

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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DELL, INC.,  
ZTE (USA) INC.,  
and  
ZTE CORPORATION,  
*Petitioners*

v.

3G LICENSING S.A.,  
*Patent Owner*

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Case IPR2020-1157  
Patent No. 7,274,933

**SECOND DECLARATION OF STUART LIPOFF  
IN SUPPORT OF PATENT OWNER**

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## **I. INTRODUCTION**

1. For this second declaration, I have been asked by Patent Owner to provide additional opinions regarding U.S. Patent No. 7,274,933 (“the ’933 patent”). Specifically, Patent Owner has requested that I address Petitioners’ grounds for invalidity of the challenged claims in view of the asserted prior art. Patent Owner has also requested that I address Patent Owner’s Motion to Amend and the substitute claims found therein. My opinions on these matters follows in this second declaration.

2. The details of my engagement have not changed since my first declaration. Please note that I will refer to Ex. 2001 as my “first declaration” in this matter.

## **II. PROFESSIONAL QUALIFICATIONS, BACKGROUND AND EXPERIENCE**

3. I am currently president of IP Action Partners Inc., a consulting practice that serves the telecommunications, information technology, media, electronics, and e-business industries.

4. I earned a Bachelor of Science degree in Electrical Engineering in 1968 and a second Bachelor of Science degree in Engineering Physics in 1969, both from Lehigh University. I earned a Master of Science degree in Electrical

Engineering from Northeastern University in 1974, and then a Master of Business Administration degree from Suffolk University in 1983.

5. I hold a Federal Communications Commission (“FCC”) General Radiotelephone License. I also hold a Certificate in Data Processing from the Institute for the Certification of Computing Professionals (“ICCP”), which is supported by the Association for Computing Machinery (“ACM”). I am also a registered professional engineer (PE) in the Commonwealth of Massachusetts and in the State of Nevada.

6. I am a fellow of the Institute of Electrical and Electronics Engineers (“IEEE”) Consumer Electronics, Communications, Computer, Circuits, and Vehicular Technology Groups. I have been a member of the IEEE Consumer Electronics Society National Board of Governors (formerly known as the Administrative Committee) since 1981, and I was Boston Chapter Chairman of the IEEE Vehicular Technology Society from 1974 to 1976. I served as the 1996-1997 President of the IEEE Consumer Electronics Society, and from 1999 to 2018 I served as Chairman of the Society’s Technical Activities and Standards Committee and as Vice President of Publications for the Society. Since 2018 I have served as Vice President of Standards and Industry Activities for the Society. I have also served as an Ibuka Award committee member for the IEEE’s Award in the field of consumer electronics.

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