UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,
Petitioner,

v.

UNILOC LUXEMBOURG, S.A.,
Patent Owner.

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Case IPR2018-00395
Patent 6,622,018 B1

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**SUPPLEMENTAL DECLARATION OF HENRY HOUH, PH.D.
UNDER 37 C.F.R. § 1.68**

Table of Contents

A. Introduction

I, Henry H. Houh, Ph.D., declare:

1.   I am making this supplemental declaration at the request of Apple Inc. in the matter of the *Inter Partes* Review of U.S. Patent No. 6,622,018 ("the '018 Patent") to Erekson.

2.   I am being compensated for my work in this matter. My compensation in no way depends upon the outcome of this proceeding.

3.   In the preparation of this declaration, I have studied:

(1)   **Exhibit APPL-1001** through **Exhibit APPL-1002**;

(2)   **Exhibit APPL-1004** through **Exhibit APPL-1006**;

(3)   **Exhibit APPL-1008** through **Exhibit APPL-1030**;

(4)   Mr. Easttom's declaration, **Exhibit Ex. 2001**;

(5)   Rescigno, Adele A., "Optimal Polling in Communication Networks," IEEE TRANSACTIONS ON PARALLEL AND DISTRIBUTED SYSTEMS, VOL. 8, NO. 5, MAY 1997. ("Rescigno"), **Exhibit APPL-1037**;

(6)   U.S. Patent No. 5,213,555, **Exhibit APPL-1039**;

(7)   J.J. Garcia-Luna-Aceves and Asimakis Tzamaloukas, "Reversing the Collision-Avoidance Handshake in Wireless Networks," IEEE

(8)   U.S. Patent No. 4,667,193, **Exhibit APPL-1041**.

B. Leichiner's description of plural "polling messages" is consistent with broadcasting

4.   I note that Leichiner describes that its remote controller transmits a "polling message" or "polling signal" (singular), and also describes that its remote controller transmits "polling messages" (plural), as illustrated in the following paragraphs:

> In operation, controller 10 ***generates polling messages to all of the controlled devices*** in the immediate vicinity thereof. ***The polling message is generated periodically*** upon request of the user, or in response to an external signal received from the controller environment. The controlled device available in the vicinity of the controller is capable of ***recognizing the polling message***, and is capable of responding with the information regarding the identification thereof.

APPL-1027, ¶ [0022] (emphasis added).

> For example, when the user has carried adaptive remote controller 282 from one room to another, the controller detects the presence of a new device, such as lamp 252 which is located in another room stated above. The reason for the above is that

the controller which is programmed for the lamp responds to the
polling signal of the adaptive remote controller.

APPL-1027, ¶ [0065] (emphasis added).

5.   Leichiner's reference to both a singular "polling message" and plural "polling messages" is not inconsistent with its overall description of the remote controller broadcasting the polling message "to a number of the controlled devices at the same time." APPL-1027, ¶ [0012]. For example, a person of ordinary skill in the art would have understood that when a message is broadcast, each receiving device gets a copy of the message. In other words, multiple messages are received as a result of the broadcast. This concept is illustrated in Figure 6 of the '018 Patent (reproduced below), where a single Broadcast Message 640 is transmitted, but Remote Device A receives a copy of Broadcast Message 640, Remote Device B receives a copy of Broadcast Message 640, and Remote Device C receives a copy of Broadcast Message 640:

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