

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INCORPORATED,
Petitioner

v.

COLLABO INNOVATIONS, INC.,
Patent Owner

Case IPR2025-01015

U.S. Patent No. 7,930,575

DECLARATION OF DAVID T. DEZERN

I, David T. DeZern, hereby declare as follows:

1. I am an attorney with the law firm of Nelson Bumgardner Conroy, P.C. and represent Collabo Innovations, Inc. in the currently pending patent litigation between Plaintiff Collabo Innovations, Inc. (“Collabo”) and Defendant Qualcomm Incorporated (“Qualcomm”) in the United States District for the Western District of Texas, Case No. 6:24-cv-00472-ADA (the “Litigation”).

2. Collabo alleges in the Litigation that Qualcomm infringes United States Patent No. 7,930,575.

3. Collabo served its Initial Disclosures on Qualcomm on May 26, 2025. Qualcomm served its Initial Disclosures on Collabo on May 27, 2025.

4. Collabo served 14 interrogatories on Qualcomm on May 26, 2025. Qualcomm responded to Collabo’s interrogatories on August 4, 2025. Qualcomm served 13 interrogatories on Collabo on May 27, 2025. Collabo responded to Qualcomm’s interrogatories on August 5, 2025.

5. Collabo served 67 requests for production on Qualcomm on May 26, 2025. Qualcomm responded to Collabo’s requests for production on August 4, 2025. Qualcomm served 54 requests for production on Collabo on May 27, 2025. Collabo responded to Qualcomm’s requests for production on August 5, 2025.

6. To date the parties have produced 96,342 pages of documents, not including source code.

7. Qualcomm produced source code via mail which was delivered to counsel for Collabo on July 3, 2025.

8. Qualcomm issued a subpoena dated July 15, 2025 to Intel Corporation for testimony and production of documents. *See* Ex. 2007.

I declare that the statements in this declaration are true and correct to the best of my knowledge, and I understand that I may be subject to punishment for making intentional false statements.

Dated: August 19, 2025

/s/ David T. DeZern
David T. DeZern