

# Exhibit “Q”

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

CELLULAR COMMUNICATIONS  
EQUIPMENT LLC,

Plaintiff,

v.

LG ELECTRONICS, INC., ET AL.,

Defendants.

Civil Action No. 6:14-cv-982-JRG  
LEAD CASE

**DECLARATION OF CLAUDE ROYER**

I, Claude Royer hereby declare:

1. I have been engaged by Plaintiff Cellular Communications Equipment LLC ("CCE") in connection with the above-captioned lawsuit to provide my analyses and opinions on certain technical aspects of this dispute. I understand this Declaration is intended as support for a submission by CCE regarding claim construction. The general purpose of this Declaration is to provide my views as to what a person of skill in the art of the Patents would understand from the disclosures about certain technical issues that relate to the parties' disputes over claim construction.

2. I am competent to testify to the matters stated in this declaration, have personal knowledge of the facts and statements herein, and each of the statements is true and correct.

3. I understand that defendants in this case may produce an expert declaration supporting their constructions and/or indefiniteness positions, and I reserve the right to supplement or amend my opinions here upon reviewing the same and/or to produce a rebuttal statement, if necessary.

4. I am being compensated at the rate of \$265 per hour for my work in connection with these cases. My compensation is not dependent in any way on the contents of this declaration, the substance of any further opinions or testimony that I may provide, or the outcome of these cases.

#### **I. QUALIFICATIONS**

5. I have been actively engaged as a Wireless telecommunications engineer since 1988. I am the Founder and President of Claude Royer Consultant Inc., a professional practice of technical consulting services. The focus of the practice is Wireless patent portfolio evaluation, verification of intellectual property infringement and Wireless system design.

6. From 2009 to 2011, I was Director of Wireless Access Research at Research In Motion LTD (RIM), the manufacturer of BlackBerry handsets and a

telecommunications service provider, giving technical direction in the creation of new protocols applicable to LTE Advanced and next generation Wireless systems. From 2007 to 2008, I was Director of Carrier Network Technology at Nortel Networks Ltd., a telecommunications equipment vendor, where I led a team that created and implemented new context-aware data and voice services for Wireless operators. From 1997 to 2006, I directed the Wireless Access Systems team at Nortel, which researched and presented to standards bodies new protocols and technologies for second, third and fourth generation Wireless systems, including GSM/EDGE, 1xEvDO, UMTS/HSPA, WiMax and LTE. I was also leading a team which implemented these technologies into base station and terminal prototypes. Prior to that, from 1994 to 1996, I managed the development team in the Nortel Wireless Networks division that introduced the world's first software defined cellular packet data radio system. From 1988 to 1994, I worked as a signal processing engineer, designing and implementing first and second generation cellular base stations, within the team that created the world's first software-defined radio for analog and digital cellular voice service. At the University of Toronto, where I was a Research Assistant from 1985 to 1987, I designed and developed prototypes for a real-time signal processing system for analysis of Doppler signals embedded in radio frequency signals.

7. I received a Bachelor's Degree in Engineering Physics, in 1985 from Université Laval in Quebec City, and a MAsc. in Electrical Engineering in 1987 from the University of Toronto.

8. I am a Senior Member of the Institute of Electrical and Electronics Engineers (IEEE) and a registered Professional Engineer in the Province of Quebec.

9. I am a named inventor on more than 23 issued patents and have provided numerous technical presentations to RIM and Nortel customers about new Wireless products and technologies.

10. I have received numerous honors in connection with my work in wireless

engineering, including Nortel Networks Platinum Talent Award, Nortel Networks Inventor Awards and a Nortel Telecom Award for customer service.

11. A complete list of my qualifications is set forth in my curriculum vitae, a current copy of which is attached hereto at the end of my Declaration.

12. In connection with preparation of this Declaration, I have reviewed:

- a) U.S. Patent No. 8,868,060 (“the ‘060 Patent”), entitled “Method, Network, and Device for Information Provision by Using Paging and Cell Broadcast Services,” and its prosecution history.
- b) U.S. Patent No. 8,385,966 (“the ‘966 Patent”), entitled “Method, Apparatus and Computer Program for Power Control Related to Random Access Procedures,” and its prosecution history.
- c) U.S. Patent No. 8,848,556 (“the ‘556 Patent”), entitled “Carrier Aggregation with Power Headroom Report,” and its prosecution history.
- d) The P.R. 4-3 disclosures exchanged in this case.
- e) The letter brief defendants submitted regarding alleged indefiniteness of certain claim terms, as well as Defendants’ claim construction brief.

The ‘060 Patent, ‘966 Patent, and ‘556 Patent are collectively referred to as “the Patents”).

13. I am also familiar with contentions of the parties as to the meaning of terms of the claims.

## II. THE PATENTS AND LEVEL OF ORDINARY SKILL IN THE ART

14. I understand that the proper construction of the patent claims should be based on the understanding of a person of ordinary skill in the art (“POSA”), and that the characterization of that person is based on the following non-exclusive factors: (1) the type of problems encountered in the art; (2) the prior art solutions to those

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