

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.
Petitioner

v.

BLITZSAFE TEXAS, LLC
Patent Owner

IPR2016-00118

Patent No. 8,155,342

Filing Date: June 27, 2006

Issue Date: April 10, 2012

Title: Multimedia Device Integration System

DECLARATION OF PRASANT MOHAPATRA, PH.D.

Table of Contents

I.	QUALIFICATIONS	1
II.	LEVEL OF ORDINARY SKILL AND RELEVANT TIME	4
A.	PROPOSED CLAIM CONSTRUCTION.....	5
1.	“integration subsystem”	5
2.	“multimedia device integration system”	6
B.	GROUND 1: INDEPENDENT CLAIMS 1 AND 49 AND DEPENDENT CLAIMS 2-4 ARE ANTICIPATED BY <i>OHMURA</i>	6
C.	GROUND 2: INDEPENDENT CLAIMS 1 AND 49 AND DEPENDENT CLAIMS 2-4 ARE OBVIOUS OVER <i>OWENS</i> IN VIEW OF <i>AHN</i>	11
D.	GROUND 3: INDEPENDENT CLAIMS 25 AND 73 ARE OBVIOUS OVER <i>OHMURA</i> IN VIEW OF <i>AHN</i>	17
E.	GROUND 4: INDEPENDENT CLAIM 97 AND DEPENDENT CLAIM 5 ARE OBVIOUS OVER <i>OHMURA</i> IN VIEW OF <i>FLICK</i>	18
F.	GROUND 5: INDEPENDENT CLAIM 97 AND DEPENDENT CLAIM 5 ARE OBVIOUS OVER <i>OWENS</i> AND <i>AHN</i> IN VIEW OF <i>FLICK</i>	20
G.	GROUND 6: INDEPENDENT CLAIM 120 AND DEPENDENT CLAIM 6 ARE OBVIOUS OVER <i>OHMURA</i> IN VIEW OF <i>TRANCHINA</i>	20
H.	GROUND 7: INDEPENDENT CLAIM 120 AND DEPENDENT CLAIM 6 ARE OBVIOUS OVER <i>OWENS</i> AND <i>AHN</i> IN VIEW OF <i>TRANCHINA</i>	22
I.	GROUND 8: DEPENDENT CLAIMS 7-10 ARE OBVIOUS OVER <i>OHMURA</i> IN VIEW OF <i>COON</i>	22

J.	GROUND 9: DEPENDENT CLAIMS 7-10 ARE OBVIOUS OVER <i>OWENS</i> AND <i>AHN</i> IN VIEW OF <i>COON</i>	24
K.	GROUND 10: DEPENDENT CLAIM 11 IS OBVIOUS OVER <i>OHMURA</i> IN VIEW OF <i>LUTTER</i>	24
L.	GROUND 11: DEPENDENT CLAIM 11 IS OBVIOUS OVER <i>OWENS</i> AND <i>AHN</i> IN VIEW OF <i>LUTTER</i>	25
M.	GROUND 12: DEPENDENT CLAIMS 12-18, 20-21 AND 23-24 ARE OBVIOUS OVER <i>OHMURA</i> IN VIEW OF <i>MCCONNELL</i>	26
N.	GROUND 13: DEPENDENT CLAIMS 12-18, 20-21 AND 23-24 ARE OBVIOUS OVER <i>OWENS</i> AND <i>AHN</i> IN VIEW OF <i>MCCONNELL</i>	27
O.	GROUND 14: DEPENDENT CLAIM 19 IS OBVIOUS OVER <i>OHMURA</i> IN VIEW OF <i>BECKERT</i>	29
P.	GROUND 15: DEPENDENT CLAIM 19 IS OBVIOUS OVER <i>OWENS</i> AND <i>AHN</i>	29
Q.	GROUND 16: DEPENDENT CLAIM 22 IS OBVIOUS OVER <i>OHMURA</i> IN VIEW OF <i>MCCONNELL</i> AND FURTHER IN VIEW OF <i>TRANCHINA</i>	30
R.	GROUND 17: DEPENDENT CLAIM 22 IS OBVIOUS OVER <i>OWENS</i> AND <i>AHN</i> IN VIEW OF <i>MCCONNELL</i> AND FURTHER IN VIEW OF <i>TRANCHINA</i>	30
S.	GROUND 18: INDEPENDENT CLAIM 121 IS OBVIOUS OVER <i>OHMURA</i> IN VIEW OF <i>EICHE</i>	30
T.	GROUND 19: INDEPENDENT CLAIM 121 IS OBVIOUS OVER <i>OWENS</i> AND <i>AHN</i> IN VIEW OF <i>EICHE</i>	32
III.	CONCLUDING STATEMENT	72
IV.	APPENDIX – TABLE OF INFORMATION RELIED UPON	73

I, Prasant Mohapatra, declare as follows:

I. QUALIFICATIONS

1. My name is Prasant Mohapatra. My findings as set forth herein, are based on my education and background in the fields discussed below.

2. I have been retained on behalf of Kilpatrick Townsend & Stockton LLP to provide this Declaration concerning technical subject matter relevant to the inter partes review petition (“Petition”) concerning Blitzsafe U.S. Pat. 8,155,342. I reserve the right to supplement this Declaration in response to additional evidence that may come to light.

3. I am over 18 years of age. I have personal knowledge of the facts stated in this Declaration and could testify competently to them if asked to do so.

4. As indicated in my curriculum vitae, I currently serve as a Professor of the Computer Science Department at the University of California (“UC Davis”) in Davis, California. I previously chaired the Computer Science Department at UC Davis from 2007 to 2013, and then served as the Interim Vice-Provost and the Campus CIO during 2013-14. I have been teaching Computer Science at UC Davis since 2001. Currently, I also service as an Associate Chancellor at UC Davis. Prior to joining UC Davis, I was an Associate Professor in the Computer Science & Engineering Department at Michigan State University from 1999 to 2001. Prior to my position at Michigan State, I was an Associate Professor in the Electrical and Computer Engineering Department at Iowa State University from 1993-1998. I have taught undergraduate and graduate courses in the computer science and engineering disciplines for more than twenty five years.

5. I have held Visiting Scientist positions at Intel Corporation, Panasonic Technologies, Institute of Infocomm Research (I2R), Singapore, and National ICT Australia (NICTA). I have also been a Visiting Professor at the University of Padova, Italy and Yonsei University, and KAIST, South Korea.

6. I received my Ph.D. in Computer Engineering from Penn State University in 1993. I also received a M.S. from the University of Rhode Island in 1989 and a B.S. from the National Institute of Technology located in Rourkela, India in 1987.

7. I am a fellow of the American Association for the Advancement of Science (AAAS) and the Institution of Electrical and Electronics Engineers (IEEE).

8. As further detailed in my CV, I have been awarded more than \$40,000,000 in grant and contract awards, many of which I have been named as the Principal Investigator or Co-Principal Investigator.

9. I have authored several books and book chapters, including books and book chapters regarding various network technologies and protocols.

10. I have authored or co-authored more than 300 journal and conference papers regarding topics related to the computer science and electrical engineering disciplines.

11. I have received numerous awards for my work, including the HP Labs Innovation Award in 2011, 2012, and 2013; Best Paper Awards from IFIP Networking (2014), ACM BodyNets (2013), IEE ICCCN (2013), the International Symposium on Wireless Personal Multimedia Communications (2011), and IEEE

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.