UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LENOVO (UNITED STATES) INC.,
MOTOROLA MOBILITY LLC.,
Petitioners,

v.

COLLISION COMMUNICATIONS, INC.
Patent Owner.

Case No. IPR2025-00284
U.S. Patent No. 8,089,946

DECLARATION OF GIUSEPPE CAIRE REGARDING PATENT OWNER'S PRELIMINARY RESPONSE FOR *INTER PARTES REVIEW* OF U.S. PATENT NO. 8,089,946

I, Dr. Giuseppe Caire, hereby declare as follows:

I. Introduction

1. My name is Giuseppe Caire. I have been retained in the above-referenced *inter partes* review proceeding by Collision Communications, Inc. ("Patent Owner"), as an independent expert in this proceeding before the United States Patent and Trademark Office.

2. I understand this proceeding involves U.S. Patent No. 8,089,946, (the "'946 patent"). I previously prepared a declaration regarding the '946 patent that was submitted by Patent Owner in IPR2024-01250 as Exhibit 2001. I was asked to review my declaration and form an opinion as to whether I still agree with the facts, analysis, and conclusions in that declaration. After reviewing my prior declaration, I still agree with the facts, analysis, and conclusions therein and adopt all testimony for purposes of this proceeding.

I declare that all statements made herein of my knowledge are true, and that all statements made on information and belief are believed to be true, and that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under section 1001 of Title 18 of the United States Code.

Dated: March 19, 2025

Dr. Giuseppe Caire