

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

TELEFONAKTIEBOLAGET LM ERICSSON,
Patent Owner

IPR2022-00338
U.S. Patent 8,995,357

**DECLARATION OF DR. ZYGMUNT HAAS,
IN SUPPORT OF PATENT OWNER'S PRELIMINARY RESPONSE**

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B.	Lee-746, Lee-668, and the Samsung Liaison document, even when combined, do not render obvious transmitting system information in “recurring time windows” or “regularly	

occurring time windows” with each time window “spanning a plurality of subframes” (all grounds, all claims).....50

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I, Zygmunt Haas, do hereby declare as follows:

I. INTRODUCTION

1. I am making this declaration at the request of Patent Owner Telefonaktiebolaget LM Ericsson, Inc. (“Ericsson”) in the matter of a Patent Owner Preliminary Response in the *Inter Partes* Review of U.S. Patent No. 8,995,357 (“the ’357 Patent”).

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

3. I have been asked to provide my opinions regarding whether claims 1-4, 6-10, 12, 14-17, and 19-24 (“the Challenged Claims”) of the ’357 Patent are patentable as they would have been non-obvious to a person having ordinary skill in the art (“POSITA”) at the time of the invention, in light of the prior art. My conclusion and opinion of my work on this project is that the challenged claims would have been non-obvious to a POSITA.

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

a. U.S. Patent No. 8,995,357 (“the ’357 Patent”), Ex. 1001;

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