UNITED STATES PATENT AND TRADEMARK OFFICE PATENT TRIAL AND APPEAL BOARD

APPLE INC., Petitioner

V.

TELEFONAKTIEBOLAGET LM ERICSSON

Patent Owner

Case No. IPR2022-00464 Patent No. 10,193,600

<u>DECLARATION OF DR. MURIEL MÉDARD, Sc.D</u> IN SUPPORT OF PATENT OWNER'S PRELIMINARY RESPONSE





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Declaration of Dr. Muriel Médard

I. <u>INTRODUCTION</u>

1. My name is Dr. Muriel Médard. I make this declaration based upon my

own personal knowledge and, if called upon to testify, would testify competently to

the matters contained herein.

2. I have been asked to provide technical assistance in the inter partes

review of U.S. Patent No. 10,193,600, which I may abbreviate as "the '600 Patent."

Ex. 1001. This declaration is a statement of my opinions on issues related to the

unpatentability of claims of the '600 Patent. I am being compensated at my normal

rate of \$600 per hour for my analysis, plus reimbursement for expenses. My

compensation does not depend on the content of my opinions or the outcome of this

proceeding.

II. EXPERIENCE AND QUALIFICATIONS

3. I am an independent consultant. In forming my opinions, I have relied

on my knowledge and experience in designing, developing, researching, and

teaching in the areas of networking, wired and wireless systems, and

communications engineering. While I am not an attorney and offer no legal opinions,

in the course of my work, I have had experience studying and analyzing patents and

patent claims from the perspective of a person having ordinary skill in the art. I am

over 18 years of age and, if I am called upon to do so, I would be competent to testify

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Declaration of Dr. Muriel Médard

as to the matters set forth herein.

4. My curriculum vitae (CV), which includes a more detailed summary of

my background, experience, patents, designs, and publications, is included as

Exhibit 2002. In the last four years, I have testified in the matter of Shichinin, LLC

v. Sprint Corp., No. 1:21-cv-00483 (D. Hawaii).

5. I received a Bachelor of Science in Electrical Engineering and

Computer Science (1989), a Bachelor of Science in Mathematics (1989), a Master

of Science degree in Electrical Engineering (1990), and a Bachelor of Science in

Humanities (1991), all from the Massachusetts Institute of Technology (MIT). In

1995, I also received a Doctorate of Science in Electrical Engineering from MIT. In

the United States and abroad, a Doctorate of Science (Sc.D.) in Electrical

Engineering is at least equivalent in training, mastery level, and prestige to a

Doctorate of Philosophy (Ph.D.) in Electrical Engineering.

6. I have extensive industry and academic experience related to the field

of communications, including wireless communications. Specifically, I have over

30 years of academic and industry experience in the design, modeling, and

development of computer networking devices, including optical networks and

protocols.

7. After graduating from MIT with a Sc.D. in 1995, I worked as a staff

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