

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

T-Mobile USA, Inc., AT&T Services Inc., AT&T Mobility LLC, AT&T Corporation, Cellco Partnership d/b/a Verizon Wireless, Nokia of America Corporation, Ericsson Inc.
Petitioners

v.

Cobblestone Wireless LLC
Patent Owner

Case IPR2024-00136
Patent 8,891,347

**DECLARATION OF SYLVIA HALL-ELLIS, PH.D.,
UNDER 37 C.F.R § 1.68**

I. INTRODUCTION

1. My name is Sylvia D. Hall-Ellis. I have been retained as an expert on behalf of T-Mobile USA, Inc., AT&T Corp., AT&T Mobility LLC, AT&T Services, Inc., Cellco Partnership d/b/a Verizon Wireless, Nokia of America Corporation, and Ericsson, Inc. (“Petitioners”).

2. I have written this Declaration on behalf of Petitioners to provide my expert opinion regarding the authenticity and public availability of *LTE – The UMTS Long Term Evolution: From Theory to Practice* by Stefania Sesia, Issam Toufik, and Matthew Baker (“Sesia”). My Declaration sets forth my opinions in detail and provides the basis for my opinions regarding the public availability of Sesia.

3. I reserve the right to supplement or amend my opinions, and basis for them, in response to any additional evidence, testimony, discovery, argument, and/or other additional information that may be provided to me after the date of this Declaration.

4. I am being compensated for my time spent working on this matter at my normal consulting rate of \$350 per hour, plus reimbursement for any additional reasonable expenses. My compensation is not in any way tied to the content of this Declaration, the substance of my opinions, or the outcome of this litigation. I have no other interests in this proceeding or with any of the parties.

5. All of the materials that I considered are discussed explicitly in this Declaration.

II. QUALIFICATIONS

6. I am currently an Adjunct Professor in the School of Information at San José State University. I obtained a Master of Library Science from the University of North Texas in 1972 and a Ph.D. in Library Science from the University of Pittsburgh in 1985. Over the last 50-plus years, I have held various positions in the field of library and information resources. I was first employed as a librarian in 1966 and have been involved in the field of library sciences since, holding numerous positions.

7. I am a member of the American Library Association (ALA) and its Association for Library Collections & Technical Services (ALCTS) Division, and I served on the Committee on Cataloging: Resource and Description (which wrote the new cataloging rules) and as the chair of the Committee for Education and Training of Catalogers and the Competencies and Education for a Career in Cataloging Interest Group. I also served as the Chair of the ALCTS Division's Task Force on Competencies and Education for a Career in Cataloging. Additionally, I have served as the Chair for the ALA Office of Diversity's Committee on Diversity, as a member of the REFORMA National Board of Directors, as a member of the Editorial Board for the ALCTS premier cataloging journal, *Library Resources and Technical*

Services, as a Co-Chair of the Library Research Round Table (LRRT) for the American Library Association, and as a member of the LRRT Nominating Committee.

8. I have also given over one hundred presentations in the field, including several on library cataloging systems and Machine-Readable Cataloging (“MARC”) standards. My current research interests include library cataloging systems, metadata, and organization of electronic resources.

9. My full curriculum vitae is attached hereto as Attachment 1A.

III. PRELIMINARIES

10. *Scope of this Declaration.* I am not an attorney and will not offer opinions on the law. I am, however, rendering my expert opinion on the authenticity of the documents referenced herein and on when and how each of these documents was disseminated or otherwise made available to the extent that persons interested and ordinarily skilled in the subject matter or art, exercising reasonable diligence, could have located the documents before on or around the listed dates of their respective publications below.

11. I am informed by counsel that a publication in a printed, electronic, or other version qualifies as publicly accessible as of the date it was disseminated or otherwise made available such that a person interested in and ordinarily skilled in the relevant subject matter could locate it through the exercise of reasonable

diligence. I understand that the determination of public accessibility rests on a case-by-case analysis of the facts particular to an individual publication. I am further informed by counsel that the following five factors can be considered to determine whether a work is publicly available as of a given date: (a) the breadth of dissemination of the work; (b) whether the material is addressed to or of interest to a POSITA; (c) how widely the work was disseminated; (d) for how long the reference was disseminated or available; and, (e) whether the information was disseminated publicly with no expectation of confidentiality.

12. *Persons of ordinary skill in the art.* I am told by counsel that the subject matter of this proceeding generally relates to wireless communications systems.

13. I have been informed by counsel that a “person of ordinary skill in the art at the time of the inventions” is a hypothetical person who is presumed to be familiar with the relevant field and its literature at the time of the inventions. This hypothetical person is also a person of ordinary creativity, capable of understanding the scientific principles applicable to the pertinent field.

14. I am told by counsel that persons of ordinary skill in this subject matter or art would have had at least a Bachelor’s degree in electrical engineering, computer engineering, computer science, physics, or the equivalent, and at least two years of experience working in the field. Relevant working experience would include experience with cellular telecommunications and networking, radio-access network

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