UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

MPH TECHNOLOGIES OY,
Patent Owner

Case IPR2019-00819
U.S. Patent No. 7,620,810

DECLARATION OF DAVID GOLDSCHLAG, PH.D.

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I, Dr. David Goldschlag, declare as follows:

1. I have been retained on behalf of Apple Inc. for the above-captioned *inter partes* review proceeding. I understand that this proceeding involves U.S. Patent No. 7,620,810 ("'810 patent"), titled "Method and Network For Ensuring Secure Forwarding of Messages," and that the '810 patent is currently assigned to Mobility Patent Holding MPH Oy.

2. I have reviewed and am familiar with the specification of the '810 patent issued on November 17, 2009. I understand that the '810 patent has been provided as Ex. 1001. I will cite to the specification using the following format: Ex. 1001, '810 patent, 1:1-10. This example citation points to the '810 patent specification at column 1, lines 1-10.

3. I have reviewed and am familiar with the following prior art used in the Petition for *Inter Partes* Review of the '810 patent:

- File Wrapper for U.S. Patent No. 7,620,810. I understand that the '810 patent file wrapper has been provided as Ex. 1003.
- **U.S. Patent No. 6,904,466** to Ishiyama *et al.* was filed on May 19, 2000, more than one year before the earliest possible priority date of the '810 patent. I understand that Ishiyama has been provided as Ex. 1004.

- **U.S. Patent No. 7,028,337** to Murakawa was filed on December 1, 2000 and published September 6, 2001, both dates being before the earliest priority date of the ’810 patent. I understand that Murakawa has been provided as Ex. 1005.
- **U.S. Patent No. 6,976,177** to Ahonen was filed on January 18, 2001 and published on July 19, 2001, both dates being more than one year before the earliest priority date of the ’810 patent. I understand that Ahonen has been provided as Ex. 1006.
- **U.S. Patent No. 6,954,790** to Forslöw was filed on December 5, 2000, more than one year before the PCT priority date of the ’810 patent. I understand that Forslöw has been provided as Ex. 1007.

4. I have also reviewed the following other documents:

- *Demystifying the IPsec Puzzle*, Sheila Franklel, Published 2001. I understand Frankel has been provided as Ex. 1008.
- IP Security - The Internet Protocol Journal – Volume 3, No. 1, William Stallings, Published March 2000. I understand Stallings has been provided as Ex. 1009.
- Mobility-aware IPsec ESP tunnels, Francis Dupont, IETF Draft Posted February 22, 2001. I understand DuPont has been provided as Ex. 1010.

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