### UNITED STATES PATENT AND TRADEMARK OFFICE

### BEFORE THE PATENT TRIAL AND APPEAL BOARD

DATASPEED INC.,

Petitioner,

v.

SUCXESS LLC, Patent Owner.

Case IPR2020-00116

Patent 9,871,671

EXPERT DECLARATION OF MAHDI SHAHBAKHTI, PH.D.

# IN SUPPORT OF PATENT OWNER RESPONSE

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