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

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

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 ("*Griffin*") (Ex. 1005) 27

B. International Patent Application No. WO 01/11824A2 ("*Zydney*") (Ex. 1006) 34

C. U.S. Patent No. 6,725,228 ("*Clark*") (Ex. 1007) 38

D. U.S. Patent No. 6,301,609 ("*Aravamudan*") (Ex. 1009) 40

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

E. International Patent Application No. WO 02/17650A1 ("*Vaananen*") (Ex. 1008) 42

F. U.S. Patent Application Publication No. 2003/0018726A1 ("*Low*") (Ex. 1010).....43

G. U.S. Patent Application Publication No. 2002/0146097A1 ("*Vuori*") (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 *Griffin* and *Zydney* 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

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

15. Claim 34 138

16. Claim 35 142

17. Claim 38 142

18. Claim 39 144

B. The Combination of *Griffin*, *Zydney*, and *Aravamudan* Discloses Every Feature of Claim 12 144

1. Claim 12 144

C. The Combination of *Griffin*, *Zydney*, and *Clark* 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 *Griffin*, *Zydney*, and *Vaananen* Discloses Every Feature of Claims 19 and 33 168

1. Claim 19 168

2. Claim 33 173

E. The Combination of *Griffin*, *Zydney*, and *Low* Discloses Every Feature of Claims 24-26 173

1. Claim 24 173

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

2. Claim 25 181

3. Claim 26 183

F. The Combination of *Griffin*, *Zydney*, and *Vuori* Discloses Every Feature of Claim 11 188

1. Claim 11 188

X. CONCLUSION 192

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.