

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.**

Petitioner,

v.

CELLECT, LLC,

Patent Owner.

Case IPR2020-00561

U.S. Patent No. 6,982,742

**DECLARATION OF DRAGO GREGOV IN SUPPORT OF PETITION FOR
INTER PARTES REVIEW OF UNITED STATES PATENT NO. 6,982,742**

I, Drago Gregov, make the following Declaration pursuant to 28 U.S.C. § 1746:

1. I am a Lead Litigation Paralegal Specialist at the law firm of Ropes & Gray LLP.

2. I provide this Declaration in support of the Petition for *Inter Partes* Review of United States Patent No. 6,982,742 that is being requested at the United States Patent and Trademark Office (“USPTO”) by Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Ex. 1002 is a true and correct copy of the Prosecution File History of United States Patent No. 6,982,742, which was obtained from the USPTO’s Public PAIR system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

4. Ex. 1003 is a true and correct copy of the Prosecution File History of United States Patent No. 6,043,839, which was retrieved from USPTO records and scanned at my request. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

5. Ex. 1016 is a true and correct copy of JP Unexamined Patent Publication No. S62-104075 (“Tanuma”), which was retrieved at my request. Ex. 1016 further includes a certified English translation of JP S62-104075, which was translated by Mr. Timothy Pennington at my request. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

6. Ex. 1017 is a true and correct copy of Plaintiff Collect LLC’S Amended and Supplemental Objections and Responses to Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.’s Interrogatory No. 2, from *Collect, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, No. 1:19-cv-00438-CMA-MEH, which was served by counsel for Collect, LLC on counsel for Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. on December 20, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

7. Ex. 1039 is a true and correct copy of Plaintiff Collect LLC’s First Amended Initial Infringement Contentions, from *Collect, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, No. 1:19-cv-00438-CMA-MEH, which was served by counsel for Collect, LLC on counsel for

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. on December 11, 2019. I have caused Ex. 1039 to be redacted of confidential information, including by removing the appendices to Ex. 1039. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings and redactions, have been made to this document.

8. Ex. 1040 is a true and correct copy of a claim chart titled U.S. Pat. No. 6,982,742 Galaxy S5 – Collect’s Preliminary Infringement Contentions, from *Collect, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, No. 1:19-cv-00438-CMA-MEH, which was served by counsel for Collect, LLC on counsel for Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. on November 21, 2019. I have caused Ex. 1040 to be redacted of confidential information. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings and redactions, have been made to this document.

9. Ex. 1057 is a true and correct copy of U.S. Patent Application No. 08/461,646, which is an excerpt of the Prosecution File History of United States Patent Application No. 08/461,646 that was retrieved from USPTO records and scanned at my request. This document has been marked with an exhibit label and

page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

10. Ex. 1060 is a true and correct copy of an article titled “NASA’s Tiny Camera Has a Wide-Angle Future,” which is an excerpt of the February 19, 1999 Information Disclosure Statement filed in the version of the Prosecution File History of United States Patent No. 6,043,839 including Non-Patent Literature. The Prosecution File History of United States Patent No. 6,043,839 including Non-Patent Literature was retrieved from USPTO records and scanned at my request. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

11. Ex. 1061 is a true and correct copy of an article titled “Silicon Eyes” in *Business Week* dated October 12, 1998, which was obtained under my direction from the U.C. Berkeley Library. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

12. Ex. 1067 is a true and correct copy of a redline comparison between the specification and claims of U.S. Patent No. 6,982,742 and WO Application Publication No. 99/18613 (“Adair,” see Exhibit 1018). This redline was generated at my request and direction. This document has been marked with an exhibit label

and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

13. Ex. 1072 is a true and correct copy of U.S. Patent Application No. 08/944,322, which is an excerpt of the Prosecution File History of United States Patent Application No. 08/944,322, which was retrieved from USPTO records and scanned at my request. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

14. Ex. 1073 is a true and correct copy of U.S. Patent Application No. 09/175,685, which is an excerpt of the Prosecution File History of United States Patent Application No. 09/175,685, which was retrieved from USPTO records and scanned at my request. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

15. Ex. 1074 is a true and correct copy of U.S. Patent Application No. 09/496,312, which is an excerpt of the Prosecution File History of United States Patent Application No. 09/496,312, which was retrieved from USPTO records and scanned at my request. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

16. Ex. 1076 is a true and correct copy of U.S. Patent Application No. 09/638,976, which is an excerpt of the Prosecution File History of United States Patent Application No. 09/638,976, which was retrieved from USPTO records and scanned at my request. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

17. Ex. 1077 is a true and correct copy of the Prosecution File History of United States Patent No. 6,424,369, which was retrieved from USPTO records and scanned at my request. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

18. Ex. 1079 is a true and correct copy of a redline comparison between the specification and claims of U.S. Patent Application No. 09/638,976 (see Ex. 1076) and the specification and claims of U.S. Patent Application No. 09/496,312 (see Ex. 1074). This redline was generated at my request and direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

19. Ex. 1086 is a true and correct copy of a redline comparison between the specification and claims of U.S. Patent Application No. 09/935,993, which was

obtained from the USPTO's Public PAIR system, and the specification and claims of U.S. Patent Application No. 09/638,976 (see Ex. 1076). This redline was generated at my request and direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

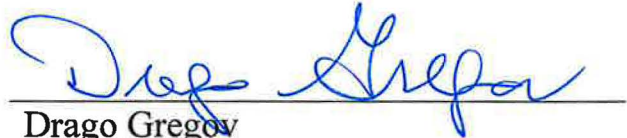
20. Certain pages have been resized to 8.5 x 11 inches. No content was removed by this resizing.

21. Each of the remaining exhibits included with Samsung's petition, Exs. 1001-1086, with the exception of any exhibit that has been reserved or addressed in the foregoing paragraphs, has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to each exhibit.

22. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

23. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of February, 2020, in East Palo Alto, California.


Drago Gregov