

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC.,
Petitioner,

v.

CONSTELLATION DESIGNS, LLC,
Patent Owner.

Case No. IPR2023-00319
U.S. Patent No. 10,693,700

**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 retained the title of Adjunct Research Professor at the University of Southern California, Los Angeles since 2016. Prior to my tenure at the University of Southern California, Los Angeles, I spent seven years as a Professor at Eurecom Institute, and held various Assistant Professorships from 1995-1998.

4. I studied Electrical Engineering and received my Ph.D. in 1994 from the Politecnico di Torino, my Master's Degree in 1992 from Princeton University, and my Bachelor of Science Degree in 1990 from the Politecnico di Torino. In addition to my studies at undergraduate and graduate levels and academic qualifications, I have held industrial research positions such as my current role as the Director of the Huawei-TU Berlin Joint Innovation Center, which has a focus on fundamental research in wireless technology.

5. I have authored or co-authored over four hundred publications in the areas of computer networks, and telecommunications. My publication and patents are listed on my curriculum vitae, which is attached hereto as EX2012.

6. In 2021, I was awarded the Leibniz Price, which is awarded to “exceptional scientists and academics for their outstanding achievements in the field of research” and known as the most important research award in Germany. In 2022, I was elected a Member of the Berlin Brandenburg Akademie der Wissenschaften

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