

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
Filing Date: July 28, 2011
Issue Date: March 26, 2013
Title: Mobile Conferencing Method and System

Inter Partes Review No.: IPR2019-00700

**DECLARATION OF DR. HENRY H. HOUH
UNDER 35 U.S.C. § 1.68**

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EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 8,406,116 to Lin
1002	Declaration of Dr. Henry Houh (this declaration)
1003	File History of U.S. Pat. No. 8,406,116 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	Amended Complaint for Patent Infringement dated April 12, 2018 (“ Uniloc Amended 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 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 ”)

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

I. INTRODUCTION

1. 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.

2. I have been asked to provide my opinions regarding whether claims 1-20 (“the challenged claims”) of the 116 patent are invalid as anticipated or obvious. In preparing this declaration, I have reviewed the 116 patent, the file history of the 116 patent, and numerous prior art references from the time of the alleged invention.

3. I have been advised and it is my understanding that patent claims in an IPR are interpreted using the same claim construction standard that is used to construe the claim in a civil action in federal district court.

4. In forming the opinions expressed in this declaration, I relied upon my education and experience in the relevant field of the art, and have considered the viewpoint of a person having ordinary skill in the relevant art, as of 2004. My opinions directed to the invalidity of claims 1-20 of the 116 patent are based, at least in part, on the following prior art publications:

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