

IPR2018-00129, IPR2018-00130, IPR2018-00131, IPR2018-00132
Patent Nos. 5,822,523 & 6,226,686

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RIOT GAMES, INC.,
Petitioner,

v.

PALTALK HOLDINGS, INC.,
Patent Owner.

Cases IPR2018-00129, IPR2018-00130, IPR2018-00131, IPR2018-00132
Patents 5,822,523 & 6,226,686

DECLARATION OF DR. KEVIN C. ALMERO TH

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B. RFC 1692 Does Not Disclose or Suggest “forming an aggregated message using said aggregated payload” (Claim 1 of the ‘523 Patent and Claims 1 and 12 of the ‘686 Patent); “create an aggregated message” (Claim 3 of the ‘686 Patent); “said aggregated message” (Claim 7 of the ‘686 Patent); and “forming a server message . . .” (Claim 18 of the ‘686 Patent)50

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X. CONCLUSION86

I, Dr. Kevin C. Almeroth, declare as follows:

I. INTRODUCTION

1. I have been retained by the law firm of Munck Wilson Mandala, LLP on behalf of Paltalk Holdings, Inc. (“Paltalk” or “Patent Owner”) as an independent expert consultant in the above-captioned proceedings before the Patent Trial and Appeal Board of the United States Patent and Trademark Office. All statements herein made of my own knowledge are true, and all statements herein made based on information and belief are believed to be true. I am over 21 and otherwise competent to make this declaration. Although I am being compensated at my standard hourly rate of \$650 for my time spent on this matter, my opinions herein are my own, no part of my compensation depends on the outcome of this proceeding, and I have no other interest in this proceeding.

2. I understand Petitioner Riot Games, Inc. has requested *inter partes* review of U.S. Patent No. 5,822,523 (“the ‘523 Patent) in *inter partes* review proceeding Nos. IPR2018-00129 and IPR2018-00130. I understand Petitioner has also requested *inter partes* review of U.S. Patent No. 6,226,686 (“the ‘686 Patent) in *inter partes* review proceeding Nos. IPR2018-00131 and IPR2018-00132. I understand that the Board has instituted trial on each of these IPRs on the following grounds:

- IPR2018-00129:

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