

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

MPH TECHNOLOGIES OY,
Patent Owner

Case IPR2019-00822
U.S. Patent No. 8,346,949

DECLARATION OF DAVID GOLDSCHLAG, PH.D.

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TABLE OF CONTENTS

I. Background and Qualifications.....	5
II. Legal Understanding	8
A. My Understanding of Claim Construction	8
B. My Understanding of Obviousness	8
C. Level of Skill in the Art.....	10
III. Overview of the State of the Art at the Time of Filing.....	11
A. Internet Protocol Security (IPSec).....	12
B. The Internet Key Exchange (IKE).....	15
C. The Secure Sockets Layer (SSL).....	17
D. IPSec and Network Address Translation (NAT).....	18
IV. Overview of the '949 Patent	20
V. Claim Construction	24
A. “secure connection”	24
B. “unique identity [of the secure connection]”.....	25
VI. The Combination of RFC3104 and Grabelsky Renders Claims 1, 2, 4-7, 9, 11-14, 20-21, and 27-29 Obvious.....	26
A. Brief Overview of RFC3104	26
B. The Combination of RFC3104 and Grabelsky.....	30
C. Claim 1.....	36
D. Claim 2.....	54
E. Claim 4.....	55
F. Claim 5.....	58
G. Claim 6.....	59
H. Claim 7.....	60
I. Claim 9.....	63
J. Claim 11.....	66
K. Claim 12.....	69
L. Claim 13.....	70
M. Claim 14.....	71

Declaration of David Goldschlag, Ph.D.
U.S. Pat. No. 8,346,949

N. Claim 20.....	71
O. Claim 21.....	72
P. Claim 27.....	73
Q. Claim 28.....	76
R. Claim 29.....	77
VII. The Combination of RFC3104, Grabelsky, and Wagner Renders Claim 3 Obvious.	78
A. Brief Overview of Wagner	78
B. Claim 3.....	79
VIII. Conclusion.....	84

Declaration of David Goldschlag, Ph.D.
U.S. Pat. No. 8,346,949

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. 8,346,949 (“the ’949 patent”), titled “Method and System for Sending a Message Through a Secure Connection,” and that the ’949 patent is currently assigned to MPH Technologies OY.

2. I am over 18 years of age. I have personal knowledge of the facts stated in this Declaration and could testify competently to them if asked to do so.

3. I have reviewed and am familiar with the specification of the ’949 patent issued on January 1, 2013. I understand that the ’949 patent has been provided as Ex. 1001. I will cite to the specification using the following format: (’949 patent, 1:1-10.) This example citation points to the ’949 patent specification at column 1, lines 1-10.

4. I have also reviewed and am familiar with the following documents and materials:

- “RFC3104: RSIP Support for End-to-end IPsec,” by Gabriel Montenegro and Michael Borella (“RFC3104”). I understand that RFC3104 has been provided as Ex. 1004.
- U.S. Patent No. 7,032,242 to Grabelsky *et al.* (“Grabelsky”). I understand that Grabelsky has been provided as Ex. 1005.

Declaration of David Goldschlag, Ph.D.
U.S. Pat. No. 8,346,949

- “Analysis of the SSL 3.0 Protocol,” by David Wagner and Bruce Schneier (“Wagner”). I understand that Wagner has been provided as Ex. 1006.
- “RFC2401: Security Architecture for the Internet Protocol,” by Stephen Kent and Randall Atkinson (“RFC2401”). I understand that RFC2401 has been provided as Ex. 1015.
- “RFC2402: IP Authentication Header,” by Stephen Kent and Randall Atkinson (“RFC2402”). I understand that RFC2402 has been provided as Ex. 1016.
- “RFC2406: IP Encapsulating Security Payload (ESP),” by Stephen Kent and Randall Atkinson (“RFC2406”). I understand that RFC2406 has been provided as Ex. 1017.
- “RFC2409: The Internet Key Exchange (IKE),” by Dan Harkins and Dave Carrel (“RFC2409”). I understand that RFC2409 has been provided as Ex. 1018.
- “RFC3102: Realm Specific IP: Framework,” by Michael Borella *et al.* (“RFC3102”). I understand that RFC3102 has been provided as Ex. 1019.
- Sheila Frankel, Demystifying the IPsec Puzzle (“Frankel”). I understand that Frankel has been provided as Ex. 1011.

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