

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

AIRE TECHNOLOGY LTD.,

Plaintiff,

v.

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

Defendants.

Case No. 6:21-cv-955-ADA

JURY TRIAL DEMANDED

AIRE TECHNOLOGY LTD.,

Plaintiff,

v.

APPLE INC.

Defendant.

Case No. 6:21-cv-1101-ADA

JURY TRIAL DEMANDED

AIRE TECHNOLOGY LTD.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:21-cv-1104-ADA

JURY TRIAL DEMANDED

**DECLARATION OF DREW B. HOLLANDER IN SUPPORT OF PLAINTIFF AIRE
TECHNOLOGY LTD.'S RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, Drew B. Hollander, hereby declare under the penalty of perjury as follows:

1. I am an attorney at Russ August & Kabat LLP, counsel of record for Aire Technology Ltd. (“Aire”). I am one of the attorneys responsible for representing Aire in this matter. I have personal knowledge of all facts stated in this declaration and if called as a witness, could and would competently testify to these facts. I respectfully submit this declaration in support of Aire’s responsive claim construction brief.

2. Attached hereto as Exhibit 1 is a true and correct copy of Samsung’s Petition for *Inter Partes* Review for U.S. Patent No. 8,174,360, IPR2022-00874.

3. Attached hereto as Exhibit 2 is a true and correct copy of Examiner Non-Final Rejection, dated June 9, 2009, filed in the prosecution of U.S. Patent No. 8,174,360 (U.S. Patent App. No. 10-565,732).

4. Attached hereto as Exhibit 3 is a true and correct copy of Examiner Non-Final Rejection, dated January 5, 2010, filed in the prosecution of U.S. Patent No. 8,174,360 (U.S. Patent App. No. 10-565,732).

5. Attached hereto as Exhibit 4 is a true and correct copy of the definition of “measuring device” from The Free Dictionary.

6. Attached hereto as Exhibit 5 is a true and correct copy of the definition of “measuring device” from The Mnemonic Dictionary.

7. Attached hereto as Exhibit 6 is a true and correct copy of the definition of “measuring device” from Vocabulary.com Dictionary.

8. Attached hereto as Exhibit 7 is a true and correct copy of the definition of “measuring device” from The Fine Dictionary.

9. Attached hereto as Exhibit 8 is a true and correct copy of Chapter 8 of “Handbuch der Chipkarten” (“Chip Card Manual”), W. Rankl, W. Effing, 3rd edition, 1999.

10. Attached hereto as Exhibit 9 is a true and correct copy of Applicant Remarks, dated March 30, 2011, filed in the prosecution of U.S. Patent No. 8,205,249 (U.S. Patent App. No. 10-531,259).

11. Attached hereto as Exhibit 10 is a true and correct copy of Applicant Remarks, dated May 27, 2010, filed in the prosecution of U.S. Patent No. 8,205,249 (U.S. Patent App. No. 10-531,259).

12. Attached hereto as Exhibit 11 is a true and correct copy of Applicant Remarks and Amendments, dated May 18, 2009, filed in the prosecution of U.S. Patent No. 8,205,249 (U.S. Patent App. No. 10-531,259).

13. Attached hereto as Exhibit 12 is a true and correct copy of the Declaration of Dr. Hugh Smith in Support of Aire’s Responsive Claim Construction Brief, dated June 9, 2022.

14. Attached hereto as Exhibit 13 is a true and correct copy of the Declaration of Dr. Michael Brogioli in Support of Aire’s Responsive Claim Construction Brief, dated June 9, 2022.

Executed on this 9th day of June, 2022 in New York, NY.

/s/ Drew B. Hollander
Drew B. Hollander

CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendants on June 9, 2022 via electronic service.

/s/ Brett Cooper
Brett Cooper