

# **EXHIBIT A**

# Martin G. Walker, PhD

## Consultant Curriculum Vitae

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### Expertise

#### IC Design

- EDA Software
- Digital circuit design and simulation
- Analog IC design and analysis
- Analog circuit design
- RF and microwave circuit design

#### Source Code

- Identification of copied source code
  - Analysis of copied source code
  - Analysis of alleged trade secret misappropriation
  - Patent infringement of source code
  - Copyright infringement of source code, including database schemas
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### Litigation Experience

Dr. Walker has testified in jury trials and arbitration involving software technology issues. He has been engaged as a “technology neutral” to assist in the resolution and adjudication of electronic discovery issues. Dr. Walker also has significant experience in giving deposition testimony and in preparing declarations and expert reports. Dr. Walker regularly works with attorneys to help articulate and manage the many technology issues that arise in complex litigation. He is particularly adept at explaining complex technology issues to lay audiences and, as such, has often been asked to present Markman tutorials and prepare demonstratives. Dr. Walker is often asked to evaluate alleged trade secrets and provide opinions regarding the sufficiency of the trade secret description.

### Industry Experience

Dr. Walker is a recognized expert with over 35-years of experience in design of integrated circuits, including analog, digital and RF/microwave circuits. His analog IC circuit design experience includes analog components such as PLLs, voltage regulators and linear systems. In the digital IC design Dr. Walker has experience at the circuit level, including such structures as ESD components, level shifters, sense amps, SDRAM circuits such as DDR sequencing circuits and On-Die Termination (ODT).

Dr. Walker also has experience in the web-based software field, serving as CTO of an internet services company, Knowledge Networks. During his tenure as CTO, Dr. Walker was responsible for groups that designed and deployed numerous web-based applications and services.

He also has acquired expertise in the analysis of alleged source code copying. He has developed specialized analysis tools that help find the “needle” of copied code in the “haystack” of large source-code databases. He has identified existence of misappropriated code as well as helped to demonstrate the lack of evidence of misappropriation. During the course of his practice, Dr. Walker has analyzed such diverse code as EDA software, VoIP software, database schema, mail-list processing software, and stock-brokerage software. He is familiar with a wide variety of source-code repositories including CVS, RCS, Subversion, and Rational ClearCase.

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**Litigation Projects**

- Date: 2000-02      **Thelen Reid (for Plaintiff)**  
Case:              Sequence Design vs various defendants  
Project:            Patent infringement relating to EDA software. Provided support for  
                         claim construction and infringement analyses.  
Status:             Settled
- Date: 2001-03      **Dechert, LLP (for Plaintiff)**  
Case:              Silvaco v CSI  
Project:            Misappropriation of trade secrets, including copied source code.  
                         Analysis of source code written in the C language. Created the 2019(d)  
                         statement that described Silvaco's trade secrets and provided numerous  
                         declarations that supported this description. Testified at deposition  
                         regarding source code copying, other trade secret misappropriation, and  
                         business practices.  
Status:             Settled on terms favorable to plaintiff  
Testimony:        Deposition
- Date: 2001-02      **FTI Teklicon (for IRS)**  
Case:              IRS vs taxpayer  
Project:            Analysis of valuation for tax purposes of EDA software and associated  
                         royalty streams.  
Status:             Completed
- Date: 2001-02      **Dechert LLP (for Plaintiff)**  
Case:              Synopsys vs Nassda (patent infringement)  
Project:            Retained as testifying expert. Project involved analysis of electronic  
                         circuit simulation software written in the C programming language.  
                         Declaration, expert report, and deposition in support of claim  
                         construction. Declaration in opposition to Summary Judgment motion  
                         for non-infringement which was denied by the Court. Infringement  
                         analysis and expert report. Opposition to invalidity claims.  
Status:             Settled on terms favorable to plaintiff  
Testimony:        Deposition  
Expert              Claim construction issues  
Report:

