

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC.,
Petitioners,

v.

UNILOC LUXEMBOURG S.A.,
Patent Owner.

IPR2158-00361
U.S. PATENT NO. 6,216,158

DECLARATION OF WILLIAM C EASTTOM II

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	BACKGROUND AND QUALIFICATIONS	2
III.	LEGAL STANARDS USED IN MY ANALYSIS.....	2
	A. Obviousness.....	2
	B. Priority Date	4
	C. Person of Ordinary Skill in the Art.....	4
	D. Broadest Reasonable Interpretation.....	5
IV.	OVERVIEW OF THE ‘158 PATENT	5
V.	CLAIM CONSTRUCTION	6
	A. palm sized computer	6
	B. means for accessing a description of a service”	7
	C. means for downloading the program code.....	7
	D. means for executing at least a portion of the program code.....	7
	E. means for sending control commands to the service in response to the means for executing.....	7
VI.	GENERAL ISSUES	8
	A. Jini: Quick Study, COMPUTERWORLD (“Jini-QS”).....	8
	B. McCandless	9
	C. Motivation to Combine	11
VII.	GROUND 1 SPECIFIC CLAIMS.....	12

A. Claim 1 “accessing a description of the service from a directory of services, the description of the service including at least a reference to program code for controlling the service”	12
B. Claim 1 “downloading the program code to the palm sized computer” ..	14
C. Claim 1 “sending control commands to the service from the palm sized computer in response to the executing”	15
D. Claim 8 “A method of controlling a program on a network device from a palm sized computer, the computer is not capable of executing the program by itself, the network device and computer being coupled in communications via a network, the method comprising”	16
E. Claim 8 “loading the program code”	18
F. Claim 9 “The method of claim 8, wherein loading the program code includes loading the program code onto the palm sized computer and the issuing the control commands includes the palm sized computer issuing the control commands”	18
G. Claim 12 “The method of claim 8 wherein loading the program code includes loading the program code onto the palm sized computer from the directory of services”	19
H. Claim 20 “means for downloading the program code”	20
VIII. GROUND 2.....	20
A. A method of controlling a service on a network using a palm sized computer, the palm sized computer being coupled in communications with the network, the method comprising	23
B. accessing a description of the service from a directory of services, the description of the service including.....	26
IX. CONCLUSIONS	27
EASTTOM CV.....	29
A. Education.....	29

1. University Degrees	29
2. Industry Certifications	30
3. Hardware and Networking Related Certifications	30
4. Operating System Related Certifications.....	30
5. Programming and Web Development Related Certifications	31
6. Database Related Certifications	31
7. Security and Forensics Related Certifications	31
8. Software Certifications	32
9. Licenses	32
 B. Publications	 32
1. Books.....	32
2. Papers, presentations, & articles.....	34
3. Patents	37
 C. Standards and Certification Creation.....	 38
 D. Professional Awards and Memberships	 39
 E. Speaking Engagements	 40
 F. Litigation Support Experience	 44
1. Testifying Experience	51
 G. Professional Experience	 54
 H. Continuing Professional Education	 58
 I. References to my work	 59
1. Media References	60
2. References to publications	61
3. Universities using my books	68
 J. Training	 70
 K. Technical Skills	 72

I, Chuck Easttom, hereby declare as follows:

I. INTRODUCTION

1. My name is William Charles Easttom II (Chuck Easttom) and I have been retained by Uniloc Luxembourg S.A. (“Uniloc” or the “Patent Owner”) to provide my expert opinions regarding U.S. Patent No. 6,216,158 (the ‘158 Patent). In particular, I have been asked to opine on whether a person of ordinary skill in the art (POSITA) at the time the inventions described in the ‘158 patent were conceived would have found all claims, claims 1-2, 6-9, 12, 14-15, and 20 (“Challenged Claims”) as unpatentable in light of the cited references and arguments in IPR2158-00361.

2. Based on my review of the Petition and its exhibits, and my understanding of the relevant requirements of patent law, and my decades of experience in the field of computer science including communications systems, it is my opinion that the Challenged Claims would not have been obvious in light of the proposed combinations.

3. I am being compensated for my time at my standard consulting rate of \$300 per hour. I am also being reimbursed for expenses that I incur during the course of this work. Apart from that, I have no financial interest in Uniloc. My compensation is not contingent upon the results of my study or the substance of my opinions.

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.