

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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

v.

SCRAMOGE TECHNOLOGY LTD.  
Patent Owner.

U.S. Patent No. 7,825,537

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**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. (collectively, “Petitioner”) for the above-captioned *inter partes* review (IPR). I understand that Petitioner challenges the validity of Claims 1-5, 9-16, 20-22, and 28 of U.S. Patent No. 7,825,537.

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. 7,825,537 (“the ’537 Patent”), Ex-1001, which resulted from U.S. Application No. 12/271,023 (the “’023 Application”). The ’023 Application was filed on November 14, 2008 and names Benjamin Freer as the inventor. *See* Ex-1001 at Cover. The ’537 Patent issued on November 2, 2010. I further understand that, according to USPTO records, the ’537 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 ’537 Patent is entitled to priority is November 14, 2008.

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