

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

JAWBONE INNOVATIONS, LLC,	§	Case No. 6:21-cv-00984-ADA
	§	
Plaintiff,	§	<u>JURY TRIAL DEMANDED</u>
	§	
v.	§	
	§	
APPLE INC.,	§	
	§	
Defendant.	§	
	§	

**DECLARATION OF PETER LAMBRIANAKOS IN SUPPORT OF
JAWBONE INNOVATIONS, LLC’S
RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, Peter Lambrianakos, hereby declare as follows:

1. I have personal knowledge of the facts set forth in this declaration. I am competent to testify as to all matters stated, and I am not under any legal disability which would in any way preclude me from testifying.
2. I am a Partner at the law firm of Fabricant LLP and counsel of record for Plaintiff Jawbone Innovations, LLC, in this matter.
3. The exhibits attached to this declaration may contain annotations and/or excerpts of the originals.
4. Attached hereto as Exhibit A is a true and correct copy of IEEE100: The Authoritative Dictionary of IEEE Standards Terms, Seventh Edition showing the definition of “transfer function,” bearing Bates Nos. JB-APPLE0000444 through JB-APPLE0000449.
5. Attached hereto as Exhibit B is a true and correct copy of excerpts from the file history of U.S. Patent No. 8,019,091.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 15, 2022 in Short Hills, New Jersey.

/s/ Peter Lambrianakos
Peter Lambrianakos