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BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARRIS GROUP, INC.
Petitioner

v.

C-CATION TECHNOLOGIES, LLC
Patent Owner

Case: IPR2015-00635

DECLARATION OF STUART LIPOFF IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 5,563,883

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1. Preamble: “In a multiple access communication system comprising a central controller, a shared transmission means for signalling data and user information, and a plurality of remote terminals, a method of allocating signalling data channels between said central controller and said plurality of remote terminals from a plurality of communication channels and of assigning remote terminals . . .” 38

2. Limitation [A]: “establishing communications between said central controller and said plurality of remote terminals via a plurality of signalling data channels, each of said remote terminals being initially assigned to a pair of predetermined signalling data channels” 51

3. Limitation [B]: “monitoring the status of a plurality of signalling data channels in use between said central controller and said plurality of remote terminals for the usability of said signalling data channels” 64

4. Limitation [C]: “determining whether one of said plurality of remote terminals needs to be reassigned to a different signalling data channel other than said predetermined signalling data channel” 69

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6. Limitation [E]: “reassigning by said central controller said remote terminal to a different and suitable signalling data channel for communication henceforward.” 82

7. It would have Been Obvious to Modify MPT 1343 to Provide for the Additional Features and Capabilities Contained in MPT 1327 and MPT 1327..... 86

B. Claim 3 Would Have Been Obvious Over the Combined Teachings of the MPT 1343, MPT 1347, and MPT 1327, and Further In View of the Zudnek Patent and the Dufresne Patent 89

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1. Preamble: “In a multiple access communication system according to claim 1, said step of monitoring the status of a plurality of the signaling data channels in use between said central controller and said plurality of remote terminals for usability of said signaling data channels” 90

2. Limitation [A]: “calculating the aggregate traffic load requirements of said plurality of signalling data channels in use” 90

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3. Limitation [B]: “sensing the status of said predetermined signalling data channel which said terminal has been

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assigned to for failure to determine whether said terminal needs to be reassigned to a different signalling data channel” 110

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