UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
RIOT GAMES, INC., Petitioner,
v.
PALTALK HOLDINGS, INC., Patent Owner.
Case IPR2018-00129. IPR2018-00130, IPR2018-00131, IPR2018-00132 Patent 5,822,523 & 6,226,686

DECLARATION OF NANCY MIRACLE



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VIIIClaim 1 of the '523 Patent and Claims 1, 3, 7, 12, and 18 of the '686 Patent
A. Petitioner's Assertion that Aldred Inherently or Obviously Discloses a portion for identifying a message group is flawed
B. RFC 1692 Does Not Disclose or Suggest "aggregating said payload portions of said messages to create an aggregated payload" (Claim 1 of the '523 Patent and Claims 7 and 12 of the '686 Patent); "aggregating said payload portions of said host messages to create an aggregated payload" (Claims 1 and 3 of the '686 Patent); "aggregating said payload portion with the payload portion of a second host message" (Claim 18 of the '686 Patent)
C. 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)
1. Petitioner does not provide sufficient motivation to combine Aldred and RFC 1692
2RFC 1692 does not disclose or suggest "forming an aggregated message using said aggregated payload," (Claim 1 of the '523 Patent and Claim 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)
D. Aldred in view of RFC 1692 does not render obvious Claim 8 of the '523 Patent
E. Aldred in view of RFC 1692 does not render obvious Claim 33 of the '523 Patent nor Claims 29, 48 and 65 of the '686 Patent
F. Aldred in view of RFC 1692 does not render obvious Claims 2-7, 9, 10, 15-27, 31, 32, 34-37, 41, 42, and 44-47 of the '523 Patent
G. GROUND 2 of IPR2018-00129: Petitioner Has Not Demonstrated that Aldred in View of RFC 1692 and RFC 1459 Renders Obvious Claims 38-40 of the '523 Patent
H. GROUND 3 of IPR2018-00129: Petitioner Has Not Demonstrated that Aldred in View of RFC 1692 and Denzer Renders Obvious Claim 43 of the '523 Patent



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	I.GROUND 2 of IPR2018-00130: Petitioner Has Not Demonstrated that Aldred in View of RFC 1692 and Ulrich Renders Obvious Claim 11-15, 23, and 27-30 of the '523 Patent	J
	J.Aldred in view of RFC 1692 does not render obvious Claims 2, 4, 8-11, 13-17, 19-21, 26-30, 34, 35, 39, 40, 45-49, 53, 54, 56, 57, 62-66 and 70 of the '686 Patent	J
	K. GROUND 2 of IPR2018-00131: Petitioner Has Not Demonstrated that Aldred in View of RFC 1692 and RFC1459 Renders Obvious Claims 31-33, 50-52, and 67-69 of the '686 Patent	
	L. GROUND 2 of IPR2018-00132: Petitioner Has Not Demonstrated that Aldred in View of RFC 1692 and Ulrich Renders Obvious Claims 22-27, 41-46, and 58-63 of the '686 Patent	
	M. GROUND 3 of IPR2018-00132: Petitioner Has Not Demonstrated that Aldred in View of RFC 1692 and Denzer Renders Obvious Claims 36 and 55 of the '686 Patent	
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IPR2018-00129, IPR2018-00130, IPR2018-00131, IPR2018-00132 Patent Nos. 5,822,523 & 6,226,686

I, Nancy Miracle, 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 this proceeding 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 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.
- 3. I have been asked to opine on whether certain other patents and materials, if combined, would meet all the limitations of the '523 and '686 patents,



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