

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

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IPR2018-00580  
PATENT 8,724,622

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**DECLARATION OF WILLIAM C EASTTOM II**

UNITED STATES PATENT AND TRADEMARK OFFICE

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FACEBOOK, INC., WHATSAPP INC.,  
Petitioners,

v.

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

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Case IPR2017-01668  
Patent 8,724,622

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**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, 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 4, 5, 12, and 24-26 (“Challenged Claims”) as obvious in light of the following referenced cited in IPR2017-01668:

- Ex. 1113, PCT Patent Application No. PCT/US00/21555 (“*Zydney*”)
- Ex. 1114, Excerpts from Debra Littlejohn Shinder, Computer Networking Essentials (“*Shinder*”)
- Ex. 1109, Paul S. Hethmon, Illustrated Guide to HTTP (“*Hethmon*”)
- Ex. 1118, Excerpts from *Microsoft Press Computer Dictionary* (1991) (“Microsoft (1991)”)
- Ex. 1119, U.S. Patent No. 6,173,323 (“*Moghe*”)

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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