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- Date: 2001-04      **Dechert, LLP (for Plaintiff)**  
Case                Synopsys vs Nassda (State Action)  
Project:           Identification of misappropriated trade secrets relating to circuit simulation. Analysis of source code creation rates. Analysis of electronic evidence tampering. Assist with discovery issues. Manage electronic discovery of more than 300Gbytes of documents. Analysis and declarations regarding disk wiping and other evidence tampering by defendants led to the defendants' decision to settle on terms widely seen as extraordinarily favorable to Plaintiff  
Status:            Settled on terms favorable to plaintiff
- Date: 2001           **Law offices of Al Reynaldo (for cross-defendant Aprés)**  
Case                Aprés vs Ho  
Project:            Misappropriation of EDA-related trade secrets  
Status:            Settled  
Testimony:        Testified at jury trial regarding software algorithms and development process
- Date: 2003-04      **Dechert LLP (for Plaintiff)**  
Case                Synopsys vs Nassda (patent infringement – '998)  
Project:            Claim construction analysis and declaration. There were 11 disputed terms. The Court adopted Dr. Walker's construction on all 11 terms, rejecting all of the defendants arguments.  
Status:            Settled pending FTC approval
- Date: 2003-04      **Dechert LLP (for Respondent)**  
Case                CSI vs Silvaco  
Project:            Arbitration resulting from alleged violation of the terms of the settlement agreement.  
Status:            Arbitration completed  
Testimony:        Three-judge arbitration panel regarding CSI's licensing, support and maintenance of certain Silvaco trade secrets
- Date: 2003-04      **Dechert LLP (for Plaintiff)**  
Case                HCL vs eKomas  
Project:            Analysis and identification of directly copied source code written in a web-host scripting language. The product at issue is a web-based application for loan management.  
Status:            Settled

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- Date: 2004      **McDermott (for Defendant)**  
Case            Tera Systems vs InTime Software  
Project:        Patent infringement related to EDA software. Researched invalidity and supported claim construction.  
Status:         Settled
- Date: 2004-05    **Dechert LLP (for Plaintiff)**  
Case            Silvaco vs CSI – OSC re Contemp  
Project:        Analysis and declaration regarding the Defendants’ continued use of Silvaco trade secrets.  
Status:         Completed  
Testimony:    Bench trail
- Date: 2004-05    **Dechert LLP (for Defendant)**  
Case            Siliconix vs AATI  
Project:        Patent infringement regarding method for manufacturing a semiconductor device. Support for claim construction and invalidity analysis. Researched prior art.  
Status:         Settled
- Date: 2005        **Kirkland & Ellis LLP (for Defendant)**  
Case            Berry vs Fleming, et al.  
Project:        Source code copyright and misappropriation of trade secrets of an SQL database schema as well as associated source code. Reviewed source code at issue.  
Expert Report    Relating to software development, non-infringement of copyright, and analysis of forensic data to refute claims of electronic evidence spoliation  
Status:         Summary judgment of non-infringement of copyright for more than 90% of potential damages. Jury verdict awarding minimal damages for balance of claims
- Date: 2005        **Dechert LLP and Wilson Sonsini (for Plaintiff and Cross Defendant Synopsys)**  
Case            Synopsys vs Magma (  
Project:        This matter involved theft of IP relating to EDA software as well as patent infringement in two venues. Analyzed Magma software written mostly in C++ for infringement identified historical software supporting invalidity of Magma patents. Provided support for claim construction and invalidity analysis.  
Status:         Settled on terms favorable to Synopsys.

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- Date: 2005      **Browne & Woods LLP (for Defendant)**  
Case            Keywords vs ISE  
Project:       Investigated allegations of source code copying and copyright infringement of source code written in an interpreted language similar to perl. Declaration ISO of opposition to preliminary injunction.  
Status:        Settled  
Expert Report: Regarding source code copying and inadequate description of alleged trade secrets
- Date: 2005-06      **Jones, Day (for Plaintiff)**  
Case            Experian v. I-Centrix  
Project:       Investigating allegations of source code copying and misappropriation of trade secrets. The code was originally written in fortran, but then translated into the C programming language. Performed analysis of electronic data that suggested evidence tampering on the part of defendants.  
Status:        Settled  
Testimony:    Deposition  
Expert Report: Identification of literal copying of source code as well as copied algorithms. The expert report identified methods the defendants used in an attempt to disguise the misappropriated code and algorithms.
- Date: 2005      **Dechert LLP (for Plaintiff)**  
Case            Silvaco vs CSI End Users  
Project:       Analysis and declarations regarding the Defendants' continued use of Silvaco trade secrets.  
Status:        Stayed  
Testimony:    Deposition
- Date: 2006      **Gordon Rees (for Defendant)**  
Case            FIS v. CalAmp  
Project:       Investigation of alleged misappropriation of trade secrets. Performed investigation and created expert report regarding the alleged misappropriation.  
Status:        Settled  
Expert Report: Relating to alleged misappropriation of software trade secrets.
- Date: 2006      **Gordon Reese (for Plaintiff)**  
Case            LiveOps v. Teleo  
Project:       Misappropriation of trade secrets, copyright infringement of VoIP software systems. Investigation to detect software copying.  
Status:        Settled

