IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

DECLARATION BY PETER RYSAVY FOR INTER PARTES REVIEW OF UNITED STATES PATENT NOS. 8,135,342 AND 8,879,987

Dated: April 30, 2016

RPX Corp. Exhibit 1008



Table of Contents

I. I	NTRODUCTION	5
A.	EDUCATIONAL AND PROFESSIONAL BACKGROUND	5
	MATERIALS CONSIDERED.	
II. T	THE '342 AND '987 PATENTS	9
A.	THE TECHNOLOGY OF THE '342 AND '987 PATENTS	9
В.	THE PATENTS' TECHNOLOGY RELATES TO ATTACHING PERIPHERALS TO	
Col	MPUTING DEVICES, WHICH WAS OLD TECHNOLOGY	12
	WIRED VERSUS WIRELESS CONNECTIONS	
D.	PERSON OF ORDINARY SKILL IN THE ART ("POSITA")	16
E.	EXEMPLARY CLAIM OF THE '342 PATENT	
F.	EXEMPLARY CLAIM OF THE '987 PATENT	19
G.	MEANING OF DIFFERENT CLAIM TERMS	20
H.	SIMILARITY OF CLAIMS AND CLAIM TERMS	24
III.	THE TEE, ACHARYA, AND BENCO PRIOR ART	34
A.	Tee	
В.	ACHARYA	
C.	BENCO	38
IV.	THE '342 CLAIM ELEMENTS, AND SPECIFIC TEACHINGS OF	
	ACHARYA AND BENCO	40
•		
	SPECIFIC DISCLOSURES OF TEE, AND COMBINING TEE WITH ACHARYA AND	
	NCO	
a.	<i>y</i>	
b.	. , , , , , , , , , , , , , , , , , , ,	
С.		
d		
e.		
f.	Computer Monitor and Display Screen (1.6)	
g.		
h.	(/	
i. :		
j. k.		
k. l.		
ı. m		
111	U. 1101700 L/V (UU) 1/1	



n.	Control External Display Through the External Keyboard (10)	53
0.	(0.0.0)	
p.	Communication network (20.4)	55
q.	Employ, At User Control (20.5)	55
r.	"Part of a separate system" versus "is connected to a separate syste	2m"
(2	20.6)	
S.	Means for receiving and means for employing a wireless	
co	ommunication (21.1, 21.2)	56
t.	Multiple Users (29-31, 45)	57
и.	Display Screen and Speaker System (55)	60
V. T	HE SOIN AND WANG PRIOR ART	61
Δ	Soin	61
	WANG	
	THE '342 CLAIM ELEMENTS, AND SPECIFIC TEACHINGS (
SOIN	AND WANG	76
A.	· · · · · · · · · · · · · · · · · · ·	
a.	User Information and Communications Network (1.2)	77
b.	(/	
\mathcal{C} .		
d.		
e.	1 2 /	
f.	Input Responsive to Output from Display Screen and Interactive and	
Ti	ime Communications (1.7, 1.8)	
g.		
h.		
i.	Personal and Third-Party Equipment (5, 6)	
j.	Peripheral Device Comprises an Input Device (9)	
k.		
l.	Control By Wireless Input Device (10)	
m	\ /	92
n.	1	
0.		94
p.		_
	ommunication (21.1, 21.2)	
q.	· · · · · · · · · · · · · · · · · · ·	
r.	Multiple Users (29, 45)	
C	Speakers as Part of Display (55)	97



RYSAVY DECLARATION

	THE '987 CLAIM ELEMENTS, AND SPECIFIC TEAC AND WANG	
A. 3	SOIN AND WANG	98
a.	Connector (20.2)	
b.	Memory (20.3)	
c.	<i>Transmitter</i> (20.4)	100
d.	Interconnect (20.7)	101
e.	<i>Information is Employed</i> (20.8)	102
f.	Control of User (21.2)	102
g.	Hub Device (24.2)	102
h.	Simultaneous Control (25)	104
i.	Cell Phones (27)	106
j.	Computer Server (28)	107
k.	Control of Operation (29)	108
l.	Uniquely Associates (31, 39, 47)	109
	THE '987 CLAIM ELEMENTS, AND SPECIFIC TEACH	
a.	Memory (20.3)	110
b.	Interconnect (20.7)	
<i>c</i> .	Control of User (21.2)	
d.	Computer Server and Connectivity Options (28)	111
e.	Control of Operation (29)	
f.	Uniquely Associates (31, 39, 47)	
g.	Simultaneous Control (25)	



I. <u>INTRODUCTION</u>

- 1. I have been retained as a technical expert by counsel on behalf of RPX Corporation, to opine on U.S. Patent Nos. 8,135,342 and 8,879,987 ("342 patent" and "987 patent," respectively) and related technologies, in association with proceedings before the United States Patent and Trademark Office ("USPTO").
- 2. I reserve the right to modify or supplement my opinions, as well as the basis for my opinions, based on the nature and content of the documentation, data, proof and other evidence or testimony that Sockeye Licensing TX LLC or Wildcat Licensing LLC or its experts may present, or based on any additional information provided to me or found by me in this matter.

A. Educational and Professional Background

- 3. I graduated with BSEE and MSEE degrees from Stanford University in 1979.
- 4. From 1988 to 1993, I was vice president of engineering and technology at Traveling Software (later renamed LapLink), at which projects included LapLink, LapLink Wireless, and connectivity solutions for a wide variety of mobile platforms. During this period, I was responsible for evaluating wireless technologies for use with the LapLink file transfer and synchronization product family. I also managed the development of a short-range wireless modem called



RYSAVY DECLARATION

DOCKET

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.

