UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INNOLUX CORPORATION

Petitioner,

v.

PHENIX LONGHORN LLC,

Patent Owner

Case No. IPR2025-00043
U.S. Patent No. 7,233,305

DECLARATION OF JOSEPH C. MCALEXANDER

I, Joseph McAlexander, hereby declare as follows:

I. INTRODUCTION

1. I have been retained by Phenix Longhorn LLC ("Phenix" or "Patent Owner") concerning the above-captioned Petition for *Inter Partes* Review ("IPR") proceeding involving U.S. Patent No. 7,233,305 ("the '305 Patent") (EX1001).

2. I have been asked by Patent Owner to offer opinions regarding the '305 Patent and Claims 1-5 and 8-14 (the "Challenged Claims") of the '305 Patent, as set forth in Innolux Corporation's ("Innolux" or "Petitioner") Petition for IPR ("the Petition").

3. This declaration contains statements of my opinions formed to date and the associated reasoning in support of my opinions. I reserve the right to offer additional opinions based on further review of the materials of this case, or any related proceedings, including opinions and/or testimony of other relevant witness, including other expert witnesses retained in this matter.

4. The statements contained herein and referenced in Phenix's Patent Owner's Preliminary Response include my opinions and the bases for my opinions.

5. I am being compensated by Patent Owner at my standard hourly consulting rate of $625.00 per hour for my time spent on this matter. My compensation is not contingent on the outcome of the IPR or on the substance of my opinions.

6. I have no financial interest in Patent Owner.

II. EDUCATION AND WORK HISTORY

7. I am a Registered Professional Engineer (#79454) and the President of McAlexander Sound, Inc. I hold a Bachelor of Science degree in Electrical Engineering from North Carolina State University. I am a member of a number of professional organizations, including the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and the National Society of Professional Engineers. I have been associated with the integrated circuit and electronics industry as a designer and consultant for the past fifty-two (52) years. I am a named inventor on thirty-one (31) U.S. patents and a number of foreign patents, including patents directed to current sensors, motion sensors, timing and voltage/current control, signal generation and detection, and conditional response circuits.

8. My skills and experience are in areas of circuit design, simulation, layout and analysis, device fabrication and assembly, testing, marketing, control system design and analysis, manufacturing operations, and respective areas of quality, reliability, and defect/failure analysis. Specifically, I have:

- designed and managed development, testing, and evaluation of devices including Dynamic Random Access Memories (DRAMs), Static Random Access Memories (SRAMs), Charge Coupled Devices (CCDs), Shift Registers (SRs), and functional circuits including I/O buffers for address and

data, decoders, clocks, sense amplifiers, fault tolerant, parallel-to-serial data paths for video applications, level shifters, converters, pumps, and logic, as well as wireless communication systems and MEMs applications;

- managed operations including engineering, training, and quality assurance for device fabrication, assembly, test, analysis, and reliability assessment, as well as manufacturing control;
- performed testing, analysis, and control involving use of mechanical calibration and measuring equipment, including optical, scanning e-beam, IR, capacitive, and laser using phase contrast and Fast Fourier Transform (FFT) for High Aspect Ratio Inspection (HARI) applications; audio and video system design and installation;
- taught courses in solid state device physics, integrated circuit design, integrated circuit fabrication, and statistical control;
- provided expert services, investigating both process and design technologies of various devices (microprocessor and controller, memory, programmable logic, card, tag, module, mixed signal, custom, and other), systems (PC and peripheral, computer, control, laser measurement, switch, architecture, software, and other), and consumer products (medical, TV, telephone, VCR, facsimile, copier, lighting, game, pressure sensors, and other); provided nuclear radiation hardness testing services for military and space clients;

managed the design and installation of audio sound and video systems for private and commercial enterprises.

9. I also have experience performing intellectual property valuation and patent portfolio work for companies. For example, when I worked at RMC Management, I conducted numerous patent portfolio valuations and negotiated licenses. Also, I was part of a consultant team with ST Microelectronics that performed patent portfolio valuations and negotiated licenses on behalf of ST Microelectronics.

10. Because of my background, training, and experience, I am qualified to provide the expert opinions within this declaration regarding the technology described and claimed in the ’305 Patent. A more detailed record of my professional qualifications is set forth in the attached Appendix A, which is my curriculum vitae, including a list of publications, awards, research grants, and professional activities.

III. MATERIALS CONSIDERED

11. In forming my opinions, I have reviewed the ’305 Patent and its prosecution history. I have also reviewed and considered the references cited by the Petitioner, the Petition itself, the Declaration of Dr. R. Jacob Baker (EX1003) submitted with the Petition, and other documents and information as set forth in this declaration and contained in the Table of Exhibits provided with Phenix’s Patent Owner’s Preliminary Response.

12. In reaching my opinions, I have relied upon my experience in the field and also considered the viewpoint of a person of ordinary skill in the art ("POSITA") at the time of the earliest claimed priority date of the '305 Patent. As explained below, I am familiar with the level of a person of ordinary skill in the art regarding the technology at issue as of that time.

IV. BACKGROUND

A. The '305 Patent

13. The '305 Patent, entitled "Gamma Reference Voltage Generator," was filed on December 23, 2003 and claims priority to a provisional application filed on June 11, 2003, and names Richard V. Orlando and Trevor A. Blyth as co-inventors. See EX1001 at 1. The '305 Patent claims a programmable integrated circuit comprising non-volatile storage cells which can be programmed with gamma reference voltages via a multiplexer and then output to displays, including LCDs. *See* EX1001, 2:16-38.

14. The '305 Patent further discloses the organization of these non-volatile storage cells into multiple "banks" wherein the integrated circuit contains a means to switch between the banks "based on one or more external signals provided." *Id*. at claim 1.

15. The ’305 Patent has 14 claims, with 3 independent claims (claims 1, 6 and 8). For the sake of clarity, I use the same limitation numbers for the claims of the ’305 Patent as provided by Petitioner. Petition at vii-ix.

16. The ’305 Patent was filed on December 23, 2003 (Appl. No. 10/746,333) and is, therefore, subject to pre-AIA review.

B. Person of Ordinary Skill in the Art

17. I am informed and understand that, in the field of patent law, a POSITA is a hypothetical person who is presumed to have known the relevant art at the time of the invention. I understand that the facts that may be considered in determining the level of ordinary skill in the art include: (a) the types of problems encountered in the art; (b) prior art solutions to those problems; (c) the rapidity with which innovations are made; (d) the sophistication of the technology at issue; and (e) the educational level of active workers in the field.

18. I am informed that the “time of invention” I should use for the purpose of providing my opinions in this declaration is June 11, 2003, the date of the filing of Provisional Patent Application No. 60/477,680 (the “’680 Provisional Application”).

19. In forming my opinions expressed in this declaration, I relied upon my knowledge, skill, experience, training, and education in the relevant filed of the art,

and have considered the viewpoint of a POSITA at the time of invention. My opinions, therefore, represent the view of a POSITA as of June 11, 2003.

20. I am informed that Petitioner's definition of a POSITA requires "at least a bachelor of science degree in physics, electrical engineering, or the equivalent thereof and three (3) years of experience in circuit design or display technologies." Petition at 16. Additionally, I am informed that Petitioner's definition of a POSITA also requires a "knowledge of integrated circuits, gamma correction, and storage of gamma correction voltage values within memory, and would have understood how to search available literature for relevant publications." *Id*.

21. For the sole purpose of addressing the Petition, I agree to Petitioner's proposed definition of a POSITA and further agree to apply the same definition. I may, however, offer additional or different definitions of a POSITA in other related matters based on review of the materials in those cases.

22. It is my opinion that I qualify as a POSITA under Petitioner's proposed definition.

C. Priority Date

23. I am informed that a priority date is established by demonstration of conception and diligent reduction to practice. I understand, therefore, that Patent Owner may demonstrate that the inventors conceived of and reduced to practice the claimed inventions as of their alleged "priority date." For evaluating the Petition, I

reviewed materials provided by the inventors to form opinions as to whether these prior documents demonstrate that the documents of the disclosures contain the same inventions as recited in the claims of the '305 Patent.

24. I understand that the inventors of the ’305 Patent were authors of a paper titled “Alta Gamma Trimster for Gamma Reference Voltage Generation for TFT Flat Panel Displays,” last modified on June 5, 2003. EX2002.

25. The inventors filed the “’680 Provisional Application” on June 11, 2003, which is claimed on the face of the ’305 Patent. EX2003.

26. I understand that the inventors of the ’305 Patent authored a datasheet titled “AG1818 Gamma Trimster” and dated August 27, 2003 (the “August 27, 2003 Datasheet”). EX2004.

27. I understand that the current copy of the ’680 Provisional Application available on the USPTO online database contains “three figures that apparently were intended to be part of the filing” but an incorrect specification that “describes an ‘Invention [that] relates [to] haptic devices, and in particular to a targeting device providing haptic feedback to a user.’” Petition at 13-14; EX1016.

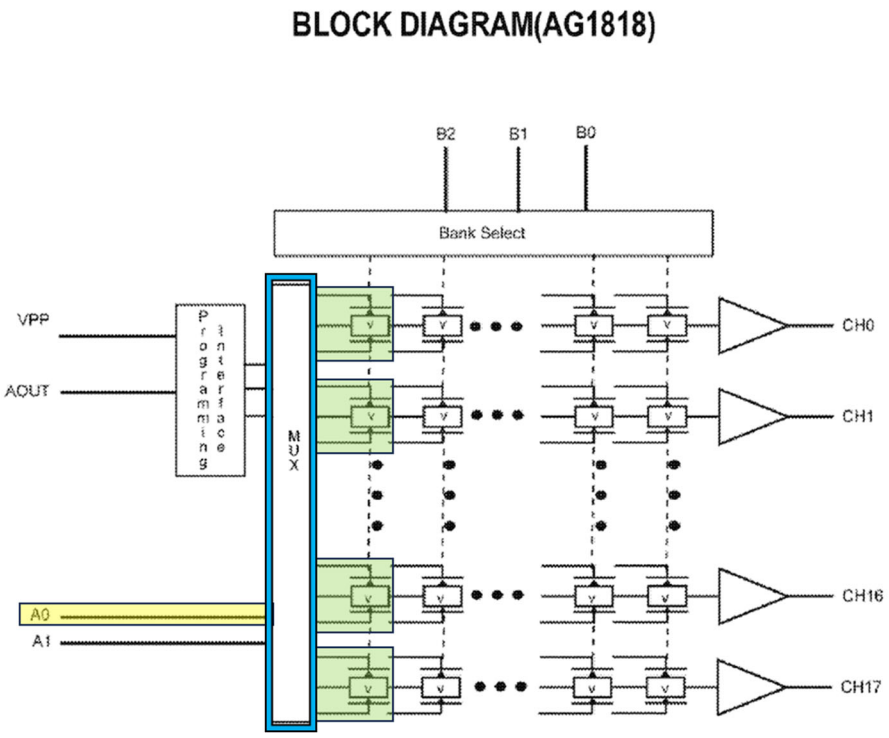
28. I understand that the ’680 Provisional Application was dated and filed on June 11, 2003, via U.S. Express Mail, with the Patent Office, which contains the correct specification. EX2003.

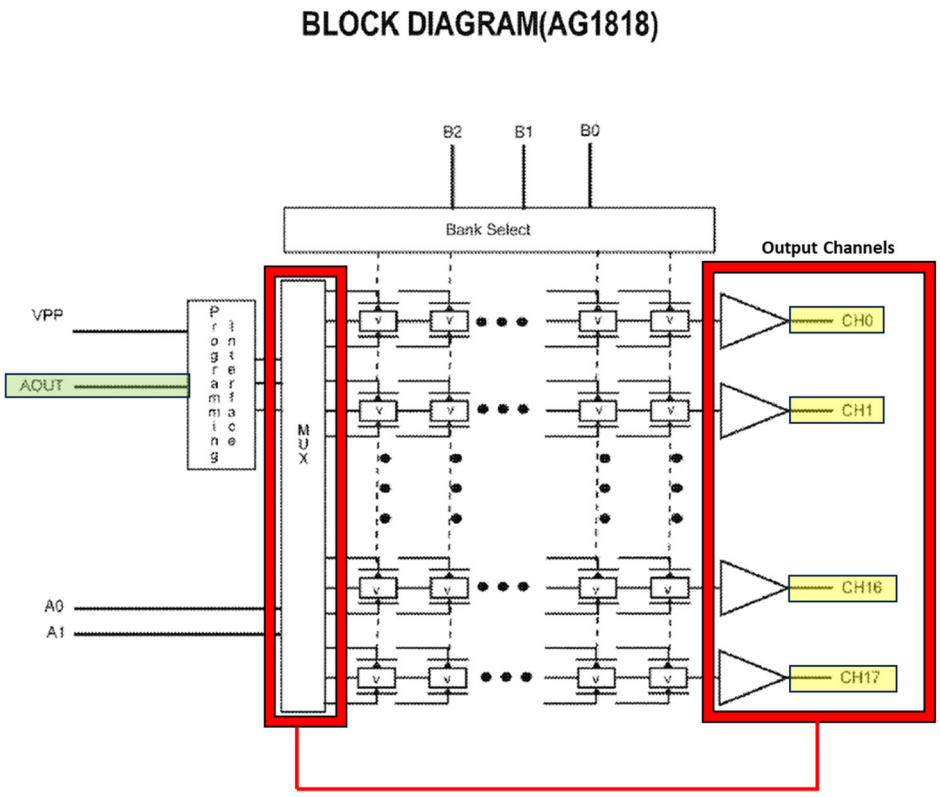
29. It is my opinion that the '680 Provisional Application and the August 27, 2003 Datasheet disclose all of the limitations of the Challenged Claims, including the "said non-volatile storage cells are organized into two or more banks of cells" limitation in claim 1 and the "an output pin connected to an output through a second multiplexer connected to said plurality of outputs" limitation in claim 8.

