

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, LLC,

Petitioner,

v.

UNILOC USA, INC. AND UNILOC LUXEMBOURG S.A.,
Patent Owner.

Case IPR2017-00225

U.S. Patent 8,995,433

DECLARATION OF WILLIAM C EASTTOM II

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	BACKGROUND AND QUALIFICATIONS	2
III.	LEGAL STANDARDS USED IN MY ANALYSIS.....	2
	A. Obviousness	3
	B. Priority Date	4
	C. Person of Ordinary Skill in the Art	4
	D. Broadest Reasonable Interpretation	6
IV.	OVERVIEW OF THE '433 PATENT	6
V.	CLAIM CONSTRUCTION	10
	A. “instant voice messaging application”	10
VI.	VALIDITY ANALYSIS.....	15
	A. No obviousness for “the instant voice messaging application includes a compression/decompression system for compressing the instant voice messages to be transmitted over the packet-switched network and decompressing the instant voice messages received over the packet-switched network” (independent Claim 6).....	15
	1. Ground 3 (based on Logan).....	16
	2. Ground 4 (based on Väänänen).....	17
	B. No obviousness for “the instant voice messaging application includes a message database storing the instant voice message” (Independent Claim 1 and dependent Claims 2-5 and 8)	19
	1. Grounds 1-3 (based on Abburi).....	20
	2. Grounds 4 and 5 (based on Väänänen).....	27

C. No obviousness for “wherein the instant voice messaging application includes a file manager system performing at least one of storing, deleting and retrieving [a/the] instant voice messages from a message database in response to a user request” (all challenged Claims 1–6 and 8) 27

 1. Grounds 1 through 3 (based on Abburi) 28

 2. Grounds 4 and 5 (based on Väänänen) 30

VII. CONCLUSION 30

I, Chuck Easttom, hereby declare as follows:

I. INTRODUCTION

1. My name is William Charles Easttom II (Chuck Easttom) and I have been retained by Uniloc, USA, Inc., and Uniloc Luxembourg S.A. (“Uniloc” or the “Patent Owner”) to provide my expert opinions regarding U.S. Patent No. 8,995,433 (the “’433 patent”). In particular, I have been asked to opine on whether claims 1-6 and 8 (the “challenged claims”) of the ’433 patent would have been obvious to a person of ordinary skill in the art (POSA) at the time the inventions described in the ’433 patent were conceived. Based on my review of the prior art then available, my understanding of the relevant of the relevant requirements of patent law, and my decades of experience in the field of computer science including communications systems, it is my opinion that the challenged claims would not have been obvious in light of the references cited in the Petition. I note that in addition to the Petition and its accompanying exhibits, in formulating my opinions I further considered the Deposition Transcript of Dr. Leonard Forys (filed as Ex. 2002).

2. I am being compensated for my time at my standard consulting rate of \$300 per hour. I am also being reimbursed for expenses that I incur during the course of this work. Apart from that, I have no financial interest in

Uniloc. My compensation is not contingent upon the results of my study or the substance of my opinions.

II. BACKGROUND AND QUALIFICATIONS

3. In my 25 years of computer industry experience I have had extensive experience in communications systems, including data networks in general that have messaging capabilities. I hold 40 industry certifications, which include (among others) extensive certifications in server-based communication systems. I have authored 20 computer science books, several of which deal with communications topics including messaging. I also am named inventor on seven patents.

4. A more detailed description of my professional qualifications, including a list of publications, teaching, and professional activities, is contained in my curriculum vitae, a copy of which is attached hereto as Appendix A.

III. LEGAL STANDARDS USED IN MY ANALYSIS

5. Although I am not an attorney and I do not offer any legal opinions in this proceeding, I have been informed of and relied on certain legal principles in reaching the opinions set forth in this Declaration.

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