

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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APPLE INC, SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG  
ELECTRONICS AMERICA, INC.,  
Petitioners,

v.

SMART MOBILE TECHNOLOGIES LLC,  
Patent Owner.

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IPR2022-00807  
U.S. Patent No. 9,756,168

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**DECLARATION OF MICHAEL KOTZIN, PH.D.,  
UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION FOR  
*INTER PARTES* REVIEW**

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I, Michael Kotzin, Ph.D., do hereby declare as follows:

## I. INTRODUCTION

1. I am making this declaration at the request of Apple Inc. in the matter of the *Inter Partes* Review of U.S. Patent No. 9,756,168 (“the ’168 Patent”) to Rao *et al.*

2. I am being compensated for my work in this matter at my 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 2-5, 19-23, 25, 28-29, and 34 (“the Challenged Claims”) of the ’168 Patent are unpatentable as they would have been obvious to a person having ordinary skill in the art (“POSITA”) at the time of the alleged invention, in light of the prior art. It is my opinion that all of the limitations of the challenged claims would have been obvious to a POSITA.

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

- a. the ’168 Patent, Ex.1001;
- b. the prosecution history of the ’168 Patent (“’168 File History”),

Ex.1002;

- c. U.S. Patent No. 5,854,985 to Sinton *et al.* (“Sinton”), Ex.1005;

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