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BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

MPH TECHNOLOGIES OY,
Patent Owner

Case IPR2019-00820
U.S. Patent No. 7,937,581

DECLARATION OF DAVID GOLDSCHLAG, PH.D.

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1. Ishiyama in view of Murakawa discloses "A method for ensuring secure forwarding of a message in a telecommunication network, having at least one mobile terminal and another terminal and a security gateway therebetween" [1-pre]. 34

2. Ishiyama discloses "a) establishing a secure connection having a first address of the mobile terminal as a first end-point and a gateway address of the security gateway as a second end-point," [1A]. 39

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3. Ishiyama discloses “b) the mobile terminal changing from the first address to a second address,” [1B]. 43

4. Ishiyama discloses “c) while at the second address, the mobile terminal sending a request message to the gateway address of the security gateway to request the security gateway to change the secure connection to be defined between the second address and the gateway address of the security gateway,” [1C]. 44

5. Ishiyama discloses “in response to the request message from the mobile terminal, the security gateway changing an address definition of the secure connection from the first address to the second address,” [1D]. 47

6. Ishiyama in view of Murakawa discloses “the mobile terminal sending a secure message in the secure connection from the second address of the mobile terminal to the other terminal via the security gateway.” [1E]. 49

D. The Combination of Ishiyama and Murakawa Renders Claim 9 Obvious. 54

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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 this proceeding involves U.S. Patent No. 7,937,581 ("'581 patent"), titled "Method and Network For Ensuring Secure Forwarding of Messages," and that the '581 patent is currently assigned to MPH Technologies OY.

2. I have reviewed and am familiar with the specification of the '581 patent, issued on May 3, 2011. I understand the '581 patent has been provided as Ex. 1001. I will cite to the specification using the following format: Ex. 1001, '581 patent, 1:1-10. This example citation points to the '581 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 '581 patent:

- **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 '581 patent. I understand 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 '581 patent. I understand Murakawa has been provided as Ex. 1005.

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