30. It is my opinion that the "Block Diagram (AG1818)" in the August 27, 2003 Datasheet discloses the "said non-volatile storage cells are organized into two or more banks of cells" limitation. EX2004, p.3. Further, the "Block Diagram (AG1818)" and description of the AOUT in the August 27, 2003 Datasheet discloses the "an output pin connected to an output through a second multiplexer connected to said plurality of outputs" limitation in claim 8. *Id*.

31. A POSITA would have understood that the MUX of the "Block Diagram (AG1818)" in the August 27, 2003 Datasheet disclosure suggests a bank of MUXs (*i.e.*, more than one multiplexer) and not a single multiplexer. *See* EX2004, p.3. This bank of multiplexers is consistent with the Board's prior construction and Petitioner's proposed construction of the term "multiplexer." *See infra* at VI.4. The MUX is not read as a single multiplexer with multiple inputs and multiple outputs. Instead, a POSITA would understand the annotated MUX block in the figures below to describe multiple multiplexers: 1) a first set of multiplexers associated with A0, A1 during the programming/write mode of operation in which an analog value input

is programmed to selected nonvolatile cells; and 2) a second set of multiplexers used to select the appropriate AOUT from the multiple channels (CH0-CH17). EX2004, p.3 (annotated for examples 1 and 2, respectively). These two sets of multiplexers necessarily handle data in different directions, the first from analog input to nonvolatile storage cell (write) and the second from nonvolatile storage cell to analog output (read verify).





EX2004, p.3 (annotated).

32. A POSITA would have understood that the August 27, 2003 Datasheet describes an AOUT output pin as being "used to read the cell which is currently[] being programmed to verify the write operation." EX2004, p.4. Put another way, the AOUT must sample the outputs of channels (*i.e.*, CH0-CH17) to determine and verify the content stored in the nonvolatile cells during the write operation. A POSITA would further have understood that the August 27, 2003 Datasheet teaches that a different multiplexer is used to select which output of CH0-CH17 for a given operation is used to output through the programming interface and then to AOUT

for sampling and verification, as demonstrated in the "Block Diagram (AG1818)." *See* EX2004, p.3.

33. For the purpose of evaluating whether the elements of claim 1 are contained in the disclosures of the '680 Provisional Application and the August 27, 2003 Datasheet, it is my opinion that the claim chart contained in the Patent Owner's Preliminary Response for this claim demonstrate that the claim was disclosed in the '680 Provisional Application and the August 27, 2003 Datasheet.

34. For the purpose of evaluating whether the elements of claim 2 are contained in the disclosures of the '680 Provisional Application and the August 27, 2003 Datasheet, it is my opinion that the claim chart contained in the Patent Owner's Preliminary Response for this claim demonstrate that the claim was disclosed in the '680 Provisional Application and the August 27, 2003 Datasheet.

35. For the purpose of evaluating whether the elements of claim 3 are contained in the disclosures of the '680 Provisional Application and the August 27, 2003 Datasheet, it is my opinion that the claim chart contained in the Patent Owner's Preliminary Response for this claim demonstrate that the claim was disclosed in the '680 Provisional Application and the August 27, 2003 Datasheet.

36. For the purpose of evaluating whether the elements of claim 4 are contained in the disclosures of the '680 Provisional Application and the August 27, 2003 Datasheet, it is my opinion that the claim chart contained in the Patent Owner's

Preliminary Response for this claim demonstrate that the claim was disclosed in the '680 Provisional Application and the August 27, 2003 Datasheet. Further, a POSITA would have understood that, because a driver is required to output a higher voltage at some fixed programmed level, then necessarily, the value in the storage cell would be a constant fraction of the signals.

37. For the purpose of evaluating whether the elements of claim 5 are contained in the disclosures of the '680 Provisional Application and the August 27, 2003 Datasheet, it is my opinion that the claim chart contained in the Patent Owner's Preliminary Response for this claim demonstrate that the claim was disclosed in the '680 Provisional Application and the August 27, 2003 Datasheet. Further, a POSITA would have understood that, the August 27, 2003 datasheet indicates a Programming Voltage (VPP) of 14 V, which a POSITA would have understood to disclose "circuits for programming require an external source for a high voltage programming means."

38. For the purpose of evaluating whether the elements of claim 8 are contained in the disclosures of the '680 Provisional Application and the August 27, 2003 Datasheet, it is my opinion that the claim chart contained in the Patent Owner's Preliminary Response for this claim demonstrate that the claim was disclosed in the '680 Provisional Application and the August 27, 2003 Datasheet.

39. For the purpose of evaluating whether the elements of claims 9-14 are contained in the disclosures of the ’680 Provisional Application and the August 27, 2003 Datasheet, it is my opinion that the claim chart contained in the Patent Owner’s Preliminary Response for these claims demonstrate that the claim was disclosed in the ’680 Provisional Application and the August 27, 2003 Datasheet.

D. Prior IPR Proceeding

40. I understand that the ’305 Patent has previously been subject to an earlier filed IPR in *Wistron Corporation v. Phenix Longhorn, LLC*, IPR2018-01255 (“the Wistron Petition”).

41. I understand that the Board declined to institute an *inter partes* review based on the Wistron Petition. *See* EX1014, IPR2018-01255, Paper 14 at 6 *Wistron Corporation v. Phenix Longhorn*, IPR2018-01255, Paper14 at 6 (the “Wistron Denial”). I further understand that the Wistron Petition relied on two of the references cited by Petitioner in this Petition (*i.e.*, the Petropoulos and Tsai references). *See id*. I understand that, as part of the Board’s denial, it found that the Petropoulos and Tsai references failed to teach the “circuits for programming coupled to a multiplexer” and “means to switch between the banks” claim limitations in the ’305 Patent. *Id*. at 32-38.

E. Alleged Prior Art

42. Petitioner's cited prior art consists of four alleged prior art references, arranged in various suggested combinations: U.S. Publication 2004/0090409 A1 ("Nakata"); U.S. Patent 6,760,068 ("Petropoulous"); U.S. Patent 5,974,528 ("Tsai"); and U.S. Patent 6,271,825 ("Yamazaki").

1. Nakata Summary

43. Nakata discloses a "gamma correction voltage generation device" with "a plurality of sets, each comprising a data holding section for holding digital data inputted thereto, a digital-to-analog converter for converting the digital data held in the data holding section to an analog voltage, and a buffer for amplifying a capacity of current of the analog voltage and outputting the analog voltage, wherein the analog voltages are outputted from the buffers as gamma correction voltages." EX1005, [0011].

2. Petropoulos Summary

44. Petropoulos discusses "a programmable analog/multi-level memory array for modifying individual outputs . . . in order to obtain a desired sensor array output." Ex. 1006, Abstract. "The memory array can be programmed with data corresponding to desired modifications, such as . . . gamma correction." *Id*.

3. Tsai Summary

45. The Board previously concluded that "Tsai discusses a microcomputer having embedded flash memory, which allows for (1) programming data into the memory and (2) reprogramming (e.g., update or change) data in memory without external programming tools or on-chip" wherein "Tsai's microcomputer (e.g., 310) includes a bus multiplexer (e.g., 350) connecting a register set (e.g., 340) to flash memory (e.g., 330)." *Id*. at 46 (*citing* Ex. 1007, 7:2–9, 49–67, Fig. 3).

4. Yamazaki Summary

46. Yamazaki discloses a "display device" comprising "[a] semiconductor display device correcting system includes a control circuit for carrying out gamma correction of a picture signal supplied from the outside and a nonvolatile memory for storing data for gamma correction." EX1008, Abstract.

5. Lack of a Motivation to Combine

47. It is my opinion that a POSITA would not have been motivated to combine any of the four alleged prior art references (Nakata, Petropoulos, Tsai, and Yamazaki) because each of the references are directed to different technical objectives.

48. For example, Petitioner concedes that Tsai is not in the same technical field as the '305 Patent because it relates to general memory storage devices. Thus, a POSITA would not have combined Tsai with the Nakata and Petropoulos

references because these references would not have required the use of a secondary microcomputer and associated storage.

49. A POSITA would not have found Tsai's alleged disclosure of "storage and retrieval of information" alone, as sufficient to provide motivation for a POSITA to utilize the Tsai reference. Petition at 36.

V. LEGAL PRINCIPLES

50. I am informed and understand that a patent claim is invalid as obvious under 35 U.S.C. § 103 if the differences between the claimed invention and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art. I am informed and understand that a claimed invention composed of several elements is not proven obvious merely by demonstrating that each of its elements was known independently in the prior art. A patent challenger must identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements. In determining whether a claimed invention is obvious, each claim must be considered separately, and hindsight may not be used, but only what was known at the time of the invention.

51. I am informed and understand that in making a determination whether a given patent claim is obvious, one must take into account (1) the scope and content of the prior art; (2) the differences between the prior art and the claims;

(3) the level of ordinary skill in the art; and (4) any objective evidence (called "secondary considerations") that may have existed at the time of the invention and afterwards that shed light on the nonobviousness of the claimed invention, including: (a) whether the invention was commercially successful as a result of the merits of the claimed invention; (b) whether the invention satisfied a long-felt need; (c) whether others had tried and failed to make the invention; (d) whether others copied the invention; (e) whether the invention achieve unexpected results; (f) whether others in the field praised the invention; among others.

VI. CLAIM CONSTRUCTION

52. I understand that claim terms are typically given their ordinary and customary meaning, as would have been understood by a POSITA at the time of invention. I also understand that, the claim term may be construed in view of the language of the claims, the patent's specification, the patent's prosecution history, and the knowledge of a POSITA at the time of invention. I have applied this understanding to my analysis and in developing my opinions.

53. For the purpose of aiding the Board's review, I provide herein descriptions of how a POSITA would have interpreted certain claim terms.

54. I understand that the Board previously provided constructions of certain claim terms in denying the Wistron Petition. *See* EX1014, pp.8-14. I also understand

that a district court previously provided construction of certain claim terms of the '305 Patent. *See* EX1013.

1. "circuits for programming"

55. I understand that the court in *Phenix Longhorn, LLC v. Wistron Corporation*, No. 2:17-CV-00711-RWS, 2019 WL 2568476 (E.D. Tex. June 21, 2019) (the "Wistron Litigation") ruled that the term the term "circuits for programming" is not a means-plus function and carries its plain and ordinary meaning. EX1013, p.34. I also understand that Petitioner and Patent Owner agree with this construction, and for the purposes of this Petition, I agree with this construction as well. Petition at 16.

2. "means to switch between the banks based on one or more external signals"

56. I understand that the District Court in the Winston Litigation ruled that the term "means to switch between the banks based on one or more external signals" is a means-plus-function limitation under § 112 ¶6. EX1013, p.46. I understand that the District Court determined that "the only detailed disclosure of bank selection [in the '305 Patent's specification] includes the damping circuit concept being used when switching between bank" and that "the disclosed bank select circuity has damping capability that is used when appropriate." EX1013, p.41. I understand that the District Court found the associated function and structure of the term as follows:

Function: switching between the banks based on one or more external signals; **Structure: '305 Patent, 5:50-6:21; Figure. 4A (B0-B2); Figure. 4B (pins 20, 22, 23); Figure. 5 (Tdamp); Figure. 6 (Bank Select, B0, B1, B2).**

Id.

57. I understand that the Board also previously construed this term and found that "[t]he recited functional limitation of 'switch[ing] between the banks based on one or more external signals'" should be construed to include "the structure corresponding to the means to switch is the B0–B2 address inputs, pins for these inputs, the bank select box, and equivalents thereof," as well as "the described internal damping circuit in the '305 patent, and equivalents thereof." EX1014, pp.9-13.

58. It is my opinion that the "means to switch" limitation as used in claim 1 is understood to include damping circuitry that slows transition between banks "when deemed appropriate." EX1001, 5:62-6:21; EX1013, p.41. This opinion is supported by the specification of the '305 Patent which explains that the transition timing employed by the damping circuitry may differ based on "the display manufacturer's requirements." EX1001, 6:19-21.

59. It is further my opinion that claim 3's recitation of damping functionality would be narrower than the use of the "means to switch" limitation in

the independent claims, as it includes a specific time by which transition employed by damping circuitry must occur, thus maintaining claim differentiation.

60. Thus, I agree with Phenix's request that the Board not adopt Petitioner's proposed construction as it is inconsistent with the both the District Court and Board's prior constructions and not supported by the specification, and that the Board adopt the claim construction of the term from the Wistron litigation.

3. "non-volatile storage cell"

61. I agree with Petitioner and Phenix that the term "non-volatile storage cell" refers to both digital or analog storage. Moreover, I believe that, under either construction, the Board's analysis is unchanged.

4. "multiplexer"

62. I understand that the Board previously construed the term "a multiplexer" in denying the Wistron Petition to mean "a device that interleaves signals to a single line, or selects one input and switches its information to the output." EX1014, p.14.

63. I understand that the District Court in the Wistron Litigation also construed the term "multiplexer" to mean "one or more circuits that couple (1) one input (or one set of inputs) to one of many outputs (or one set of many sets of outputs) or (2) one of many inputs (or one set of many sets of inputs) to one output (or one set of outputs)." EX1013, p.13.

64. I understand that Petitioner proposes a similar construction to the one found by the District Court, contending that the term should mean "one or more circuits that couple (1) one input (or one set of inputs) to one of many outputs (or one of many sets of outputs) [a demultiplexer] or (2) one of many inputs (or one set of many sets of inputs) to one output (or one set of outputs) [a multiplexer]." Petition at 20.

65. It is my opinion both the Board's prior construction and Petitioner's slightly modified proposed construction from the District Court are analogous insofar as the term "couple" in the Wistron Litigation's construction is understood to incorporate the *selecting* and *switching* functionality of the Board's construction. *See e.g.*, EX1001, 3:56-4:3. It is also my opinion that the use of "couple" to include the selecting and *switching* functionality is consistent with how a POSITA would have understood the term as interchangeable with "selectively couple" when applied to integrated circuits, and more specifically, multiplexers.

