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.

Case IPR2017-01797
United States Patent No. 8,724,622

DECLARATION OF WILLIAM C. EASTTOM II

Samsung v. Uniloc, IPR2017-1797
Uniloc's Exhibit 2001

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I, Chuck Easttom, hereby declare as follows:

I. INTRODUCTION

1. My name is William Charles Easttom II ("Chuck Easttom"). Uniloc Luxembourg S.A. ("Uniloc" or the "Patent Owner") retained me to provide my expert opinions regarding United States Patent No. 8,724,622 ("the '622 Patent").

2. From 2003 to 2013, I taught professional development courses to IT professionals in programming (C, Java, C++, and C#), web development (HTML, JavaScript, CSS, and .net), networking, and network security at Collin College, McKinney, TX. From 2000 to 2003, I was Department Chair for Computer Information Systems at Remington College, in _____. I have been a software engineer at Alegis Corporation Systems Group and a programmer at Boeing Aerospace Operations.

3. The Patent Owner asked me to study Claims 3, 4, 6–8, 10–13, 18, 21–23, 27, 32, 34, 35, 38, and 39 (the "challenged claims") of the '622 Patent ("EX1001") to determine whether a person having ordinary skill in the technical art most pertinent to the art of the challenged claims at the priority date of the '622 Patent (hereafter a "PHOSITA") would have considered those claim obvious in light of the asserted references considered as a whole.

4. I reviewed the ’622 Patent, its prosecution file wrapper, the state of the art at the time the application was filed, the references asserted by Samsung, Samsung’s Petition IPR2017-1797 (“Petition”), the Declaration of Dr. Haas (EX1002) in support of the Petition, the references relied upon in the Petition (including *Zydney*, *Griffin*, *Aravamudan*, and *Vuori*) and my own Declarations from IPR2017-01667 and IPR2017-01668 in support of the Patent Owner. IPR2017-01667 and IPR2017-01668 also involved a challenge to the ’622 Patent based on *Zydney*. I also determined the scope and content of the prior art, ascertained the differences between the challenged claims and the prior art, and determined the level of ordinary skill in the art most pertinent to the claimed technology. All the opinions I express here are my own.

5. Based on the above, and my familiarity with those having ordinary skill in the art at the time the application was filed, and my decades of experience in the field of computer science including communications systems, I concluded that challenged the challenged claims would not have been obvious in light of the arguments and references relied upon in the Petition.

6. The Patent Owner compensates me at my standard consulting rate of $300 per hour. Patent Owner also reimburses my reasonable expenses necessary to this work. I have no financial interest in Patent Owner, and my

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

II. MY BACKGROUND AND QUALIFICATIONS

7. I have worked in the computer industry for over 25 years. During that time I have had extensive experience with network communications systems. I hold 42 industry certifications, which include certifications in network communications. I have authored 24 computer science books, several of those deal with network communications topics. I am a named inventor on thirteen United States patents:

- ✓ United States Patent No. 9,755,887, entitled "Managing a Network Element Operating on a Network", issued Sep. 5, 2017, assigned to Open Invention Network LLC.
- ✓ United States Patent No. 9,754,108, entitled "Method and Apparatus of Performing Data Executable Integrity Verification", issued Sep. 5, 2017, assigned to Open Invention Network LLC.
- ✓ United States Patent No. 9,753,957, entitled "System and Method for Document Tracking", issued Sep. 5, 2017, assigned to Open Invention Network LLC.

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