

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

STRATOSAUDIO INC., )  
 )  
 Plaintiff, ) Case No. 6:20-CV-01125-ADA  
 v. )  
 )  
 HYUNDAI MOTOR AMERICA, )  
 )  
 Defendant. )

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STRATOSAUDIO INC., )  
 )  
 Plaintiff, ) Case No. 6:20-cv-1126-ADA  
 v. )  
 )  
 MAZDA MOTOR OF AMERICA, INC., )  
 )  
 Defendant. )

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STRATOSAUDIO INC., )  
 )  
 Plaintiff, ) Case No. 6:20-cv-1128-ADA  
 v. )  
 )  
 SUBARU OF AMERICA, INC. )  
 )  
 Defendant. )

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STRATOSAUDIO INC., )  
 )  
 Plaintiff, ) Case No. 6:20-cv-1129-ADA  
 v. )  
 )  
 VOLVO CARS USA, LLC, )  
 )  
 Defendant. )

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STRATOSAUDIO INC., )  
 )  
 Plaintiff, ) Case No. 6:20-CV-01131-ADA  
 v. )  
 )  
 VOLKSWAGEN GROUP OF )  
 AMERICA, INC., )  
 )  
 Defendant. )

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**SECOND DECLARATION OF ROBERT GROSELAK IN SUPPORT OF  
DEFENDANTS' REPLY CLAIM CONSTRUCTION BRIEF**

I, Robert B. Groselak, declare:

1. I am an associate with the law firm of DLA Piper LLP (US), counsel of record for Defendants Mazda Motor Of America, Inc. (“Mazda”) and Subaru Of America, Inc. (“Subaru”). I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to these facts under oath.
2. Attached to this declaration as Exhibit B (“Ex. B”) is a true and correct copy of the transcript of the deposition of Dr. William Mangione-Smith, Ph.D., Plaintiff’s expert witness. The deponent was located in Kirkland, Washington, and the deposition was taken via Zoom by all Defendants on September 17, 2021.
3. Attached to this declaration as Exhibit C (“Ex. C”) is a true and correct copy of excerpts from the transcript of the deposition of Dr. Berry P. Medoff, Ph.D., one of Defendants’ expert witnesses. The deponent was located in Palo Alto, CA, and the deposition was taken via Zoom by Plaintiff on August 30, 2021.
4. Attached to this declaration as Exhibit D (“Ex. D”) is a true and correct copy of a PDF printed from the web-based Google Books Ngram Viewer for the term “interactive media receiver” as last viewed on September 20, 2021 at 9:11 AM PDT.
5. Attached to this declaration as Exhibit E (“Ex. E”) is a true and correct copy of a PDF printed from the web-based Google Books Ngram Viewer for the term “responder identifier” as last viewed on September 20, 2021 at 9:12 AM PDT.
6. Attached to this declaration as Exhibit F (“Ex. F”) is a true and correct copy of Exhibit 0005 from the deposition of Dr. William Mangione-Smith taken on September 17, 2021. This exhibit is a true and correct copy of a PDF printed from the web-based Google Books Ngram Viewer for the term “stream analysis module”.

7. Attached to this declaration as Exhibit G (“Ex. G”) is a true and correct copy of Exhibit 0006 from the deposition of Dr. William Mangione-Smith taken on September 17, 2021. This exhibit is a true and correct copy of a PDF printed from the web-based Google Books Ngram Viewer for the term “stream scanner module”.
8. Attached to this declaration as Exhibit H (“Ex. H”) is a true and correct copy of Exhibit 0007 from the deposition of Dr. William Mangione-Smith taken on September 17, 2021. This exhibit is a true and correct copy of a PDF printed from the web-based Google Books Ngram Viewer for the term “broadcast scanning module”.
9. Attached to this declaration as Exhibit I (“Ex. I”) is a true and correct copy of Exhibit 0008 from the deposition of Dr. William Mangione-Smith taken on September 17, 2021. This exhibit is a true and correct copy of excerpts from an Office Action during the prosecution of U.S. Application Number 15/404,075, which is a continuation of, *inter alia*, 9,584,843 and 9,294,806, two of the patents-in-suit.
10. Attached to this declaration as Exhibit J (“Ex. J”) is a true and correct copy of excerpts from the transcript of the deposition of Dr. Tim A. Williams, Ph.D., one of Defendants’ expert witnesses. The deponent was located in Danville, CA, and the deposition was taken via Zoom by Plaintiff on August 27, 2021.

I declare under penalty of perjury under the laws of the State of Texas and the United States of America that the foregoing is true and correct.

Executed on September 20, 2021 in Chicago, IL.

Robert B. Groselak  
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