66. It is my opinion that the claim term "multiplexer" must include a selecting and switching functionality consistent with the District Court's and the Board's prior construction. For example, the specification recites that "[t]he mux 320 [*i.e.*, the multiplexer] connects signals from the programming engine 310 to any one of the programmable analog floating gate memory cells 330 through 337,

depending on three address inputs (A_0, A_1, and A_2). Address inputs are *used to select* which cell is being written to at any time." EX1001, 3:56-4:3 (emphasis added).

5. "two or more banks of cells"

67. I understand that the Board previously construed the term "banks of cells" to mean "contiguous sections of addressable, computer memory." EX1014, pp.14-15. I also understand that the District Court in the prior Wistron Litigation did not construe this term. *See generally*, EX1013.

68. It is my opinion that the language of the Board's construction itself resolves Petitioner's complaints that the claim allegedly "refers to a plurality of banks of cells, not a single bank." Petition at 23. The Board's construction specifically includes "contiguous *sections* of addressable, computer memory" and, therefore, it is my opinion that the Board's prior construction is suitable for the Board's review.

VII. PETITIONER'S ASSETED GROUNDS

69. I understand that Petitioner provided the following Grounds for the Board's review:

Grounds	Claims	References
1	1–5, and 8–14	Nakata (EX1005)
2	1–5, and 8–14	Nakata (EX1005) in view of Tsai (EX1007)
3	1–5, and 8–14	Petropoulous (EX1006)

4[1]	1–5, and 8–14	Petropoulous (EX1006) in view of Tsai (EX1007)
5	1–5, and 8–14	Nakata (EX1005) in view of Yamazaki (EX1008)
6	1–5, and 8–14	Petropoulous (EX1006) in view of Yamazaki (EX1008)
7	1–5, and 8–14	Petropoulous (EX1006) in view of Tsai (EX1007) in further view of Yamazaki (EX1008)

A. All Grounds Fail to Identify the Required "Damping" Functionality of the Independent Claims

70. The '305 Patent includes claim limitations directed to the "means to switch between the banks based on one or more external signals" as part of the Challenged Claims (*i.e.*, limitation 1[6] and claim 10).

71. I understand that pursuant to both the District Court and the Board's prior claim constructions, the claim term "means to switch between the banks" must include a "damping circuit" wherein the "the disclosed bank select circuity has damping capability that is used when appropriate." EX1013, p.41; EX1014, pp.9-13.

72. Each of Petitioner's Grounds fail to identify this required "damping circuit" for the term "means to switch between the banks" in any of its Grounds. *See*

[1] Petitioner titles both Ground 3 and Ground 4 as "Ground 3" in its discussion. Petition at 57, 66. For the sake of clarity, my analysis addresses the Grounds as provided on page 26 of the Petition.

Petition at 43-44 (Ground 1); 53-54 (Ground 2); 61-62 (Ground 3); 66 (Ground 4); 72 (Ground 5); 77-78 (Grounds 6 and 7).

73. It is my opinion that Petitioner's failure to show that any of the alleged prior art teaches or otherwise describes a "damping circuit" or damping functionality in discussing its Challenged Claims, renders all of the Grounds deficient on this basis alone.

B. Patent Owner's Demonstration that Nakata is Not Prior Art

74. I understand that Petitioner contends that its alleged Nakata reference (Grounds 1, 2, and 5) has a priority date of November 7, 2003. Petition at 25. I have been informed that Patent Owner assumes that Nakata is entitled to the November 7, 2003 date for the purpose of addressing the Petition. I am further informed that Nakata does not qualify as prior art to the '305 Patent and, therefore, cannot provide a basis for obviousness under 35 U.S.C. § 103.

C. GROUND 1 – Nakata (EX1005)

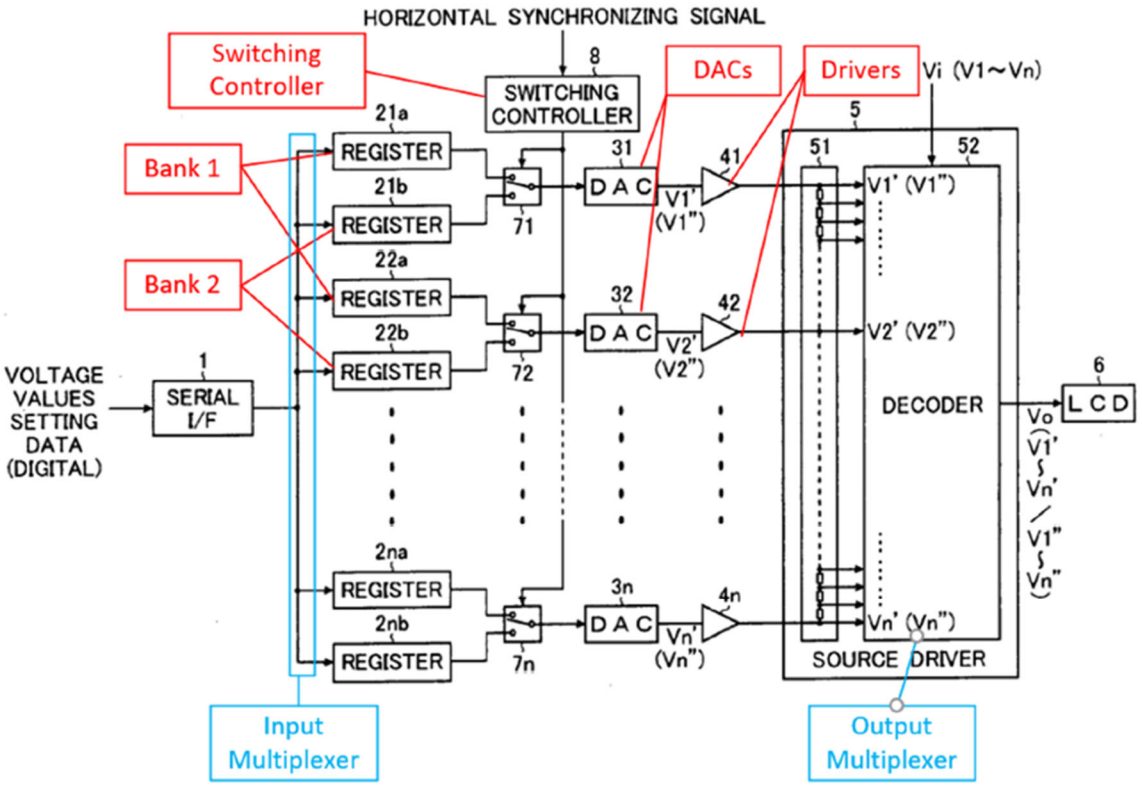
75. Ground 1 in the Petition relies solely upon the Nakata reference.

76. I am informed that Nakata cannot provide a basis for institution because it is not prior art to the '305 Patent and, therefore, this Ground is deficient.

1. Nakata does not disclose the "multiplexer" of the Challenged Claims

77. It is my opinion that, under both the Board's prior construction, and Petitioner's proposed construction, Nakata fails to disclose the "multiplexer" of the Challenged Claims.

78. I disagree with Petitioner's contention that "a POSITA would understand the serial interface 1 includes multiplexing functionality to route serial data to multiple registers based on addressing." Petition at 39. Nakata's "serial interface 1," which is annotated as an "input multiplexer" in the Petition, does not identify a multiplexer but instead identifies a serial bus component. *Id*.



(EX1005, at Fig. 3 (annotated)).

79. A POSITA would have understood that a serial bus is not, and cannot be, a multiplexer. Therefore, the serial interface 1 is not an "Input Multiplexer" as Petitioner or Dr. Baker contend. Petition at 38-40; EX1003, ¶¶ 93-94.

80. Further, Nakata neither teaches nor suggests that the "serial interface 1" includes multiplexing functionality as required by the multiplexer in the '305 Patent. Rather, Nakata describes the "serial interface 1" as a communication interface that distributes digital data for serial input to the registers utilizing the serial bus identified in Figure 3. EX1005, 0017. The "serial interface 1" in Nakata is a communication interface that simply receives and transmits digital data, while the

multiplexer in the ’305 Patent requires logic functionality to select which one of several inputs to send to an output. A serial interface is simply not a multiplexer.

81. Nakata’s description of a serial interface is consistent with a POSITA’s understanding of the term. A serial interface is an interface that communicates with a data bus for receiving and transmitting data sequentially. A POSITA would not have understood a serial interface to have logic functionality allowing for selective transmission that take place via a multiplexer.

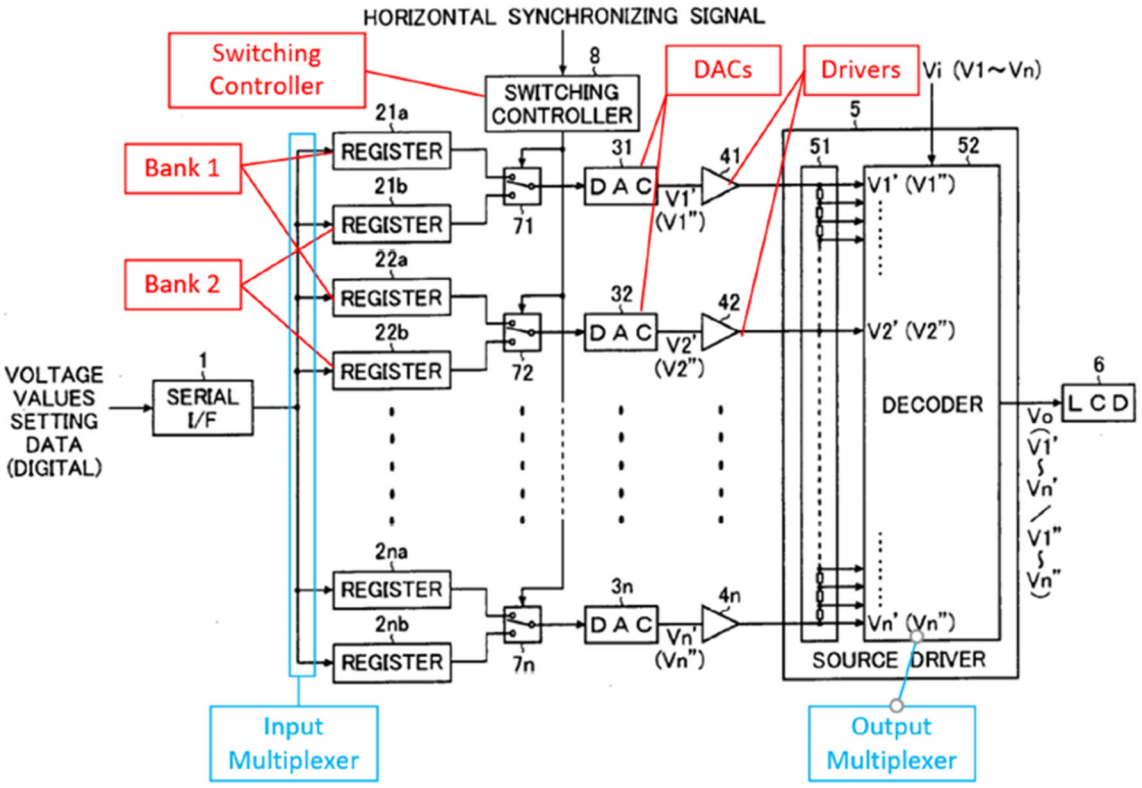
82. It is my opinion, therefore, that under either the Board’s prior construction or Petitioner’s proposed construction of “multiplexer,” this fundamental difference between the ’305 Patent’s multiplexer and Nakata’s serial bus (*i.e.*, serial interface 1) renders Nakata’s disclosure deficient.

2. Nakata does not disclose a “means to switch between the banks” as required by the Challenged Claims

83. It is my opinion that Nakata fails to disclose a “means to switch between the banks” as recited in the Challenged Claims (*i.e.*, limitation 1[6] and claim 10).

84. As previously discussed, it is my opinion that Petitioner’s failure to identify any “damping” functionality or circuitry for Nakata’s claims renders this Ground deficient. *See supra* at Section VII.A.

85. I disagree with Petitioner's identification of "a switching controller 8 that controls selectors 71 to 7n to switch between different sets (banks) of registers." Petition at 43.



(EX1005, at Fig. 3 (annotated)).

Petition at 43.

86. Petitioner incorrectly identifies the "sets" of Nakata's "registers" as disclosing the claimed "banks" of the '305 Patent (as identified "Bank 1" and "Bank 2" in Petitioner's annotated figure). Nakata's registers, however, are not banks at all. A POSITA would have understood that the claimed banks refer to the organization of nonvolatile storage cells as separate from one another, whereas the

registers of Nakata are not nonvolatile storage cells and are each interlinked, thereby negating the need for individually switching between them.

87. Further switching controller 8 (Petitioner's identified structure for switching between the banks) switches between the interlinked registers and not between any banks of cells. For example, in the annotated figure, switching controller 8 switches signals between Register 21a and Register 21b – but Petitioner's identified "bank" of cells consist of Register 21a, Register 22a….Register 2Na. *See* Petition at 43. Accordingly, the switching controller 8 switches between one portion of Petitioner's alleged bank of cells but does not switch between the banks themselves, the banks identified by the Petitioner not being banks at all, as explained above.

D. Ground 2 – Nakata (EX1005) in view of Tsai (EX1007)

88. Ground 2 of the Petition relies upon the Nakata (EX1005) reference as a primary reference. *See* Petition at 48-57.

89. I am informed that Nakata cannot provide a basis for institution because it is not prior art to the '305 Patent and, therefore, this Ground is deficient.

