IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

United States Patent No.: 5,915,210	§	Attorney Docket No.:
Inventors: Dennis Wayne Cameron, et al.	§	109109-0017-652
Formerly Application No.: 08/899,476	§	Customer No. 28120
Issue Date: Jun. 22, 1999	§	
Filing Date: Jul. 24, 1997	§	Petitioners: Aruba Networks,
Former Group Art Unit: 2649	§	Inc.; Hewlett Packard
Former Examiner: Thanh Cong Le	§	Enterprise Co.; HP Inc.; ARRIS
	§	Group, Inc.; Juniper Networks,
	§	Inc.; Brocade Communications
	§	Systems, Inc.; Ruckus Wireless,
	§	Inc.

For: METHOD AND SYSTEM FOR PROVIDING MULTICARRIER SIMULCAST TRANSMISSION

MAIL STOP PATENT BOARD
Patent Trial and Appeal Board
United States Patent and Trademark Office
Post Office Box 1450
Alexandria, Virginia 22313-1450

DECLARATION OF ANTHONY ACAMPORA, Ph.D. IN SUPPORT OF THE PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT NO. 5,915,210

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF CONTENTS

I. INTRODUCTION 1

II. BACKGROUND AND QUALIFICATIONS 1

III. LEVEL OF ORDINARY SKILL IN THE ART 7

IV. MATERIALS RELIED UPON 10

V. ANALYSIS OF THE '210 PATENT 10

A. Overview of the '210 Patent 10
B. Overview of the '210 Patent Prosecution History 16
C. Claim Construction of the '210 Patent Claims 18

VI. BACKGROUND ON THE STATE OF THE ART 20

VII. THE CHALLENGED CLAIMS ARE INVALID 33

A. Legal Standards 33
B. Claims 1, 7-8, 10, 15-17, and 19 Are Obvious Over Rault in view of the knowledge of a POSA (Ground 1); Claims 7, 8, 15, and 19 Are Obvious Over Rault in view of Mojoli (Ground 2) 37
1. Overview of Rault 38
2. Overview of Mojoli 42
3. Motivation to Combine Rault with Mojoli 44
4. Claim 1 45
5. Claim 7 54
6. Claim 8 58
7. Claim 10 61
8. Claim 15 64
9. Claim 16 65
10. Claim 17 65
11. Claim 19 66

C. Claims 1, 7-8, 10, 15-17, and 19 Are Obvious Over Nakamura in view of Saalfrank (Ground 3) 76
1. Overview of Nakamura 76
2. Overview of Saalfrank 80
3. Motivation to combine Nakamura with Saalfrank 81
4. Claim 1 82
5. Claim 7 90
6. Claim 8 93
7. Claim 10 94

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

8. Claim 15 98
9. Claim 16 98
10. Claim 17 99
11. Claim 19 100
D. SECONDARY CONSIDERATIONS 105

VIII. CONCLUSION 106

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

I. INTRODUCTION

1. I have been retained on behalf of Petitioners and real parties in interest, Aruba Networks, Inc., Hewlett Packard Enterprise Company, HP Inc., ARRIS Group, Inc., Juniper Networks, Inc., Brocade Communications Systems, Inc., and Ruckus Wireless, Inc. to offer statements and opinions generally regarding the invalidity, novelty, application of prior art, obviousness considerations, and understanding of a person of ordinary skill in the art ("POSA") in the industry as it relates to U.S. Patent No. 5,915,210 ("the '210 Patent"). Attached hereto as Appendix A is a true and correct copy of my Curriculum Vitae describing my background and experience in the field of telecommunications.

2. I have personal knowledge of the facts and opinions set forth in this declaration, and believe them to be true. If called upon to do so, I would testify competently thereto. I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both.

II. BACKGROUND AND QUALIFICATIONS

3. I received my Bachelor of Science, Master of Science, and Doctor of Philosophy degrees, all in Electrical Engineering, from the Polytechnic Institute of Brooklyn in 1968, 1970, and 1973, respectively. Both my master's thesis and my Ph.D. dissertation involved theoretical aspects of electromagnetic wave propagation in plasma and gaseous media. From June 1968 through September 1988, I

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

was employed at AT&T Bell Laboratories in various engineering, research, and managerial positions, all in the general area of telecommunications.

4. My initial work at Bell Laboratories (1968-1974) involved high power radar design and development, and signal design and processing for extraction of pertinent information from radar target returns, both focused on anti-ballistic missile defense applications. A modern radar system operates by transmitting carefully designed radio signals toward a target, and processing the reflected radio signals arriving back at the radar, to determine target location, velocity, and key features. For ballistic missile defense applications, it is also important to distinguish real warheads from decoys.

5. My next assignment at Bell Laboratories (1974-1981) was in the Radio Research Laboratory, an organization responsible for basic research, where I was involved in new discovery and proposals involving novel approaches for communication satellite systems. Communication satellites are radio systems, often worldwide in scope, intended to enable wireless communications among terrestrial users from a platform of one or more Earth-orbiting satellites. My contributions to the communication satellite state-of-the-art included (1) strategies to efficiently encode and recover digital information sent to and from the satellites via high capacity radio beams; (2) novel systems and on-board satellite switching approaches that use multiple radio beams (so-called spot beams), each focused on a small portion of

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

DOCKET ALARM

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.