

UNITED STATES PATENT AND TRADEMARK OFFICE  
PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,  
Petitioner

v.

TELEFONAKTIEBOLAGET LM ERICSSON  
Patent Owner

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

**DECLARATION OF DR. MURIEL MÉDARD, Sc.D**  
**IN SUPPORT OF PATENT OWNER'S PRELIMINARY RESPONSE**

ERICSSON EXHIBIT 2001  
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**I. INTRODUCTION**

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

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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