1. Nakata's failure to disclose a "multiplexer" is not cured by Tsai.

90. It is my opinion that both Nakata and Tsai fail to disclose the "multiplexer" of the Challenged Claims.

91. I disagree with Petitioner's contention that Tsai's "bus multiplexer 350" describes the same "multiplexer" claimed in the '305 Patent. Petition at 51. As the Board previously found, Tsai describes "a bus multiplexer (e.g., 350) connecting a register set (e.g., 340) to flash memory (e.g., 330)." EX1014, p.46. Tsai describes that:

> "[T]he logic states of MSEL and BSEL are switched in such a manner as to respectively switch the active block of the embedded flash memory unit 330 to the user block 332 and cause the bus multiplexer 350 to connect the I/O circuit 333 of the embedded flash memory unit 330 to the register set 340. This allows the data currently stored in the register set 340 (i.e., the new data that are to programmed into the user block 332 of the embedded flash memory unit 330) to be transferred via the bus multiplexer 350 to the user block 332, whereby the new data are written into the user block 332."
> EX1007, 7:57-67.

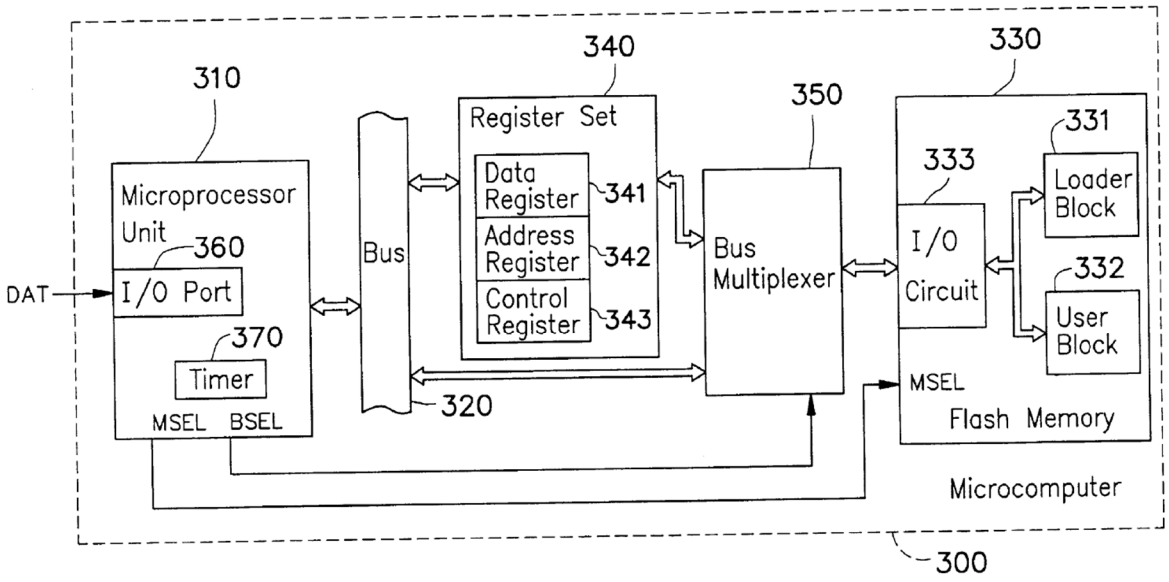


FIG. 3

EX1007, FIG.3.

92. Therefore, Tsai's "bus multiplexer 350" essentially operates as a switch to switch the connection of the "I/O circuit 333 of the embedded flash memory unit 330" to the register set 340.

93. A POSITA would not have understood the routine switching activity of Tsai's "bus multiplexer 350" to have logic functionality allowing for selective transmission ascribed to the multiplexer of the claims of the '305 Patent.

94. It is my opinion, therefore, that under either the Board's prior construction or Petitioner's proposed construction of "multiplexer," this fundamental difference between the '305 Patent's multiplexer and Tsai's "bus multiplexer 350" renders Tsai's disclosure deficient.

2. Nakata's failure to disclose a "means to switch between the banks" is not cured by Tsai.

95. It is my opinion that both Nakata and Tsai fail to disclose a "means to switch between the banks" as recited in the Challenged Claims (*i.e.*, limitation 1[6] and claim 10).

96. I disagree with Petitioner's contention that the loader block and user block of Tsai's memory are equivalent to the claimed banks for storing gamma correction values and that these blocks of Tsai can be separately addressed and accessed to retrieve their respective programs for execution. Petition at 53-54. This is contrary to the teachings of Tsai, which describes that only one block of Tsai's

memory (*i.e.*, the user block) can be used to retrieve programs for execution. EX1007, 6:26-43. Specifically, Tsai teaches that the loader block only stores programs to be loaded into the user block while existing programs within the user block are being erased.

97. Tsai does not teach, however, that the microcontroller can retrieve programs stored in the loader block for execution. Rather, Tsai's loader block is selected when new date is to be loaded (*i.e.*, stored) into the memory while the user block is selected when loaded data (received by the user block from the loader block) is to be retrieved for execution. EX1007, 6:26-43. Therefore, even if the microcontroller is able to selectively switch between the two blocks, the microcontroller is only able to retrieve from one of the two blocks. Furthermore, because the loader block and user block eventually store the same programs, there would be no point in selectively switching between these blocks since the same programs will be retrieved regardless of which block is chosen.

98. Even further, Tsai teaches that use of the user block requires retrieval and execution of all programs stored within this block and does not teach that programs stored in the user block can be selectively retrieved and executed. *See id*.

E. Ground 3 – Petropoulos (EX1006)

99. Ground 3 in the Petition relies solely upon the Petropoulos (EX1006) reference. *See* Petition at 57-65.

100. As previously discussed, I understand that Petropoulos has already been reviewed and denied by the Board, where the reference was found to not disclose either of the "multiplexer" or the "means to switch between the banks" limitations of the '305 Patent. EX1014, pp.33-38.

1. Petitioner fails to identify a "multiplexer," rendering its Ground deficient.

101. It is my opinion that Petropoulos fails to disclose the "multiplexer" of the Challenged Claims.

102. I disagree with Petitioner's allegations that the "address signal generator" in Petropoulos describes the "multiplexer" of the Challenged Claims. Petition, 59. I understand that the Board previously considered Petropoulos' "address signal generator" as it relates to the "multiplexer" limitation and determined that "Petropoulos does not discuss how address signal generator 320 behaves like a multiplexer as commonly understood by an ordinary skilled artisan." EX1014, p. 33. Based on Petitioner's failure to explain or differentiate the arguments previously found deficient by the Board, it is my opinion that Petitioner has failed to identify a "multiplexer" rendering this Ground deficient.

2. Petitioner fails to identify a "means to switch between the banks," rendering its Ground deficient.

103. It is my opinion that Petropoulos fails to disclose a "means to switch between the banks" as recited in the Challenged Claims (*i.e.*, limitation 1[6] and claim 10).

104. I disagree with Petitioner's identification of "a routing circuit 220" that "selects the desired modification" of the "memory arrays 210" in Petropoulos as allegedly describing claim limitation 1[6]. Petition at 61-62. I understand that the Board previously considered the same argument in the Wistron Petition. EX1014, p.34. ("Petitioner states routing circuit 220 selects a desired modification and that one skilled in the art would have understood the decoder, which accesses the desired voltage from a memory array, maps to the recited 'means to switch between banks based on external signals, i.e., the routing circuit.'"). There, the Board found Wistron's argument insufficient because Petropoulos' Figure 2 provides "no accompanying discussion of a corresponding structure (i.e., a bank select circuit, algorithm, pins, and/or damping circuit that uses a bank address signal) to limitation [g] in Figure 2." *Id*. at 35. I understand that the Board found Petropoulos' Figure 3 likewise deficient as "[a]lthough this figure shows decoders 330 and 340, Petitioner does not explain sufficiently or identify adequately how Petropoulos's decoder is a

corresponding structure (i.e., a bank select circuit, algorithm, pins, and/or damping circuit that uses a bank address signal) to limitation [g]." *Id*. at 36.

105. It is my opinion that because Petitioner identifies the same features in Petropoulos that the Board has already concluded to be deficient, Petitioner's Ground is likewise deficient.

F. Ground 4 – Petropoulos (EX1006) in view of Tsai (EX1007)

106. Ground 4 of the Petition relies on the combination of Petropoulos and Tsai. *See* Petition at 66.

107. I understand that the Wistron Petition also relied on the Petropoulos and Tsai references, and as part of the Board's denial, found that the Petropoulos and Tsai references failed to teach the "circuits for programming coupled to a multiplexer" and "means to switch between the banks" claim limitations in the '305 Patent. *Id*. at 32-38, 46-48.

1. A POSITA would not have been motivated to combine Petropoulos with Tsai.

108. It is my opinion that a POSITA would not have been motivated to incorporate what Petitioner alleges to be a "Tsai's bank switching mechanism" with Petropoulos, because such a modification would cause Petropoulos to be modified unsatisfactory for its intended purpose and would still not achieve the inventions of the '305 patent.

109. As described in detail in Section VII.D.2 above, Petitioner's attempt to point to the loader block and user block of Tsai's memory as the claimed "banks" for storing gamma correction values is incorrect. *See supra*, at Section VII.D.2; Petition at 64.

110. Petitioner and Petitioner's expert have failed to consider that Tsai teaches that the loader block only *stores* programs to be loaded into the user block while existing programs within the user block are being erased. Tsai does not teach, however, that the microcontroller can *retrieve* programs stored in the loader block for execution. Thus, even if the microcontroller is able to selectively switch between the two blocks, the microcontroller is only able to retrieve from one of the two blocks, and such selection is inconsequential because the same information would be retrieved regardless of which block is chosen.

111. These features of Tsai run contrary to Petropoulos's system that is designed to include a memory array having multiple memory cells each designed to store different gamma correction values such that different memory cells can be accessed when different gamma correction values are needed. Incorporating Tsai's loading and user blocks into Petropoulos's system would cause Petropoulos's system to lose the selection functionalities provided by Petropoulos's original memory system and result in a new memory system where only one set of gamma correction values stored within a user block can be retrieved for use at any given time, thus

effectively limiting Petropoulos's system to use of only a single memory cell for gamma correction value storage and retrieval.

112. A POSITA, therefore, would have understood that incorporating Tsai's "bank switching mechanism" would cause Petropoulos to be modified unsatisfactorily for its intended purpose and a POSITA would not have expected to achieve the invention of the '305 patent using the combination of Petropoulos and Tsai.

2. The combination of Petropoulos and Tsai does not render the Challenged Claims obvious.

113. It is my opinion that, even assuming that a POSITA would have been motivated to combine Petropoulos with Tsai, which a POSITA would not, the resulting combination still would not disclose all of the elements of the challenged claims.

114. As described in Sections VII.E and VII.D, respectively, it is my opinion that Petropoulos and Tsai fail to disclose at least limitations 1[2], 1[5], and 1[6] of independent claim 1 and substantially identical limitations 8[2] dependent claim 10. It is my opinion, therefore, that the combined system of Petropoulos in view of Tsai does not render the challenged claims obvious and Petitioner's Ground 4 is deficient.

G. Ground 5 – Nakata (EX1005) in view of Yamazaki (EX1008)

115. Ground 5 of the Petition relies upon the Nakata (EX1005) reference as a primary reference. *See* Petition at 66-76.

116. I am informed that Nakata cannot provide a basis for institution because it is not prior art to the '305 Patent and, therefore, this Ground is deficient.

117. It is my opinion that both Nakata and Yamazaki fail to disclose the "multiplexer" of the Challenged Claims.

118. As described in Section VII.C.1 above, it is my opinion that Nakata fails to disclose the "multiplexer" of the Challenged Claims. It is also my opinion that Yamazaki fails to remedy Nakata's omission of a "multiplexer" because Yamazaki also fails to describe any multiplexers. Petition at 69-70. A POSITA would have known that decoders are simply not multiplexers. Further, X-and Y-address decoders 301 and 302 of Yamazaki do not act as multiplexers, and cannot be interchangeable with multiplexers.

119. A POSITA would have understood that a decoder is not a multiplexer under both the Board's prior construction or Petitioner's proposed construction of the term. In particular, decoders and multiplexers are electronical components that have completely different structures and functions.

120. As described *supra*, at VI.4, the term "multiplexer" requires inputs and outputs to be "selectively coupled" to one another. For example, only one input signal among multiple input signals received by respective inputs of a multiplexer will be selected by the multiplexer itself (e.g., internally using the components internal to the multiplexer) to be output via a single output coupled to the multiple

outputs. In a multiplexer, an input signal received at one of multiple inputs is selected to be passed through the multiplexer's internal circuitry to the single output of the multiplexer, which is not how a decoder works. A POSITA would have understood that a decoder neither passes data through from one input to an output nor performs any internal selections to couple one of many inputs to a single output. Instead, a decoder converts (i.e., transforms) a series of input signals into an output signal. Said another way, instead of passing an input signal received at one input through to an output, a decoder transforms an input signal into one of many possible output signals.

121. Using Yamazaki's X- and Y- address decoders 301 and 302 as an example, the X- and Y- address decoders 301 and 302 will transform a specific input sequence into a specific sequence for selecting memory addresses denoted by at least characters (0, 0), (1, 0), (1,1), and (63, 63). EX1008, 8:35-49. As Yamazaki explains, to write to memory element (1, 1), the X-address decoder 301 receives an input signal that would cause it to apply 50 volts to the line C1 output and 5 volts to the line D1 output where the input signal is neither the 50 volts nor the 5 volts that are being applied at the outputs. *Id*. at 8:50-61. If the X-address decoder 301 acted instead as a multiplexer, it would have only provided an output signal at one of the line C1 output or the line D1 output, and what is output at the single selected line output would be the same as what was received as an input signal (e.g., if an input

A received a gamma correction value of ABC as an input signal and was selected as the input to be coupled to the single output, the single output would output that gamma correction value ABC that was received at that input A). Thus, a POSITA would have understood that replacing the X- and Y- address decoders 301 and 302 with multiplexers would cause the nonvolatile storage cells of Yamazaki to lose their cell selection function.

H. Ground 6 – Petropoulos (EX1006) in view of Yamazaki (EX1008)

122. Ground 6 of the Petition relies on the combination of Petropoulos and Yamazaki. *See* Petition at 77.

123. As previously discussed, I understand that Petropoulos has already been reviewed and denied by the Board, where the reference was found to not disclose either of the "multiplexer" or the "means to switch between the banks" limitations of the '305 Patent. EX1014, pp.33-38.

