

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

UNILOC LUXEMBOURG S.A.
Patent Owner

Case No. IPR2018-00884
Patent No. 8,539,552

DECLARATION OF WILLIAM C. EASTTOM II (CHUCK EASTTOM)

TABLE OF CONTENTS

I. INTRODUCTION.....4

II. BACKGROUND AND QUALIFICATIONS4

III. CLAIM CONSTRUCTION.....4

 A. Intercepting Signaling Messages5

 B. Claim 1: “sender device,” “recipient device,” and “device profile” 10

IV. THE ‘552 PATENT 10

V. ONE OF ORDINARY SKILL IN THE ART 12

VI. GENERAL ISSUES 13

 A. Motivation to combine 13

VII. SPECIFIC CLAIMS 15

 A. Claim 1 preamble “1[Preamble]: “A method for controlling a plurality of services in packet-based networks, the method comprising” 15

 B. Claim 1[A]: “a network entity intercepting a signaling message associated with a call between a sender device of the message and an intended recipient device of the message” 16

 C. Claim 1[B]: “wherein the signaling message includes an indication of one type of the plurality of services which the signaling message is intended to invoke”
 18

 D. Claim 1[C] the network entity making a determination of whether either the sender device or the intended recipient device is authorized to invoke the type of service indicated in the signaling message based in part on a device profile maintained in part on a remote enforcement point,..... 22

 E. Claim 1 [E] the network entity filtering the signaling message based on the determination such that the signaling message is transmitted to the intended recipient device if either the sender device or the intended recipient device is authorized to invoke the type of service indicated in the signaling message.24

F.	Claim 4: “wherein filtering the signaling message comprises discarding the signaling message having an indication of services which the sender device or the intended recipient devices is unauthorized to use”	26
G.	Claim 6[A]: “a network entity intercepting a message associated with a call between a sender of the message and an intended recipient of the message; 27	
H.	Claim 21. The method of claim 18, wherein the message is a session initiation protocol (SIP) message.....	32
I.	Remaining Challenged Claims.....	33
VIII.	CONCLUSIONS.....	33
IX.	APPENDIX A – EASTTOM CV.....	35
A.	Education	35
1.	University Degrees.....	35
2.	Industry Certifications.....	35
3.	Security and Forensics Related Certifications.....	37
4.	Software Certifications	37
5.	Licenses.....	37
B.	Publications.....	38
1.	Books	38
2.	Papers, presentations, & articles.....	39
C.	Patents	41
D.	Standards and Certification Creation.....	42
E.	Professional Awards and Memberships	43
F.	Speaking Engagements	43
G.	Litigation Support Experience.....	46
1.	Testifying Experience	51
H.	Professional Experience	54
I.	Continuing Professional Education	57
J.	References to my work.....	58

1. Media References	58
2. References to publications	59
3. Universities using my books	64
K. Training	66
L. Technical Skills	67

I. INTRODUCTION

1. I have been retained by Uniloc to provide my expert opinions regarding validity of U.S. Patent No. 8,539,552 (“552 Patent”).

2. I am being compensated for my time at my standard consulting rate of \$300 per hour. I am also being reimbursed for expenses that I incur during the course of this work. My compensation is not contingent upon the results of my study or the substance of my opinions.

II. BACKGROUND AND QUALIFICATIONS

3. I have 25+ years of experience in the computer science industry including extensive experience with computer security, computer programming, and computer networking. I have authored 26 computer science books, including textbooks used at universities around the world. I hold 42 different computer industry certifications, including many in networking subjects. I am experienced with multiple programming languages. I also have extensive experience in computer networking. In fact, in the late 1990’s I was a senior software engineer for a telecommunications company. I am an inventor with 14 computer science patents. I am a Distinguished Speaker for the Association of Computing Machinery (ACM), and a reviewer for the IEEE Security and Privacy journal, as well as a reviewer for the International Journal of Cyber Warfare and Terrorism (IJCWT). My CV is attached as appendix A.

III. CLAIM CONSTRUCTION

4. For the purposes of an IPR, claim terms are given their broadest reasonable meaning.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.