

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.

Petitioner

v.

SCRAMOGE TECHNOLOGY LTD.

Patent Owner

Patent No. 10,193,392

DECLARATION OF DR. GARY WOODS

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I, Gary Woods, hereby declare as follows:

I. INTRODUCTION

1. I have been retained as an expert witness on behalf of Google LLC, Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (“Petitioner”) for the above-captioned *inter partes* review (IPR). I understand that Petitioner challenges the validity of Claims 1, 2, and 5-8 of U.S. Patent No. 10,193,392.

2. I am over the age of eighteen (18) and otherwise competent to make this declaration. I am being compensated for my time in connection with this IPR at my standard consulting rate.

3. I understand that the petition for *inter partes* review involves U.S. Patent No. 10,193,392 (the “’392 Patent”), Ex-1001¹, which resulted from U.S. Application No. 15/110,665 (“the ’665 application”). The ’665 Application was filed on July 8, 2016 as a national stage application of PCT KR2015/00163, filed January 7, 2015. The ’392 Patent also claims priority to Korean Patent Applications 10-2014-0002327 and 10-2014-0009243, filed January 8, 2014, and January 24,

¹ All exhibit citations refer to the exhibits attached to the Petition for *Inter Partes* Review of U.S. Patent No. 10,193,392, filed concurrently herewith.

2014, respectively. The '392 Patent names Su Ho Bae as the inventor and issued on January 29, 2019, from the '665 application. *See* Ex-1001 at Cover. I further understand that, according to USPTO records, the '392 Patent is currently assigned to Scramoge Technology Limited (“Patent Owner” or “Scramoge”).

4. I have been asked to assume that the earliest date to which the '392 Patent is entitled to priority is January 8, 2014.

5. In preparing this Declaration, I have reviewed the '392 Patent and considered each of the documents cited herein, in light of general knowledge in the art. In formulating my opinions, I have relied upon my experience in the relevant art and have also considered the viewpoint of a person of ordinary skill in the art.

6. I am familiar with the technology at issue as of January 8, 2014, the earliest claimed priority date of the '392 Patent. I am also familiar with a person of ordinary skill in the art with respect to the technology at issue as of the January 8, 2014 earliest claimed priority date of the '392 Patent.

II. *MY BACKGROUND AND QUALIFICATIONS*

7. Since 2008, I have been employed as a Professor in the Practice in the Department of Electrical and Computer Engineering at Rice University in Houston, Texas. Since 2020, my title has been Distinguished Professor in the Practice. Before that, I worked as a postdoctoral fellow at the University of California, Santa Barbara

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