Computer Science (EECS) from the University of California at Berkeley in 1989. I have published extensively, with about 100 technical publications and eight books in the areas of computing, signal processing and communications systems.

8. I am an Institute of Electrical and Electronics Engineers (“IEEE”) Fellow and, in 2006, I was awarded the 2006 Frederick Emmons Terman Medal by the American Society of Engineering Education (“ASEE”) and HP Corporation for my contributions to electrical engineering.

9. I have been a Full Professor of Electrical/Computer Engineering at the Georgia Institute of Technology (“Georgia Tech”) since 1989. I lead several

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