

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORP., DELL INC., and DELL TECHNOLOGIES INC.,

Petitioner,

v.

GENERAL VIDEO, LLC,

Patent Owner.

Case IPR2025-01038

Case IPR2025-01039

Patent No. 7,359,437

DECLARATION OF MATTHEW G. MCANDREWS

I, MATTHEW G. MCANDREWS, declare as follows:

1. I have personal knowledge or have acquired knowledge of the matters set forth herein, and if I am called to testify, I could testify competently thereto.

2. I am an attorney at the firm of McAndrews, Held & Malloy, Ltd.

3. I represent Patent Owner General Video, LLC (“GV”) in the following district court cases in which U.S. Patent No. 7,359,437 (the “437 Patent”) is asserted: *General Video, LLC v. Dell Inc. et al.*, Case No. 1-24-cv-01530 (W.D. Tex.) (the “Dell Case”), *General Video, LLC v. HP Inc.*, Case No. 5-24-cv-00123 (E.D. Tex.) (the “HP Case”), and *General Video, LLC v. ASUSTeK Computer, Inc. et al.*, Case No. 5-24-cv-00126 (E.D. Tex.) (the “ASUSTeK Case”). The HP Case and the ASUSTeK Case will collectively be referred to as the “ED Texas Cases.” The ED Texas Cases and the Dell Case will collectively be referred to as the “Texas Cases.” General Video also asserted the 437 Patent in *General Video, LLC v. Lenovo Group Limited*, Case No. 5-234-cv-00122 (E.D. Tex.) (the “Lenovo Case”), which was dismissed without prejudice for lack of personal jurisdiction on August 11, 2025.

4. I was asked to provide a summary of the investment and efforts that have been made to date in the Texas Cases.

5. Exhibit 2002 is a true and accurate copy of the Docket Report from PACER for the Dell Case, Exhibit 2003 is a true and accurate copy of the Docket Report from PACER for the Lenovo Case, Exhibit 2004 is a true and accurate copy

of the Docket Report from PACER for the HP Case, and Exhibit 2005 is a true and accurate copy of the Docket Report from PACER for the ASUSTeK Case.

6. On August 30, 2024, GV filed complaints in the Eastern District of Texas for patent infringement against the defendants in the Dell Case, HP Case, and ASUSTeK Case. The Complaints in those three cases asserted the 437 Patent along with five other patents – U.S. Patent Nos. 6,584,443 (the “443 Patent”), 7,069,224 (the “224 Patent”), 7,225,282 (the “282 Patent”), 9,843,786 (the “786 Patent”), and 9,036,010 (the “010 Patent”) (collectively, the “General Video Patents”). In each case, GV asserted infringement of claims 7 and 9 of the 443 Patent, claims 3 and 5 of the 224 Patent, claim 1 of the 282 Patent, claim 41 of the 437 Patent, claims 1 and 12 of the 010 Patent, and claim 1 of the 786 Patent. On November 22, 2024, the Dell Case was transferred to the Western District of Texas, and on April 8, 2025, the ED Texas Cases were consolidated.

7. Trial is scheduled for September 28, 2026 in the ED Texas Cases. Trial is currently scheduled for March 29, 2027 in the Dell Case based on a scheduling order that was entered on March 24, 2025 by then-presiding District Judge Robert Pitman. On March 25, 2025, however, the Dell Case was transferred to District Judge Alan Albright and, on June 18, 2025, Patent Owner filed an opposed motion for entry of a new scheduling order that tracks Judge Albright’s exemplary

scheduling order and that schedules trial for October 19, 2026. No party has moved for a stay in any of the Texas Cases.

8. In each of the Texas Cases, GV has served initial disclosures, infringement contentions, interrogatories, interrogatory responses, and issued third-party subpoenas to Via Licensing Alliance and the Video Electronics Standards Association (“VESA”), and the defendants have served initial disclosures, interrogatories, interrogatory responses, and invalidity contentions. GV served its infringement contentions on March 29, 2025 in the Dell Case and served them on April 28, 2025 in the ED Texas Cases. In each of the Texas Cases, GV asserted infringement of claims 1 and 12 of the 010 Patent, claims 1 and 13 of the 786 Patent, claims 7 and 9 of the 443 Patent, claims 3 and 5 of the 224 Patent, claim 1 of the 282 Patent, and claim 41 of the 437 Patent. In each of the Texas Cases, the defendant’s invalidity contentions (including exhibits) are well over 10,000 pages long and include contentions that the asserted claims of the General Video Patents are invalid under 35 U.S.C. §§ 101, 102, 103, and 112. Some of the Section 102/103 invalidity contentions are based on system art.

9. The parties in each of the Texas Cases have exchanged terms for claim construction, their proposed claim constructions, and extrinsic evidence.

10. The defendants in the Dell Case filed a partial motion to dismiss certain claims. That motion has been fully briefed and is pending with the Court.

11. In the Dell Case, the defendants have issued subpoenas to Intel Corp. and Via Licensing Alliance and served interrogatories on GV, which GV has responded to. The defendant in the HP Case filed a motion to dismiss for lack of venue, and the parties took discovery on venue before the defendant withdrew its motion.

12. The parties in the Texas Cases have so far produced over 200,000 pages of documents combined, and discovery and other issues in those cases require near daily actions involving things like deficiency letters, response letters, follow-up, meet-and-confer conferences, motions, briefing, and argument.

I declare that all statements made herein of my own knowledge are true, 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 Section 1001 of Title 18 of the United States Code.

Date: August 25, 2025

/s/ Matthew G. McAndrews