

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner

v.

BILLJCO LLC,

Patent Owner

CASE: IPR2022-00131

U.S. PATENT NO. 8,639,267

**DECLARATION OF ISTVAN JONYER, PH.D. REGARDING CLAIMS 1, 5,
13, 20, 21, 29, 30, 34, 42, AND 49 OF U.S. PATENT 8,639,267**

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I, Istvan Jonyer, Ph.D., hereby declare as follows:

I. INTRODUCTION

1. I am a computer scientist, former academic, Google manager, and technology entrepreneur with experience developing mobile device applications.

2. I have been engaged by Patent Owner BillJCo LLC as a consultant in connection with the present *inter partes* review by Petitioner Apple Inc.

3. This Declaration sets forth the opinions I have formed and the bases for them concerning patentability of claims 1, 5, 13, 20, 21, 29, 30, 34, 42, and 49 ("the Challenged Claims") of U.S. Patent No. 8,639,267 ('267 Patent) (EX1001).

4. I have relied on my knowledge, experience, and expertise in the technologies involved, which I have acquired over my career, in providing the analysis and opinions contained in this report. All of my conclusions and opinions are provided within a reasonable degree of professional certainty.

II. SUMMARY OF OPINIONS

5. It is my opinion that the Challenged Claims are not obvious: in view of U.S. Patent Application Publication No. 2005/0096044 ("Haberman") (EX1004) alone; in view of Haberman, further in view of U.S. Patent Application Publication No. 2002/0159401 ("Boger") (EX1005); or in view of U.S. Patent Application Publication No. 2002/0132614 ("Vanluijt") (EX1006).

6. It is my opinion that Haberman fails to disclose or make obvious the various "privilege" related limitations found the Challenged Claims.

7. It is also my opinion that Haberman fails to disclose or make obvious the claimed "destination identity" limitation, as recited in each independent claim of the Challenged Claims (i.e., claims 1 and 29) of the '267 Patent.

8. It is my opinion that the Haberman reference in combination with Boger fails to disclose or make obvious the various "privilege" related limitations found the Challenged Claims.

9. It is also my opinion that Haberman in combination with Boger fails to disclose or make obvious the claimed "destination identity" limitation, as recited in each independent claim of the Challenged Claims of the '267 Patent.

10. It is my further opinion that the Vanluijt reference fails to disclose or make obvious the various "privilege" related limitations found the Challenged Claims.

11. It is also my opinion that Vanluijt fails to disclose or make obvious the claimed "destination identity" limitation, as recited in each independent claim of the Challenged Claims of the '267 Patent.

12. It is further my opinion that Apple's devices accused of infringement in a pending litigation between Apple and BillJCo (*BillJCo, LLC v. Apple, Inc.*, 4:22-

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