UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC.
Petitioner

v.

UNILOC 2017 LLC
Patent Owner

Patent No. 6,836,654

DECLARATION OF DR. ZYGMUNT J. HAAS

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A. *Nokia* – Ex. 1004 – Owner's Manual for the Nokia 9000i Communicator, Issue 1.1 19

B. *Alos* – Ex. 1005 – U.S. Patent Publication US2002/0147028 22

C. *Kemppi* – Ex. 1006 – U.S. Patent No. 4,868,846 25

D. *Matsukida* – Ex. 1021– Japanese Patent Application Publication No. JP H6-216841 26

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VIII. THE PRIOR ART DISCLOSES THE CHALLENGED CLAIMS OF THE '654 PATENT 31

A. The Combination of *Nokia* and *Alos* Discloses Claims 1-4 and 7-9 31

1. Claim 1 31

a) [1pre] "A mobile radiotelephony device, comprising:" 31

b) [1a] "blocking means for preventing a normal operation of the mobile radiotelephony device, wherein the normal operation includes a processing of outgoing calls;" 36

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c) [1b] "timing means for activating the blocking means in response to the mobile radiotelephony device being inactive during the normal operation of the mobile radiotelephony device for a defined period of time subsequent to a mounting of a linked user identification module inside the mobile radiotelephony device;" 40

(1) "timing means for activating the blocking means in response to the mobile radiotelephony device being inactive during the normal operation of the mobile radiotelephony device for a defined period of time…" 40

(2) "subsequent to a mounting of a linked user identification module inside the mobile radiotelephony device;" 43

d) [1c] "deblocking means for permitting the normal operation of the mobile radiotelephony device in response to a supply of a deblocking code to the mobile radiotelephony device subsequent to the mounting of the linked user identification module inside the mobile radiotelephony device and subsequent to the defined period of time." 52

2. Claim 2 57

a) "The mobile radiotelephony device of claim 1, wherein an activation of the blocking means prevents all transmission of outgoing calls." 57

3. Claim 3 60

a) "The mobile radiotelephony device of claim 1, wherein an activation of the blocking means prevents all transmissions of non-emergency outgoing calls and permits all transmissions of emergency outgoing calls." 60

4. Claim 7 63

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a) "The mobile radiotelephony device of claim 1, wherein an international identification number stored on the linked user identification module is stored on the mobile radiotelephony device as data corresponding to a link between the mobile radiotelephony device and the linked user identification module." 63

5. Claim 8 67

a) "The mobile radiotelephony device of claim 1, wherein a personal identification number stored on the linked user identification module is stored as the deblocking code on the mobile radiotelephony device." 67

6. Claim 9 74

a) [9pre] "The mobile radiotelephony device of claim 1, further comprising:" 74

b) [9a] "test means for activating the blocking means when any unlinked user identification module is mounted inside the mobile radiotelephony device." 74

B. The Combination of *Nokia*, *Alos*, and *Kemppi* Discloses Claims 4-6 79

1. Claim 4 79

a) [4pre] "The mobile radiotelephony device of claim 1, further comprising:" 79

b) [4a] "locking means for facilitating an activation of the block means by the timing means." 79

(1) Interpretation 1: "Locking Means" Relates to "Timing Means" 80

(2) Interpretation 2: "Locking Means" Relates to a SIM Lock Feature 80

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2. Claim 5 86

a) [5pre] "The mobile radiotelephony device of claim 1, further comprising:" 86

b) [5a] "connecting means for establishing a link between the mobile radiotelephony device and the linked user identification module." 86

3. Claim 6 90

a) [6pre] "The mobile radiotelephony device of claim 5, further comprising:" 90

b) [6a] "locking means for facilitating an establishment of the link between the mobile radiotelephony device and the linked user identification module by the connection means." 90

C. The Combination of *Matsukida* and *Alos* Discloses Claims 1-2 and 7-9 94

1. Claim 1 94

a) [1pre] "A mobile radiotelephony device, comprising:" 94

b) [1a] "blocking means for preventing a normal operation of the mobile radiotelephony device, wherein the normal operation includes a processing of outgoing calls;" 95

c) [1b] "timing means for activating the blocking means in response to the mobile radiotelephony device being inactive during the normal operation of the mobile radiotelephony device for a defined period of time subsequent to a mounting of a linked user identification module inside the mobile radiotelephony device;" 98

(1) "timing means for activating the blocking means in response to the mobile radiotelephony device

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