UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TCT Mobile (US) Inc., Huizhou TCL Mobile Communication Co., Ltd., and Shenzhen TCL Creative Cloud Technology Co., Ltd.,

Petitioners,

v.

Ancora Technologies, Inc.,

Patent Owner.

PTAB Case No. IPR2020-01034

Patent No. 6,411,941 B1

DECLARATION OF ANDREW WOLFE IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,411,941

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B. Claim 1 45

1. Preamble: "A method of restricting software operation within a license for use with a computer including an erasable, non-volatile memory area of a BIOS of the computer, and a volatile memory area; the method comprising the steps of:" 45

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2. Element 1.a: "selecting a program residing in the volatile memory".....55

3. Element 1.b: "using an agent to set up a verification structure in the erasable, non-volatile memory of the BIOS, the verification structure accommodating data that includes at least one license record".....60

4. Element 1.c: "verifying the program using at least the verification structure from the erasable non-volatile memory of the BIOS, and".....68

5. Element 1.d: "acting on the program according to the verification.".....69

C. Claim 2: "A method according to claim 1, further comprising the steps of: establishing a license authentication bureau.".....70

D. Claim 3.....71

1. Preamble: "A method according to claim 2, wherein setting up a verification structure further comprising the steps of:".....71

2. Element 3.a: "establishing, between the computer and the bureau, a two-way data-communications linkage;".....71

3. Element 3.b: "transferring, from the computer to the bureau, a request-for-license including an identification of the computer and the license-record's contents from the selected program;".....72

4. Element 3.c: "forming an encrypted license-record at the bureau by encrypting parts of the request-for-license using part of the identification as an encryption key;".....76

5. Element 3.d: "transferring, from the bureau to the computer, the encrypted license-record; and".....77

6. Element 3.e: "storing the encrypted license record in the erasable non-volatile memory area of the BIOS.".....78

E. Claim 6: "A method according to claim 1 wherein selecting a program includes the steps of: establishing a licensed-software-program in the volatile memory of the computer wherein said licensed-software-program includes contents used to form the license-record.".....79

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F. Claim 7 80
1. Preamble: "A method according to claim 6 wherein using an agent to set up the verification structure includes the steps of:" 80
2. Element 7.a: "establishing or certifying the existence of a pseudo-unique key in a first non-volatile memory area of the computer; and" 80
3. Element 7.b: "establishing at least one license-record location in the first nonvolatile memory area or in the erasable, non-volatile memory area of the BIOS." 82
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3. Element 8.b: "establishing the encrypted license-record in one of the at least one established license-record locations." 84
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1. Preamble: "A method according to claim 7 wherein verifying the program includes the steps of:" 85
2. Element 9.a: "encrypting the licensed-software-program's license-record contents from the volatile memory area or decrypting the license-record in the erasable, non-volatile memory area of the BIOS, using the pseudo-unique key; and" 85
3. Element 9.b: "comparing the encrypted licenses-software-program's license-record contents with the encrypted license-record in the erasable, non-volatile memory area of the BIOS, or comparing the license-software-program's license-record contents with the decrypted license-record in erasable non-volatile memory area of the BIOS." 86

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I. Claim 10: "A method according to claim 9 wherein acting on the program includes the step: restricting the program's operation with predetermined limitations if the comparing yields non-unity or insufficiency."....88

J. Claim 11: "A method according to claim 1 wherein the volatile memory is a RAM." 89

K. Claim 12: "The method of claim 1, wherein a pseudo-unique key is stored in the non-volatile memory of the BIOS."....89

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