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Filed on behalf of Unified Patents Inc.
By: David L. Cavanaugh, Reg. No. 36,476
Daniel V. Williams, Reg. No. 45,221
Wilmer Cutler Pickering Hale and Dorr LLP
1875 Pennsylvania Ave., NW
Washington, DC 20006
Tel: (202) 663-6000
Email: David.Cavanaugh@wilmerhale.com
Email: Daniel.Williams@wilmerhale.com

Roshan Mansignhani, Reg. No. 62,429
Jonathan Stroud, Reg. No. 72,518
Unified Patents Inc.
1875 Connecticut Ave. NW, Floor 10
Washington, DC, 20009
Tel: (202) 805-8931
Email: Jonathan@unifiedpatents.com
Email: Roshan@unifiedpatents.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.
Petitioner

v.

PLECTRUM LLC
Patent Owner

IPR2017-01430
Patent 5,978,951

DECLARATION OF DR. SRINIVASAN SESHAN

US PATENT 5,978,951 – CLAIMS 1-6, 8, 11-14, AND 21-24

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TABLE OF CONTENTS

Page

I. INTRODUCTION 1

II. QUALIFICATIONS 3

III. TECHNOLOGY BACKGROUND 8

IV. OVERVIEW OF THE '951 PATENT 14

A. Summary of the Alleged Invention 14
B. Level of Ordinary Skill in the Art 20
C. Prosecution History 20
D. Level of Ordinary Skill in the Art 23
E. Understanding of the Law 23

V. CLAIM CONSTRUCTION 26

A. "code generator," (claim 1), "coded address," (claim 1), and "encoding" (claim 2) 26

VI. SUMMARY OF OPINIONS 28

A. Ground I: Claims 1, 2, and 21 are rendered obvious by *Cheriton* in view of ordinary skill in the art 28

1. Overview of Cheriton 28
2. Claim 1 is obvious in view of *Cheriton* and ordinary skill 31
3. Claim 2 is obvious in view of *Cheriton* 44
4. Claim 21 is obvious in view of *Cheriton* 52

B. Ground II: Claims 3, 5, and 6 are rendered obvious by Cheriton in view of Kessler 61

1. Overview of *Kessler* 61
2. Claim 3 is obvious in view of *Cheriton* and *Kessler* 62
3. Claim 5 is obvious in view of *Cheriton* and *Kessler* 64
4. Claim 6 is obvious in view of *Cheriton* and *Kessler* 66

C. Ground III: Claims 4, 22, 23, and 24 are rendered obvious by Cheriton in view of Kessler in view of Jain 67

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1. Overview of *Jain* 67
2. Claim 4 is obvious in view of *Cheriton, Kessler,* and *Jain* 68
3. Claim 22 is obvious in view of *Cheriton* and *Jain* 69
4. Claim 23 is obvious over *Cheriton* and *Jain* 70
5. Claim 24 is obvious over *Cheriton*, *Kessler*, and *Jain* 71

D. Ground IV: Claims 8 and 11-14 are rendered obvious by Cheriton in view of Jain 72

1. Claim 8 is obvious in view of *Cheriton* and *Jain* 72
2. Claim 11 is obvious in view of *Cheriton* and *Jain* 80
3. Claim 12 is obvious in view of *Cheriton* and *Jain* 81
4. Claim 13 is obvious in view of *Cheriton* and *Jain* 82
5. Claim 14 is obvious in view of *Cheriton* and *Jain* 82

VII. AVAILABILITY FOR CROSS-EXAMINATION 83

VIII. RIGHT TO SUPPLEMENT 84

IX. JURAT 84

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I, Srinivasan Seshan, declare as follows:

I. INTRODUCTION

1. I have been retained by Unified Patents Inc. ("Unified" or "Petitioner") as an independent expert consultant in this proceeding before the United States Patent and Trademark Office.

2. I understand that this proceeding involves US Patent No. 5,978,951 to Christopher P. Lawler et al. (the "'951 patent"), (attached as EX1001 to Unified's petition). I have reviewed the specification, file history and claims of the '951 patent.

3. I understand that the application for the '951 patent was filed on September 11, 1997. I also understand that the '951 patent is currently assigned to Plectrum LLC.

4. I have been asked to consider whether certain references disclose or suggest the features recited in the claims of the '951 patent.

5. I have also been asked to consider the state of the art and the prior art available as of September 11, 1997. In particular, I have been asked to consider the network related aspects in the '951 patent and compare those to the prior art available as of September 11, 1997. My opinions are provided below.

6. I have reviewed and understand US Patent 6,091,725 ("Cheriton") (EX1002).

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7. I have reviewed and understand European Patent Application No. EP0522743A1 ("Jain") (EX1003).

8. I have reviewed and understand Kessler et al., "Inexpensive Implementations of Set-Associativity", 17:3 ACM SIGARCH Computer Architecture News – Special Issue: Proceedings of the 16th annual international symposium on Computer Architecture 131 ("Kessler") (EX1004).

9. I have reviewed every document cited in this declaration.

10. I have been retained by Petitioner Unified Patents Inc. as an expert in networks, and more particularly, network switching and routing devices.

11. I am being compensated at my normal consulting rate for my work. My compensation is not dependent on and in no way affects the substance of my statements in this declaration.

12. To the best of my knowledge, I have no financial interest in Petitioner. Petitioner's counsel has informed me that Plectrum LLC ("Plectrum") purports to own the '951 patent. To the best of my knowledge, I have no financial interest in Plectrum, and I have had no contact with Plectrum. To the best of my knowledge, I similarly have no financial interest in the '951 patent. To the extent any mutual funds or other investments I own have a financial interest in the Petitioner, Unified Patents Inc., or the '951 patent, I do not knowingly have any financial interest that would affect or bias my judgment.

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