Exhibit G

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

JAWBONE INNOVATIONS, LLC,

Plaintiff,

v.

META PLATFORMS, INC.,
D/B/A META,

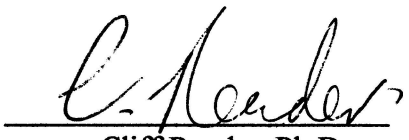
Defendant.

Case No. 6:23-cv-00158-ADA-DTG

JURY TRIAL DEMANDED

SUPPLEMENTAL DECLARATION OF CLIFF READER, PH.D.

Dated: May 8, 2024



Cliff Reader, Ph.D.

I. INTRODUCTION

1. My name is Cliff Reader, Ph.D. I am over 18 years of age and, if I am called upon to do so, I would be competent to testify as to the matters discussed below.

2. I have prepared this declaration at the request of Defendant Meta Platforms, Inc. ("Meta"). This declaration is a supplement to a declaration dated April 2, 2024 that I previously submitted in this case, as well as an original declaration dated May 25, 2022 in another case concerning the same patents. Both declarations, including their exhibits and appendices, are incorporated by reference herein. I have not been asked by Meta to provide any additional opinions regarding any terms other than the terms that I discuss below.

3. In this declaration, I give my opinions regarding the view of a person of ordinary skill in the art of certain terms in the claims of the Asserted Patents. This declaration is based on information currently available to me, and I am willing to testify on the topics addressed below. This case is ongoing, and I may supplement or amend these opinions based on the results of further analysis and in rebuttal to positions taken by the Plaintiff. Because this declaration is based on information currently available to me, I reserve the right to continue my investigation, to review documents and information that may be produced, and to consider declarations, briefing, and deposition testimony from future depositions in this case. Therefore, I reserve the right to supplement, expand, and/or modify my opinions as my investigation continues and in response to any additional information that comes to my attention, including matters raised by the Plaintiff and other opinions provided by the Plaintiff's expert(s).

II. MATERIALS AND OTHER INFORMATION CONSIDERED

4. I have reviewed each of the Asserted Patents along with their file histories, the parties' exchange of terms and proposed constructions, Jawbone's Responsive Claim Construction Brief and Dr. Sayeed's accompanying declaration, both dated April 24, 2024, and the evidence identified therein. I have also considered the sources cited below as well as my over 45 years of educational and professional experience in research and development in the areas of engineering, video/audio compression, audio/video transmission, signal and audio processing, real-time processing and display, system and algorithm design, and communications. In addition to the documents cited within this declaration, materials I considered are listed in Exhibit C of my April 2 2024 declaration.

III. DISPUTED TERMS

5. In this section, I supplement my opinions in my April 2, 2024 declaration regarding the view of a POSITA of certain terms in the asserted claims of the Asserted Patents.

6. I have reviewed the '213, '611, '080, '691, and '357 patents and their corresponding file histories and have confirmed that for each patent, the terms "approximately similar" and "approximately dissimilar," or "substantially similar" and "substantially dissimilar" were recited in the claims as originally filed, and were not introduced through amendment. Moreover, as I explained in my declaration dated April 2, 2024 submitted in this case, none of the patents (including the claims and specification) provides any objective boundaries that are applicable to the terms "approximately similar" noise responses and "approximately dissimilar" speech responses, or "substantially similar" noise responses and "substantially dissimilar" speech responses. Thus, it is my opinion that the POSITA reading the patents and prosecution

histories would not have been able to determine any applicable objective boundaries to these terms.

7. I understand that Jawbone and Dr. Sayeed contend that the POSITA would be able to apply these terms without construction "because the POSITA would know that the noise responses must be similar enough, and the speech responses must be dissimilar enough, that the noise signal can be accurately compared to the main signal to detect speech, even in noisy environments" and "that the noise signal can be subtracted from the main signal to result in cleaned and denoised speech in later processing." Sayeed Decl. ¶ 60. I disagree.

8. As an initial matter, the patents and claims make clear that the terms "approximately similar," "approximate dissimilar," "substantially similar," and "substantially dissimilar" relate to how dissimilar speech responses are or how similar noise responses are. As I explain below, the patents do not tie these terms to speech detection or denoising, which are actually tied to other terms recited in the claims.

9. Even if the POSITA would have known to that these terms were tied to speech detection or denoised speech, there are no objective boundaries for these terms in the patents or prosecution histories. Thus, it is my opinion that the POSITA would not have been able to apply these terms without construction.

A. The '213 and '611 patents: The terms "approximately similar" and "approximately dissimilar" are indefinite.

10. **First**, the POSITA would have understood that "approximately," "similar," and "dissimilar" are terms of degree, and are subjective words with imprecise and inexact boundaries. Because the word "approximately" means "roughly or in the region of" (*see* Collins English Dictionary Excerpt at 4), its boundary is inexact. The word "similar" means "showing resemblance in qualities, characteristics, or appearance; alike but not identical" (*see id.* at 6). For responses to

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