

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.  
Petitioner

v.

UNILOC USA, INC. and UNILOC LUXEMBOURG, S.A.  
Patent Owner

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Patent 7,587,207

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**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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