UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before the Honorable Clark S. Cheney
Chief Administrative Law Judge

In the Matter of **CERTAIN SEMICONDUCTOR DEVICES, AND METHODS OF MANUFACTURING SAME AND PRODUCTS CONTAINING THE SAME**	Investigation No. 337-TA-1366

DECLARATION OF DR. ERIC FRED SCHUBERT IN SUPPORT OF COMPLAINANT'S OPENING CLAIM CONSTRUCTION BRIEF
(September 22, 2023)

I, Dr. Eric Fred Schubert, make the following declaration based on my personal knowledge and, if called to testify, I could and would testify as follows:

I. INTRODUCTION

1. My name is Dr. Eric Fred Schubert. I was retained by Blank Rome LLP to serve as an expert witness on behalf of the Efficient Power Conversion Corporation ("EPC") in the above-captioned investigation to offer opinions and testimony regarding the claim construction and to respond to any purported indefiniteness arguments put forth by Innoscience (Zhuhai) Technology Company, Ltd. and Innoscience America, Inc. (collectively, "Innoscience") related to U.S. Pat. Nos. 8,350,294 ("the '294 patent"); 8,404,508 ("the '508 patent"); 9,748,347 ("the '347 patent"); and 10,312,335 ("the '335 patent") (collectively, the "Asserted Patents").

2. I understand that EPC is asserting claims 1-3 of the '294 patent, claim 1 of the '508 patent, claims 1-3 of the '347 patent, and claims 1-7 of the '335 patent.

3. I am being compensated at a rate of $ 525 per hour. This compensation is not contingent on the substance of my opinions, my testimony, or the outcome of this matter.

INNOSCIENCE EXHIBIT 1030
INNOSCIENCE v. EPC
IPR2023-01382

a. U.S. Pat. No. 8,350,294

b. Prosecution History of U.S. Pat. No. 8,350,294

c. U.S. Pat. No. 8,404,508

d. Prosecution History of U.S. Pat. No. 8,404,508

e. U.S. Pat. No. 9,748,347

f. Prosecution History of U.S. Pat. No. 9,748,347

g. U.S. Pat. No. 10,312,335

h. Prosecution History of U.S. Pat. No. 10,312,335

i. Alex Lidow et al., GaN Transistors for Efficient Power Conversion (2nd Ed.) (2015). (Ex. C)

j. The Authoritative Dictionary of IEEE Standard Terms (2000, 7th ed.) (the "IEEE Dictionary") (Ex. D)

V. PERSON OF ORDINARY SKILL IN THE ART

23. I understand that a person of ordinary skill in the art at the time of the invention is presumed to know the relevant art and would be capable of understanding the scientific and engineering principles applicable to the pertinent art. This person of ordinary skill in the art can perform routine tasks in the relevant field with a reasonable likelihood of success.

24. I consider myself to be a person of at least ordinary skill in the art. Based on my experience, a person of ordinary skill in the art in the context of the Asserted Patents would have possessed at least a four-year degree in electrical engineering, physics, or material science, with course work in semiconductor materials, and three years of professional work experience in the epitaxial growth, design, and fabrication of semiconductor electronic devices, including those of GaN. Relevant graduate education could substitute for the professional work experience.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 22, 2023.

By: 

Dr. E. Fred Schubert