

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.
Petitioner

v.

IRON OAK TECHNOLOGIES, LLC.
Patent Owner

Patent No. 5,699,275

DECLARATION OF BENJAMIN B. BEDERSON, PH.D.

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| | a) “A system for remote patching of operating code located in a mobile unit, comprising:” | 46 |
| | b) “a manager host operable to initiate transmission through a wireless communication network of at least one discrete patch message defining at least one patch;” | 59 |
| | c) “a first mobile unit operable to receive the at least one discrete patch message, the first mobile unit further operable to create patched operating code by merging the at least one patch with current operating code located in the first mobile unit and to switch execution to the patched operating code; and” | 67 |
| | d) “a second mobile unit operable to receive the at least one discrete patch message, the second mobile unit further operable to create patched operating code by merging the at least one patch with current operating code located in the second mobile unit and to switch execution to the patched operating code; and” | 74 |
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C. *Ballard and Shimizu* Disclose the Features of Claim 188

1. Claim 188

a) **“A system for remote patching of operating code located in a mobile unit, comprising:”**88

b) **“a manager host operable to initiate transmission through a wireless communication network of at least one discrete patch message defining at least one patch;”**101

c) **“a first mobile unit operable to receive the at least one discrete patch message, the first mobile unit further operable to create patched operating code by merging the at least one patch with current operating code located in the first mobile unit and to switch execution to the patched operating code; and”**124

d) **“a second mobile unit operable to receive the at least one discrete patch message, the second mobile unit further operable to create patched operating code by merging the at least one patch with current operating code located in the second mobile unit and to switch execution to the patched operating code; and”**130

e) **“wherein the manager host is further operable to address the at least one discrete patch message such that the at least one discrete patch message is transmitted to the first mobile unit but not to the second mobile unit.”**131

D. *Hapka and Parrillo* Disclose the Features of Claim 1138

1. Claim 1138

a) **“A system for remote patching of operating code located in a mobile unit, comprising:”**138

b) “a manager host operable to initiate transmission through a wireless communication network of at least one discrete patch message defining at least one patch;”167

c) “a first mobile unit operable to receive the at least one discrete patch message, the first mobile unit further operable to create patched operating code by merging the at least one patch with current operating code located in the first mobile unit and to switch execution to the patched operating code; and”177

d) “a second mobile unit operable to receive the at least one discrete patch message, the second mobile unit further operable to create patched operating code by merging the at least one patch with current operating code located in the second mobile unit and to switch execution to the patched operating code; and”183

e) “wherein the manager host is further operable to address the at least one discrete patch message such that the at least one discrete patch message is transmitted to the first mobile unit but not to the second mobile unit.”185

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