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- Date: 2005      **Dewey Ballantine (for Plaintiff)**  
Case            Matsushita v. MediaTek  
Project:        Patent infringement investigations (invalidity, claim construction, infringement) relating to various patents, including design techniques and DFM technology. Provided expert report regarding infringement and validity of the patents at issue.  
  
Status:        Settled  
Testimony:    Markman tutorial, for three patents at issue; deposition  
Expert        Relating to infringement and validity of DFM patent related to  
Report:        processing of metallization structures.
- Date: 2006      **Court-Appointed Technology Neutral**  
Case            Apple Resellers et al v. Apple Computer  
Project:        Technology neutral appointed by Judge Jacobs May in Superior Court of Santa Clara to resolve the parties disputes regarding proper production of electronic documents  
  
Status:        Settled  
Testimony:    Two hearings before the Court relating to several discovery motions  
Expert        Explained technology and issues relating to the electronic production by  
Report:        the various parties.
- Date: 2006      **Paul Hastings (for Defendants)**  
Case            iSmart International v I-Docsecure  
Project:        Plaintiffs allege that Defendants misrepresented certain technology in the context of an equity investment. Investigated to determine facts; provided declaration regarding business practices and lack of factual basis for claims. Source code at issue was written in a web-host scripting language.  
  
Status:        Settled
- Date: 2006      **Gordon & Rees (for Defendants)**  
Case            Microsoft vs BWT Industry Technology  
Project:        Provided expert opinion regarding alleged pirating of Microsoft products.  
Status:        Settled
- Date: 2006      **Greenan, Peffer (for Defendant & Cross-Complainant)**  
Case            Benedict v Mediatrac  
Project:        Expert testimony at a jury trial regarding standard level of care relating to IT practices.  
  
Status:        Jury award for Defendant  
Testimony:    Jury trial regarding software coding and management standards; deposition



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Date	2007-	<b>Miller Barondess (for Plaintiff and Cross-defendant BHE)</b>
Case		BHE Group v MTS Products
Project		Analysis of expert testimony; investigation relating to performance of computers
Status		Won jury award in excess of \$45,000,000 for client, BHE
Testimony		Testified at jury trial relating to adequacy of the design of laptop computers; deposition.
Date	2007-	<b>Synopsys, Inc.</b>
Projects:		IP-related consulting activities regarding patents and patent strategy
Status:		Ongoing
Date	2007-08	<b>Dechert, LLP (for cross-complainant Acer, Inc)</b>
Case		HP v Acer
Project		Retained as testifying expert. Analyzed ICs regarding infringement of Acer's circuit design patents. Analyzed and documented infringement of several different ICs. Research included on-site inspections of IC designs using owner-supplied design tools to demonstrate infringement.
Status		Settled
Date	2008	<b>Bergeson, LLP (for defendant Clarus)</b>
Case		Variphy, Inc. et al, v Clarus Systems, Inc.
Project		Investigate alleged misappropriation of trade secrets and source code copying of VoIP telephony and related applications.
Status		Settled
Date	2008	<b>Wilson Sonsini (for plaintiff Sandisk Corporation)</b>
Case		Sandisk v various Flash memory manufacturers
Project		Retained as consulting expert responsible for analyzing flash memory controller products for possible infringement of SanDisk patents. Analyzed the detailed design of various products and prepared infringement analyses. Support depositions of technical personnel and experts.
Status		Complete
Date	2008	<b>Wilson Sonsini (for defendant Go Daddy)</b>
Case		Web.com v Go Daddy
Project		Prepared and presented claim construction tutorial explaining the background technology for 4 web-hosting related patents
Status		Settled
Testimony:		Markman tutorial explaining technology for the web-hosting patents at issue.

