UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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Intel Corporation
Petitioner

v.

Qualcomm Incorporated
Patent Owner of U.S. Patent No. 8,838,949

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Trial No. IPR2018-01334[1]

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**REMAND DECLARATION OF BILL LIN, PH.D.
ON BEHALF OF PETITIONER**

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[1] IPR2018-01335 and IPR2018-01336 have been consolidated with the instant

proceeding.

**IPR2018-01334
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1.   I, Bill Lin, Ph.D. declare as follows:

I.   INTRODUCTION

2.   I have been retained by Intel Corporation ("Intel" or "Petitioner") as an independent expert consultant in this proceeding before the United States Patent and Trademark Office. I previously prepared and submitted my Opening Declarations in support of the Petitions in IPR2018-01334, IPR2018-01335, and IPR2018-01336, dated July 2, 2018 and July 3, 2018 (Exs. 1002, 1020, and 1021). I also submitted my Reply Declaration in IPR2018-01334[2], which has been consolidated with IPR2018-01335 and IPR2018-01336, on September 27, 2019. I submit this Declaration in support of Petitioner's Opening Brief on Remand.

3.   Since preparing my Opening and Reply Declarations, I have also reviewed the following materials:

- Petitioner's Sur-Reply (Paper 25);

- Final Written Decision (Paper 30);

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[2] Because IPR2018-01335 and IPR2018-01336 have been consolidated with IPR2018-01334, I have cited to exhibits from IPR2018-01334 throughout, unless noted otherwise.

- Federal Circuit Opinion (*Intel Corp. v. Qualcomm Inc.,* 21 F.4th 801 (Fed. Cir. 2021));

- Scheduling Order on Remand (Paper 34); and

- Any other document cited in this Declaration.

4.   I am being compensated for my work on this matter, but my opinions are based on my own views of the patent and the prior art. My compensation in no way depends on the outcome of this proceeding or the content of my testimony.

II.   QUALIFICATIONS

5.   I described my qualifications in my Opening Declarations. Ex. 1002 (Lin Op. Decl.) at ¶¶ 1-12; Ex. 1020 (Lin Op. Decl. in IPR2018-01335) at ¶¶ 1-11.

III.   RELEVANT LAW

6.   In my first Declarations, I set forth the applicable principles of patent law that were provided to me by counsel. Ex. 1002 (Lin Op. Decl.) at ¶¶ 16-27; Ex. 1020 (Lin Op. Decl. in IPR2018-01335) at ¶¶ 15-26. As appropriate, I have continued to apply those principles in providing my opinions in this Declaration.

IV.   CLAIMS 1-9, 12 AND 16-17 ARE OBVIOUS

7.   In its Final Written Decision, the Board found unpatentable claims 10, 11, 13-15, and 18-23 of the '949 patent, but did not find unpatentable claims 1-9,

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