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# **EXHIBIT 5**

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#### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

SLYDE ANALYTICS LLC,

Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD. and SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Civil Action No. 2:23-cv-00083-RWS-RSP

DECLARATION OF DR. MAJID SARRAFZADEH IN SUPPORT OF SAMSUNG'S PROPOSED CLAIM CONSTRUCTIONS

**DOCKET A L A R M** Find authenticated court documents without watermarks at <u>docketalarm.com</u>. I, Majid Sarrafzadeh, declare and state as follows:

#### I. INTRODUCTION

1. My name is Majid Sarrafzadeh. I am a Professor of Computer Science and Electrical Engineering at the University of California at Los Angeles. I am over the age of eighteen, and I am a citizen of the United States.

2. I have been retained by defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung" or "Defendants") in connection with civil action *Slyde Analytics LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, Case No. 2:23-cv-00083-RWS-RSP (E.D. Texas), to provide my opinions regarding technical background, level of ordinary skill in the art, and other subject matter relevant to interpretation of certain disputed claim terms in the asserted claims of U.S. Patent Nos. 8,588,033 ("the '033 Patent") and 9,804,678 ("the '678 Patent") (collectively, "the Asserted Patents").

3. I have been asked to provide my opinions on the following topics: (1) the technology relevant to the Asserted Patents; (2) the state of the art at the time the relevant patent applications were filed; (3) the level of ordinary skill in that field as of what I understand to be the priority dates of the Asserted Patents; (4) how those of ordinary skill in the art at the time of the invention would have understood statements made by the patentee during prosecution of the Asserted Patents; and (5) how those of ordinary skill in the art at the time of the invention would have understood certain terms used in the claims of the Asserted Patents.

4. My opinions expressed in this declaration rely on my own personal knowledge and experience. However, where I also considered specific documents or other information in formulating the opinions expressed in this declaration, such items are referred to in this declaration. This includes, but is not limited to, the Asserted Patents, their prosecution histories (including, if applicable, *inter partes* review proceedings before the Patent Trial and Appeal Board), prior art

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references cited during prosecution, and certain dictionaries and other extrinsic evidence cited by Samsung and/or Slyde as part of their claim construction disclosures.

#### II. QUALIFICATIONS

5. I am a Distinguished Professor of Computer Science and Electrical Engineering at the University of California at Los Angeles ("UCLA"), the director of the UCLA Embedded and Reconfigurable Computing Laboratory ("ER Lab"), and a co-director of the UCLA Center for SMART Health.

6. I earned a Bachelor of Science, Master of Science, and Ph.D. degrees from the University of Illinois at Urbana-Champaign in Electrical and Computer Engineering in 1982, 1984, and 1987, respectively. I became an Assistant Professor at Northwestern University in 1987, earned tenure in 1993, and became a Full Professor in 1997. In 2000, I joined the Computer Science Department at UCLA as a Full Professor. In 2008, I co-founded and became a director of the UCLA Wireless Health Institute. The UCLA Wireless Health Institute is an institute that addresses health care problems using technology. The institute investigates problems in collaboration with health care providers and takes ideas from inception to commercialization, including hardware and software design and development, clinical trials, and patent filings.

7. I have substantial experience as a system designer, circuit designer, and software designer. This experience includes positions as a design engineer at IBM and Motorola and a test engineer at Central Data Corporation. I was the main architect of an Electronic Design Automation ("EDA") software tool for Monterey Design Systems, Inc. ("Monterey"). Monterey was acquired by Synopsys in 2004. I co-founded and managed the technical team at Hierarchical Design, Inc. ("Hier Design"), an EDA company that specialized in reconfigurable FPGA systems. Hier Design was acquired by Xilinx in 2004. I co-founded MediSens Wireless, Bruin Biometrics, and WANDA Health. MediSens Wireless and WANDA Health were later acquired.

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8. I am a Fellow of the Institute of Electrical and Electronics Engineers, Inc. ("IEEE") for my contributions to "Theory and Practice of VLSI Design." The IEEE gives the title of Fellow for "extraordinary record or accomplishments" in the field of electrical engineering. IEEE limits the number of members that can become an IEEE Fellow in any year to 0.1 percent of the membership at the end of the previous year.

9. I have served on the technical program committees of numerous conferences in the area of system design. I co-founded the International Conference on Wireless Health and have served in various committees of this conference. I am a fellow of the National Academy of Inventors.

10. I have published approximately 590 papers and have received a number of best paper and distinguished paper awards. I am a co-author of the book <u>Synthesis Techniques and</u> <u>Optimizations for Reconfigurable Systems</u> (Springer 2003), a co-author of the book <u>An</u> <u>Introduction to VLSI Physical Design</u> (McGraw Hill 1996), and a co-editor of <u>Algorithmic Aspects of VLSI Layout</u> (World Scientific Publishing 1993).

11. I have particular expertise and experience in the field of healthcare systems, tracking, and motion sensors. For example, I was involved in the design of embedded systems and foundational work related to applications in healthcare, including classification of skin-related ulcers and laboratory automation systems. Since 2000, I have worked on Remote Health Monitoring Systems such as Smart Assistive Devices, smart shoes containing accelerometers and other sensors, and Personal Activity Monitors (PAM).

12. I am a named inventor on approximately 30 issued U.S. patents. Time Magazine named one of my inventions as the best invention in medical technology in 2020.

13. In terms of product development, my colleagues at UCLA and I have developed a compact perfusion scanner and method of characterizing tissue health status that incorporates

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