

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

SAMSUNG ELECTRONICS AMERICA, INC.  
Petitioner

v.

UNILOC LUXEMBOURG, S.A.  
Patent Owner

---

Patent No. 8,724,622

---

**DECLARATION OF DR. ZYGMUNT J. HAAS**

**TABLE OF CONTENTS**

I.	INTRODUCTION .....	1
II.	QUALIFICATIONS .....	1
III.	SUMMARY OF OPINIONS.....	5
IV.	PERSON OF ORDINARY SKILL IN THE ART .....	8
V.	TECHNOLOGICAL BACKGROUND .....	9
A.	Instant Messaging.....	10
1.	General Background .....	10
2.	History.....	12
B.	Voice over IP (“VoIP”).....	15
1.	Communication Protocols Background.....	15
2.	VoIP Background.....	18
3.	History.....	19
C.	The IEEE 802.11 Standard.....	20
VI.	OVERVIEW OF THE ’622 PATENT .....	22
VII.	CLAIM CONSTRUCTION .....	27
VIII.	OVERVIEW OF THE PRIOR ART .....	27
A.	U.S. Patent No. 8,150,922 (“ <i>Griffin</i> ”) (Ex. 1005) .....	27
B.	International Patent Application No. WO 01/11824A2 (“ <i>Zydney</i> ”) (Ex. 1006).....	34
C.	U.S. Patent No. 6,725,228 (“ <i>Clark</i> ”) (Ex. 1007) .....	38
D.	U.S. Patent No. 6,301,609 (“ <i>Aravamudan</i> ”) (Ex. 1009).....	40

Declaration of Dr. Zygmunt J. Haas  
*Inter Partes* Review of U.S. Patent No. 8,724,622

E.	International Patent Application No. WO 02/17650A1 (“ <i>Vaananen</i> ”) (Ex. 1008) .....	42
F.	U.S. Patent Application Publication No. 2003/0018726A1 (“ <i>Low</i> ”) (Ex. 1010).....	43
G.	U.S. Patent Application Publication No. 2002/0146097A1 (“ <i>Vuori</i> ”) (Ex. 1015).....	45
IX.	THE PRIOR ART DISCLOSES ALL OF THE FEATURES OF THE CHALLENGED CLAIMS OF THE ’622 PATENT .....	46
A.	The Combination of <i>Griffin</i> and <i>Zydney</i> Discloses Every Feature of Claims 3, 4, 6-8, 10, 11, 13, 18, 21-23, 27, 32, 34, 35, 38, and 39 .....	46
1.	Claim 3 .....	46
2.	Claim 4 .....	81
3.	Claim 6 .....	86
4.	Claim 7 .....	90
5.	Claim 8 .....	97
6.	Claim 10 .....	101
7.	Claim 11 .....	107
8.	Claim 13 .....	117
9.	Claim 18 .....	121
10.	Claim 21 .....	124
11.	Claim 22 .....	125
12.	Claim 23 .....	128
13.	Claim 27 .....	129
14.	Claim 32 .....	138

Declaration of Dr. Zygmunt J. Haas  
*Inter Partes* Review of U.S. Patent No. 8,724,622

15.	Claim 34 .....	138
16.	Claim 35 .....	142
17.	Claim 38 .....	142
18.	Claim 39 .....	144
B.	The Combination of <i>Griffin, Zydney, and Aravamudan</i> Discloses Every Feature of Claim 12 .....	144
1.	Claim 12 .....	144
C.	The Combination of <i>Griffin, Zydney, and Clark</i> Discloses Every Feature of Claims 14-17, and 28-31 .....	151
1.	Claim 14 .....	151
2.	Claim 15 .....	158
3.	Claim 16 .....	159
4.	Claim 17 .....	162
5.	Claim 28 .....	167
6.	Claim 29 .....	167
7.	Claim 30 .....	167
8.	Claim 31 .....	168
D.	The Combination of <i>Griffin, Zydney, and Vaananen</i> Discloses Every Feature of Claims 19 and 33 .....	168
1.	Claim 19 .....	168
2.	Claim 33 .....	173
E.	The Combination of <i>Griffin, Zydney, and Low</i> Discloses Every Feature of Claims 24-26 .....	173
1.	Claim 24 .....	173

Declaration of Dr. Zygmunt J. Haas  
*Inter Partes* Review of U.S. Patent No. 8,724,622

2.	Claim 25 .....	181
3.	Claim 26 .....	183
F.	The Combination of <i>Griffin</i> , <i>Zydney</i> , and <i>Vuori</i> Discloses Every Feature of Claim 11 .....	188
1.	Claim 11 .....	188
X.	CONCLUSION.....	192

# 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.