

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

NOKIA CORPORATION,)
))
Plaintiff,)
))
v.)
))
APPLE INC.,)
))
Defendant.)

APPLE INC.,)
))
Counterclaim-Plaintiff,)
))
v.)
))
NOKIA CORPORATION and NOKIA INC.,)
))
Counterclaim-Defendants.)
_____)

CIVIL ACTION NO. 10-CV-249

DECLARATION OF MICHAEL S. BRAASCH

1. My name is Dr. Michael S. Braasch. I have personal knowledge of the information set forth herein, and I could and would competently testify thereto if called as a witness.
2. I have been retained by the law firm of Wilmer Cutler Pickering Hale and Dorr LLP as an expert on behalf of defendant Apple Inc. (“Apple”) in this action for patent infringement brought by Nokia Corporation against Apple.
3. I understand that in this action, Nokia has accused Apple of infringing U.S. Patent No 7,556,696, entitled “Method and Device for Position Determination” (the “’696 patent”). Specifically, I understand that Nokia has accused Apple of infringement of claims 1, 3, 4, 5, 9, 11, 14, 16, 18, 19, 21, 22, 23, and 25 of the ’696 patent.

4. I have worked in the field of GPS technology since 1989, holding various positions such as an engineer, scientist, and director of the Avionics Engineering Center. My industry experience includes working as a consultant for GE/Harris Railway Electronics, GPSof LLC, Honeywell, ITT Industries, LinCom, Navtech Seminars, and Tracking and Imaging Systems, Inc.

5. I hold a Bachelor of Science degree in electrical engineering (1988), a Master of Science degree in electrical engineering (1989) and a Ph. D. degree in electrical engineering (1992). I obtained each of my degrees from Ohio University. I am a licensed Professional Engineer in the State of Ohio, as well as a Senior Member of the Institute of Electrical and Electronics Engineers (IEEE) and a Fellow of the U.S. Institute of Navigation.

6. I have done work with all aspects of GPS technology during my career. As a result, I am familiar with the manner in which GPS devices use both hardware and software to acquire and process GPS satellite signals and calculate position.

7. Based on my experience in the field of GPS technology, my extensive professional background and my professional recognition, I am very familiar with the technology described in the '696 patent.

8. I have reviewed the '696 patent, which was filed on July 2, 2001.

9. I was asked to consider, based on my experience and my review of the '696 patent, whether the phrase "position method selection device" would connote structure to a person skilled in the art. In my opinion, this does not connote structure to a person skilled in the art of the technology of the '696 patent. This is true today and was true as of July 2, 2001.

10. The term "position method selection" simply explains the function of the "device." It does not connote or define its structure.

11. I am not aware of any device, component, or product called a “position method selection device” being used or manufactured.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on the 17th day of December, 2010 in Cincinnati, Ohio

/s/ Michael S. Braasch
Michael S. Braasch, Ph.D., P.E.