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- Date 2007-  
Case  
Project **Jones Day (for Plaintiff On Semi)**  
On Semiconductor v Samsung  
Retained as testifying expert. Performed research to determine infringement and validity of four patents. Three of the patents related to circuits; one related to metallization systems. Prepared expert reports regarding infringement and validity. Prepared declarations in support of various discovery motions. Prepared Markman tutorial for all patents at issue. Assisted attorneys in deposition of Samsung's expert and other technology witnesses.
- Status Settled  
Testimony Deposition  
Expert Relating to validity and infringement of three circuit-related patents and  
Reports: one metallization process technology patent
- Date 2008-  
Case  
Project **Wilson Sonsini (for defendant Synopsys)**  
Ricoh v Synopsys  
Consulting expert. Prepared technology tutorial. Researched and assisted in preparation of a Motion for Summary Judgment for non-infringement and reply.
- Status: Ongoing
- Date 2009  
Case  
Project **King and Spalding (for Plaintiff Spansion)**  
Spansion v Samsung (ITC and District Court actions)  
Consulting expert. Provide analysis and discovery advice on evidence needed to demonstrate infringement of the patents at issue.
- Status Ongoing
- Date 2009  
Case **Ford Marrin Esposito Witmeyer & Gleser (for complainant Toshiba)**  
Toshiba Medical v. Stubitsch  
Testifying expert. Provided expert report and declarations relating to the sufficiency of Toshiba trade secrets descriptions and their misappropriation. Analyzed and responded to motions regarding the particularization of the trade secrets
- Status Ongoing
- Date 2009  
Case **Andrews Kurth (for defendant Bancorp South)**  
Data Treasury v Wells Fargo, et al  
Testifying expert. Provided expert report relating to non-infringement of patents by Bancorp South in this extensive litigation in Eastern District of Texas. Reviewed documents and plaintiff expert reports. Developed and documented several bases for non-infringement.

### **Employment History**

From: 2001            **Brass Rat Group, Inc.**

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To: Current  
Position: Woodside, CA  
*CEO*  
Brass Rat Group is a successful Silicon Valley based consulting organization specializing in litigation consulting and business consulting in the semiconductor (IC) design field. Dr. Walker provided litigation support and expert analysis for plaintiff Synopsys in Synopsys vs Nassda, which was recently settled resulting in a “significant victory” for Synopsys.

From: 2000  
To: 2001  
Position: **Knowledge Networks**  
Menlo Park, CA  
*Chief Technology Officer*  
Knowledge Networks is a pre-IPO market research company that is leveraging internet technology to revolutionize the market research industry. KN recruited a panel of over 50,000 consumers to be interviewed on a variety of topics weekly. Dr. Walker managed KN’s engineering group, which designed and created automated systems to create surveys, conduct interviews, process data, and manage the panel. He also managed the IT group which was responsible for high-availability web-based systems for fielding the interviews as well as the internal systems required to analyze the data and produce real-time reports.

From: 1995  
To: 2000  
Position: **Sequence Design (Formerly Frequency Technology)**  
*Founder, Founding CEO, Director & CTO*  
Sequence Design, formerly Frequency Technology, is the leader in the EDA segment called Design Closure. Sequence's products and services, consisting of pre- and post-layout optimization based on accurate layout extraction, enable designers to bring higher performance, lower-power integrated circuits quickly to tape out. Dr. Walker:

- Developed business plan and raised over \$9MM in financing;
- Hired staff and led development, including defining technical product definition; Personally developed many of the basic algorithms, which resulted in five issued patents;
- Led initial marketing efforts;
- Wrote numerous technical articles advancing the company’s technical position;
- Served as chief technical spokesman for the company.

From: 1990  
To: 1995  
Position: **Symmetry Design Systems**  
Los Altos, CA  
*Founder, Director & Executive Vice President*  
Symmetry, a self-funding enterprise, was a service and product business specializing in the analog simulation EDA market. Products included simulation-model libraries, modeling tools, and special-purpose analog

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simulators. Dr Walker was responsible for a joint venture in Beijing China, where new products were developed. Symmetry was acquired by Analogy, Inc.

- Initiated Japanese and European marketing activities.
- Developed conceptual framework and user-interface model for the Sun OpenLook-based product.
- Served as technical spokesman in customer and industry forums.
- Conducted sales training in the US, Asia, and Europe.

