

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.

UNIVERSAL SECURE REGISTRY, LLC,

Patent Owner.

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Case IPR2018-00813

U.S. Patent No. 9,100,826

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**DECLARATION OF DR. VICTOR SHOUP  
IN SUPPORT OF PETITIONER'S OPPOSITION TO  
PATENT OWNER'S CONDITIONAL MOTION TO AMEND**

Apple 1119

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I, Victor Shoup, Ph.D., declare as follows:

**I. INTRODUCTION**

1. I have been retained by Apple to provide opinions in this proceeding relating to Universal Secure Registry's ("USR" or "Patent Owner") Conditional Motion to Amend ("CMTA") the claims of U.S. Patent No. 9,100,826 ("826 patent"). I previously prepared and submitted a Declaration in support of the Petition in this proceeding, dated April 4, 2018.

2. Since preparing my previous Declaration, I have reviewed the following additional materials in connection with this Declaration:

- The Board's Decision on Institution ("DOI")
- USR's Patent Owner Response ("POR")
- Dr. Jakobsson's Declaration in Support of USR's POR (Ex. 2003)
- USR's CMTA
- Dr. Jakobsson's Declaration in support of USR's CMTA (Ex. 2013)
- The transcript of Dr. Jakobsson's March 20, 2019 deposition (Ex. 1117)
- EP 1 028 401 to Schutzer (Ex. 1130)
- Declaration of Dr. Juels (Ex. 1120)
- Declaration of Dr. Mullins (Ex. 1022)
- Burnett et al., RSA Security's Official Guide to Cryptography (Ex.

1021)

- Copy of Burnett et al., RSA Security's Official Guide to Cryptography from deposition of Dr. Jakobsson (Ex. 1023)
- Introduction to Cryptography (Ex. 1024)

3. My background and qualifications are summarized in Section I of my previous Declaration and my curriculum vitae, which was attached thereto as Appendix A.

4. I am being compensated at my normal consulting rate for my work. My compensation is not dependent on the outcome of this IPR proceeding or the related litigation, and does not affect the substance of my statements in this Declaration.

5. I have no financial interest in Petitioner. I have no financial interest in the '826 patent.

## II. LEGAL PRINCIPLES

6. I am not an attorney. For purposes of this Declaration, I have been informed about certain aspects of the law that are relevant to my analysis and opinions.

### A. Claim Construction

7. I have been informed that claim construction is a matter of law and that the final claim construction will be determined by the Board.

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