

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ASSA ABLOY AB, ASSA ABLOY INC., ASSA ABLOY RESIDENTIAL
GROUP, INC., AUGUST HOME, INC., HID GLOBAL CORPORATION,
ASSA ABLOY GLOBAL SOLUTIONS, INC.,
Petitioners,

v.

CPC PATENT TECHNOLOGIES PTY LTD.,
Patent Owner.

Case IPR2022-01094
Patent 8,620,039

EXPERT DECLARATION OF SAMUEL RUSS, PHD.

U.S PATENT NO 8,620,039 (CLAIMS 1-20)

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I. INTRODUCTION

1. I, Samuel Russ, submit this Declaration in support of Patent Owner CPC Patent Technologies Pty Ltd. (“CPC”) Patent Owner’s Response to the Petitioners’, ASSA ABLOY AB, ASSA ABLOY Inc., ASSA ABLOY Residential Group, Inc. (“Yale”), August Home, Inc. (“August”), HID Global Corporation (“HID”), ASSA ABLOY Global Solutions, Inc. (“Hospitality”) (collectively “Petitioners”) Petition for *Inter Partes* Review (“Petition” or “IPR”) against U.S. Patent No. 8,620,039 (the “’039 patent”).

2. I have been asked to review the Petition, as well as the Declaration of Stuart Lipoff (EX-1006) and the transcript of his deposition (EX-2041), as submitted in the above-captioned IPR (and the exhibits cited in each) in which Petitioners and Mr. Lipoff have asserted and offered opinions that the claims of the ’039 patent are obvious.

3. All of the opinions set forth in this Declaration are based on my own personal knowledge, professional experience, education, and judgment in consideration of the documents, materials and information referenced herein.

4. I am being compensated for my services as an independent expert in these proceedings at an hourly rate of \$450. I expect to be available to provide oral testimony should the need arise. My compensation is not in any way contingent

upon the outcome of any *Inter Partes* review. I have no financial or personal interest in the outcome of these proceedings, or of any related litigation.

II. QUALIFICATIONS AND EXPERIENCE

5. My experience and education are detailed in my curriculum vitae (“CV”), which I understand has been submitted into the record of this proceeding as EX-2040. My CV also lists publications on which I am a named author and identifies parties on behalf of whom I have previously provided expert testimony.

6. I have experience in a number of areas, and have particular expertise in electronics, security systems, including biometric security systems, device access security, payment terminals, and their related technologies, such as in debit-capable payment terminals and digital set-top boxes, which include design, physical security, system layout, and cryptography schemes. This expertise is directly applicable to the technical area of the '039 patent, which relates to a system for providing secure access to a controlled item, such as physical locking mechanism or an electronic key circuit, using physical biometric attributes.

7. I received my bachelor’s degree in electrical engineering from Georgia Institute of Technology in 1986. I then received my Ph.D. in electrical engineering from Georgia Institute of Technology in 1991.

8. From 2007 to the present, I have been a member of the faculty of the University of South Alabama as an Assistant and Associate Professor in the

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