

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ERICSSON INC. AND  
TELEFONAKTIEBOLAGET LM ERICSSON, INC.  
Petitioners

v.

INTELLECTUAL VENTURES II LLC  
Patent Owner

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Case IPR2018-01380  
Patent 8,682,357 B2

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**DECLARATION OF JONATHAN WELLS, PH.D.**

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Patent Trial and Appeal Board  
U.S. Patent & Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

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    A. CATT in view of LG fails to disclose *“a radio network temporary identity (RNTI) associated with a plurality of UEs”* as recited in independent claims 11, 30, and 47 ..... 33

B. CATT in view of LG fails to disclose a “*message having an allocation of resources for a shared channel*” as recited in independent claims 11, 30, and 47. ....43

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I, Jonathan Wells, declare as follows:

**I. BACKGROUND**

1. I have been retained by Sterne, Kessler, Goldstein & Fox, P.L.L.C. (“SKGF”), which represents Intellectual Ventures II LLC (“IV” and/or “Patent Owner”) in connection with this *inter partes review* of U.S. Patent No. 8,682,357 to Worrall, titled *Paging in a Wireless Network* (Ex. 1001, “’357 patent”).

2. I have reviewed and am familiar with the ’357 patent, which was filed on May 2, 2006 and issued on March 25, 2014. I understand that the ’357 patent includes 54 claims. Claims 1, 11, 21, 30, and 47 are the independent claims.

3. It is my understanding that the Petition in IPR2018-01380 seeks to cancel claims 11-14, 19, 30-33, 38, 47-50, and 54 of the ’357 patent (“the challenged claims”) based on the following grounds. My analysis and opinions will focus on the challenged claims and the asserted grounds.

| Ground | References                            | Claims                 |
|--------|---------------------------------------|------------------------|
| 1      | CATT <sup>1</sup> and LG <sup>2</sup> | 11, 13, 30, 32, 47, 49 |
| 2      | CATT, LG, and CATT2 <sup>3</sup>      | 12, 19, 31, 38, 48, 54 |
| 3      | CATT, LG, Huawei <sup>4</sup>         | 14, 33, 50             |

4. I have been asked to consider how a person of ordinary skill in the art (“POSITA”) would have understood the challenged claims in light of the specification of the ’357 patent. I have also been asked to consider how a POSITA would have understood the prior art. Further, I have been asked to consider and provide my technical review, analysis, insights, and opinions on whether: (1)

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<sup>1</sup> CATT, PCH mapping and Paging control, 3GPP RAN1/RAN2 Joint meeting on LTE (Ex. 1005).

<sup>2</sup> LG Electronics, Discussion on LTE Paging and DRX, Joint RAN WG1 and RAN WG2 on LTE (Ex. 1006).

<sup>3</sup> CATT & RITT (“CATT2”), Access procedure for TDD, 3GPP RAN1/RAN2 Joint Meeting on LTE (Ex. 1007).

<sup>4</sup> Huawei, Inter-cell Interference Mitigation, 3GPP TSG RAN WG1 Ad Hoc on LTE (Ex. 1008).

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