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
Patent 6,993,049

DECLARATION OF DR. CHARLES D. KNUTSON IN SUPPORT OF THE PETITIONER'S REPLY



Proceeding No.: IPR2019-00251

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	A.	Larsson's broadcast message for route discovery is an inquiry message	11	
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	C.	IrOBEX discloses "the method comprising the primary station broadcasting a series of inquiry messages"	17	
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IV.	CONCLUSION			



DECLARATION EXHIBITS

APPLE-1001	U.S. Patent No. 6,993,049 to Davies ("'049 Patent")
APPLE-1002	Prosecution History of the '049 Patent ("the Prosecution History")
APPLE-1003	Declaration of Dr. Charles Knutson
APPLE-1004	Curriculum Vitae of Dr. Charles Knutson
APPLE-1005	U.S. Patent No. 6,704,293 ("Larsson")
APPLE-1006	IrDA Object Exchange Protocol ("IrOBEX")
APPLE-1007	Prosecution History of the 7,587,207 Patent ("207 Prosecution History")
APPLE-1008	Second Declaration of Dr. Charles Knutson
APPLE-1009	U.S. Patent No. 7,587,207 ("Davies" or the "'207 Patent")
APPLE-1010	U.S. Patent No. 6,570,857 ("Haartsen")
APPLE-1011	U.S. Patent No. 6,480,505 ("Johansson")
APPLE-1012	Specification of the Bluetooth System: Wireless connections made easy, Profiles, Vol. 2, Bluetooth, Dec. 1, 1999 ("BT Profiles")
APPLE-1013	The New Shorter Oxford English Dictionary on Historical Principles, Vol. 1, Clarendon Press, 1993 ("Oxford Dictionary")
APPLE-1014	Specification of the Bluetooth System: Wireless connections made easy, Core, Vol. 1, Bluetooth, Dec. 1, 1999 ("BT Core")
APPLE-1015	U.S. Patent No. 6,683,886 ("Tuijn")



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APPLE-1016	Internet Archive Capture of http://www.bluetooth.com:80/developer/specification/specification.asp from March 1, 2000
APPLE-1017	Internet Archive Capture of http://www.bluetooth.com:80/developer/specification/core.asp from March 1, 2000
APPLE-1018	Internet Archive Capture of http://www.bluetooth.com:80/developer/specification/order.asp from March 1, 2000
APPLE-1019	Internet Archive Capture of http://www.bluetooth.com:80/news/archive/archive.asp from March 4, 2000
APPLE-1020	Declaration of Michael Foley
APPLE-1021	The Concise Oxford English Dictionary, 5 th Ed., Oxford University Press, 1964 ("Concise Oxford English Dictionary")
APPLE-1022	Amended Complaint dated May 30, 2018, Uniloc USA v Apple Inc., Civil Action No. 1:18-cv-00164-LY, Western District of Texas, Austin Division ("Complaint")
APPLE-1023	McGraw-Hill Dictionary of Electrical and Computer Engineering, ISBN 0-07-144210-3, 2004
APPLE-1024	Internet Archive Capture of https://web.archive.org/web/20000618190007/http://www.bluet ooth.com/text/news/archive/archive.asp?news=2 from June 18, 2000
APPLE-1025	U.S. Patent No. 6,622,018 ("Erekson")
APPLE-1026	PCT Patent Application Publication No. WO 00/76238 ("Buttery")
APPLE-1027	U.S. Patent No. 6,922,548 ("Moore")
APPLE-1028	U.S. Patent No. 6,799,318 ("Davison")
APPLE-1029	U.S. Patent No. 6,779,185 ("Roukbi")



APPLE-1030	U.S. Patent No. 6,982,962 ("Lunsford")
APPLE-1031	U.S. Patent No. 6,255,800 ("Bork")
APPLE-1032	U.S. Patent No. 6,975,205 ("French")
APPLE-1033	Declaration of Mr. Peter Rysavy
APPLE-1034	Declaration of Mr. Lawrence Faulkner
APPLE-1035	Declaration of Dr. Charles Knutson
APPLE-1036	"Wireless Wonders Coming Your Way" by Peter Rysavy, https://rysavyresearch.files.wordpress.com/2017/08/2000_05_w ireless_wonders.pdf, last accessed on January 8, 2020.
APPLE-1037	Internet Archive Capture of https://web.archive.org/web/20000517192715/http://www.bluet ooth.com/text/news/archive/archive.asp?news=2, last accessed on January 8, 2020.
APPLE-1038	Internet Archive Capture of https://web.archive.org/web/20000518114920/http://www.bluet ooth.com/text/news/archive/archive.asp?news=list, last accessed on January 8, 2020.
APPLE-1039	Oregon State University Open Source Lab Webpage, http://netwinder.osuosl.org/pub/netwinder/docs/nw/irda/ , last visited January 8, 2020.
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