

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

GOOGLE INC., MOTOROLA MOBILITY LLC, HUAWEI DEVICE CO., LTD.,  
HUAWEI DEVICE USA, INC., HUAWEI INVESTMENT & HOLDING CO.,  
LTD., HUAWEI TECHNOLOGIES CO., LTD., AND HUAWEI DEVICE  
(DONGGUAN) CO., LTD.  
Petitioners,

v.

UNILOC USA, INC. and UNILOC LUXEMBOURG S.A.,  
Patent Owners.

---

Case IPR2017-02080  
Patent 8,724,622

---

**DECLARATION OF WILLIAM C EASTTOM II**

## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
II.	BACKGROUND AND QUALIFICATIONS .....	2
III.	LEGAL STANARDS USED IN MY ANALYSIS.....	2
	A. Anticipation .....	3
	B. Obviousness.....	3
	C. Priority Date .....	4
	D. Person of Ordinary Skill in the Art.....	5
	E. Broadest Reasonable Interpretation.....	6
IV.	OVERVIEW OF THE ‘622 PATENT .....	6
V.	CLAIM CONSTRUCTION .....	9
	A. “instant voice messaging application” .....	9
	B. “client platform system” .....	12
	C. “communication platform system” .....	13
VI.	INTERNATIONAL APPLICATION WO 01/11824 (“ZYDNEY”) .....	14
VII.	VALIDITY ANALYSIS.....	17
	A. “...wherein the instant voice message includes an object field including a digitized audio file” .....	18
	B. “wherein the instant voice message includes an action field identifying one of a predetermined set of permitted actions requested by the user.”.....	26
VIII.	CONCLUSION .....	27

EASTTOM CV .....	29
A. Education .....	29
1. University Degrees .....	29
2. Industry Certifications .....	30
3. Hardware and Networking Related Certifications .....	30
4. Operating System Related Certifications .....	30
5. Programming and Web Development Related Certifications .....	31
6. Database Related Certifications .....	31
7. Security and Forensics Related Certifications .....	31
8. Software Certifications .....	32
9. Licenses .....	32
B. Publications .....	32
1. Books .....	33
2. Papers, presentations, & articles .....	35
3. Patents .....	37
C. Standards and Certification Creation .....	38
D. Professional Awards and Memberships .....	39
E. Speaking Engagements .....	40
F. Litigation Support Experience .....	44
1. Testifying Experience .....	51
G. Professional Experience .....	54
H. Continuing Professional Education .....	58
I. References to my work .....	60
1. Media References .....	60
2. References to publications .....	61
3. Universities using my books .....	69
J. Training .....	71
K. Technical Skills .....	73

I, Chuck Easttom, hereby declare as follows:

## **I. INTRODUCTION**

1. My name is William Charles Easttom II (Chuck Easttom) and I have been retained by Uniloc, USA, Inc., and Uniloc Luxembourg S.A. (“Uniloc” or the “Patent Owner”) to provide my expert opinions regarding U.S. Patent No. 8,724,622 (the ‘622 Patent). In particular, I have been asked to opine on whether a person of ordinary skill in the art (POSITA) at the time the inventions described in the ’622 patent were conceived would have found claims 3-23 (“Challenged Claims”) obvious in light of the references cited in IPR2017-2080.

2. Based on my review of the cited references, my understanding of the relevant of the relevant requirements of patent law, and my decades of experience in the field of computer science including communications systems, it is my opinion that the Challenged Claims would not have been obvious in light of the proposed combinations.

3. I am being compensated for my time at my standard consulting rate of \$300 per hour. I am also being reimbursed for expenses that I incur during the course of this work. Apart from that, I have no financial interest in

Google et al. v. Uniloc, IPR2017-2080  
Uniloc’s Exhibit 2001

Page 1

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

## **II. BACKGROUND AND QUALIFICATIONS**

4. In my over 25 years of computer industry experience I have had extensive experience in communications systems, including data networks in general that have messaging capabilities. I hold 42 industry certifications, which include (among others) multiple networking certifications. I have authored 26 computer science books, several of which deal with networking topics. I am also the sole named inventor on thirteen patents.

5. A more detailed description of my professional qualifications, including a list of publications, teaching, and professional activities, is contained in my curriculum vitae, a copy of which is attached hereto as Exhibit A.

## **III. LEGAL STANDARDS USED IN MY ANALYSIS**

6. Although I am not an attorney and I do not offer any legal opinions in this proceeding, I have been informed of and relied on certain legal principles in reaching the opinions set forth in this Declaration.

# 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.