

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 JULIE DILLNER PROVIDING SUPPLEMENTAL
EVIDENCE

I, Julie Dillner, hereby declare as follows:

1. I am a paralegal in the law firm of Saul Ewing Arnstein & Lehr LLP, counsel of record for Patent Owner BillJCo, LLC (“BillJCo”).

2. I have personal knowledge of the facts set forth in this Declaration. I make this Declaration to provide supplemental evidence, pursuant to 37 C.F.R. § 42.64(b)(2), in response to Petitioner’s Objection to Evidence dated August 24, 2022. See Paper 17.

3. **Exhibit 2014** is a true and correct copy of the technical dictionary definitions for the term “privileged instruction,” “privilege,” and “preferences.” The definitions were downloaded on August 17, 2022 from the following online sources:

<https://encyclopedia2.thefreedictionary.com/privileged+instruction;>

[https://en.wikipedia.org/wiki/Privilege_\(computing\);](https://en.wikipedia.org/wiki/Privilege_(computing);)

<https://www.techopedia.com/definition/16044/privilege-security;>

<https://dictionary.cambridge.org/us/dictionary/english/preference;>

<https://www.google.com/search?q=preferece+definition;>

<https://www.yourdictionary.com/preferences;> and

[https://www.computerhope.com/jargon/p/preference.htm.](https://www.computerhope.com/jargon/p/preference.htm)

4. **Exhibit 2015** is a true and correct copy of the Amended Complaint [Dkt No. 68] (SEALED) filed in *BillJCo, LLC v. Apple, Inc.*, Case No.: 5:22-CV-03201-VKD (N.D. Cal.) (“the Amended Complaint”), and select exhibits, including

Exhibit LL. Exhibit LL to the Amended Complaint is a true and correct copy of Exhibit H (ECF No. 1-13) to the original Complaint for Patent Infringement (ECF No. 1) filed in the litigation *BillJCo, LLC v. Apple, Inc.*, Case No.: 6:21-cv-00528 (E.D. Tex.), which was transferred to the Northern District of California. Exhibit LL to the Amended Complaint is a claim chart comparing claims of U.S. 8,639,267 to Apple iOS Products.

5. **Exhibit 2020** is a true and correct copy of a document title “Getting Started With iBeacon,” Version 1.0 and dated June 2, 2014. Exhibit 2020 was downloaded 1.0 (June 2, 2014), from <https://developer.apple.com/ibeacon/Getting-Started-with-iBeacon.pdf> on October 26, 2020.

I declare upon penalty of perjury that the forgoing is true and correct to the best of my understanding and belief.

Dated: September 8, 2022

/s/ Julie Dillner
Julie Dillner

Certification of Service Under 37 C.F.R. § 42.6(e)(4)

The undersigned hereby certifies that on September 8, 2022, I caused a true and correct copy of the DECLARATION OF JULIE DILLNER PROVIDING SUPPLEMENTAL EVIDENCE to be served on the following counsel for Petitioner by electronic mail to the following email addresses:

Larissa S. Bifano	larissa.bifano@dlapiper.com
Joseph Wolfe	Joseph.Wolfe@us.dlapiper.com
Zachary Conrad	Zack.Conrad@dlapiper.com

Date: September 8, 2022

/Brian R. Michalek/
(Reg. No. 65,816)
Attorney for Patent Owner