

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC.,
Petitioners,

v.

UNILOC LUXEMBOURG S.A.,
Patent Owner.

IPR2018-00394
PATENT 6,622,018

DECLARATION OF WILLIAM C EASTTOM II

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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. 6,622,018 (the ‘018 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 ‘018 patent were conceived would have found all claims, claims 1-27 (“Challenged Claims”) as unpatentable in light of the cited references and arguments in IPR2018-00394.

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.

Apple v. Uniloc, IPR2018-00394
Uniloc’s Exhibit 2001, page 1

II. BACKGROUND AND QUALIFICATIONS

4. In my over 25 years of computer industry experience I have had extensive experience in communications systems, including data networks in general that have messaging capabilities. I hold 42 industry certifications, which include (among others) networking certifications. I have authored 26 computer science books, several of which deal with networking topics. I am also the sole named inventor on thirteen patents.

5. A more detailed description of my professional qualifications, including a list of publications, teaching, and professional activities, is contained in my curriculum vitae, a copy of which is attached hereto as Exhibit A.

III. LEGAL STANDARDS USED IN MY ANALYSIS

6. Although I am not an attorney and I do not offer any legal opinions in this proceeding, I have been informed of and relied on certain legal principles in reaching the opinions set forth in this Declaration.

A. Obviousness

7. I understand that a patent claim is invalid if the differences between the subject matter and the prior art are such that the subject matter as a whole would have been obvious to a POSITA at the time of the alleged invention. I further understand that an obviousness analysis involves a review of the scope and content of the asserted prior art, the differences between the

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