

Case IPR2017-01934
Patent No. 8,799,468

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.

Petitioner

vs.

MULTIMEDIA CONTENT MANAGEMENT LLC

Patent Owner

Case IPR2017-01934

U.S. Patent No. 8,799,468

DECLARATION OF JOEL R. WILLIAMS

TABLE OF CONTENTS

I.	INTRODUCTION	6
II.	QUALIFICATIONS	10
III.	LEGAL UNDERSTANDING	15
	Level of Ordinary Skill in the Art	16
	Enablement	16
	Anticipation	19
	Inherency	21
	Obviousness	21
IV.	SUMMARY OF OPINION	27
V.	PERSON OF ORDINARY SKILL IN THE ART	29
VI.	OVERVIEW OF THE '468 PATENT	29
VII.	MEANING OF SPECIFIC CLAIM TERMS	30
	A. "Service Provider Network"	31
	B. "Controller Instructions"	36
	C. "Gateway Unit"	40
	D. "Generate [controller instructions]"	43
VIII.	PATENTABILITY ANALYSIS FOR CLAIMS 1-5, 9, 11-13, 19, 23-27, AND 32-34 OF THE '468 PATENT	47
	A. GROUND 1 - <i>Freund</i>	47
	1. Brief Overview of the <i>Freund</i> Reference	48
	Analysis of Claim 1	51
	1. <i>Freund</i> does not disclose "a processor configured to generate controller instructions"	52

2.	<i>Freund</i> does not disclose “a gateway unit...configured to receive the controller instructions from the controller node through the service provider network”	59
3.	<i>Freund</i> does not disclose “a gateway unit”	63
Analysis of Claim 2		64
1.	<i>Freund</i> does not disclose “an identifier that uniquely identifies the gateway unit”	64
Analysis of Claims 3-5, 9, 11-13, and 19		71
Analysis of Claim 23		71
1.	<i>Freund</i> does not disclose “generating, by a controller node..., controller instructions”	72
2.	<i>Freund</i> does not disclose “receiving, by the gateway units, from the controller node, the controller instructions”	72
3.	<i>Freund</i> does not disclose “a gateway unit”	73
Analysis of Claim 24		73
Analysis of Claim 25-27, and 33		74
B.	GROUND 2 – <i>Spusta</i>	74
1.	Brief Overview of the <i>Spusta</i> Reference	75
Analysis of Claim 1		79
1.	<i>Spusta</i> does not disclose “a system for regulating access to a service provider network”	80
2.	<i>Spusta</i> does not disclose “a processor configured to generate controller instructions”	81
3.	<i>Spusta</i> does not disclose “controller instructions”	83

4.	<i>Spusta</i> does not disclose “the second processor is configured to selectively transmit the content requests to the service provider network”	85
5.	<i>Spusta</i> does not disclose a “gateway unit”	87
	Analysis of Claims 2, 3, 11, and 13	88
	Analysis of Claim 23	88
1.	<i>Spusta</i> does not disclose “a system for regulating access to a service provider network”	89
2.	<i>Spusta</i> does not disclose “a processor configured to generate controller instructions”	90
3.	<i>Spusta</i> does not disclose “controller instructions”	90
4.	<i>Spusta</i> does not disclose “the second processor is configured to selectively transmit the content requests to the service provider network”	90
5.	<i>Spusta</i> does not disclose a “gateway unit”	90
	Analysis of Claims 24, 25, 32, and 34	91
IX.	CONCLUSION	91
X.	CERTIFICATION	91

Case IPR2017-01934
Patent No. 8,799,468

EXHIBITS

2005 RFC 1918 – Address Allocation for Private Internets

2006 RFC 2131 – Dynamic Host Configuration Protocol

2007 IPTABLES – Administration tool for IPv4 packet filtering and NAT

2008 RFC 2616 – Hypertext Transfer Protocol -- HTTP/1.1

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.