

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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**MOTOROLA SOLUTIONS, INC.**  
Petitioner

v.

**STA GROUP LLC**  
Patent Owner

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Inter Partes Review No.: IPR2024-00511  
U.S. Patent No. 9,319,852 B2

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**DECLARATION OF MADHUSUDAN PAI IN SUPPORT OF PETITION  
FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 9,319,852**

I hereby declare under penalty of perjury under the laws of the United States of America that the following is true and correct, and that all statements made of my own knowledge are true and that all statements made on information and belief are believed to be true. I understand that willful false statements are punishable by fine or imprisonment or both. See 18 U.S.C. § 1004.

Dated: January 30, 2024

  
Madhusudan Pai

I Madhusudan Pai, declare as follows:

**I. INTRODUCTION**

1. I am the Director of Product Management and Cybersecurity at Motorola Solutions, Inc. (“MSI” or “Motorola”). I am familiar with the facts set forth herein. If called as a witness in this proceeding, I could and would competently testify to all facts within my personal knowledge except where stated upon information and belief.

2. Based on my past experience working with OMA and 3GPP documentation, I have been asked to address the date on which the following documents were published and publicly available:

- Push to Talk over Cellular (PoC) - Architecture V2.0 (OMA-AD-PoC-V2\_0) (October 2, 2007) (EX1029)
- OMA Push to Talk over Cellular 2 Requirements V2.0 (OMA-RD-PoC-V2\_0) (October 2, 2007) (EX1030)
- OMA PoC System Description V2.0 (OMA-TS-PoC\_System\_Description-V2\_0) (October 2, 2007) (EX1031)
- OMA PoC Interworking Service V2.0 (OMA-TS-PoC\_Interworking\_Service-V2\_0) (October 2, 2007) (EX1032)
- 23.979-700 (June 19, 2007) (EX1033)
- 23.060-800 (March 20, 2008) (EX1034)
- Push to Talk over Cellular (PoC) - Architecture V2.0 (OMA-AD-PoC-V2\_0) (February 26, 2008) (EX1037)

- OMA Push to Talk over Cellular 2 Requirements V2.0 (OMA-RD-PoC-V2\_0) (April 21, 2008) (EX1038)
- OMA PoC System Description V2.0 (OMA-TS-PoC\_System\_Description-V2\_0) (February 26, 2008) (EX1039)
- OMA PoC Interworking Service V2.0 (OMA-TS-PoC\_Interworking\_Service-V2\_0) (February 26, 2008) (EX1040)

3. In forming this opinion, I have relied upon the following additional documents, each of which is a true and correct copy of a webpage from the Wayback Machine (also known as the Internet Archive). Each of these documents was created by visiting the webpage listed in the header/footer of each document and then printing the webpage to pdf.

- OMA FTP POC Public Documents (July 11, 2007) (EX1042), available at [https://web.archive.org/web/20070711185720/http://member.openmobilealliance.org/ftp/public\\_documents/POC/Permanent\\_documents/](https://web.archive.org/web/20070711185720/http://member.openmobilealliance.org/ftp/public_documents/POC/Permanent_documents/)
- OMA Release Program and Specifications (October 26, 2007) (EX1043), available at [https://web.archive.org/web/20071026121236/http://www.openmobilealliance.org/release\\_program/index.html](https://web.archive.org/web/20071026121236/http://www.openmobilealliance.org/release_program/index.html)
- OMA Push to talk over Cellular Working Group (February 20, 2008) (EX1044), available at <https://web.archive.org/web/20080220172844/http://www.openmobilealliance.org/Technical/poc.aspx>
- OMA Technical Section - Publicly Available Documents (February 23, 2008) (EX1045), available at <https://web.archive.org/web/20080223000148/http://www.openmobilealliance.org/tech/publicmaterial.html>
- OMA Publicly Available Documents (March 8, 2008) (EX1046), available at <https://web.archive.org/web/20080308082514/http://www.openmobilealliance.org/Technical/PublicMaterial.aspx>

