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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN JOSE DIVISION
18
19

20 BARCO N.V.,

21 Plaintiff,

22 v.

23 TECHNOLOGY PROPERTIES LTD.,
PATRIOT SCIENTIFIC CORP., and
24 ALLIACENSE LTD.,

25 Defendants.
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27
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Case No. 5:08-cv-05398 JF

**DECLARATION OF DIMAS
BRATAADIREDDJA IN SUPPORT OF
DEFENDANTS' MOTION FOR LEAVE
TO AMEND INFRINGEMENT
CONTENTIONS FOR U.S. PATENT
NO. 5,440,749**

Date: April 22, 2011
Time: 9:00 a.m.
Dept.: Courtroom 3, 5th Floor
Judge: The Honorable Jeremy Fogel

[RELATED CASES]

1 ACER, INC., ACER AMERICA
2 CORPORATION and GATEWAY, INC.,

3 Plaintiffs,

4 v.

5 TECHNOLOGY PROPERTIES LTD.,
6 PATRIOT SCIENTIFIC CORP., and
7 ALLIACENSE LTD.,

8 Defendants.

Case No. 5:08-cv-00877 JF

9 HTC CORPORATION and HTC AMERICA,
10 INC.,

11 Plaintiffs,

12 v.

13 TECHNOLOGY PROPERTIES LTD.,
14 PATRIOT SCIENTIFIC CORP. and
15 ALLIACENSE LTD.,

16 Defendants.

Case No. 5:08-cv-00882 JF

17 I, Dimas Brataadiredja, declare as follows:

18 1. I am the Director of Licensing Operations at Defendant Alliacense Ltd.

19 (“Alliacense”). I have held this position for approximately five months. I have personal
20 knowledge of the matters set forth below, and if called and sworn as a witness, I could and would
21 competently testify to the facts set forth herein.

22 2. I am currently the Director of Licensing Operations at Alliacense. I am involved
23 in Alliacense’s acquisition, testing, and analysis of products sold in the United States that may
24 infringe one or more of the Moore Microprocessor Portfolio patents (“MMP patents”). The MMP
25 patents consist of the following United States patents: 5,809,336, 5,784,584, 5,440,749 (“the ‘749
26 patent”), 6,598,148, and 5,530,890. I also was involved in the preparation of the product reports
27 and claim charts that are the subject of this Motion for Leave to Amend Infringement
28 Contentions. The product reports contain a claim-by-claim, element-by-element analysis of how
the accused products infringe the ‘749 patent.

1 3. Upon receiving notice of the Notice of Intent to Issue a Reexamination Certificate
2 for the '749 patent, Alliacense began a comprehensive product review to determine whether any
3 products first sold in the United States after June 25, 2010 by the following companies infringe
4 the reexamined '749 patent claims expected to issue: Barco N.V. ("Barco"); Acer, Inc., Acer
5 America Corp., and Gateway, Inc. (collectively, "Acer"); HTC Corp., and HTC America, Inc
6 (collectively, "HTC"). Alliacense also reviewed the Acer, HTC, and Barco products previously
7 accused of infringing the '749 patent claims to determine whether any of these products also
8 would infringe the claims of the reexamined '749 patent expected to issue.

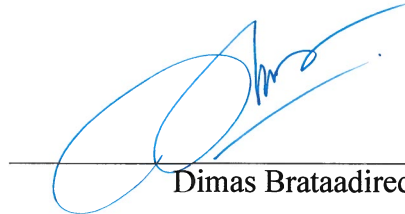
9 4. Alliacense undertakes considerable effort to identify and analyze each product it
10 believes infringe claims of the '749 patent. First, Alliacense reviews press releases and other
11 publicly available information to identify products it believes infringe the '749 patent. After
12 identifying potentially infringing products, Alliacense researches each product to analyze the
13 functionality of the accused products and determine the type of microprocessor used. This effort
14 includes reviewing publicly available sources to locate specifications and other materials for the
15 accused product and the microprocessors contained within. Alliacense uses this publicly
16 available information to help determine whether any of the claims of the '749 patent are
17 infringed. When the publicly available information does not indicate the microprocessor used,
18 Alliacense acquires the products to analyze and determine the functionality and structure of the
19 microprocessors used.

20 5. Once the analysis and research is completed, Alliacense prepares claim charts,
21 which are then compiled into product reports. Alliacense prepares at least one claim chart for
22 each accused product, illustrating how the accused product infringes each asserted claim of a
23 patent. It takes approximately 8 hours to generate each claim chart showing where each element
24 of each asserted claim is found in the accused product. To prepare the amended infringement
25 charts as to Barco, Acer, and HTC, Alliacense prepared approximately 88 claim charts.

26 6. Alliacense completed its effort to identify new infringing products, and to draft
27 claim charts showing how these products infringe the '749 patent claims, around March 23, 2011.
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1 As a result of this effort, Alliacense identified: two Barco products first sold in the United States
2 after June 25, 2010, that infringe the '749 patent claims expected to issue; three Acer products
3 first sold in the United States after June 25, 2010, that infringe the '749 patent claims expected to
4 issue; and thirteen HTC products first sold in the United States after June 25, 2010, that infringe
5 the '749 patent claims expected to issue.

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct. Executed this 25th day of March, 2011, at Cupertino, California.

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12 Dimas Brataadiredja
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