

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INCORPORATED*

Petitioner

v.

NETWORK SYSTEM TECHNOLOGIES, LLC

Patent Owner

Patent No. 7,373,449

Inter Partes Review No. IPR2024-00338

DECLARATION OF PETER C. KRUSIEWICZ

* Qualcomm Incorporated filed a petition and a motion for joinder in IPR2024-01081 and was joined as a petitioner in this proceeding.

I, Peter C. Krusiewicz, hereby declare as follows:

1. I am an attorney at Nixon Peabody LLP, attorneys for Network System Technologies, LLC (“Patent Owner”) in the above-captioned *inter partes* review.

2. Submitted with Patent Owner’s Response as Exhibit 2072 is a true and correct copy of “A Survey of Research and Practices of Network-on-Chip,” authored by Tobias Bjerregaard, available from the following URL:
<https://www.ecb.torontomu.ca/~courses/ee8205/Data-Sheets/noc/NoC-Survey-06.pdf>.

3. Submitted with Patent Owner’s Response as Exhibit 2073 is a true and correct copy of “Routing Algorithms For On Chip Networks,” authored by Maksat Atagoziyev, available from the following URL:
<https://etd.lib.metu.edu.tr/upload/12609136/index.pdf>.

4. Submitted with Patent Owner’s Response as Exhibit 2074 is a true and correct copy of excerpts of “Dictionary of Scientific and Technical Terms,” Fifth Edition, published by McGraw-Hill. I personally obtained a copy of this dictionary from the Nixon Peabody LLP library in Chicago, Illinois.

5. Submitted with Patent Owner’s Response as Exhibit 2075 is a true and correct copy of excerpts of “The Authoritative Dictionary of IEEE Standards Terms,” Seventh Edition, published by IEEE. Support staff at Nixon Peabody LLP

obtained this excerpt, at my direction, on or around November 15, 2024 from Nixon Peabody's San Francisco office library.

6. Submitted with Patent Owner's Response as Exhibit 2076 is a true and correct copy of "Supported token-ring functions," which is included as part of IBM i 7.3 documentation and available from the following URL:

<https://www.ibm.com/docs/en/i/7.3?topic=overview-supported-token-ring-functions>.

7. Submitted with Patent Owner's Response as Exhibit 2077 is a true and correct copy of "Token Ring Solutions," authored by Jonathan Follows, available from the following URL:

http://ibmfiles.com/ibmfiles/networking/token_ring_solutions.pdf.

8. Submitted with Patent Owner's Response as Exhibit 2080 is a true and correct copy of the deposition transcript of Mr. Gordon MacPherson, taken in *Qualcomm Inc. v. Network Sys. Techs. LLC*, IPR2024-00343.

9. Submitted with Patent Owner's Response as Exhibit 2081 is a true and correct copy of "Terms & Disclosures for Use of IEEE Websites" available from the following URL: <https://www.ieee.org/about/help/site-terms-conditions.html>.

10. Submitted with Patent Owner's Response as Exhibit 2082 is a true and correct copy of the IEEE Xplore webpage for "An efficient on-chip network

interface offering guaranteed services, shared-memory abstraction, and flexible network configuration,” authored by A. Radulescu et al., available from the following URL: <https://ieeexplore.ieee.org/document/1268998/metrics#metrics>.

11. Submitted with Patent Owner’s Response as Exhibit 2083 is a true and correct copy of the IEEE Xplore webpage for “Networks on silicon: combining best-effort and guaranteed services” authored by K. Goossens et al., available from the following URL: <https://ieeexplore.ieee.org/document/998309/metrics#metrics>.

12. Submitted with Patent Owner’s Response as Exhibit 2084 is a true and correct copy of the *Markman* Hearing Transcript in *Network Sys. Techs., LLC v. Samsung Elecs. Co., Ltd.*, No. 2:22-cv-481-JRG, Dkt. 122 (E.D. Tex. Apr. 9, 2024).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: November 19, 2024

By: /s/ Peter C. Krusiewicz

Peter C. Krusiewicz