

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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APPLE INC.,  
Petitioner,

v.

TOGAIL TECHNOLOGIES LTD.,  
Patent Owner.

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IPR2023-00720  
U.S. Patent No. 10,791,502

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**DECLARATION OF DR. ZHI DING, PH.D.,  
UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION FOR  
*INTER PARTES* REVIEW**

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I, Dr. Zhi Ding, do hereby declare as follows:

## **I. INTRODUCTION**

1. I am making this declaration at the request of Apple Inc. in the matter of the *Inter Partes* Review of U.S. Patent No. 10,791,502 (“the ’502 patent”) to Chen, *et al.*

2. I am being compensated for my work on this matter and for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the outcome of this matter or the specifics of my testimony, and I have no other interest in this case or the parties thereto.

3. I have been asked to provide my opinions regarding whether claims 1-20 (“the Challenged Claims”) of the ’502 patent are patentable, or whether they would have been obvious to a person having ordinary skill in the art (“POSITA”) at the time of the alleged invention, in light of the prior art. It is my opinion that all of the limitations of the challenged claims would have been obvious to a POSITA.

4. In the preparation of this declaration, I have studied:

- a. the ’502 patent, Ex.1001;
- b. the prosecution history of the ’502 patent (“’502 File History”),

Ex.1002;

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