

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAGEMCOM BROADBAND SAS,

Petitioner

v.

ENTROPIC COMMUNICATIONS, LLC,

Patent Owner.

IPR2026-00263

U.S. Patent No. 11,875,275

SUPPLEMENTAL DECLARATION OF MR. DAVID B. LETT

IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW

OF U.S. PATENT NO. 11,875,275

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I, David B. Lett, declare as follows:

I. INTRODUCTION

1. Petitioner Sagemcom Broadband SAS (“Sagemcom” or “Petitioner”) has retained me as an expert consultant to provide my opinions and testimony evaluating the patentability of claims 1-20 of the ’275 patent (“Challenged Claims”) in connection with its Petition seeking *inter partes* review of U.S. Patent 11,785,275 (the “’275 patent,” Ex. 1001). Counsel for Sagemcom (“Counsel”) has engaged me to submit this supplemental declaration on behalf of Sagemcom.

2. I am being compensated at my usual consulting rate or testimony rate. My compensation is in no way dependent upon my opinions or testimony or the outcome of this proceeding. I have no financial interest in the parties or in the outcome of this proceeding.

3. This supplemental declaration incorporates by reference and reaffirms my previous opinions I provided in my declarations and deposition testimony submitted on behalf of Petitioner Comcast Corporation, Comcast Cable Communications, LLC, and Comcast Cable Communications Management, LLC (altogether, “Comcast”) seeking *inter partes* review of the ’275 Patent in *Comcast Cable Communications, LLC v. Entropic Communications, LLC*, IPR2025-00180 (PTAB Dec. 6, 2024) (the “Comcast IPR”). In that IPR, I provided opinions in the form of two declarations and two depositions. *See* Ex. 1002 (“Comcast

Declaration”); Ex. 1085 (“Comcast Reply Declaration”); Ex. 2022¹ (“First Comcast Deposition”); Ex. 2031 (“Second Comcast Deposition”). Counsel has informed me that the parties of the Comcast IPR settled the matter without the Board reaching a Final Written Decision. *See* Paper 42. Counsel has requested that I evaluate the opinions that I offered in the Comcast IPR and reaffirm them here.

II. BACKGROUND AND QUALIFICATIONS

4. I am a technical consultant and product development industry veteran with expertise in electronics, software, hardware, video, audio, and data communications, having led product development organizations in cable, satellite, consumer electronics, home automation, asset tracking, remote tank logistics, and alarm industries. I provided a fulsome overview of my background and qualifications in my Comcast Declaration. Ex. 1002, ¶¶4-16; Ex. 1003; *see also* Ex. 1132 (my current *curriculum vitae* as of February 11, 2026).

¹ I confirm that opposing counsel for Entropic Communications, LLC in the Comcast IPR deposed me a second time regarding the ’275 Patent in IPR2025-00180 on December 16, 2025 (noticed in Paper 27), even though the transcript for this deposition (Ex. 2031) bears a caption with “Case No.” identifying separate IPRs 2024-00432, 2024-00435, and 2024-00438 rather than the case number assigned to the Comcast Litigation: IPR2025-00180.

III. LEVEL OF ORDINARY SKILL IN THE ART

5. I reaffirm my opinions offered in the Comcast IPR that a person of ordinary skill in the art of the '275 patent, at the time of the alleged invention of the '275 patent, would have had a degree in electrical engineering or a similar discipline, along with three-to-four years of experience with digital signal processing (DSP) and radio frequency (RF) tuning systems for satellite and/or cable communications. Additional education may substitute for professional experience, and significant work experience may substitute for formal education. Ex. 1002, ¶¶30-31.

6. I further reaffirm, as I stated previously, that I worked in the relevant field with such persons at, and leading up to, the time of the alleged invention of the '275 patent, and thus, I am familiar with the knowledge that such persons had at the time (i.e., early 2009 or early 2010). At that time, I had a skill level that was at least as high as the skill level I describe above for a person of ordinary skill in the art of the '275 patent and offered my opinions with respect to that time period. Ex. 1002, ¶¶31-32.

IV. MATERIALS CONSIDERED

7. In forming and reaffirming my opinions expressed herein, in addition to relying on my education and experience (Ex. 1003), I considered the totality of the materials that I referenced in the Comcast IPR (*see, e.g.,* my Comcast

Declaration, Reply Declaration, First and Second Depositions) and that I further reference in my opinions herein.

V. LEGAL STANDARDS

8. I reaffirm the opinions I provided in the Comcast IPR regarding my understanding of the applicable legal standards pertaining to the patentability issues presented there because those legal standards are likewise applicable here. *See, e.g.*, Ex. 1002, ¶¶19-29.

VI. SUMMARY OF OPINIONS

A. Overview of the '275 Patent

9. I reaffirm my opinions regarding the overview of the '275 patent, its prosecution history, and the prosecution history of the parent to the '275 patent (U.S. Application 17/862,946, issued as U.S. Patent 11,4901,152) as I provided in the Comcast IPR. *See, e.g.*, Ex. 1002, ¶¶36-48.

B. Claim Construction

10. I reaffirm my opinions regarding the construction of the claims of the '275 patent as I provided in the Comcast IPR. *See, e.g.*, Ex. 1002, ¶¶33-35.

C. Prior Art

11. I reaffirm my opinions regarding the general state of the prior art and those specific prior art references that anticipate or render obvious the claims of the

'275 patent as I provided in the Comcast IPR. *See, e.g.*, Ex. 1002, ¶¶49-98. A list of those specific prior art references that I evaluated and found anticipate or render obvious the Challenged Claims (with respect to the Grounds I discuss further below) include the following:

Reference	Name	Exhibit
U.S. Publication 2003/0056221	Zhang	1013
U.S. Patent 7,237,214	Pandey	1014
PCT Publication 2004/059933	Zhang '933	1077
“Classical and Modern Receiver Architectures” by Mirabbasi	Mirabbasi	1018
U.S. Publication 2004/0250284	Dong	1078

D. Grounds

12. I evaluated and reaffirm that the following prior art references render the respective claims unpatentable as anticipated or obvious:

Ground	Prior Art Reference(s)	Claims	Basis per U.S. Code Title 35
A	Zhang	1-3, 5, 7-13, 15, 17-20	§102(b)
B	Zhang	1-3, 5, 7-13, 15, 17-20	§103(a)
C	Zhang, Pandey	2, 3, 12, 13	§103(a)
D	Zhang, Zhang '933	2, 12	§103(a)
E	Zhang, Mirabbasi	4, 11-15, 17-20	§103(a)
F	Zhang, Dong	5, 6, 15, 16	§103(a)
G	Zhang, Mirabbasi, Pandey	12, 13	§103(a)
H	Zhang, Mirabbasi, Zhang '933	12	§103(a)
I	Zhang, Mirabbasi, Dong	15, 16	§103(a)

Ex. 1002, ¶¶99-271; Ex. 1085, ¶¶5-38.

VII. CONCLUSION

13. Thus, I reaffirm my opinions submitted in the Comcast IPR that the Challenged Claims of the '275 patent are anticipated or rendered obvious by the respective prior art references I identified again above and explained in the Comcast IPR.

14. I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. I understand that willful false statements are punishable by fine or imprisonment or both. *See* 18 U.S.C. § 1001.

Date: February 18, 2026

By:

A handwritten signature in cursive script that reads "David B. Lett". The signature is written in black ink and is positioned above a horizontal line.

Mr. David B. Lett