From: 1983

To: 1990

Position:

#### **Analog Design Tools**

Sunnyvale, CA

*Founder, Director, Founding CEO & Chief Scientist*

ADT's first product, the Analog WorkBench, pioneered the market for Analog CAE workstations, including such fundamental concepts as multiple window CAE systems, and simulated test instruments as a paradigm for CAE user interface. ADT, which had grown to \$16MM in annual sales and 150 employees, was acquired by Cadence.

- Formulated original business plan and presented concept to venture investors. Raised initial venture financing. Led fund-raising activities through the series C round.
- Served as President during formative stage. Director and Chief Scientist (CTO) from the founding through acquisition. Set the product direction. Drove the technology development.
- Formulated ADT's initial marketing strategy. The international distribution strategy focused primarily on Japan.
- Developed the Japanese market for ADT's products. Responsible for establishing and maintaining our distributor relationship, negotiating contracts, supporting customers, and building sales that amounted to 20% of the installed base.

From: 1980

To: 1983

Position:

#### **COMSAT**

Palo Alto, CA

*Director, Microwave Systems*

Managed a Navy sponsored program to develop high productivity techniques for manufacturing of microwave components. Developed a microwave circuit-synthesis product.

From: 1973

To: 1980

Position:

#### **Watkins-Johnson**

Palo Alto, CA

*Member of the Technical Staff*

Developed GaAsMESFET-based microwave amplifiers, components, and tuners. Designed and produced the world's first GaAsMESFET amplifiers to be delivered in production quantities.

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## Consultant Curriculum Vitae

### Consulting History (within last 5 years)

From: 2005           **Sequence Design**  
To:     2007           Santa Clara  
Duties:           EDA software analysis

From: 2005           **Sabio Labs**  
To:     2006           Palo Alto, CA  
Duties:           Created business plan, operating plan, and marketing plan for EDA startup focused on analog circuit optimization and synthesis

From: 2005           **Synopsys, Inc**  
To:     On-going       Mountain View, CA  
Duties:           Technology investigations relating to IP issues. Presented technology overview to non-technical staff

### Patents

<u>Patent Number</u>	<u>Date Issued</u>	<u>Title</u>
6,643,831	2003	Method and system for extraction of parasitic interconnect impedance including inductance
6,381,730	2002	Method and system for extraction of parasitic interconnect impedance including inductance
5,901,063	1999	System and method for extracting parasitic impedance from an integrated circuit layout

### Education

<u>Year</u>	<u>College/University</u>	<u>Degree</u>
1987	AEA/Stanford Executive Institute	Completed w/distinction
1979	Stanford University, Stanford, CA	Ph.D., Electrical Engineering
1976	Stanford University, Stanford, CA	MS, Electrical Engineering
1973	Massachusetts Institute of Technology, Boston, MA	BS, Electrical Engineering

### Publications

Over fifty articles in the fields circuit design and design automation, including technical papers in peer-reviewed journals, an invited article in the IEEE Spectrum, and various conference proceedings. I have organized seminars, which were designed to enhance the technical credibility of my companies, and written numerous opinion pieces published in journals such as EETimes that served to establish and promote our corporate position. Some more recent publications are listed below.

Martin G. Walker, Modeling the Wiring of Deep Submicron ICs, IEEE Spectrum Vol 37, No. 3, March 01, 2000 at pp. 65-71.

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### **Consultant Curriculum Vitae**

Martin G. Walker, Keh-Jeng (KJ) Chang, Christopher J. Bianchi, SIPP's Why Do We Need a New Standard for Interconnect Process Parameters? VLSI: Systems on a Chip, Kluwer Academic Publishers, December, 1999.

Martin Walker, Timing Errors Haunt Interconnects, Electronic Engineering Times No. 1021, August 17, 1998.

Martin Walker, Interconnect Analysis Must Move to 3-D, Electronic Engineering Times No. 980, November 10, 1997.

Martin G. Walker, The Guardband Crisis, Electronic Engineering Times No. 929 November 25, 1996 at p. 43.

In addition to the foregoing, I also submitted opinion pieces to Integrated Systems Design (May 1997), Electronic Business (April 1998), and EE Times (June, July, and September 1998).

### **Professional Associations and Achievements**

- 1999 Fortune Magazine "Cool Company" for Frequency Technology.
  - 1984 Electronic Products New Product of the Year award for the Analog Workbench
  - 1976 IEEE Microwave Applications award recognizing contributions to the design of GaAsFET amplifiers.
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