

# Exhibit D

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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META PLATFORMS, INC.,

Petitioner,

v.

JAWBONE INNOVATIONS, LLC,

Patent Owner.

Patent No. 10,779,080

Filing Date: July 22, 2013

Issue Date: September 15, 2020

Inventor: Gregory C. Burnett

Title: DUAL OMNIDIRECTIONAL MICROPHONE ARRAY (DOMA)

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**DECLARATION OF AKBAR M. SAYEED, Ph.D.**

Case No. IPR2024-00350

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1. Petitioner’s Combination Does Not Disclose or Render Obvious “the second linear response to noise [is/being] substantially similar to the first linear response to noise” as Recited in Independent Claims 7 and 14 or “wherein the first virtual microphone ad second virtual microphone have substantially similar responses to noise” as recited in Independent Claim 1 .....	14
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I, Akbar M. Sayeed, declare as follows:

1. I have been asked by counsel for Patent Owner, Jawbone Innovations, LLC (“Jawbone” or “Patent Owner”), to review U.S. Patent No. 10,779,080 (the “’080 Patent”) entitled DUAL OMNIDIRECTIONAL MICROPHONE ARRAY (DOMA) and to provide my technical review, analysis, insights, and opinions regarding the ‘080 Patent in view of the prior art cited by Petitioner Meta Platforms, Inc. (“Meta” or “Petitioner”). I submit this declaration in support of Patent Owner’s Preliminary Response in this IPR proceeding. I have personal knowledge of the matters stated herein and would be competent to testify to them if required.

2. I have been retained on behalf of Jawbone for the above-captioned *inter partes* review proceeding. I understand that the ‘080 Patent is currently assigned to Jawbone.

3. I am over 18 years of age. I have personal knowledge of the facts stated in this Declaration and could testify competently if asked to do so.

## **I. INTRODUCTION**

### **A. Background and Qualifications**

4. I have reviewed and am familiar with the specification of the ‘080 Patent. I understand the ‘080 Patent has been provided as Exhibit 1001. I will cite to the specification using the following format: ‘080 Patent at col.:line.

5. My CV is being submitted simultaneously herewith (Ex. 2002).

6. I received my B.S. degree in Electrical and Computer Engineering (ECE) from the University of Wisconsin-Madison in 1991. I received my M.S. and Ph.D. degrees in ECE from the University of Illinois at Urbana-Champaign in 1993 and 1996, respectively. In my undergraduate and graduate studies, I took a variety of courses generally focusing on the areas of signal processing, communication theory, information theory, electromagnetics and antennas, and statistical techniques in signal processing and communications. My Ph.D. dissertation was entitled “Statistical Time-Frequency Analysis” in which I proposed a new framework for statistical signal processing using time-frequency representations, mathematical tools that extend the powerful theory of Fourier transforms and Fourier analysis to time-varying signals and systems.

7. I currently work as an Independent Researcher, Engineer and Technical Consultant, and worked as professor of Electrical and Computer Engineering at the University of Wisconsin-Madison from 1997-2021, where I directed the Wireless Communications and Sensing Laboratory until my retirement on August 1, 2021 to pursue a career as an independent researcher and consultant.

8. My current work as an independent researcher and consultant spans STEM (science, technology, engineering & mathematics) fields through the lens of information science and technology. My STEM skills and experience cover a broad range of areas, including:

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