

On behalf of Petitioner

By: Richard F. Giunta
Elisabeth H. Hunt
Randy J. Pritzker
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
Tel: (617) 646-8000
Fax: (617) 646-8646
RGiunta-PTAB@wolfgreenfield.com

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

RPX Corporation

Petitioner

v.

Applications in Internet Time, LLC

Patent Owner

Case IPR2015-01750
Patent 8,484,111 B2

Case IPR2015-01751
Case IPR2015-01752
Patent 7,356,482 B2¹

DECLARATION OF WILLIAM W. CHUANG

¹ The word-for-word identical paper is served in each proceeding identified in the heading.

RPX Exhibit 1019
RPX v. AIT

I, William W. Chuang, declare:

1. I am Vice President of Client Relations at RPX Corporation (“RPX”).

My responsibilities include overseeing interactions with clients and ensuring strong continuing relationships with clients. [REDACTED]

[REDACTED]

2. In addition to my Client Relations responsibilities, I am also involved in RPX initiatives, including RPX’s patent quality initiative, because of my long history with RPX and extensive legal experience. I have worked at RPX since December of 2010 and am generally involved in senior level discussions.

3. I am an attorney with over fifteen years of experience specializing in intellectual property law.

4. Prior to joining RPX, I was a partner at O’Melveny & Myers, an international law firm with hundreds of lawyers, where I specialized in intellectual property law.

5. I am familiar with the reasons why RPX files petitions for *inter partes* review (IPR) in general, and was personally involved in RPX’s decision to file the petitions for *inter partes* review numbered 2015-01750, 2015-01751, and 2015-01752 (“the AIT IPRs”) concerning U.S. Patents Nos. 7,356,482 and 8,484,111 (“the AIT Patents”) owned on their face by Applications in Internet Time, LLC (“AIT”).

I. RPX'S REASONS FOR FILING IPRS IN GENERAL

6. RPX has many reasons for filing IPR petitions.

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] RPX provides insurance against NPE patent infringement lawsuits to clients who purchase insurance policies. (See Attachment A: RPX 10-K, p. 2.) [REDACTED]

[REDACTED]

[REDACTED] Filing after companies are sued in low quality, cost-of-litigation lawsuits often has a minimal impact as defendants find that it is more cost efficient to settle than to bear the costs of litigation during the time it takes to draft and prosecute a successful IPR challenge.

8. [REDACTED]

[REDACTED] RPX's core business is acquiring valuable patent rights and obtaining licenses for its client base. (See Attachment B: RPX website, Services tab.) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11. RPX has a history of success in preventing future lawsuits by filing IPRs against invalid patents. The first IPR petition that RPX ever filed was *RPX Corporation v. Macrosolve, Inc.*, IPR2014-00140. That IPR petition resulted in the owner of a facially invalid patent abandoning the patent and changing from an NPE business model to focus instead on drone technology. The IPR thus prevented the patent owner from pursuing additional lawsuits.

12. Another IPR petition RPX filed before deciding to file against AIT was in *RPX Corporation v. Cedatech Holdings, LLC*, IPR2015-00736. At the time RPX filed the IPR petition against Cedatech, the remaining defendants in the copending litigation had already indicated to the court that they were settling. Nevertheless,

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.