

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. 8,199,747

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.....	9
1.	General Background	9
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 ’747 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
IX.	THE PRIOR ART DISCLOSES ALL OF THE FEATURES OF THE CHALLENGED CLAIMS OF THE ’747 PATENT	38
A.	The Combination of <i>Griffin</i> and <i>Zydney</i> Discloses Every Feature of Claims 1-3, 12, and 13	38

Declaration of Dr. Zygmunt J. Haas
Inter Partes Review of U.S. Patent No. 8,199,747

1.	Claim 1	38
2.	Claim 2	75
3.	Claim 3	94
4.	Claim 12	101
5.	Claim 13	103
X.	CONCLUSION.....	110

Declaration of Dr. Zygmunt J. Haas
Inter Partes Review of U.S. Patent No. 8,199,747

I, Dr. Zygmunt J. Haas, declare as follows:

I. INTRODUCTION

1. I have been retained as an independent expert consultant on behalf of Samsung Electronics America, Inc. (“Petitioner”) in this proceeding before the United States Patent and Trademark Office (“PTO”) regarding U.S. Patent No. 8,199,747 (“the ’747 Patent”) (Ex. 1001). I have been asked to consider whether certain references disclose or suggest the features recited in claims 1-3, 12, and 13 (“the challenged claims”) of the ’747 Patent. My opinions are set forth below.

2. I am being compensated at my rate of \$450 per hour for the time I spend on this matter. My compensation is in no way contingent on the nature of my findings, the presentation of my findings in testimony, or the outcome of this or any other proceeding. I have no other interest in this proceeding.

II. QUALIFICATIONS

3. I am a Professor and Distinguished Chair in Computer Science at the University of Texas in Dallas. I am also Professor Emeritus at the School of Electrical and Computer Engineering at Cornell University. In addition, I provide technical consulting services in intellectual property matters, including matters involving computer networks and wireless communication technologies.

4. I received my Bachelor of Science Degree in Electrical Engineering, summa cum laude, from Technion (IIT), Israel, in 1979, and a Master of Science

Declaration of Dr. Zygmunt J. Haas
Inter Partes Review of U.S. Patent No. 8,199,747

Degree in Electrical Engineering, summa cum laude, from Tel-Aviv University, Israel, in 1985. I subsequently authored the thesis titled “Packet Switching in Fiber-Optic Networks” as part of earning my Ph.D. in Electrical Engineering from Stanford University in 1988.

5. I have worked for about 35 years in the field of Electrical Engineering. The primary focus of my work has been on communication and networking systems, with an emphasis on wireless communication networks. I have authored and co-authored numerous technical papers and book chapters related to wireless communication networks. As shown in my curriculum vitae, which I understand is provided as Exhibit 1003, I hold eighteen patents in the fields of high-speed networking, wireless networks, and optical switching, with three additional patents pending.

6. My employment history following my graduation from Stanford University began at the Network Research Department of AT&T Bell Laboratories in 1988. At AT&T Bell Laboratories, I pursued research on wireless communications, mobility management, fast protocols, optical networks, and optical switching. During my tenure at AT&T, I also worked for the AT&T Wireless Center of Excellence, where I investigated various aspects of wireless and mobile networks. As part of my employment at AT&T, I also worked on multimedia conferencing systems.

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.