124. As described in Ground 5 above, Yamazaki also fails to disclose a "multiplexer" and "switching" mechanism required by the Challenged Claims of the '305 Patent. It is my opinion, therefore, that Yamazaki fails to cure the deficiencies of Petropoulos and Ground 6 is likewise deficient.

1. A POSITA would not have been motivated to combine Petropoulos with Yamazaki.

125. It is my opinion that a POSITA would not have been motivated to incorporate what Petitioner alleges to be Yamazaki's memory address switching mechanism with Petropoulos, because such a modification would be redundant.

126. Petitioner alleges such an incorporation would enable Petropoulos' system to be able to dynamically select between banks storing the sets of gamma correction values. Petition at 66. Petropoulos, however, includes a memory array 21 having memory cells C11 to CMN that made up of n-channel floating gate transistors (EX1006, 5:19-29), which is substantially identical in make-up and structure to the nonvolatile memory of Yamazaki. Petropoulos also includes an addressing circuit 215 that is configured to select which memory cells to use (i.e., read data from or write data into), which is substantially identical in make-up and structure to the x and y address decoders 301 and 302 of Yamazaki's bank switching mechanism. EX1006, 4:34-38; EX1008, 8:35-61.

127. Petropoulos' addressing circuit 215 and memory array 21 performs the same function as Yamazaki's address switching mechanism. That is, Petropoulos's addressing circuit 215 and memory array 21 combination allows for switching between the various memory cells C11 and CMN (i.e., memory addresses) of the memory array 21. Thus, a POSITA would have found that Petropoulos already has

its own bank switching mechanism and would have no need for Yamazaki's bank switching mechanism.

128. Further, Petitioner does not address such a redundancy in the Petitioner's rationale for incorporating Yamazaki's bank switching mechanism into Petropoulos because a POSITA taking Petropoulos would not have been motivated to combine its teachings with Yamazaki.

2. The combination of Petropoulos and Yamazaki does not render the Challenged Claims obvious.

129. It is my opinion that, even assuming that a POSITA would have been motivated to combine Petropoulos with Yamazaki (which a POSITA would not), the resulting combination still would not disclose all of the elements of the challenged claims.

130. As described Sections VII.E and VII.G, respectively, Petropoulos and Yamazaki fail to disclose at least limitations 1[2], 1[5], and 1[6] of independent claim 1 and substantially identical limitations 8[2] dependent claim 10. It is my opinion, therefore, that the combined system of Petropoulos in view of Yamazaki does not render the challenged claims obvious and Petitioner's Ground 6 is deficient.

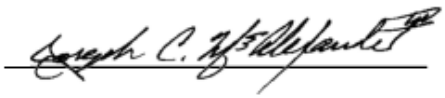
I. Ground 7 – Petropoulos (EX1006) in View of Tsai (EX1007) in further view of Yamazaki (EX1008)

131. Ground 7 of the Petition relies on the same arguments it presented in its analysis of Petropoulos, Tsai, and Yamazaki in its discussion of previous grounds (§§ XIV, XII, and XV). *See* Petition at 77-78.

132. Therefore, it is my opinion that for the reasons described above with respect to each of the alleged references, Petitioner's Ground 7 is likewise deficient. *See supra*, at VII.E, VII.F, and VII.H. Moreover, for the same reason that a POSITA would not have been motivated to combine Petropoulos and Tsai, or Petropoulos with Yamazaki, a POSITA would not be motivated to combine the alleged references of Ground 7. *See supra*, at Sections VII.F.1 and H.1.

I hereby declare that all statements of my knowledge made in this declaration are true and that these statements were made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: 3/12/2025



Joseph McAlexander

APPENDIX A

PROFESSIONAL SUMMARY

Currently a Registered Professional Engineer (#79454) and recognized as an inventor on 31 US and a number of foreign patents, I am President of McAlexander Sound, Inc., and the Managing Director of McAlexander Sound Pte Ltd. I have focused my expertise to support a number of clients in product, process, and operations analysis and investigation. Fifty-two years of experience in microcircuit and semiconductor technologies has developed my skills in areas of circuit design and analysis, device fabrication and assembly, testing, marketing, control system design and analysis, manufacturing operations and respective areas of quality, reliability, and defect / failure analysis. I am also the President and CEO of MDFHoldings, Inc., an IP holding company currently engaged in the field of GPS Tracking, and was formerly, among others, a Manager with QM Partners, LP, supporting clients in IP management and licensing. I have:

- designed and managed development, testing, and evaluation of devices including Dynamic Random Access Memories (DRAMs), Static Random Access Memories (SRAMs), Charge Coupled Devices (CCDs), Shift Registers (SRs), and functional circuits including I/O buffers for address and data, decoders, clocks, sense amplifiers, fault tolerant, parallel-to-serial data paths for video applications, level shifters, converters, pumps, and logic, as well as wireless communication systems and MEMs applications;

- designed, built, and managed 4 physical / chemical analysis laboratories to assess cause of defect and reliability of products, including nanostructure integrated circuits, systems, and product packaging;

- managed operations including engineering, training, and quality assurance for device fabrication, assembly, test, analysis, and reliability assessment, as well as manufacturing control, each of which involved both volatile and non-volatile memory; testing, analysis, and control involving use of mechanical calibration and measuring equipment, including optical, scanning e-beam, IR, capacitive, and laser using phase contrast and Fast Fourier Transform (FFT) for High Aspect Ratio Inspection (HARI) applications; audio and video system design and installation;

- taught courses in solid state device physics, integrated circuit design, integrated circuit fabrication, and statistical control;

- provided expert services, investigating both process and design technologies of various devices (microprocessor and controller, memory, programmable logic, card, tag, module, mixed signal, custom, and other), systems (PC and peripheral, computer, control, laser measurement, switch, architecture, software, and other), and consumer products (medical, TV, telephone, VCR, facsimile, copier, lighting, game, and other);

- provided nuclear radiation hardness testing services for military and space clients; and

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PROFESSIONAL SUMMARY

- managed the design and installation of audio sound and video systems for private and commercial enterprises.

From 1986-1990, I was Executive Vice President of EPI Technologies, Inc., prior to joining the staff at Cochran Consulting, Inc. where I served as senior managing consultant from 1991-2002. From 1972 to 1986, I was employed by Texas Instruments Incorporated.

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EXPERIENCE PROFILE

1988-present **McAlexander Sound, Inc. (McASI)** - Richardson, TX
President

o System, Product, and Process investigation, expert witness services for protection of intellectual property;
o Patent portfolio development and valuation;
o Product liability and insurance claim investigation, expert witness services for matters involving such claims;
o Quality Systems consulting and engineering;
o Radiation Hardness Testing Technical Representative;
o Acoustic system design/installation
o Technical Advisor in High Aspect Ratio and Surface Contour Measurement using Direct-to-Digital Holography.

2005-present **McAlexander Sound Pte Ltd** - Singapore
Managing Director

o System, Product, and Process investigation, expert witness services for protection of intellectual property;
o Patent portfolio development and valuation;
o Contract consultation;
o Not assigned any patents and is not engaged in any IP related licensing or litigation activities.

2002-present **MDFHoldings, Inc.** – Las Vegas, NV
CEO

o IP holding and licensing company;
o Assigned U.S. Patent Nos. 7,340,260 and 7,657,265 and EP 1 557 058 B1, each related to an object locating system;
o Has not been and is not engaged in any IP related litigation or licensing activities.

2006-2020 **QM Partners, L.P.** – Texas
Manager

o Management of development, licensing, prosecution and exploitation of assigned intellectual property;
o Not assigned any patents and is not engaged in any IP related licensing or litigation activities.

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EXPERIENCE PROFILE (continued)

2006-2020 **Guardian Technologies, LLC** – Texas
Manager

o IP holding and licensing company;
o Litigated U.S. Patent No. 5,657,076 related to security surveillance 2009-2011 (patent expired 2015);
o Assigned U.S. Patent No. 8,334,775 related to RFID tracking (reassigned 2020 to personal);
o Not engaged in any IP related licensing or litigation activities.

2006-2020 **Appropriate Holdings, LLC** – Delaware
Manager

o IP holding company;
o Not assigned any patents, has not been and is not engaged in any IP related licensing or litigation activities.

1996-2010 **RMC Management, LLP** - Plano, TX
Partner

o Asset management.

1991-2002 **Cochran Consulting, Inc. (CCI)** - Richardson, TX
Managing Consultant

o System, Product, and Process investigation, expert witness services for protection of intellectual property;
o Design, process, and product reliability;
o Defect and failure analysis.

1986-Nov'90 **EPI Technologies, Inc.** - Richardson, TX
Executive Vice President and Company Officer

o Managed Advanced Technology Div., QA, and Engineering, including software program development;
o Developed strategic, space/energy market growth plans;
o Negotiated the acquisition of and managed a radiation company;
o Designed and managed physical analysis, radiation effects, and environmental stress laboratories, including optical and e-beam measurement;
o Achieved > 30% annual revenue growth and profitability for each laboratory the first 12 months;

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EXPERIENCE PROFILE (continued)

o Product and Process investigation services for protection of intellectual property.

1972 – 1986 **Texas Instruments, Inc.** - Dallas/Houston, TX; Singapore

'84 - '86 **Quality/Reliability Assurance Manager, TI Dallas** Advanced DRAM semiconductor wafer fabrication facility

o Developed/implemented on-line, computerized SPC software tools for dimensioning analysis and control and pattern recognition;
o Coordinated people development, design-of-experiments;
o Managed chemical and physical analysis laboratories;
o Implemented control systems to assure product, process, material, equipment, and facility compliance, including Cost of Quality analysis.

'82 - '84 **Quality/Reliability Assurance and Engineering Manager**, **TI Singapore** assembly/test facility

o Developed, implemented, and operated an effective Quality/Reliability Assurance program for assembly processing including optical pattern recognition for equipment registration;
o Supervised 225 people for 7 day/week operation, including QRA, Computer Systems software development, and Training;
o Trained engineers in Solid State Physics, device fabrication, and statistical process control.

'81 - '82 **Engineering Operations Manager**, **TI Houston**

o Managed DRAM memory product cost center;
o Responsible for division test software generation, product assembly and test quality / yield, cost reduction and quality improvement;
o Provided technical customer interface for marketing;
o Coordinated TI Singapore engineering test/assembly.

'79 - '81 **Product Engineering Manager**, **TI Houston**

o Responsible for yield improvement, technical customer interface, quality improvement, design evaluation, and device characterization for DRAM and CCD products;
o Developed device specifications and test software.

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EXPERIENCE PROFILE (continued)

'72 - '79 **Design Section Manager / Engineer**, **TI Houston**

o Responsible for design and development, process compatibility, production introduction of Dynamic Ram products;
o Activities included electrical and physical layout, SPICE model simulation, test program generation, and product implementation for MOS Dynamic Ram products.

1969 - 1972 **U. S. Army** - Coventry, Rhode Island; Seoul, Korea
Captain, Air Defense Artillery

o Served one year as Communications Officer in Korea;
o Served two years as Tactical Officer, New England Defense.

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ORGANIZATIONS, PUBLICATIONS, EDUCATION

PROFESSIONAL ORGANIZATIONS AND AWARDS

1 - Institute of Electrical and Electronics Engineers, Inc. (IEEE), Senior Member. Societies: Computer, Electron Devices, Solid State Circuits
2 - Licensing Executives Society (LES)
3 - National Society of Professional Engineers
4 - Texas Board of Professional Engineers, Registered License #79454
5 - American Society of Civil Engineers
6 - Architectural Engineering Institute
7 - 2000/2001 Nationwide Register's Who's Who in Executives and Businesses
8 - 1996/1997 Strathmore's Who's Who Registry of Business Leaders

PUBLICATIONS

1- NUS Proceedings of Engineering Convention '83, Aug '83, pgs. 139-142, The Memory Challenge.

2- Archives of Biochemistry and Biophysics, Dec'81, Vol. 212, No. 2, Equilibrium Constants under Physiological Conditions for the Reactions of D-3-Phosphoglycerate Dehydrogenase and L-Phosphoserine Aminotransferase.

3- International Electron Devices Meeting, Dec '79, pgs. 355-357, Sub 100ns 16K x 1 MOS Dynamic RAM Using a Grounded Substrate.

