UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS INC.,

Petitioner,

v.

PANTECH WIRELESS, LLC,

Patent Owner.

Case IPR2023-01270

U.S. Patent No. 10,869,247

DECLARATION OF JONATHAN BRADFORD IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT NO. 10,869,247

1. I, Jonathan Bradford, make the following Declaration pursuant to 28 U.S.C. § 1746: I am a Senior IP Paralegal at the law firm of Ropes & Gray LLP.

2. I provide this Declaration in connection with the above-identified *Inter Partes* Review proceeding that is before the United States Patent and Trademark Office ("USPTO"). Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Ex. 1001 is a true and correct copy of U.S. Patent No. 10,869,247 ("'247"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

4. Ex. 1002 is a true and correct copy of File History of U.S. Application No. 17/008,439 ("'247 FH), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

5. Ex. 1006 is a true and correct copy of U.S. Patent Application Publication No. 2004/0223507 ("Kuchibhotla"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit

label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

6. Ex. 1007 is a true and correct copy of U.S. Patent Application Publication No. 2005/0048920 ("Liu"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

7. Ex. 1008 is a true and correct copy of U.S. Patent No. 6,359,877 ("Rathonyi"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

8. Ex. 1009 is a true and correct copy of U.S. Patent Application Publication No. 2003/0076783 ("Das"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

9. Ex. 1010 is a true and correct copy of U.S. Patent Application Publication No. 2004/109433 ("Khan"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and

page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

10. Ex. 1011 is a true and correct copy of U.S. Patent Application Publication No. 2003/210669 ("Vayanos"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

11. Ex. 1012 is a true and correct copy of File History of U.S. Application No. 10/962,720, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

12. Ex. 1013 is a true and correct copy of File History of U.S. Application No. 11/434,330, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

13. Ex. 1014 is a true and correct copy of File History of U.S. Application No. 13/308,950, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each

page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

14. Ex. 1015 is a true and correct copy of File History of U.S. Application No. 13/908,242, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

15. Ex. 1016 is a true and correct copy of File History of U.S. Application No. 14/869,313, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

16. Ex. 1017 is a true and correct copy of File History of U.S. Application No. 15/699,418, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

17. Ex. 1018 is a true and correct copy of File History of U.S. Application No. 16/283,407, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each

page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

18. Ex. 1019 is a true and correct copy of File History of U.S. Application No. 16/545,398, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

19. Ex. 1020 is a true and correct copy of Joint Claim Construction and Prehearing Statement, *Pantech Corp. et al. v. LG Electronics Inc. et al.*, Case 5:22-cv-00113-RWS-JBB (E.D. Texas), Dkt. No. 118, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

20. Ex. 1021 is a true and correct copy of Claim Construction Expert Report of Peter Rysavy Concerning U.S. Patent No. 9,854,545, *Pantech Corp. et al. v. LG Electronics Inc. et al.*, Case 5:22-cv-00113-RWS-JBB (E.D. Texas) (June 23, 2023), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

21. Ex. 1022 is a true and correct copy of Appendix 5 to Pantech's Preliminary Infringement Contentions of U.S. Patent No. 10,869,247, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

22. Ex. 1023 is a true and correct copy of Third Amended Docket Control Order, *Pantech Corp. et al. v. LG Electronics Inc. et al.*, Case 5:22-cv-00113-RWS-JBB (E.D. Texas), Dkt. No. 98, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

23. Ex. 1024 is a true and correct copy of Docket Navigator, "Time to Trial" report for Judge Robert W. Schroeder, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

24. Ex. 1025 is a true and correct copy of U.S. District Court – Judicial Caseload Profile for Eastern District of Texas, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each

page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

25. Ex. 1026 is a true and correct copy of Claim Construction Memorandum Opinion and Order, *Pantech Corp. v. OnePlus Tech. (Shenzhen) Co., Ltd.*, No. 22-cv-00069-RWS-JBB, Dkt. No. 51 (E.D. Tex. Aug. 8, 2023), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

26. Certain pages have been resized to 8.5 x 11 inches. No content was removed by this resizing.

27. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

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

Executed this 11th day of August, 2023, in Boston, Massachusetts.

/Jonathan Bradford/

Jonathan Bradford
ROPES & GRAY LLP