

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD. AND DELL TECHNOLOGIES INC.  
Petitioners

v.

MYPAQ HOLDINGS LTD.  
Patent Owner

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Case No. IPR2022-TBD  
Patent 8,477,514

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**DECLARATION OF DR. SAYFE KIAEI**

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## **Declaration of Dr. Sayfe Kiaei**

### **I. INTRODUCTION**

1. I have been retained by Samsung Electronics Co., Ltd. (“Samsung” or “Petitioner”) as an independent expert consultant in this proceeding before the United States Patent and Trademark Office (“PTO”).

2. My compensation is in no way contingent on the nature of my findings, the presentation of my findings in testimony, or the outcome of this or any other proceeding. I have no other interest in this proceeding.

3. I have been asked to consider whether certain references disclose or suggest the features recited in the claims of U.S. Patent No. EX1001 – US8477514B2 (“the ’514 patent”) (EX1001).<sup>1</sup> My opinions are set forth below.

### **II. EXPERIENCE AND QUALIFICATIONS**

4. I am a professor at Arizona State university and am an independent consultant for this IPR. All of my opinions stated in this declaration are based on my own personal knowledge and professional judgment.

5. In forming my opinions, I have relied on my education, experience, and knowledge regarding electrical engineering, computer science, and consumer electronics product design. A copy of my current curriculum vitae, which details

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<sup>1</sup> Where appropriate, I refer to exhibits I understand will be attached to the petition for *inter partes* review of the ’514 patent (the “Petition”).

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