

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION
Petitioner,

v.

PACT XPP SCHWEIZ AG
Patent Owner

Case IPR2020-00541
U.S. Patent 9,075,605

**DECLARATION OF ZIYONG LI
IN SUPPORT OF PATENT OWNER'S SUR-REPLY**

I, Ziyong Li, do hereby declare as follows:

1. I have been retained to represent Patent Owner, PACT XPP SCHWEIZ AG (“PACT”), in the matter of PACT XPP SCHWEIZ AG v. Intel Corporation, Case No. 19-1006 in the United States District Court for the District of Delaware (“the Delaware Action”).
2. In the course of discovery in the Delaware Action, as of August 6, 2020, Petitioner (“Intel”) has produced over 100,000 documents, which account for over 2,200,000 pages; and PACT has produced over 100,000 documents, which account for over 2,700,000 pages. In total, over 5,000,000 pages have already been exchanged between the parties.
3. Intel has filed twelve petitions for *inter partes* review against PACT’s patents which cumulatively include challenges against over 100 patent claims on more than 50 grounds.
4. Depositions have been scheduled for the Delaware Action. One deposition is set for each of the following dates in 2020: August 21, September 1, September 2, September 3, September 4, September 8, September 10, September 11, September 15, September 16, September 18, September 22, September 24, September 25, September 29, September 30, and October 2.
5. In Intel’s declaration, Ex. 1042, Raymundo Avila declared that he executed service of the hard-copy documents of the IPR petitions by hand-delivery at

Quinn Emanuel's Los Angeles office and Melody Ormano signed for the delivery. After a reasonable investigation with Quinn Emanuel staff, I understand that Melody Ormano is not an employee of Quinn Emanuel and does not work for Quinn Emanuel's office building in Los Angeles.

6. I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that all statements made of my own knowledge are true and that all statements made on information and belief are believed to be true. I understand that willful false statements are punishable by fine or imprisonment or both. *See* 18 U.S.C. § 1001.

Date: August 6, 2020

Respectfully submitted,

/Ziyong Li/
Ziyong Li