

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LG ELECTRONICS, INC., TOSHIBA CORP.,  
VIZIO, INC., and HULU, LLC  
Petitioner,

v.

STRAIGHT PATH IP GROUP, INC.  
Patent Owner

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Case No. IPR2015-00209  
U.S. Patent No. 6,108,704

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**DECLARATION OF DR. STUART STUBBLEBINE**

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I, Dr. Stuart Stubblebine, being of legal age, hereby declare, affirm, and state the following:

**I. Introduction**

1. The facts set forth below are known to me personally and I have firsthand knowledge of them.

2. I have been retained as an independent expert witness by Straight Path IP Group, Inc. (“Patent Owner”) to make this declaration in support of Patent Owner’s Response to Petition for Inter Partes Review of U.S. Patent No. 6,108,704. I am being compensated for my time at a rate of \$850 per hour. My compensation is not dependent in any way upon the outcome of this *Inter Partes* Review.

**II. Background and Qualifications**

3. I received a Bachelor of Science degree in Computer Science and Mathematics from Vanderbilt University in May 1983. Later that year and into 1984, I completed graduate level courses in Teleprocessing Systems (including computer networks and distributed processing) and Radio Systems Design at the US Army Signal Center. In December 1988, I received a Master of Science degree in Electrical Engineering from the University of Arizona; my area of focus was computer engineering with an emphasis in networking and distributed systems. I received my Doctorate in Electrical Engineering in August 1992 from the

University of Maryland; my area of focus was computer engineering, and my dissertation was on Message Integrity in Cryptographic Protocols. My CV is attached as Exhibit 1.

4. I have been working as an independent consultant since March 2000, specializing in computer and network security evaluations, detailed design and formal analysis, applied research, technical due diligence reviews, and in the provision of expert witness services, particularly in patent litigation. My clients range from domestic start-ups to international Fortune 500 companies, and include American Express, AMD, British Telecom, First Data Corporation, IBM, and Microsoft, as well as the New York City Department of Education and the New York City Police Department.

5. Previously, I worked as a research scientist with Stubblebine Research Labs, LLC, where I conduct research in the areas of security and privacy technology. Some of this research has been funded by the National Science Foundation.

6. Between July 2002 and June 2004, I was a Professional Researcher—a position that was the equivalent of a Full Professor—at the University of California at Davis. I was affiliated with the Computer Science Department and my

research was focused in the areas of security, cryptography, and secure software engineering.

### **III. Materials Considered**

7. In forming the opinions set forth in this report, I have considered and relied upon my education, knowledge of the relevant field, and my experience. I have also reviewed and considered U.S. Patent No. 6,108,704, its prosecution history, and documents produced by both Patent Owner and Petitioner.

Specifically, I have considered the following materials:

- U.S. Patent No. 6,108,704 (the “’704 patent”).
- File history for the ’704 patent.
- Reexamination history for the ’704 patent.
- Microsoft Windows NT Server Version 3.5 TCPIP.HLP.
- Technical Standard: Protocols for X/Open PC Interworking: SMB, Version 2.
- Protocol Standard for a NetBIOS Service on a TCP/UDP Transport: Concept and Methods, RFC 1001 (Mar. 1987).
- Protocol Standard for a NetBIOS Service on a TCP/UDP Transport: Detailed Specifications, RFC 1002 (Mar. 1987).
- U.S. Patent No. 5,533,110 (“Pinard”).

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