

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC.
Petitioner

v.

UNILOC USA, INC. and UNILOC LUXEMBOURG S.A.,
Patent Owner

IPR2018-00579
PATENT 8,724,622

DECLARATION OF WILLIAM C EASTTOM II

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Case IPR2017-01667
Patent 8,724,622

DECLARATION OF WILLIAM C EASTTOM II

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	BACKGROUND AND QUALIFICATIONS	2
III.	LEGAL STANDARDS USED IN MY ANALYSIS.....	2
	A. Obviousness.....	3
	B. Priority Date	4
	C. Person of Ordinary Skill in the Art.....	4
	D. Broadest Reasonable Interpretation.....	6
IV.	OVERVIEW OF THE ‘622 PATENT	6
V.	CLAIM CONSTRUCTION	9
	A. “instant voice messaging application”	9
	B. “client platform system”	14
	C. “communication platform system”	15
VI.	PETITIONERS’ CITED REFERENCES	16
	A. International Application WO 01/11824 (“Zydney”)	17
	B. Excerpt of Computer Networking Essentials (“Shinder”).....	21
	C. U.S. Patent No. 6,725,228 (“Clark”)	22
	D. U.S. Patent No. 6,750,881 (“Appelman”)	26
VII.	VALIDITY ANALYSIS	29
	A. Zydney does not render obvious “wherein the instant voice messaging application includes a document handler system for attaching one or more files to the instant voice message” (claim 27)	29

B. Zydney does not render obvious “wherein the instant voice message includes an object field” (independent claim 3).....	32
C. No prima facie obviousness for “wherein the instant voice messaging application includes a message database storing the instant voice message, wherein the instant voice message is represented by a database record including a unique identifier” (dependent claims 14-17 and 28-31)	34
1. Zydney and Clark both lack a database record in a message database, where that database record includes both a unique identifier and an instant voice message	35
2. There could not have been any motivation to combine Zydney with Clark to devise a database record that included a unique identifier	37
3. No prima facie obviousness because Petitioners’ proposed combination of Zydney with Clark results in messages being deleted once they are sent to the server	39
D. No prima facie obviousness for “a display [at the client device] displaying a list of one or more potential recipients” (claims 38-39).....	41
VIII. CONCLUSION	44

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, USA, Inc., and Uniloc Luxembourg S.A. (“Uniloc” or the “Patent Owner”) to provide my expert opinions regarding U.S. Patent No. 8,724,622 (the ‘622 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 ‘622 patent were conceived would have found all claims, Claims 3, 6-8, 10, 11, 13, 14-23, 27-35, 38, and 39 (“Challenged Claims”) as obvious in light of the following referenced cited in IPR2017-01667:

- Ex. 1003, PCT Patent Application No. PCT/US00/21555 (“*Zydney*”)
- Excerpts from Debra Littlejohn Shinder, Computer Networking Essentials (“*Shinder*”)
- Ex. 1007, U.S. Patent No. 6,725,228 (“*Clark*”)
- Ex. 1008, U.S. Patent No. 6,750,881 (“*Appelman*”)

2. Based on my review of the prior art then available, my understanding of the relevant 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.

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