

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners,

v.

VASU HOLDINGS, LLC,

Patent Owner.

Case IPR2025-00447

U.S. Patent No. 10,206,154

**DECLARATION OF JONATHAN BRADFORD
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S.
PATENT NO. 10,206,154**

1. I, Jonathan Bradford, make the following Declaration pursuant to 28 U.S.C. § 1746: I am a Senior IP Paralegal at the law firm of Ropes & Gray LLP.

2. I provide this Declaration in connection with the above-identified *Inter Partes* Review proceeding that is before the United States Patent and Trademark Office (“USPTO”). Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Ex. 1001 is a true and correct copy of U.S. Patent No. 10,206,154 (“154”), which was obtained from the USPTO’s Patent Center 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. 1002 is a true and correct copy of File History of U.S. Application No. 14/510,766 (“154FH”), which was obtained from the USPTO’s Patent Center 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.

5. Ex. 1004 is a true and correct copy of U.S. Patent App. Pub. 2005/0282541 (“Iizuka”), which was obtained from the USPTO’s Patent Center 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.

6. Ex. 1005 is a true and correct copy of U.S. Patent App. Pub. 2002/0126654 (“Preston”), which was obtained from the USPTO’s Patent Center 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.

7. Ex. 1008 is a true and correct copy of U.S. Provisional App. No. 60/534,466 (“466-Prov”), which was obtained from the USPTO’s Patent Center 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.

8. Ex. 1009 is a true and correct copy of U.S. Provisional App. No. 60/643,829 (“829-Prov”), which was obtained from the USPTO’s Patent Center 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.

9. Ex. 1010 is a true and correct copy of U.S. Patent App. No. 11/031,498 (“498-CIP”), which was obtained from the USPTO’s Patent Center 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.

10. Ex. 1011 is a true and correct copy of U.S. Patent Pub. 2005/0136927 (“Enzmann”), which was obtained from the USPTO’s Patent Center 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.

11. Ex. 1012 is a true and correct copy of U.S. Patent Pub. 2007/0146475 (“Inoue”), which was obtained from the USPTO’s Patent Center 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.

12. Ex. 1013 is a true and correct copy of U.S. Patent Pub. No. 2003/0134638 (“Sundar”), which was obtained from the USPTO’s Patent Center 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.

13. Ex. 1014 is a true and correct copy of Docket Control Order (Dkt. No. 28), *Vasu Holdings, LLC v. Samsung Electronics Co., Ltd.*, No. 2:24-cv-00034-JRG-RSP (E.D. Tex.). This document was downloaded at my direction from the

United States Court's Public Access to Court Electronic Records ("PACER") 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.

14. Ex. 1015 is a true and correct copy of U.S. Patent Pub. No. 2004/0009761 ("Money"), which was obtained from the USPTO's Patent Center 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.

15. Ex. 1016 is a true and correct copy of Jim Zyren, Intersil Corporation, "IEEE 802.11g Explained" (2001). This document was downloaded at my direction and is available at:

https://www.3g4g.co.uk/Other/WiLan/802_11g/WP_IEEE802gExpla_12_06.pdf

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. 1017 is a true and correct copy of Guide to IEEE 802.11 Wireless LAN Standards, EE Times (May 23, 2003). This document was downloaded at my direction and is available at:

<https://www.eetimes.com/guide-to-ieee-802-11-wireless-lan-standards/>

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. 1018 is a true and correct copy of File History of U.S. Application No. 13/240,776 (“181FH”), which was obtained from the USPTO’s Patent Center 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.

18. Ex. 1019 is a true and correct copy of Plaintiff Vasu Holdings, LLC’s Objections and Responses to Defendants Samsung Electronics Co., Ltd, and Samsung Electronics America, Inc.’s First Set of Interrogatories (Nos. 1-25), *Vasu Holdings, LLC v. Samsung Electronics Co., Ltd.*, No. 2:24-cv-00034-JRG-RSP (E.D. Tex.). This document was served upon Ropes & Gray by counsel for Vasu Holdings, LLC. 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. 1020 is a true and correct copy of Plaintiff Vasu Holdings, LLC’s Supplemental Objections and Responses to Defendants Samsung Electronics Co., Ltd, and Samsung Electronics America, Inc.’s Interrogatories (Nos. 1-5, 8, 9, 13-

15, 19-22, 25), *Vasu Holdings, LLC v. Samsung Electronics Co., Ltd.*, No. 2:24-cv-00034-JRG-RSP (E.D. Tex.). This document was served upon Ropes & Gray by counsel for Vasu Holdings, LLC. 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. Ex. 1021 is a true and correct copy of Plaintiff Vasu Holdings, LLC's Objections and Responses to Defendants Samsung Electronics Co., Ltd, and Samsung Electronics America, Inc.'s Second Set of Interrogatories (No. 26), *Vasu Holdings, LLC v. Samsung Electronics Co., Ltd.*, No. 2:24-cv-00034-JRG-RSP (E.D. Tex.). This document was served upon Ropes & Gray by counsel for Vasu Holdings, LLC. 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.

21. Ex. 1022 is a true and correct copy of U.S. Patent No. 7,664,501 ("Dutta"), which was obtained from the USPTO's Patent Center 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.

22. Ex. 1023 is a true and correct copy of an excerpt of Dictionary of Computer Science, Engineering, and Technology, which was obtained at my

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.

23. Ex. 1024 is a true and correct copy of an excerpt of Microsoft Computer Dictionary, Fifth Edition, which was obtained at my 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.

24. Ex. 1025 is a true and correct copy of WiFi Alliance, WiFi Overview, which is an archived version of “http://www.weca.net/OpenSection/why_Wi-Fi.asp?TID=2” (June 3, 2004). This document was downloaded at my direction and is available at:

https://web.archive.org/web/20040603035514/http://www.weca.net/OpenSection/why_Wi-Fi.asp?TID=2

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.

25. Ex. 1026 is a true and correct copy of U.S. Patent Pub. No. 2005/0190747 (“Sindhvani”), which was obtained from the USPTO’s Patent Center 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.

26. Ex. 1027 is a true and correct copy of U.S. Patent No. 6,300,887 (“Le”), which was obtained from the USPTO’s Patent Center 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.

27. Ex. 1028 is a true and correct copy of U.S. Patent No. 7,751,316 (“Yarlagadda”), which was obtained from the USPTO’s Patent Center 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.

28. Ex. 1029 is a true and correct copy of U.S. Patent No. 7,359,979 (“Gentle”), which was obtained from the USPTO’s Patent Center 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.

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

30. 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.

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

Executed this 23rd day of January, 2025, in Boston, Massachusetts.

/Jonathan Bradford/
Jonathan Bradford
ROPES & GRAY LLP