

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

UNILOC 2017 LLC,
Patent Owner

U.S. Patent No. 8,406,116

Inter Partes Review No.: IPR2019-00700

**DECLARATION OF DR. HENRY H. HOUH
IN SUPPORT OF PETITIONER'S REPLY TO
PATENT OWNER'S RESPONSE TO PETITION**

TABLE OF CONTENTS

	Page
I. Introduction.....	1
II. Background and Qualification.....	1
III. Materials Considered for this Declaration.....	1
IV. Understanding of the Law	1
V. Summary of my Opinions.....	2
VI. The Challenged Claims Are Unpatentable	2
A. Ground 1: Claims 1-20 are Unpatentable Over the Combination of Kirmse (Ex. 1005) and Chambers (Ex. 1006)	2
B. Ground 2: Claims 1-20 are Unpatentable Over the Combination of Chambers (Ex. 1006) and RSIP (EX. 1007).....	2
C. Ground 3: Claims 1-3, 5-10, 12-17, and 19-20 are Unpatentable Over Cordenier (Ex. 1007) and TURN (Ex. 1009).....	4
VII. The Petition Establishes the Obviousness of Every Dependent Claim.....	6
VIII. Conclusion	6

EXHIBITS

Exhibit No.	Description
1001	U.S. Patent No. 8,018,877 to Lin
1002	Declaration of Dr. Henry Houh
1003	File History of U.S. Pat. No. 8,018,877 to Lin
1004	File History of U.S. Pat. No. 7,961,663 to Lin
1005	U.S. Pat. No. 6,699,125 (“ Kirmse ”)
1006	U.S. Pat. App. Pub. No. US 2003/0142654 (“ Chambers ”)
1007	European Pat. App. Pub. EP 1 385 323 A1 (“ Cordenier ”)
1008	Complaint for Patent Infringement dated February 22, 2018 (“ Uniloc Complaint ”)
1009	<i>Declaration by Alexa Morris with the exhibit “draft-rosenberg-midcom-turn-00.txt”, Traversal Using Relay NAT (“TURN”)</i>
1010	<i>Declaration of Sandy Ginoza for IETF RFC 793: Transmission Control Protocol with the exhibit, RFC 793, “Transmission Control Protocol” (“RFC793”)</i>
1011	U.S. Pat. App. Pub. No. 2003/0217174 (“ Dorenbosch ”)
1012	U.S. Patent No. 7,961,663 to Lin (“ 663 Patent ”)
1013	<i>Declaration of Sandy Ginoza for IETF RFC 3103: Realm Specific IP: Protocol Specification with exhibit, RFC 3103, “Realm Specific IP: Protocol Specification” (“RSIP”)</i>
1014	Certified Translation and Original of European Pat. App. Pub. EP 1 009 153 A1 (“ Alos ”)
1015	<i>Declaration by Alexa Morris with the exhibit “draft-rosenberg-sipping-ice-00.txt,” Interactive Connectivity Establishment (ICE): A Methodology for Network Address Translator (NAT) Traversal for the Session Initiation Protocol (SIP) (“ICE”)</i>
1016	U.S. Patent No. 7,969,925 to Lin (“ 925 Patent ”)
1017	<i>Declaration of Sandy Ginoza for IETF RFC 1918: Address Allocation for Private Internets with exhibit, RFC 1918, “Address Allocation for Private Internets” (“NAT”)</i>
1018	U.S. Patent No. 8,539,552 (“ Grabelsky ”)
1019	<i>Declaration of Sandy Ginoza for IETF RFC 3489: STUN - Simple</i>

EXHIBITS continued

Exhibit No.	Description
	<i>Traversal of User Datagram Protocol (UDP) Through Network Address Translators (NATs)</i> with the exhibit, RFC 3489, “STUN - Simple Traversal of User Datagram Protocol (UDP) Through Network Address Translators (NATs)” (“ STUN ”)
1020	January 3, 2011 Amendment and Response to Office Action from file history of U.S. Pat. No. 7,969,925 to Lin
1021	U.S. Pat. App. No. 10/817,994 to Lin
1022	U.S. Pat. App. No. 10/935,342 to Lin
1023	U.S. Pat. App. No. 11/042,620 to Lin
1024	<i>Declaration of Sandy Ginoza for IETF RFC 2026: The Internet Standards Process – Revision 3</i> with the exhibit, RFC 2026: “The Internet Standards Process – Revision 3” (“ Internet Standards Process ”)
1025	Declaration of Dr. Henry H. Houh In Support of Petitioner’s Reply to Patent Owner’s Response to Petition
1026	Merriam-Webster’s Collegiate Dictionary, 10th Ed., (2002) definition of “allocate”

I, Dr. Henry H. Houh, do hereby declare:

I. INTRODUCTION

1. As I discussed in my declaration dated February 22, 2019 that I provided for the Petition in this proceeding (Ex. 1002), I have been retained as an expert witness on behalf of petitioner Apple Inc. (“Apple”) for the above-captioned Petition for *Inter Partes* Review (“IPR”) of U.S. Patent No. 8,406,116 (“116 patent”). I am being compensated for my time in connection with this IPR at my standard consulting rate of \$620 per hour. My compensation is in no way dependent on the outcome of this matter.

II. BACKGROUND AND QUALIFICATION

2. Section II of my prior declaration (Ex. 1002, ¶¶7-25) states my background and expertise that qualify me as an expert in the technical issues in this case. There are no relevant updates to that background or expertise.

III. MATERIALS CONSIDERED FOR THIS DECLARATION

3. In addition to my general knowledge, education, and experience, and the prior art publications I listed in paragraphs 7 through 25 of Exhibit 1002, I considered the materials filed in this proceeding and the materials listed in the Exhibit List above in forming my opinions.

IV. UNDERSTANDING OF THE LAW

4. Paragraphs 27 through 32 of Exhibit 1002 state the legal principles that Apple counsel explained to me and on which I rely.

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.