## 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

IPR2018-00580 PATENT 8,724,622

**DECLARATION OF WILLIAM C EASTTOM II** 

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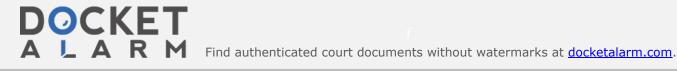
FACEBOOK, INC., WHATSAPP INC., Petitioners,

v.

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

Case IPR2017-01668 Patent 8,724,622

**DECLARATION OF WILLIAM C EASTTOM II** 



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	<ul> <li>A. No prima facie obviousness for dependent Claims 4, 5 and 1217</li> <li>1. Zydney distinguishes voice containers from voice messages17</li> <li>2. Zydney does not render obvious "wherein the instant voice message includes an object field" (claims 3, 4, 5 and 12)19</li> <li>3. Zydney teaches away from "wherein the instant voice message includes an action field identifying one of a predetermined set of permitted actions requested by the user" (claims 4 and 5)21</li> </ul>

	B. Zydney does not render obvious "wherein the messaging system receive connection object messages from the plurality of instant voice message	S
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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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