

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner,

v.

INTELLECTUAL VENTURES II LLC,
Patent Owner.

IPR2025-00217
U.S. Patent No. 10,952,153

**DECLARATION OF MICHAEL D. KOTZIN, PH.D.
UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION FOR
INTER PARTES REVIEW**

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I. INTRODUCTION

1. I am making this declaration at the request of Tesla, Inc. in the matter of the *Inter Partes* Review of U.S. Patent No. 10,952,153 (“the ’153 patent”) to Anderson.

2. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the outcome of this matter or the specifics of my testimony, and I have no other interest in this case or the parties thereto.

3. I have been asked to provide my opinions regarding whether claims 1-5, 10-15, and 20 (“the Challenged Claims”) of the ’153 patent are unpatentable as they would have been obvious to a person having ordinary skill in the art (“POSITA”) at the time of the alleged invention, in light of the prior art. It is my opinion that all of the limitations of the Challenged Claims would have been obvious to a POSITA.

4. In preparation of this declaration, I have studied:

Exhibit	Description
Ex.1001	U.S. Patent No. 10,952,153 to Anderson (“’153 Patent”)
Ex.1004	U.S. Patent No. 6,600,772 to Zeira et al. (“Zeira”)
Ex.1005	U.S. Patent Application Publication No. 2004/0190485 by Khan (“Khan”)

Exhibit	Description
Ex.1006	U.S. Patent No. 7,493,133 to Krishnan et al. (“Krishnan”)
Ex.1007	U.S. Patent No. 6,529,741 to Tong et al. (“Tong”)
Ex.1008	U.S. Patent Application Publication No. 2004/0077370 by Dick et al. (“Dick”)
Ex.1009	U.S. Patent No. 6,334,047 to Andersson et al. (“Andersson”)
Ex.1010	U.S. Patent Application Publication No. 2001/0036238 by Baker et al. (“Baker”)
Ex.1012	Harri Holma & Antti Toskala, WCDMA for UMTS: Radio Access for Third Generation Mobile Communications (2d ed. 2002) (“Holma”)
Ex.1016	Shin & Zeira et al., “Pathloss-Aided Closed Loop Transmit Power Control for 3G UTRA TDD,” IEEE (2003) (“Shin & Zeira”)
Ex.1025	Andrew S. Tanenbaum, “Computer Networks,” 4th ed. (2002) (“Tanenbaum”)
Ex.1027	Behrouz A. Forouzan, “Data Communications and Networking,” (3 rd ed. 2003) (“Forouzan”)
Ex.1029	Prabhakar Chitrapu, et al., “Wideband TDD: WCDMA for the Unpaired Spectrum,” (2004) (“Chitrapu”)
Ex.1030	U.S. Patent No. 7,519,390 (“390 patent”)
Ex.1031	U.S. Patent No. 6,351,460 (“460 patent”)

5. In forming the opinions expressed below, I have considered:

the documents listed above;

the relevant legal standards, including the standard for obviousness, as

explained to be by counsel, and any additional authoritative documents as

cited in the body of this declaration; and

my own knowledge and experience based upon my work in the field of wireless communication systems as described below.

6. Unless otherwise noted, all emphasis in any quoted material has been added.

II. QUALIFICATIONS AND PROFESSIONAL EXPERIENCE

7. My complete qualifications and professional experience are described in my *Curriculum Vitae*, a copy of which can be found in Exhibit 1014. The following is a brief summary of my relevant qualifications and professional experience.

8. My academic and professional background is in electrical engineering and computer science, and I have been working in those fields since the completion of my B.S. in electrical engineering almost 50 years ago. The following is a brief summary of my relevant qualifications and professional experience.

9. In 1975, I received a Bachelor of Science in Electrical Engineering and a Bachelor of Science in Chemistry from the University of Illinois at Urbana. In 1977, I received a Masters of Science in Electrical Engineering from Northwestern University in Evanston, Illinois. My master's project was entitled "Digital Filter Implementation Using Cascaded Microprocessors." At the time,

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