UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

YMAX CORPORATION,
Petitioner

v.

FOCAL IP, LLC,
Patent Owner

Inter Partes Review No.: Unassigned

U.S. Patent No. 8,155,298

**DECLARATION OF TAL LAVIAN, PH.D.
IN SUPPORT OF THE PETITION FOR
INTER PARTIES REVIEW OF PATENT NO. 8,155,298**

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A. “web enabled” 28

B. "processing system" 29

C. “Controller” 30

D. “switching facility” / “switching facilities” 32

E. “a network comprising edge switches for routing calls from and to users within a local geographic area and switching facilities for routing calls to other edge switches or other switching facilities local or in other geographic areas” (claim 1) / “the second network is coupled to a switching facility of a network comprising edge switches for routing calls from and to users within a local geographic area and switching facilities for routing calls to other edge switches or other switching facilities local or in other geographic areas” (claim 20) 37

F. "coupled to" 39

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2. Claim 1 47

3. Claim 20 62

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1. Claim 1 71

D. Ground 3: Claim 20 is Obvious over O'Neal in view of Chang 74

1. Claim 20 74

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Declaration of Tal Lavian, Ph.D.

I, Tal Lavian, declare as follows:

1. I make this declaration based upon my own personal knowledge and, if called upon to testify, would testify competently to the matters contained herein.

2. I have been asked to provide technical assistance in connection with inter partes review of U.S. Patent No. 8,155,298 ("the '298 Patent").

3. This declaration is a statement of my opinions on issues related to the invalidity of claims 1 and 20 of the '298 Patent.

I. Background and Qualifications

4. My qualifications are stated more fully in my curriculum vitae. Ex. 1016. Here I provide a brief summary of my qualifications.

5. I have more than 25 years of experience in the networking, telecommunications, Internet, and software fields. I received a Ph.D. in Computer Science from the University of California at Berkeley in 2006 and obtained a Master's of Science ("M.Sc.") degree in Electrical Engineering from Tel Aviv University, Israel, in 1996. In 1987, I obtained a Bachelor of Science ("B.Sc.") in Mathematics and Computer Science, also from Tel Aviv University.

6. I am currently employed by the University of California at Berkeley and was appointed as a lecturer and Industry Fellow in the Center of

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