

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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RIOT GAMES, INC.,  
Petitioner,

v.

PALTALK HOLDINGS, INC.,  
Patent Owner.

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Case No. IPR2017-  
U.S. Patent Nos. 5,822,523 and 6,226,686

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**DECLARATION OF DAVID H. CROCKER**

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**EXHIBIT LIST**

<b>No.</b>	<b>Exhibit Description</b>
1010	Transport Multiplexing Protocol (TMUX), RFC 1692 (Aug. 1994)
1011	Internet Protocol DARPA Internet Program Protocol Specification, RFC 791 (Sept. 1981)
1018	Protocol Standard for a NetBIOS Service on a TCP/UDP Transport: Concepts and Methods, RFC 1001 (Mar. 1987)
1021	The Internet Standards Process – Revision 2, RFC 1602 (Mar. 1994)
1022	Internet Official Protocol Standards, RFC 1720 (Nov. 1994)
1025	Internet Relay Chat Protocol, RFC 1459 (May 1993)
1027	Dave Crocker CV
1028	The Internet Standards Process, RFC 1310 (Mar. 1992)
1029	The Internet Standards Process – Revision 3, RFC 2026 (Oct. 1996)

**I. Introduction**

1. I, David H. Crocker, make this declaration. I am over 21 and otherwise competent to make this declaration.
2. 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. Unless a specific time period is noted, all statements herein refer to the time period relevant to the above-captioned proceeding.
3. I am a principal at Brandenburg InternetWorking (“Brandenburg”), which I founded in 1991, and I have participated in the development of technical specifications for the Internet and its predecessor, the Advanced Research Projects Agency Network (“ARPANET”), since 1972. I understand that my CV has been filed as Exhibit 1027.
4. I have been retained by counsel for Petitioner as an expert witness in the above-captioned proceeding. I have been asked to provide my opinion about the publication status of several Request for Comments (“RFC”) documents. My opinions in this declaration are informed by my substantial background and expertise in the RFC development and publication process, as well as the specific RFC documents I discuss below and the other evidence I cite in this declaration. Although I am being compensated for my time in preparing this declaration, the opinions herein are my own.

## **II. The Internet Engineering Task Force (“IETF”)**

5. The principal Internet technical standards body is the Internet Engineering Task Force (“IETF”). The IETF produces technical documents relating to the design, use, and management of the Internet. The IETF has no formal membership or membership requirements, and all participants and managers are volunteers; it has a very small paid support staff.

6. Prior to 1997, the IETF was entirely or partially supported by the U.S. government. Since then, the IETF has been independently funded by participants and through its association with the Internet Society, which is an international membership-based non-profit organization.

7. The IETF comprises working groups that are organized into areas by subject matter. Each IETF area is overseen by an Area Director. The Area Directors, together with the IETF Chair, form the Internet Engineering Steering Group (“IESG”), which is responsible for the overall operation of the IETF. I was the first Area Director for the area of Network Management. I served as an Area Director for six years, from 1989 to 1995.

8. The IETF’s Administrative Oversight Committee (“IAOC”) comprises ten members and provides logistical and administrative support for the IETF. I served on the IAOC for two years, from 2011 to 2013.

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