- 3GPP Specifications Home Page (July 2, 2007) (EX1047), available at <https://web.archive.org/web/20070702234758/http://www.3gpp.org/specs/specs.htm>
- 3GPP specification Release version matrix (July 4, 2007) (EX1048), available at <https://web.archive.org/web/20070704004228/http://www.3gpp.org/ftp/Specs/html-info/SpecReleaseMatrix.htm>
- 3GPP Specification 23.979 (August 3, 2007) (EX1049), available at <https://web.archive.org/web/20070803213451/http://www.3gpp.org/ftp/Specs/html-info/23979.htm>
- 3GPP specification status report (September 17, 2007) (EX1050), available at <https://web.archive.org/web/20070917060533/http://www.3gpp.org/ftp/Specs/html-info/status-report.htm>
- 3GPP Specifications Releases (and phases and stages) (October 20, 2007) (EX1051), available at <https://web.archive.org/web/20071020044252/http://www.3gpp.org/specs/releases.htm>
- 3GPP Specifications Releases (and phases and stages) (March 31, 2008) (EX1052), available at <https://web.archive.org/web/20080331005358/http://www.3gpp.org/specs/releases.htm>
- 3GPP Specification 23.060 (April 21, 2008) (EX1053), available at <https://web.archive.org/web/20080421203604/http://www.3gpp.org/FTP/Specs/html-info/23060.htm>
- 3GPP specification Release version matrix (April 25, 2008) (EX1054), available at <https://web.archive.org/web/20080425220025/http://www.3gpp.org/ftp/Specs/html-info/SpecReleaseMatrix.htm>
- 3GPP specification status report (April 30, 2008) (EX1055), available at <https://web.archive.org/web/20080430174910/http://www.3gpp.org:80/ftp/Specs/html-info/status-report.htm>
- 3GPP Home Page (March 31, 2008) (EX1056), available at <https://web.archive.org/web/20080331113619/http://www.3gpp.org/>

## II. BACKGROUND AND EXPERIENCE

4. As previously mentioned, I was asked to prepare this declaration because of my experience working with 3GPP and OMA documents and standards in the 2006 to 2008 time frame.

5. I joined MSI (formerly known as Motorola, Inc.) in 2003, and by 2005 was a Lead Engineer within the Motorola PoC (Push to Talk over Cellular) Server Development team. *See* EX1057 (Motorola's PoC Solution offerings circa 2006); EX1058; EX1059 (Motorola's PoC Solution offerings circa 2007); EX1060 (Motorola PoC Solution Brochure (2004)). In 2006, I was promoted to Project Manager for the Motorola PoC (Push to Talk over Cellular) Server Development team. I continued working as the Project Manager for the Motorola PoC (Push to Talk over Cellular) Server Development team until October 2008, when I was promoted to Engineering Manager, also within the Motorola PoC (Push to Talk over Cellular) Server Development team.

6. During the 2007 to 2008 time frame, I would regularly visit the OMA and 3GPP websites (*i.e.*, [www.openmobilealliance.org](http://www.openmobilealliance.org) and [www.3gpp.org](http://www.3gpp.org)), which is where many of the specifications and documents relevant to the PoC specification/standard were published. I recognize exhibits EX1042 to EX1056 as webpages I either did visit or, based on information and belief, would have visited when downloading the latest version of a specification/document related to PoC. I

would visit those OMA and 3GPP websites because the specifications/documents related to the PoC specification/standard were updated often.

7. Based on my experience, the OMA and 3GPP specifications and documents related to the PoC specification/standard were uploaded to the OMA or 3GPP websites either on the date or within a few days of the date listed on the front of each document during 2007 and 2008.

8. I recognize each of the documents labeled as EX1029, EX1030, EX1031, EX1032, EX1033, EX1034, EX1037, EX1038, EX1039, and EX1040 based on my prior experience working on Motorola's PoC product offerings.

9. It is my opinion, based on my experience above, that each of the OMA and 3GPP specifications and documents labeled as each of the documents labeled as EX1029, EX1030, EX1031, EX1032, EX1033, EX1034, EX1037, EX1038, EX1039, and EX1040 were published on the respective OMA or 3GPP websites on or within a few days (*e.g.*, 3–4 days) of the date listed on the front of each document. For example, it is my opinion, based on my experience, that EX1032 (OMA-TS-PoC\_Interworking\_Service-V2\_0) was published on or within a few days (*e.g.*, 3–4 days) of the October 2, 2007, date listed on the front of EX1032.