

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner

Case IPR2025-00341

U.S. PATENT NO. 7,181,743

**DECLARATION OF SYLVIA D. HALL-ELLIS, PH.D.
UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION
FOR *INTER PARTES* REVIEW**

I. INTRODUCTION

1. My name is Sylvia D. Hall-Ellis. I have been retained as an expert by Counsel for Tesla (referred to herein as “Tesla”).

2. I have written this declaration at the request of Tesla to provide my expert opinion regarding the authenticity and public availability of three publications. My declaration sets forth my opinions in detail and provides the basis for my opinions regarding the public availability of these publications.

3. I reserve the right to supplement or amend my opinions, and basis for them, in response to any additional evidence, testimony, discovery, argument, and/or other additional information that may be provided to me after the date of this declaration. If called to testify in the above-captioned matter, I will testify with regard to the opinions and bases set forth below.

4. I am being compensated for my time spent working on this matter at my normal consulting rate of \$400 per hour, plus reimbursement for any additional reasonable expenses. My compensation is not in any way tied to the content of this declaration, the substance of my opinions, or the outcome of this proceeding. I have no other interests in this proceeding or with any of the parties.

5. All of the materials that I considered are discussed explicitly in this declaration.

II. QUALIFICATIONS

6. I am currently an Adjunct Professor in the School of Information at San José State University. I obtained a Master of Library Science from the University of North Texas in 1972 and a Ph.D. in Library and Information Science from the University of Pittsburgh in 1985. Over the last fifty years, I have held various positions in the field of library and information resources. I was first employed as a librarian in 1966 and have been involved in the field of library sciences since, holding numerous positions.

7. I am a member of the American Library Association (“ALA”) and its Association for Library Collections & Technical Services (“ALCTS”) Division, and I served on the Committee on Cataloging: Resource and Description (which wrote the new cataloging rules) and as the chair of the Committee for Education and Training of Catalogers and the Competencies and Education for a Career in Cataloging Interest Group. I also served as the Chair of the ALCTS Division’s Task Force on Competencies and Education for a Career in Cataloging. Additionally, I served as the Chair for the ALA Office of Diversity’s Committee on Diversity, as a member of the REFORMA National Board of Directors, and as a member of the Editorial Board for the ALCTS premier cataloging journal, *Library Resources and Technical Services*, as a Co-Chair of the Membership Committee for the Library Research Round Table (LRRT) of the American Library

Association, and as a member of the LRRT Nominating Committee. Currently I serve as a member of the CORE Margaret Mann Citation Committee.

8. I have also given over one-hundred presentations in the field, including several on library cataloging systems and Machine-Readable Cataloging (“MARC”) standards. My current research interests include library cataloging systems, metadata, and organization of electronic resources.

9. I have been deposed thirty-eight times: (1) *Symantec Corp. vs. Finjan, Inc.*, Petition for *Inter Partes Review* of U.S. Patent No. 7,613,926, May 26, 2016, on behalf of Symantec Corp.; (2) *Symantec Corp. vs. Finjan, Inc.*, Northern District of California, 14-cv-299-HSG, on behalf of Symantec Corp., September 14, 2017; (3) one deposition for ten matters: *Intellectual Ventures I LLC vs. AT&T Mobility LLC*; AT&T Mobility II LLC, New Cingular Wireless Services, Inc., SBC Internet Services, Inc., Wayport, Inc., and Cricket Wireless LLC, C.A. No. 12-193 (LPS); *Intellectual Ventures II LLC vs. AT&T Mobility LLC*; AT&T Mobility II LLC, New Cingular Wireless Services, Inc., SBC Internet Services, Inc., Wayport, Inc., and Cricket Wireless LLC, C.A. No. 13-1631 (LPS); *Intellectual Ventures I LLC vs. T-Mobile USA, Inc. and T-Mobile US, Inc.*, C.A. No. 13-1632 (LPS); *Intellectual Ventures II LLC vs. T-Mobile USA, Inc. and T-Mobile US, Inc.*, C.A. No. 13-1633 (LPS); *Intellectual Ventures I LLC, vs. Nextel Operations, Inc., Sprint Spectrum L.P., Boost Mobile, LLC and Virgin Mobile USA, L.P.*, C.A. No. 13-1634

(LPS); *Intellectual Ventures II LLC vs. Nextel Operations, Inc., Sprint Spectrum L.P., Boost Mobile, LLC and Virgin Mobile USA, L.P.*, C.A. No. 13-1635 (LPS); *Intellectual Ventures I LLC, vs. United States Cellular Corporation*, C.A. No. 13-1636 (LPS); *Intellectual Ventures I LLC vs. United States Cellular Corporation*, C.A. No. 13-1637 (LPS); *Intellectual Ventures II LLC vs. AT&T Mobility LLC, AT&T Mobility II LLC, New Cingular Wireless Services, Inc.*, C.A. No. 15-799 (LPS); *Intellectual Ventures I LLC vs. T-Mobile USA, Inc. and T-Mobile US, Inc.*, C.A. No. 15-800 (LPS), on behalf of AT&T Mobility LLC; AT&T Mobility II LLC, Boost Mobile, LLC Cricket Wireless LLC, Nextel Operations, Inc., New Cingular Wireless Services, Inc., SBC Internet Services, Inc., Sprint Spectrum L.P., T-Mobile USA, Inc., T-Mobile US, Inc., United States Cellular Corporation Virgin Mobile USA, L.P., and Wayport, Inc., November 15, 2016; (4) *Hitachi Maxell, LTD., v. Top Victory Electronics (Taiwan) Co. Ltd., et al.*, Eastern District of Texas, 2:14-cv-1121 JRG-RSP (E.D. Texas), on behalf of Top Victory Electronics (Taiwan) Co. LTD, *et. al.*, January 20, 2016; (5) *Sprint Spectrum, L.P. vs. General Access Solutions, Ltd.*, Petition for *Inter Partes* Review of U.S. Patent No. 7,173,916, on behalf of Sprint Spectrum L.P., July 13, 2018; (6) *Nichia Corporation vs. Vizio, Inc.*, Central District of California, 8:16-cv-00545; on behalf of Vizio, Inc., October 12, 2018; (7) *Intellectual Ventures I LLC, vs. T-Mobile USA, Inc., T-Mobile US, Inc., Ericsson Inc., and Telefonaktiebolaget LM Ericsson*,

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