

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS INC.

Petitioner

- vs. -

FALL LINE PATENTS, LLC

Patent Owner

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IPR2018-00043

U.S. Patent 9,454,748

DECLARATION OF A.L. NARASIMHA REDDY, PHD, UNDER 37 C.F.R.

§ 1.68 IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW

OF U.S. PATENT NO. 9,454,748 (CLAIMS 16-19 AND 21-22)

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I, A.L. Narasimha Reddy, do hereby declare as follows:

**I. INTRODUCTION**

1. I have been retained by counsel for Unified Patents Inc. (“Unified”) as an independent expert witness for the above-captioned Petition for *Inter Partes* Review (“IPR”) of U.S. Patent No. 9,454,748 (“the ’748 Patent”). I am being compensated at my usual and customary rate for the time I spend in connection with this IPR. My compensation is not affected by the outcome of this IPR.

2. I have been asked to provide my opinions regarding whether claims 16-19 and 21-22 (each a “Challenged Claim” and collectively the “Challenged Claims”) of the ’748 Patent are invalid as they would have been obvious to a person having ordinary skill in the art (“POSITA”) as of the earliest claimed priority date. It is my opinion that all of the Challenged Claims would have been obvious to a POSITA after reviewing the prior art discussed below.

3. In preparing this Declaration, I have reviewed:

- a) EX1001, the ’748 Patent;
- b) EX1002, the file history of the ’748 Patent;
- c) EX1003, excerpts from the file history of the parent ’816 Patent;
- d) EX1004, the parent ’816 Patent;
- e) the prior art references discussed below:

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- US Patent 6,154,745 to Kari et al. (“*Kari*” (EX1006));
- HTML 4 Unleashed by Darnell et al. (“*Darnell*” (EX1007));
- US Patent 6,380,928 to Todd (“*Todd*” (EX1009));
- US Patent 6,381,603 to Chan et al. (“*Chan*” (EX1010)); and

f) any other document cited below.

4. I understand that the '748 Patent issued on September 27, 2016, from U.S. Patent Application No. 12/910,706 (“the '706 application”), filed on October 22, 2010. The '706 application is a continuation of U.S. Patent Application No. 10/643,516 (“the '516 application”), filed August 19, 2003, which became U.S. Patent No. 7,822,816 (“the '816 patent”). I previously submitted a declaration supporting an *inter partes* review challenging claims 1-14 of the '816 patent. The '516 application claims priority to U.S. Provisional Application No. 60/404,491 (“the '491 Provisional”), filed August 19, 2002. The face of the '748 Patent lists J. David Payne as the purported inventor. Further, the face of the '748 Patent identifies EDICHE, LLC as the initial assignee of the '748 Patent. I understand that Fall Line Patents LLC is the current assignee of the '748 Patent.

5. In forming the opinions expressed in this Declaration, I relied upon my education and experience in the relevant field of art, and have considered the viewpoint of a Person of Ordinary Skill in the Art (POSITA), as of August 19, 2002. I have also considered:

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