EDUCATION PROFILE

1980 - 1985	Taught Solid State Device Physics, Semiconductor Processing, Circuit Design Techniques, and Statistical Quality Control Methods Effectiveness Training and Japanese Manufacturing Techniques, Participative Problem Solving courses
1975 - 1976	1.5 years Graduate Study in Neural Science, the University of Texas Graduate School of Biomedical Science
1965 - 1969	BSEE, North Carolina State University

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PATENTS (US-31, Foreign-8)

4,239,993	(1980) High Performance Dynamic Sense Amplifier with Active Loads
4,280,070	(1981) Balanced Input Buffer Circuit for Semiconductor Memory
4,288,706	(1981) Noise Immunity in Input Buffer Circuit for Semiconductor Memory
4,370,575	(1983) High Performance Dynamic Sense Amplifier with Active Loads
4,418,293	(1983) High Performance Dynamic Sense Amplifier with Multiple Column Outputs
4,533,843	(1985) High Performance Dynamic Sense Amplifier with Voltage Boost for Row Address Lines
4,543,500	(1985) High Performance Dynamic Sense Amplifier Voltage Boost for Row Address Lines
4,543,501	(1985) High Performance Dynamic Sense Amplifier with Dual Channel Grounding Transistor
4,748,349	(1988) High Performance Dynamic Sense Amplifier with Voltage Boost for Row Address Lines
6,172,640 B1	(2001) Pet Locator
6,236,358 B1	(2001) Mobile Object Locator
6,421,001 B1	(2002) Object Locator
6,441,778 B1	(2002) Pet Locator
6,480,147 B2	(2002) Portable Position Determining Device
6,518,919 B1	(2003) Mobile Object Locator
6,771,213 B2	(2004) Object Locator
6,859,171 B2	(2005) Mobile Object Locator

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PATENTS (continued)

7,113,126 B2	(2006) Portable Positioning Determining Device
7,179,674 B2	(2007) Bi-Directional Released-Beam Sensor
7,209,075 B2	(2007) Mobile Object Locator
7,324,044 B2	(2008) Object Locator
7,336,227 B2	(2008) Portable Position Determining Device
7,340,260 B2	(2008) System and Method for Tracking the Location of Multiple Mobile Radio Transceiver Units (assigned to MDFHoldings, Inc.)
7,353,706 B2	(2008) Weighted Released-Beam Sensor
7,397,097 B2	(2008) Integrated Released Beam Layer Structure Fabricated in Trenches and Manufacturing Method Thereof
7,564,405 B2	(2009) Object Locator
7,657,265 B2	(2010) System and Method for Tracking the Location of Multiple Mobile Radio Transceiver Units (assigned to MDFHoldings, Inc.)
7,760,137 B2	(2010) Portable Positioning Determining Device
7,764,228 B2	(2010) Portable Positioning Determining Device
7,989,906 B2	(2011) Bi-Directional released-Beam Sensor
8,334,775 B2	(2012) RFID-Based Asset Security and Tracking System, Apparatus and Method (assigned to personal)
JP 55-053640 B4	(1980) Defect Resistant Semiconductor Memory Cell
JP 59-044720 B4	(1984) Semiconductor High Speed Read/Write Memory Unit
DE2935121 C2	(1980) Clock Voltage Generator for Semiconductor Memory with Reduced Power Dissipation
DE3043651 A1	(1981) Clock Voltage Generator for Semiconductor Memory with Reduced Power Dissipation

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PATENTS (continued)

GB2032211 B2	(1980) High Performance Dynamic MOS Read/Write Memory
EP 1 557 058 B1	(2011) System and method for tracking the location of multiple mobile radio transceiver units (assigned to MDFHoldings, Inc.) [States: AT BE BG CH CY CZ DE DK EE ES FI FR GB GR HU IE IT LI LU MC NL PT RO SE SI SK TR]
EP 1 676 809 B1	(2010) Weighted released-beam sensor [States: DE FR GB IT]
EP 1 676 810 B1	(2010) Bi-directional released-beam sensor [States: DE FR GB IT]

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CASES

Cases over at least the past 7 years, either active or closed, in which I have signed a Protective Order, have testified as an expert either at a trial, hearing, or deposition, or have submitted statements / opinions by declaration, affidavit, or report, are:

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Kangaroo Media* v. Immersion Entertainment (*firm: Kenyon & Kenyon)	2:12-cv-00382-JFC, 2:14-cv-01536-JFC	WD PA	2012 - 2016	P,t
(Audio/Video Entertainment System patent)				
Securus* v. Global (*firm: Gruber)	3:13-CV-03009-K	ND TX	2014 - 2017	P,t
(Patents related to telecom systems)				
Global v. Securus* (*firm: Gruber)	3:14-CV-0829-K, 3:13-CV-00713-JRS	ND TX / ED VA	2014 - 2017	P
(Patents related to telecom systems)				
Advanced Audio Devices* (*firm: Clark Hill PLC)	IPR2014-01155	USPTO PTAB	2014 - 2016	P,t
(Patent 7,289,393 related to music jukebox)				
Advanced Audio Devices* (*firm: Clark Hill PLC)	IPR2014-01156	USPTO PTAB	2014 - 2016	P,t
(Patent 7,817,502 related to a personal digital stereo player)				
Advanced Audio Devices* (*firm: Clark Hill PLC)	IPR2014-01157	USPTO PTAB	2014 - 2016	P,t
(Patent 7,933,171 related to a personal digital stereo player)				
Advanced Audio Devices* (*firm: Clark Hill PLC)	IPR2014-01158	USPTO PTAB	2014 – 2016	P,t
(Patent 8,400,888 related to a personal digital stereo player)				

[1] * = Client

[2] P=Patent, C=Contract, ©=Copyright, TS=Trade Secret, AT=Antitrust; CA=Class Action; t=testified, TH=Trial/Hearing

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
One-E-Way* v. Sony, Sennheiser, BlueAnt, Creative Tech, Beats, Jawbone, Jabra (*firm: Knobbe Marten, Olson & Bear)	337-TA-943	ITC (Pender)	2014 - 2018	P,t
(Patents related to bluetooth configured headphones)				
Omega* v. Calamp	6:13-cv-1950-Orl-31DAB	MD, FL	2015 - 2016	P,t,TH
(Patents related to vehicular control systems and tracking)				
AVM* v. Intel (*firm: Boies, Schiller & Flexner)	1:15-cv-00033-RGA	DE	2015 - 2016	P,t,TH
(Patent related to dynamic logic circuits)				
Allure Energy* v. Honeywell (*firm: McKool Smith)	1:15-cv-00079-RP	WDTX, Austin	2015 - 2017	P
(Smart Thermostat)				
IV* v. Toshiba (*firm: Desmarais)	13-cv-453-SLR-SRF	DE	2015 - 2017	P,t,TH
(NAND Flash)				
IMS v. Micron* (*Weil Gotchal/ Orrick)	1:14-cv-01480-RGA	DE	2015 - 2022	P,t
(Patents related to flash memory)				
Honeywell v. Allure* (*firm: Dickinson Wright)	IPR201501248, 01251,01253	USPTO PTAB	2015 - 2017	P
(Smart Thermostat)				
Blitzsafe* v Honda (*firm: Brown Rudnick)	2:15-cv-01274-JRG-RSP	EDTX, Marshall	2015 - 2017	P,t
(Patents related to audio device integration systems)				
Blitzsafe* v Hyundai (*firm: Brown Rudnick)	2:15-cv-01275-JRG-RSP	EDTX, Marshall	2015 - 2017	P,t
(Patents related to audio device integration systems)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Blitzsafe* v Nissan (*firm: Brown Rudnick)	2:15-cv-01276-JRG-RSP	EDTX, Marshall	2015 - 2017	P,t
(Patents related to audio device integration systems)				
Blitzsafe* v Toyota (*firm: Brown Rudnick)	2:15-cv-01277-JRG-RSP	EDTX, Marshall	2015 - 2017	P,t
(Patents related to audio device integration systems)				
Blitzsafe* v VW (*firm: Brown Rudnick)	2:15-cv-01278-JRG-RSP	EDTX, Marshall	2015 - 2017	P,t
(Patents related to audio device integration systems)				
3rd Eye Surveillance* v Stealth (*firm: Kennedy Law)	6:14-cv-00162 JDL	EDTX, Tyler	2015 - 2016	P
(Patents related to real-time image processing to response agency)				
3rd Eye Surveillance* v Vision Video (*firm: Kennedy Law)	6:14-cv-00161-JDL	EDTX, Tyler	2015 - 2016	P
(Patents related to real-time image processing to response agency)				
3rd Eye Surveillance* v Ft Worth / e-Watch (*firm: Kennedy Law)	6:14-cv-00725	EDTX, Tyler	2015 - 2017	P,t,TH
(Patents related to real-time image processing to response agency)				
3rd Eye Surveillance* v Uinted States (*firm: Kennedy Law)	1:15-cv-00501-CFL	Court of Federal Claims, DC	2015 -	P,t,TH
(Patents related to real-time image processing to response agency)				
Hitachi v TPV* (*firm: O'Melveny & Myers)	2:14-cv-1121-JRG-RSP	EDTX, Marshall	2015 - 2016	P
(Patent related to LCD power and signal board arrangement)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Nidec Motor v Broad Ocean Motor* (*firm: Locke Lord)	2:15-cv-00443	EDTX, Marshall	2016	P
(Patent related to blower motor control for HVAC)				
TracBeam* v T-Mobile (*firm: Dovel & Luner)	6:14-cv-678-RWS	EDTX, Tyler	2016	P,t
(Patents related to geographic location estimates)				
SMS v Emerson* (*firm: Davidson Berquist)	2:15-cv-00032-RWS-RSP	EDTX, Marshall	2016	P
(Patent related to a method of monitoring a protected space)				
Prong v Sorias* (*firm: Gottlieb, Rackman & Reisman)	IPR2015-01317	USPTO PTAB	2016	P
(Patent related to attachable mobile charger)				
Skyline Software Systems v Duane Morris* (*firm: Venable)	2015-08868	Circuit Court Fairfax County	2016	P
(3D mapping technology)				
SignalQuest v Oncque* (*firm: Duane Morris)	11-cv-00392-JL	NH	2016	P
(Patents related to vibration switches)				
TiVo v Samsung* (*firm: Fish & Richardson)	2:15-CV-1503	EDTX, Marshall	2016	P
(Patent related to multimedia signal processing)				
Richtek v uPi* (*firm: Hogan Lovells)	C 09-05659 WHA LB	NDCA, SF	2016	P
(Patents related to converter channel current balance and PWM circuit)				
Paice* v VW, Porsche, Audi (*firm: Fish & Richardson)	337-TA-998	ITC	2016 – 2017	P
(Patents related to hybid vehicle technology)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Biosonix v Hydrowave* (*firm: Bradley)	4:16-cv-00139-RC	EDTX, Sherman	2016 - 2017	P
(Patent related to underwater sound listening and generation)				
Univ of S FL* v Fujifilm (*firm: Dickinson Wright)	8:16-cv-01194-MSS-TGW	MDFL, Tampa	2017	P
(Patent related to Workstation Interface – Digital Mammography)				
Univ of S FL * v BRIT (*firm: Dickinson Wright)	8:16-cv-03109-MSS-TGW	MDFL, Tampa	2017	P,t
(Patent related to Workstation Interface – Digital Mammography)				
Nokia v Apple	337-TA-1038	ITC	2017	P
(Patent related to controllable bias mode oscillator)				
Univ of IL v Micron* (*firm: Fish & Richardson)	2:11-cv-02288-SLD-JAG	CDIL, Rock Falls	2017	P, C
(Patents and contract related to use of deuterium in semicondutor processing)				
ZiiLabs v AMD* (*firm: O'Melveny & Myers)	337-TA-1037	ITC-Shaw	2017	P
(Patents related to graphics processors)				
MTL* v Sandisk (*firm: Tensegrity)	337-TA-1034	ITC-Lord	2017	P,t
(Patents related to flash memory)				
Razberi v Dynacolor* (*firm: McDole Williams)	01-16-0003-3734	AAA	2017 - 2018	C,TS,t, TH
(Arbitration related to contractual obligations)				
Seed Spring* v Microsoft (*firm: Dovel)	6:17-cv-427-RWS	EDTX, Tyler	2017	P
(Patents related to Wirelss Location)				
TracBeam* v Microsoft (*firm: Dovel)	6:17-cv-426-RWS	EDTX, Tyler	2017	P
(Patents related to Wirelss Location)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
TracBeam* v Cisco (*firm: Dovel)	6:17-cv-525-RWS	EDTX, Tyler	2017 - 2018	P
(Patents related to Wirelss Location)				
Arris* v Sony (*firm: Fish & Richardson)	337-TA-1060	ITC-Lord	2017	P,t
(Patent related to Broadcast Signals)				
Vivint* v Alarm.com (*firm: Weil)	2:15-cv-00392-CW-BCW	UT	2017 - 2023	P,t
(Patents related to Electronic Message Delivery)				
Blitzsafe* v Bosch (*firm: Brown Rudnick)	2:17-cv-00105-JRG	EDTX, Marshall	2017 - 2019	P,t
(Patents related to audio device integration systems)				
Blitzsafe* v Daimler & Mercedes (*firm: Brown Rudnick)	2:17-cv-00422-JRG	EDTX, Marshall	2017 – 2019	P
(Patents related to audio device integration systems)				
Blitzsafe* v BMW (*firm: Brown Rudnick)	2:17-cv-00418-JRG	EDTX, Marshall	2017 - 2019	P
(Patents related to audio device integration systems)				
Blitzsafe* v Mazda (*firm: Brown Rudnick)	2:17-cv-00423-JRG	EDTX, Marshall	2017 - 2019	P
(Patents related to audio device integration systems)				
Blitzsafe* v Mitsubishi (*firm: Brown Rudnick)	2:17-cv-00430-JRG	EDTX, Marshall	2017 - 2019	P
(Patents related to audio device integration systems)				
Blitzsafe* v Subaru (*firm: Brown Rudnick)	2:17-cv-00421-JRG	EDTX, Marshall	2017 - 2019	P,t
(Patents related to audio device integration systems)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Blitzsafe* v Tata & Jaguar (*firm: Brown Rudnick)	2:17-cv-00424-JRG	EDTX, Marshall	2017 - 2019	P
(Patents related to audio device integration systems)				
Blitzsafe* v Volvo (*firm: Brown Rudnick)	2:17-cv-00420-JRG	EDTX, Marshall	2017 - 2019	P
(Patents related to audio device integration systems)				
AGIS* v Huawei (*firm: Brown Rudnick)	2:17-00513-JRG	EDTX, Marshall	2017 - 2018	P,t
(Patents related to Patents related to interactive remote communications)				
AGIS* v HTC (*firm: Brown Rudnick)	2:17-00514-JRG	EDTX, Marshall	2017 - 2019	P,t
(Patents related to Patents related to interactive remote communications)				
AGIS* v LG (*firm: Brown Rudnick)	2:17-00515-JRG	EDTX, Marshall	2017 - 2019	P,t
(Patents related to Patents related to interactive remote communications)				
AGIS* v Apple (*firm: Brown Rudnick)	2:17-00516-JRG	EDTX, Marshall	2017 - 2019	P,t
(Patents related to Patents related to interactive remote communications)				
AGIS* v ZTE (*firm: Brown Rudnick)	2:17-00517-JRG	EDTX, Marshall	2017 - 2019	P
(Patents related to Patents related to interactive remote communications)				
Arya v Dufossat* (*firm: Robert Sueiro)	4:16-cv-03595	SDYX, Houston	2017 -	TS,C,t
(Dispute related to Trade Secrets)				
Seven Networks v Samsung* (*firm: Fish & Richardson)	2:17-cv-00441-JRG	EDTX, Marshall	2017 - 2018	P,t
(Patents related to Power Management of Mobile Networks)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
ZF Micro Solutions* v. Tat Investment (*firm: Berger)	1-09-CV-134970	Santa Clara County	2018	C,t,TH
(Business tort, unfair practice)				
Univ of S FL* v Fujifilm (*firm: Dickinson Wright)	3:18-cv-00215-AVC	Connecticut	2018	P,t
(Patent related to Workstation Interface – Digital Mammography)				
Univ of S FL* v BRIT (*firm: Dickinson Wright)	3:18-CV-0250-K	NDTX, Dallas	2018 - 2019	P,t
(Patent related to Workstation Interface – Digital Mammography)				
Cypress Insurance v Hynix* (*firm: Bird Marella)	C17-467 RAJ	WDWA, Seattle	2018 - 2019	C,t,TH
(Contract dispute related to product delivery)				
Belliveau* v BARCO (*firm: McKool)	1:17-CV-00379-SS	WDTX, Austin	2018	C,t
(Patent portfolio liceinsing dispute)				
MPS* v Intersil (*firm: Perkins	16-1125-LPS	DE	2018 - 2021	TS,t
(Trade Secret dispute)				
GoGo v Squire Patton Boggs* (*firm: Cozen O'Connor)	2016-L-007789	Cook County, IL	2018 - 2019	P
(Patent Malpractice claim)				
X2Y* v Intel (*firm: Dovel)	3:18-cv-1394-HZ	DOR, Portland	2018 - 2020	P
(Patents related to package layer metalization)				
Power Integration* v ON Semi (*firm: Fish & Richardson)	5:16-cv-06371-BLF	NDCA, San Jose	2019	P,t
(Patents related to power converter regulation)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
ON Semi v Power Integration* (*firm: Fish & Richardson)	1:17-cv-00247-LPS-CJB	DE	2019	P,t
(Patents related to power converter regulation)				
Semcon* v Amazon (*firm: Brown Rudnick)	2:18-CV-00192-JRG	EDTX, Marshall	2019	P
(Patent related to Adaptive Power Control)				
Semcon* v Asustek (*firm: Brown Rudnick)	2:18-CV-00193-JRG	EDTX, Marshall	2019	P
(Patent related to adaptive power control)				
Semcon* v Kyocera (*firm: Brown Rudnick)	2:18-CV-00197-JRG	EDTX, Marshall	2019	P
(Patent related to adaptive power control)				
Innovation Sciences* v Amazon (*firm: Davidson Berquist)	4:18-cv-00474-ALM	EDTX, Sherman	2019 - 2020	P,t,TH
(Patent related to Internet communication)				
Innovation Sciences* v HTC (*firm: Davidson Berquist)	4:18-cv-00476-ALM	EDTX, Sherman	2019 - 2020	P,t
(Patent related to Internet communication)				
Innovation Sciences* v Resideo (*firm: Davidson Berquist)	4:18-cv-00475-ALM	EDTX, Sherman	2019 - 2020	P,t
(Patent related to Internet communication)				
Innovation Sciences* v Vector (*firm: Davidson Berquist)	4:18-cv-00477-ALM	EDTX, Sherman	2019	P
(Patent related to Internet communication)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
CXT* v JC Penny (*firm: Brown Rudnick)	2:18-cv-00171-RWS-RSP (lead) 2:18-CV-233-RWS-RSP	EDTX, Marshall	2019 - 2020	P,t
(Patents related to storage management and information distribution)				
Photonics* v Lenovo (*firm: Brown Rudnick)	1:18-cv-00489-MN	DE	2019	P
(Patents related to GDS-II Layout)				
Quest NetTech Corp* v Apple (*firm: Brown Rudnick)	2:19-CV-00118-JRG	EDTX, Marshall	2019 - 2020	P
(Patent related to programmable credit card system)				
Pilot, Inc.* v Schumacher (*firm: Bradford)	1:19-cv-05982-EEC	NDIL, Eastern Div	2019 - 2921	P
(Patents related to battery chargers)				
Vocalife* v Amazon (*firm: Brown Rudnick)	2:19-cv-00123-JRG	EDTX, Marshall	2019 - 2020	P,t,TH
(Patent related to microphone array)				
Semcon* v Vuitton (*firm: Brown Rudnick)	2:19-CV-00122-JRG	EDTX, Marshall	2019	P,t
(Patent related to adaptive power control)				
Semcon* v Shenzhen (*firm: Brown Rudnick)	2:18-CV-00196-JRG	EDTX, Marshall	2019	P,t
(Patent related to adaptive power control)				
Ultravision* v GoVision (*firm: Brown Rudnick)	2:18-cv-00100-JRG-RSP	EDTX, Marshall	2019	P
(Patents related to modular display panels and LED lighting)				
Ultravision* v Shenzhen (*firm: Brown Rudnick)	2:18-cv-00103-JRG-RSP	EDTX, Marshall	2019	P
(Patents related to modular display panels and LED lighting)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Ultravision* v Aoto (*firm: Brown Rudnick)	2:18-cv-00113-JRG-RSP	EDTX, Marshall	2019	P
(Patents related to modular display panels and LED lighting)				
Ultravision* v Leyard (*firm: Brown Rudnick)	2:18-cv-00102-JRG-RSP	EDTX, Marshall	2019	P
(Patents related to modular display panels and LED lighting)				
Ultravision* v NEC (*firm: Brown Rudnick)	2:18-cv-00150-JRG-RSP	EDTX, Marshall	2019	P
(Patents related to Modular Display Panels and LED lighting)				
Ultravision* v Prismaflex (*firm: Brown Rudnick)	2:18-cv-00108-JRG-RSP	EDTX, Marshall	2019	P
(Patents related to modular display panels and LED lighting)				
Ultravision* v Unilumin (*firm: Brown Rudnick)	2:18-cv-00116-JRG-RSP	EDTX, Marshall	2019	P
(Patents related to modular display panels and LED lighting)				
Ultravision* v Yaham (*firm: Brown Rudnick)	2:18-cv-00118-JRG-RSP	EDTX, Marshall	2019	P
(Patents related to modular display panels and LED lighting)				
Ultravision* v Absen (*firm: Brown Rudnick)	2:18-cv-00112-JRG-RSP	EDTX, Marshall	2019	P
(Patents related to modular display panels and LED lighting)				
Birchett* v City of Fort Worth (*firm: Kennedy Law)	DC-19-06941	Dallas County	2019	C,t
(Whistleblower)				
Innovation Sciences* v HTC (*firm: Davidson Berquist)	337-TA-1180	ITC	2020 - 2021	P,t
(Patent related to wireless communication)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Innovation Sciences* v Resideo (*firm: Davidson Berquist)	337-TA-1180	ITC	2020	P,t
(Patent related to Internet communication)				
CXT* v Neiman Marcus (*firm: Brown Rudnick)	2:19-cv-00270-RWS-RSP	EDTX, Marshall	2020	P
(Patents related to storage management and information distribution)				
CXT* v General Nutrition (*firm: Brown Rudnick)	2:19-cv-00271-RWS-RSP	EDTX, Marshall	2020	P
(Patents related to storage management and information distribution)				
CXT* v Steven Madden (*firm: Brown Rudnick)	2:19-cv-00272-RWS-RSP	EDTX, Marshall	2020	P
(Patents related to storage management and information distribution)				
Consolidated* v Amazon (*firm: Devlin Law)	1:19-cv-01715-RGA	DE	2020 – 2021	P,t
(Patents related to on-line shopping)				
Consolidated* v Ford (*firm: Devlin Law)	1:19-cv-01916-RGA	DE	2020 - 2021	P,t
(Patents related to on-line shopping)				
Consolidated* v JC Penney (*firm: Devlin Law)	1:19-cv-01918-RGA	DE	2020 - 2021	P,t
(Patents related to on-line shopping)				
Consolidated* v Ebay (*firm: Devlin Law)	1:19-cv-01580-RGA	DE	2020 - 2021	P,t
(Patents related to on-line shopping)				
Consolidated* v Walmart (*firm: Devlin Law)	1:19-cv-01581-RGA	DE	2020 - 2021	P,t
(Patents related to on-line shopping)				

