

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

NOKIA CORPORATION,

Plaintiff,

v.

APPLE INC.,

Defendant.

Civil Action No. 10-CV-249

JURY TRIAL DEMANDED

APPLE INC.,

Counterclaim-Plaintiff,

v.

NOKIA CORPORATION and NOKIA INC.,

Counterclaim-Defendants.

DECLARATION OF WILLIAM C. SIMPSON

I, William C. Simpson, declare and state as follows:

1. I am an expert in the field of design and development of computer display systems. I hold a B.S. degree in Electrical Engineering from Lehigh University, in Bethlehem, Pennsylvania and an M.S. degree in Electrical Engineering from Rensselaer Polytechnic Institute, in Troy, New York. Additionally, I have 21 post-masters credits in Electrical Engineering from Lehigh University, where, from 1975 to 1977, I taught Electrical Engineering courses as an Instructor. I have developed and taught computer architecture courses at Intel, Unisys, and Texas Instruments. I have 38 years of experience in the design and development of computer systems, including computer display systems. I have been designing computer graphic display hardware and software

since 1984. I have extensive experience with computer graphic software standards including Graphical Kernel System (GKS), PHIGS (Programmer's Hierarchical Interactive Graphics System), the X Window system, OpenGL (Open Graphics Library), Computer Graphics Metafile (CGM), and raster graphics. I have designed PC hardware, including PC video computer display systems, since 1988. I designed computer graphic display hardware and software for Omnicomp Graphics Corp in 1984 and for Ferranti International Controls in 1985 through 1989. I designed computer graphic software for Magnavox in 1987 using the GKS computer graphic software standard. I designed computer graphic display hardware and software for Dupont Graphics Division in 1988. I designed PC computer graphic display hardware and software for Intel in 1987 through 1993. I designed PC hardware and software, including PC video display, Plug-and-Play for PCMCIA, PCI, and ISA, docking stations, and VESA DDC for Compaq (now HP) in 1995 through 1997.

2. I have been retained by Alston & Bird LLP, attorneys for Nokia Corporation and Nokia, Inc. ("Nokia"), to offer my opinions regarding Apple Inc.'s ("Apple") Patent No. 7,380,116 (the "'116 patent"). The matters set forth herein are of my own personal knowledge and if called as a witness I could competently testify thereto.

3. My experience and education are detailed in my resume, attached as Exhibit A.

4. In connection with my preparation of this declaration, I reviewed the '116 patent in its entirety and portions of its file history, and the patents and applications cited therein. I believe that I am an expert regarding the subject matter disclosed therein.

5. In my opinion, a person of ordinary skill in the art at the time would have had a B.S. degree in electrical engineering or computer systems engineering, and five years experience in the field of computer systems engineering, including computer display systems, or equivalent practical experience.

6. The '116 patent is directed to computer display systems, and specifically, changes in the configuration of the display environment. The term "modifying" is a general term and has no specialized meaning in the industry. The term "allocation" is a general term and has no specialized meaning in the industry. The phrase "modifying the allocation of display space," as used in Claim 1 of the '116 patent, was not a term of the art that was used by persons having ordinary skill in the art at the time the patent was filed, and does not have a specialized meaning in the industry.

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

Dated: December 16, 2010

A handwritten signature in cursive script that reads "William C. Simpson".

William C. Simpson