# UNITED STATES PATENT AND TRADEMARK OFFICE

_____

# BEFORE THE PATENT TRIAL AND APPEAL BOARD

_____

RIOT GAMES, INC.,
Petitioner,

v.

PALTALK HOLDINGS, INC.,
Patent Owner.

_____

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

_____

# DECLARATION OF DAVID H. CROCKER

# TABLE OF CONTENTS

**EXHIBIT LIST**

| No. | Exhibit Description |
| --- | --- |
| 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.

# DOCKET ALARM

# 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.

**WHAT WILL YOU BUILD?** | sales@docketalarm.com | 1-866-77-FASTCASE

fastcase®
Smarter legal research.