

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LG ELECTRONICS, INC. and  
LG ELECTRONICS U.S.A., INC.  
Petitioners

v.

TOSHIBA SAMSUNG STORAGE TECHNOLOGY KOREA CORPORATION  
Patent Owner

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Patent No. 6,785,065

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**DECLARATION OF MASUD MANSURIPUR, PH.D.**

LG Electronics, Inc. et al.

**EXHIBIT 1011**

IPR Petition for

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I, Dr. Masud Mansuripur, hereby declare as follows:

**I. Introduction**

1. I am currently a Professor of Optical Sciences in the College of Optical Sciences and the Chair of Optical Data Storage at the University of Arizona.

2. I have been retained by Rothwell, Figg, Ernst & Manbeck, P.C. (hereinafter, “Rothwell Figg” or “Counsel”) in this matter to provide my opinions regarding U.S. Patent No. 6,785,065 (the “’065 patent”).

3. I have been advised that Rothwell Figg represents LG Electronics, Inc. and LG Electronics U.S.A., Inc. (collectively, “Petitioners” or “LG”) in this matter. I have no financial interest in LG.

4. I have been advised by Counsel that Toshiba Samsung Storage Technology Korea Corporation (“TSST-K”) is the record owner of the ’065 patent. I have also been advised by Counsel that TSST-K has brought counterclaims against Petitioners in a related district court litigation asserting that Petitioners infringe the ’065 patent. I have also been advised by Counsel that Toshiba and Samsung may have an interest in that lawsuit and/or ’065 patent. I have no financial interest in TSST-K, Toshiba, or Samsung.

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