

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC.

Petitioner

v.

CONSTELLATION DESIGNS, LLC

Patent Owner

US Patent No. 10,693,700

Issue Date: June 23, 2020

Title: Receivers Incorporating Non-Uniform Multidimensional Constellations and
Code Rate Pairs

Inter Partes Review No.: IPR2023-00228

DECLARATION OF DR. BERTRAND HOCHWALD

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I, Dr. Bertrand Hochwald, declare as follows:

I. INTRODUCTION

[0001] I have been retained by LG Electronics, Inc. (“Petitioner” or “LG”) to serve as an independent expert consultant in the *Inter Partes* review (IPR) proceedings regarding U.S. Patent No. 10,693,700 (the “’700 Patent” or LGE1001). I have been asked to consider the validity of claims 1, 4, 6-11, 14, 16-21, 24, and 26-30 of the ’700 Patent (the “Challenged Claims”). My opinions are set forth below.

[0002] I am being compensated at my normal rate of \$675/hour for all services rendered. 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.

[0003] My analysis of the materials produced in this proceeding is ongoing and I will continue to review any new material that is provided. This declaration is indicative of only those opinions that I have formed to date. I reserve the right to amend, revise, and/or supplement my opinions stated herein based on any new information that may become available to me or my continuing analysis of the materials already provided.

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