

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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PANASONIC AUTOMOTIVE SYSTEMS CO., LTD.,

Petitioner,

v.

UNM RAINFOREST INNOVATIONS,

Patent Owner.

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*INTER PARTES* REVIEW OF  
U.S. PATENT NO. 8,265,096 B2  
Case IPR2024-00364

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**DECLARATION OF DR. CHRISTOPHER J. HANSEN, Ph.D.  
(CORRECTED)**

Ex. 1002

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## I. INTRODUCTION

1. My name is Christopher J. Hansen. I have been retained by counsel for Petitioner, Panasonic Automotive Systems Co., Ltd., as an expert witness in this *inter partes* review to examine whether claims 8, 44-47, and 49-50 of U.S. Patent No. 8,265,096 (“the ’096 Patent) are patentable over certain prior art.

2. I have personal knowledge of all the facts set forth herein, and if called to testify at any hearing in this *inter partes* review, I would competently testify and verify that testimony contained herein.

3. I am being compensated at my hourly rate of \$500 per hour. I am also being reimbursed for out-of-pocket expenses. My compensation does not depend in any way on the outcome of this proceeding or the particular opinions I express, or the testimony I give.

4. I expect to be available for deposition and to testify at the evidentiary hearing in this *inter partes* review to the extent required.

5. This declaration contains my conclusions and a summary of my analysis including a summary of my conclusions; an overview of my qualifications as an expert; an overview of the scope and terms of my engagement for this declaration; an overview of the materials I have considered in arriving at my conclusions; an overview of the terminology and legal principles that I applied in my analysis; an overview of the technical background of the subject matter; an

overview of '096 Patent; an analysis of the level of ordinary skill in the art related to the '096 Patent; an analysis of the asserted references; and a patentability analysis of the challenged claims.

6. I have been informed that Patent Owner UNM Rainforest Innovations (formerly STC.UNM) has asserted the '096 Patent in the following lawsuits: *UNM Rainforest Innovations f/k/a STC.UNM v. Toyota Motor North America, Inc. et al*, 2-23-cv-00424 (E.D. Tex.); *UNM Rainforest Innovations v. Zyxel Commc 'ns Corp.*, 6:20-cv-00522 (W.D. Tex.); *UNM Rainforest Innovations v. Dell Techs., Inc.*, 6:20-cv-00468 (W.D. Tex.); *UNM Rainforest Innovations v. ASUSTek Comput., Inc.*, 6:20-cv-00142 (W.D. Tex.); *UNM Rainforest Innovations v. D-Link Corp.*, 6:20-cv-00143 (W.D. Tex.); *UNM Rainforest Innovations v. Apple Inc.*, 1:20-cv-00351 (W.D. Tex.); *UNM Rainforest Innovations v. TP-Link Techs. Co., Ltd.*, 6:19-cv-00262 (W.D. Tex.).

7. This declaration is based on information currently available to me. I intend to continue my investigation and study, which may include a review of documents and information that may yet be produced, as well as deposition testimony from depositions for which transcripts are not yet available or that may yet be taken in this review. Therefore, I expressly reserve the right to expand or modify my opinions as my investigation and study continue, and to supplement my opinions in response to any additional information that becomes available to me,

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