

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COMMSCOPE, INC.,
Petitioner

v.

TQ DELTA, LLC,
Patent Owner

U.S. Patent No. 9,485,055
Issue Date: November 1, 2016
Title: PACKET RETRANSMISSION AND MEMORY SHARING
Case No. IPR2022-00833

**DECLARATION OF BRUCE MCNAIR IN SUPPORT OF PETITION FOR *INTER*
PARTES REVIEW OF U.S. PATENT NO. 9,485,055**

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I, Bruce McNair, declare as follows:

I. INTRODUCTION AND QUALIFICATIONS

A. Introduction

1. I am an independent consultant.
2. I have been retained by Goodwin Procter LLP, counsel for CommScope Inc. (“CommScope”), as a technical expert witness in connection with the petition for *inter partes* review of U.S. Patent No. 9,485,055 (“’055 patent”). I understand that the ’055 patent claims priority to a provisional application filed on April 12, 2006. For purposes of my analysis herein, I have assumed this date is the priority date.
3. I have been asked by CommScope to offer opinions regarding the ’055 patent, including the patentability of the claims in view of certain prior art references and the knowledge of a person having ordinary skill in the art. This Declaration sets forth the opinions I have reached to date regarding these matters.
4. In preparing this Declaration, I have reviewed the ’055 patent, its prosecution history, and each of the documents I reference herein. In reaching my opinions, I have relied upon my experience in the field and have also considered the viewpoint of a person having ordinary skill in the art at the time of the ’055 patent’s priority date. As explained below, I am familiar with the level of skill of a

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