

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Patent of: Billhartz et al.  
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Title: WIRELESS COMMUNICATIONS SYSTEM INCLUDING  
A WIRELESS DEVICE LOCATOR AND RELATED  
METHODS

**DECLARATION OF DR. ZHI DING**

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I, Zhi Ding, Ph.D., declare that:

## **I. Introduction**

1. My name is Zhi Ding, and I have been retained by counsel for Petitioner Apple, Inc. (“Apple” or “Petitioner”) as an expert witness to provide assistance regarding U.S. Patent 7,110,779 (“the ’779 Patent”). Specifically, I have been asked to consider the validity of claims 1-34 of the ’779 Patent (the “Challenged Claims”) in view of prior art, anticipation and obviousness considerations, and understanding of a person of ordinary skill in the art (“POSITA”) at the time of the invention, i.e., as of the effective filing date of the patent application as it relates to the ’779 Patent. I have personal knowledge of the facts and opinions set forth in this declaration and believe them to be true. If called upon to do so, I would testify competently thereto.

2. I am being compensated for my time at my standard consulting rate. I am also being reimbursed for expenses that I incur during the course of this work. My compensation is not contingent upon the results of my study, the substance of my opinions, or the outcome of any proceeding involving the challenged claims. I have no financial interest in the outcome of this matter or on the pending litigation between Petitioner and Patent Owner.

3. My analysis here is based on my years of education, research and experience, as well as my investigation and study of relevant materials, including those cited herein.

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