

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 7,587,207

**DECLARATION OF DR. CHARLES D. KNUTSON
IN SUPPORT OF THE PETITION**

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DECLARATION EXHIBITS

- APPLE-1001 U.S. Patent No. 7,587,207 to Davies (“’207 Patent”)
- APPLE-1002 Prosecution History of the ’207 Patent (“the Prosecution History”)
- APPLE-1004 Curriculum Vitae of Dr. Charles Knutson
- APPLE-1005 U.S. Patent No. 6,738,628 (“McCall”)
- APPLE-1006 U.S. Patent No. 5,806,017 (“Hancock”)
- APPLE-1007 Specification of the Bluetooth System: Wireless connections made easy, Core, Vol. 1, Bluetooth, Dec. 1, 1999 (“BT Core”)
- APPLE-1008 U.S. Patent No. 6,255,800 (“Bork”)
- APPLE-1009 [Reserved]
- APPLE-1010 Internet Archive Capture of <http://www.bluetooth.com:80/developer/specification/specification.asp> from March 1, 2000
- APPLE-1011 Internet Archive Capture of <http://www.bluetooth.com:80/developer/specification/core.asp> from March 1, 2000
- APPLE-1012 Internet Archive Capture of <http://www.bluetooth.com:80/developer/specification/order.asp> from March 1, 2000
- APPLE-1013 Internet Archive Capture of <http://www.bluetooth.com:80/news/archive/archive.asp> from March 4, 2000
- APPLE-1014 U.S. Patent No. 6,704,293 (“Larsson”)

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APPLE-1015

PCT Patent Application Publication No. WO 01/41371
("Rune")

...

I, Charles D. Knutson, hereby declare the following:

I. INTRODUCTION

1. I have been retained by Fish & Richardson P.C., counsel for Apple Inc. (“**Apple**” or “**Petitioner**”), to analyze certain issues relating to the validity of certain claims of U.S. Patent No. 7,587,207 (“**’207 Patent**”).

2. In forming the opinions I have expressed in this declaration, I have reviewed the ’207 patent, its file history, the Petition for *Inter Partes Review* from Apple, and any documents cited or listed in this declaration. Furthermore, my opinions are also based on my experience and knowledge (as detailed further below).

3. I have been retained on behalf of Apple Inc., and am being compensated for my work on this matter. My compensation is not contingent upon the outcome of this matter.

II. SUMMARY OF CONCLUSIONS

4. As explained below, my opinion is that a POSITA would have viewed claims 1-3, 5, 6, and 9-11 of the ’207 patent as being obvious in view of U.S. Patent No. 6,738,628 (“McCall”), U.S. Patent No. 5,806,017 (“Hancock”), U.S. Patent No. 6,704,293 (“Larsson”), and Specification of the Bluetooth System: Wireless connections made easy, Core, Vol. 1, Bluetooth, Dec. 1, 1999 (“BT Core”).

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