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CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Semcon* v TCT Mobile (*firm: Brown Rudnick)	2:18-CV-00194-JRG	EDTX, Marshall	2020	P
(Patent related to adaptive power control)				
BNR v Samsung* (*firm: Fish & Richardson)	2:19-cv-00286-JRG	EDTX, Marshall	2020	P
(Patents related to portable communication devices)				
AGIS* v Google (*firm: BRudnick, Fabricant)	2:19-cv-00361-JRG	EDTX, Marshall	2020 - 2022	P,t
(Patents related to interactive remote communications)				
AGIS* v Waze (*firm: BRudnick, Fabricant)	2:19-cv-00359-JRG	EDTX, Marshall	2020 - 2022	P,t
(Patents related to interactive remote communications)				
Burke* v City of Fort Worth (*firm: Kennedy Law)	DC-19-07239	Dallas County	2020	C,t
(Whistleblower)				
Infinera v Oyster Optics* (*firm: Davidson Berquist)	IPR2020-00325	PTAB	2020	P,t
(Patent related to fiber optic telecommunications)				
Blitzsafe* v GM (*firm: Fabricant)	2:19-cv-00377-JRG	EDTX, Marshall	2020	P,t
(Patents related to audio device integration systems)				
Blitzsafe* v FCA (*firm: Fabricant)	2:19-cv-00378-JRG	EDTX, Marshall	2020	P,t
(Patents related to audio device integration systems)				
Kuster v Western Digital* (*firm: Shearman & Sterling)	6:20-cv-00563	WDTX, Waco	2020	P,t
(Patent related to memory stack storage)				

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CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
TruSun* v Eaton (*firm: Duane Morris)	6:19-cv-00656-ADA	WDTX, Waco	2020 - 2022	P,t
(Patent related to a light-generating system)				
RJR v PMI* (*firm: Latham Watkins)	1:20-cv-00393-LO-TCB	EDVA, Alexandria	2020 - 2022	P,t,TH
(Patents related to e-cigarette controls)				
Koss* v Apple et al (*firm: K L Gates)	6:20-cv-00665	WDTX, Waco	2020 - 2022	P,t
(Patents related to Wireless Headphones)				
Koss* v Bose (*firm: K L Gates)	6:20-cv-00661	WDTX, Waco	2020	P
(Patents related to Wireless Headphones)				
Ipcom v Sprint et al (Nokia*) (*Alston Bird)	2:20-cv-321	EDTX, Marshall	2020 - 2022	P
(Patents related to CDMA communication)				
Ipcom v Verizon et al (Nokia*) (*Alston Bird)	2:20-cv-323	EDTX, Marshall	2020 - 2022	P
(Patents related to CDMA communication)				
Pilot* v CarKu (*firm: Bradford / Sheridan)	7131799991	Amazon Arbitration	2020	P,t
(Patent related to jump starters)				
MPS* v Meraki (*firm: Perkins Coie)	6:2020cv00876-ADA	WDTX, Waco	2020 - 2022	P,TS,C
(Patents related to synchronous rectifier control)				
AGIS* v Uber (*firm: Fabricant)	2:21-cv-00026-JRG-RSP)	EDTX, Marshall	2021	P
(Patents related to interactive remote communications)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
AGIS* v WhatsApp (*firm: Fabricant)	2:21-cv-00029-JRG-RSP)	EDTX, Marshall	2021	P
(Patents related to interactive remote communications)				
One E-Way* v Apple (*firm: Knobbe Martin)	2:20-cv-06339-JSK-PD	CDCA	2021 - 2023	P,t
(Patent related to Bluetooth Headphones)				
BMW v Omega Patents* (*firm: Allen Dyer)	IPR2021-00181	PTAB	2021 -	P,t
(Patent related to remote start)				
Pilot* v The NOCO Co (*firm: Bradford / Sheridan)	2:20-cv-01452-SRB	AZ	2021 - 2023	P,t
(Patents related to auto chargers)				
Express Mobile* v Atlassian (*firm: Mololamken)	6:20-cv-00805-ADA	WDTX, Austin	2021	P
(Patents related to browser-based web site generation)				
AGIS* v Lyft (*firm: Fabricant)	2:21-cv-00024-JRG-RSP	EDTX, Marshall NDCA	2021 - 2022	P
(Patents related to interactive remote communications)				
AGIS* v T-Mobile (*firm: Fabricant)	2:21-cv-00072-JRG-RSP	EDTX, Marshall	2021	P
(Patents related to interactive remote communications)				
Altria* v RJR (*firm: Weil Gotshal)	1:20-cv-00472	MDNC	2021 - 2022	P,t,TH
(Patents related to e-cig)				
One E-Way* v Apple (*firm: Knobbe Martin)	IPR2021-00283 IPR2021-00286	PTAB	2021 - 2022	P,t
(Patent related to Bluetooth Headphones)				

