

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LG ELECTRONICS, INC.,  
Petitioner,

v.

CONSTELLATION DESIGNS, LLC,  
Patent Owner.

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Case No. IPR2023-00228  
U.S. Patent No. 10,693,700

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**DECLARATION OF GIUSEPPE CAIRE REGARDING PATENT  
OWNER'S PRELIMINARY RESPONSE FOR *INTER PARTES REVIEW* OF  
U.S. PATENT NO. 10,693,700**

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I, Dr. Giuseppe Caire, hereby declare as follows:

## **I. Introduction**

1. My name is Giuseppe Caire. I have been retained in the above-referenced *inter partes* review proceeding by Constellation Designs, LLC, to evaluate United States Patent No. 10693,700 (the “700 patent”) against certain references that are presented by the Petitioner. As detailed in this report, it is my opinion that the Petition does not establish that of the challenged claims are anticipated or rendered obvious by the references presented by the Petitioner. If requested by the Patent Trial and Appeal Board, I am prepared to testify at trial about my opinions expressed herein.

## **II. Qualifications**

2. I have over thirty years of experience in the field of electrical engineering. For the past nine years I have held a Full Professorship and faculty position as the Chair of Communications and Information Theory at Technische Universität Berlin. In my work and research, I have researched and written about Information Theory, Communication Theory and Coding Theory, Wireless Communication Systems, Signal Processing and Statistics.

3. Prior to my appointment at the Technische Universität, Berlin I was a tenured Full Professor at the University of Southern California, Los Angeles from 2005-2016. Although I am currently at the Technische Universität Berlin, I have

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