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CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Altria* v RJR (*firm: Weil Gotshal)	IPR2021-00650 IPR2021-00652 IPR2021-00725 IPR2021-00744 IPR2021-00745 IPR2021-00746 IPR2021-00747 IPR2021-00793	PTAB	2021 - 2022	P,t,TH
(Patents related to e-cig control)				
Kiwi Connection* v Anker (*firm: Bradford)	8519300821	Amazon Arbitration	2021	P,t
(Patent related to bidirectional connector)				
Kiwi Connection* v JBL (*firm: Bradford)	8674855301	Amazon Arbitration	2021	P,t
(Patent related to bidirectional connector)				
Platform Science v Omnitracs* (*firm: Kirkland & Ellis)	IPR2020-0187 IPR2020-1517 IPR2020-1518	PTAB	2021 – 2022	P,t
(Patent related to critical event reporting)				
Netlist v Samsung* (*firm: Bird Marella)	8:20-cv-993-MCS	CDCA, Southern	2021	C,t
(Contract dispute)				
Monterey Research* v (*firm: Desmarais)	IPR 2021-00119 IPR 2021-00120 IPR 2021-00172	PTAB	2021 - 2022	P,t
(Patents related to semiconductor processing)				
Apple / Bose v Koss* (*firm: K L Gates)	IPR2021-00255 IPR2021-00297 IPR2021-00305 IPR2021-00381 IPR2021-00592	PTAB	2021 - 2022	P,t
(Patents related to Wireless Headphones)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Vocalife* v Amazon2 (*firm: Fabricant)	2 :20-cv-00401-JRG-RSP	EDTX, Marshall	2021 - 2023	P,t
(Patent related to microphone array)				
Vocalife* v Google (*firm: Fabricant)	2 :21-cv-00124-JRG-RSP	EDTX, Marshall	2021 - 2023	P,t
(Patent related to microphone array)				
Luxshare* v Amphenol (*firm: K L Gates)	IPR2022-00132	PTAB	2021 - 2022	P,t
(Patent related to high performance connector)				
Vervain v Micron* (*firm: Orrick)	6:20-cv-487-ADA	WDTX, Waco	2021 - 2023	P,t
(Patents related to MLC & SLC endurance)				
Express Mobile* v Dropbox (*firm: Mololamken)	3:21-cv-01145	NDCA	2021	P
(Patents related to browser-based web site generation)				
Lexmark v Universal Imaging* (*firm: Allen Dyer)	8:18-cv-1047-T-17AEP	MDFL, Tampa	2021 - 2023	P
(Patents related to printer cartridge authentication)				
Pilot* v The NOCO Co (*firm: Bradford / Sheridan)	IPR2021-00777 IPR2021-01232 IPR2023-00167 IPR2023-00810	PTAB	2021	P,t
(Patents related to auto chargers)				
Delta T* v MacroAir (*firm: Latham/VedderPrice)	5:20-cv-00728-GW-GJS	CDCA, LA	2022 - 2023	P
(Patents related to fan sensors and control)				
MPS* v Dong & Sheng (*firm: Perkins Coie)	4 :20-cv-6752-JSW	NCCA, Oakland	2022 - 2023	P, TS
(Patents related to synchronous rectifier control)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Vocalife* v Sonos (*firm: Fabricant)	2 :21-cv-00129-JRG	EDTX, Marshall	2022	P,t
(Patent related to microphone array)				
Vocalife* v Bose (*firm: Fabricant)	2 :21-cv-00128-JRG	EDTX, Marshall	2022	P,t
(Patent related to microphone array)				
Enovsys* v T-Mobile (*firm: Eichmann)	2:21-cv-00368-JRG	EDTX, Marshall	2022	P,t
(Patents related to precise location determination and secure disclosure)				
Enovsys* v Verizon (*firm: Eichmann)	2:21-cv-00315-JRG-RSP	EDTX, Marshall	2022	P,t
(Patents related to precise location determination and secure disclosure)				
Lyft v AGIS* (*firm: Fabricant)	5 :21-cv-04653-BLF	NDCA, San Jose	2022 - 2023	P
(Patents related to interactive remote communications)				
Vocalife* v Amazon (*firm: Fabricant)	IPR2021-01331	PTAB	2022	P,t
(Patent related to microphone array)				
MPS* v Meraki (*firm: Perkins Coie)	4:22-cv-01986 JSW	NDCA, Oakland	2022 - 2023	P,TS,C
(Patents related to synchronous rectifier control)				
Signode v Polychem* (*firm: Latham)	1 :22-cv-00519-UNA	DE	2022	P
(Patents related to a strapping apparatus)				
Pilot* v Hulkman (*firm: BRADFORD)	10427111251	Amazon Arbitration	2022	P,t
(Patent related to jump starters)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Netlist v Samsung* (*firm: Fish & Richardson)	2:21-cv-463	EDTX, Marshall	2022 - 2024	P,t,TH
(Patents related to DIMM DDR3 signal timing, power management, and rank multiplication)				
Orange* v Autel (*firm: Sughrue Mion)	2 :21-cv-240	EDTX, Marshall	2022 - 2023	P,t,TH
(Patent related to Tire Pressure Monitoring Systems)				
Bell Power v MPS* (*firm: Perkins Coie)	6 :21-cv-00655-ADA	WDTX, Waco	2022 -	P
(Patents related to power converter/regulator control)				
VPR v Jupiter* (*firm: Noroozi PC)	2:20-CV-02185-DJH	AZ	2023 -	P,t
(Patent related to electronic vape device with air flow sensor)				
Multimodal* v Guangdong (*firm: Fabricant)	2:21-cv-00436-JRG-RSP	EDTX, Marshall	2023	P
(Patents related to communication over a network, call completion)				
Multimodal v ZTE (*firm: Fabricant)	2:21-cv-00437-JRG-RSP	EDTX, Marshall	2023	P
(Patents related to communication over a network, call completion)				
Entropic* v Charter Communications et al. (*firm: K L Gates)	2 :22-cv-00125-JRG	EDTX, Marshall	2022	P
(Patents related to modems and broadband content distribution)				
Oasis Tooling* v Global Foundries U.S. (*firm: Kramer Levin)	22-00312-CJB	DE	2022 - 2024	P,t
(Patents related to chip design process workflow)				
Oasis Tooling* v Siemens Industry Software (*firm: Kramer Levin)	22-00151-CJB	DE	2022 - 2024	P,t
(Patents related to chip design process workflow)				

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Cases (continued)

CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
AGIS* ITC (*firm: Fabricant)	337-TA-1347	ITC	2023	P
(Patents related to Location-Sharing Systems)				
Monterey* v Nanya (*firm: Desmarais)	19-2090-NIQA-LAS	DE	2023 – 2024	P
(Patents directed to semiconductor technology)				
Geotab v Omega* (*firm: Allen Dyer)	IPR2023-00504	PTAB	2023	P,t
(Patent related to multi-vehicle communication)				
Adv Lighting Concepts* v mate (*firm: Munsch)	IPR2023-01264	PTAB	2023	P
(Patent related to LED drivers)				
SitePro* v Waterbridge (*firm: Perkins Coie)	6:23-cv-00115-ADA-DTG	WDTX, Waco	2023	P,TS,C
(Patents and Trade Secrets related to remote delivery control)				
Nanya v Monterey* (*firm: Botos Churchill)	EPR 6,825,526C1 EPR 6,680,516	USPTO	2023	P,t
(Patents directed to semiconductor technology)				
ICPillar* v ARM (*firm: Eichmann)	6_23-cv-00115-ADA-DTG	WDTX, Austin	2023 - 2024	P
(Patents related to computer method for IC design)				
GoTV Streaming v Netflix* (*firm: Wilkie Farr)	EPR 8478245 EPR 8989715	USPTO	2023	P,t
(Patent related to rendering content on a wireless device)				
Greenthread v MPS* (*firm: Perkins Coie)	23-579-RGA	DE	2024	P
(Patents related to semiconductor structure with graded doping)				

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CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
MPS* v REED (*firm: Perkins Coie)	23-1155-JFM	DE	2023 -	P,t
(Patent related to bootstrap refresh control)				
Verizon v Omega* (*firm: Allen Dyer)	IPR2023--01162	PTAB	2023 -	P,t
(Patent related to multi-vehicle communication)				
MOSAID v MediaTek* (*firm: Fish & Richardson	2:23-cv-00129-JRG-RSP	EDTX, Marshall	2023 - 2024	P
(Patents related to IC Power Management)				
GoTV Streaming v Netflix* (*firm: Wilkie Farr)	2 :22-cv-07556-RGK-SHK	CDCA	2023	P
(Patent related to rendering content on a wireless device)				
Lifetime* v Qima (*firm: Fabricant)	2:23-cv-00216-JRG	EDTX, Marshall	2024	P,t
(Patents related to Quality Management)				
Stellar* v Motorola Solutions (*firm: Devlin)	4:23-cv-00750-SDJ	EDTX, Sherman	2024 -	P
(Patents related to write protect recording)				
Enovsys* v Lyft (*firm: Seth Law)	23-cv-05157-EJD	NDCA, San Jose	2024	P
(Patents related to mobile unit tracking)				
ARM v ICPillar* (*firm: Lowenstein)	IPR2024-00476 IPR2024-00566	PTAB	2024	P,t
(Patents related to computer method for IC design)				
Maxell v TCL* (*firm: King & Spalding)	5:23-CV-00108-RWS-JBB	EDTX, Texarkana	2024 -	P,t
(Patents related to image display apparatus)				
Enovsys* v Uber (*firm: Seth Law)	23-cv-04549-EJD	NDCA, San Jose	2024	P
(Patents related to mobile unit tracking)				

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CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
Uber v Enovsys* (*firm: Seth Law)	IPR2024-00825 IPR2024-00826 IPR2024-00827	PTAB	2024 -	P,t
(Patents related to mobile unit tracking)				
JUUL v NJOY* (*firm: Weil Gotshal)	337-TA-1368 IPR2024-00231	ITC PTAB	2024	P,t,TH
(Patent related to vaping devices)				
RJR v Guangdong et al.* (*firm: Mei & Mark)	337-TA-1410	ITC	2024 -	P,t
(Patent related to vaping devices)				
RJR v Kangvape* (*firm: Fish & Richardson)	337-TA-1410	ITC	2024 -	P,t
(Patent related to vaping devices)				
RJR v Breeze et al.* (*firm: Goodwin Procter)	337-TA-1410	ITC	2024 -	P,t
(Patent related to vaping devices)				
RJR v Pastel et al.* (*firm: Keller Heckman)	337-TA-1410	ITC	2024 -	P,t
(Patent related to vaping devices)				
RJR v Shenzhen Yanyang et al.* (*firm: Rimon)	337-TA-1410	ITC	2024 -	P,t
(Patent related to vaping devices)				
RJR v Maduro* (*firm: Thompson Hine)	337-TA-1410	ITC	2024 -	P,t
(Patent related to vaping devices)				
RJR v TheSy* (*firm: Thompson Hine)	337-TA-1410	ITC	2024 -	P,t
(Patent related to vaping devices)				

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CASE[1]	CASE NUMBER	LOCATION	YEAR	TYPE[2]
RJR v SV3* (*firm: Sterne Kessler)	337-TA-1410	ITC	2024 -	P,t
(Patent related to vaping devices)				
REED v MPS* (*firm: Perkins Coie)	IPR2024-00871	PTAB	2024 -	P,t
(Patent related to bootstrap refresh control)				
Phenix* v AU Optronics (*firm: Womble Bond)	2:23-cv-00477-RWS-RSP	EDTX, Marshall	2024 -	P
(Patents related to Gamma reference generation)				
Phenix* v Innolux (*firm: Womble Bond)	2:23-cv-00478-RWS-RSP	EDTX, Marshall	2024 -	P
(Patents related to Gamma reference generation)				

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I have worked with other clients in various areas of my expertise, including "system, product, and process investigation," "patent valuation," "product liability and insurance claim investigation," "quality systems consulting and engineering," and "IP licensing." This work generally relates to patents and/or trade secrets and may involve analysis of products either defensively or offensively. In no case does any of the work involve design of circuits, processes, packaging, software, or systems.

Non-confidentially, I have represented a radiation effects testing company, ICS Radiation Technology. Further, I have worked with investment companies, such as Hatcreek Partners, reviewing potential investment opportunities, and have participated as a technical advisor to nLine Corporation, a company that developed a product for semiconductor wafer inspection using holographic High Aspect Ratio Inspection (HARI) technology. Work associated with each of these matters occurred more than 10 years ago.

These and other non-confidentially related companies are:

The Aspire International Foundation (2019-present)
- Partner;
- Rediscovering and redefining identity and purpose through experiential equine learning programs;
- Not assigned any patents and not engaged in any IP related activities.

Casualty Consulting Group of America (2013-present)
- Partner;
- Assessment of structural damage caused by extreme weather events;
- Not assigned any patents and not engaged in any IP related activities.

VCSY (2013-2020)
- Advisory board Member;
- Technology related to encrypted communication.

Bethel Cannon Group / Bethel Cannon Holdings (2011-present)
- Partner;
- Counseling / Event / Retreat Center / Hunting Lodge;
- Not assigned any patents and not engaged in any IP related activities.

Spirit Song Youth Equestrian Academy / Spirit Song Holdings (2011-present)
- CEO;
- Equine Assisted Learning Program for abused / traumatized youth, families, corporations, and churches;
- Not assigned any patents and not engaged in any IP related activities.

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E^3A (2016-present)
- President (2018-2023);
- Certification training of Equine Practitioners;
- Not assigned any patents and not engaged in any IP related activities.

Novo Tellus Capital Partners (2016-2017)
- Novo Tellus is an investment firm. I served as a technical advisor in reviewing the technology and contracts of investment opportunities.

UTAC (2008-2016)
- Technical consultant in matters related to packaging test and assembly, patents, and contracts.

ICS Radiation Technology (1988-2009)
- Consulting work related to nuclear radiation effects testing.

Creative Management Consultants (CMC) (2003-2004)
- Consulting work related to Internet services, such as access service to clients and web site hosting services; providing business co-op services and internet product purchasing sites.

Hatcreek Partners (1999-2003)
- Hatcreek Partners is an investment firm. I served as a technical advisor in reviewing the technology of investment opportunities.

nLine Corporation (1999-2003)
- Member of Technical Advisory Board;
- nLine Corp.'s business related to semiconductor holographic High Aspect Ratio Inspection (HARI) technology.

Texas Instruments (pre 2002)
- Patent evaluation and application consulting.

CONTACT : McAlexander Sound, Inc.
101 W. Renner Rd., Suite 350
Richardson, TX 75082-2016
(972) 421-4411 direct
(214) 542-1772 cell
(972) 421-4422 fax
joemc@ieee.org email

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