

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ERICSSON INC.,
Petitioner,

v.

KONINKLIJKE KPN N.V.,
Patent Owner.

Case No. IPR2022-00557
Patent 9,667,669

DECLARATION OF ANTHONY WECHSELBERGER

Table of Contents

I.	INTRODUCTION	7
II.	MATERIALS CONSIDERED	8
III.	QUALIFICATIONS	11
IV.	LEGAL UNDERSTANDING	19
	A. My Understanding of Claim Construction.....	19
	B. My Understanding of Obviousness	20
	C. Level of Ordinary Skill in the Art	25
V.	THE '669 PATENT	25
	A. Priority Date	25
	B. Overview of the '669 Patent.....	26
	C. Level of Ordinary Skill in the Art	31
	D. The Challenged Claims	32
	E. Claim Construction.....	33
	1. “Composition Session”	34
VI.	APPLICATION OF THE PRIOR ART TO THE CHALLENGED CLAIMS	37
	A. Grounds of Unpatentability	37
	B. Brief Summary of Prior Art	37
	1. Foti (EX1006)	37
	2. RFC 3261 (EX1007)	43
	3. RFC 4566 (EX1008)	45
	4. RFC 2326 (EX1009)	45
	5. Wright (EX1010)	46
	6. Lloyd (EX1011)	47
	C. Ground 1: Foti in view of RFC 3261, RFC 4566, RFC 2326, Wright, and Lloyd	49
	1. Rationale and Motivation to Combine.....	49
	2. Claim 1	55

i.	1[p] A method for managing associated sessions in a network, the network having a network element configured for managing associated sessions between the network and at least one user equipment, the method comprising	55
(i)	[1a] providing a composition session identifier for associating sessions in the network	58
(ii)	[1b] after providing the composition session identifier, exchanging the composition session identifier between a user equipment and the network element a first time	61
(iii)	[1c] associating two or more sessions with the composition session identifier by exchanging the composition session identifier at least a second time, wherein exchanging the composition session identifier at least a second time comprises the network element exchanging the composition session identifier with the user equipment	63
a.	AS 40 Associates Two or More Sessions With the Composition Session Identifier	64
b.	Associating the Two or More Sessions By Exchanging the Composition Session ID a Second Time.....	66
(iv)	[1d] initiating establishment of a composition session, the composition session being a signaling session for facilitating management of the two or more sessions and exchanging the composition session identifier between the user equipment and the network element as part of said establishment, the composition session being different from the two or more sessions.....	68
a.	Foti's SIP Signaling Session Comprises the Claimed "Composition Session" Under Either Petitioner's Construction or the Construction Argued by Patent Owner.	69
a.	Foti's SIP Signaling Session Facilitates Management of the Two or More Sessions	71

b.	Foti's SIP Signaling Session Exchanges the Composition Session Identifier Between UT 20 and AS 40 as Part of Said Establishment.	74
c.	Foti's SIP Signaling Session is Different than the Two or More Associated RTSP Sessions.	74
1.	[1e] modifying the composition session, wherein modifying the composition session comprises using signaling in the composition session to terminate all of the two or more sessions	74
3.	Claim 2.	80
i.	[2p] The method according to claim 1, wherein providing the composition identifier comprises the user equipment generating the composition session identifier.	80
ii.	[2a] sending a request for initiating the composition session from the user equipment to the network element, the request comprising the composition session identifier.	80
4.	Claim 3. The method according to claim 2, wherein the request for initiating the composition session further comprises one or more session identifiers and, optionally, resource reservation information and/or resource allocation information associated with the one or more sessions identified by the session identifiers.	81
a.	Foti teaches that the SIP INVITE may include the one or more RTSP sessions.	81
a.	IETF Protocols and Wright Describe the Ability to Include Resource Reservation and/or Resource Allocation Information in the SIP INVITE.	83
5.	Claim 6. The method according to claim 1, wherein the method further comprises: the user equipment initiating the two or more associated sessions by sending two or more session initiation requests for a session to the network element, each request comprising the composition session identifier.	85

6. Claim 8. The method according to claim 1, wherein the method further comprises: the network element initiating the two or more associated sessions by sending two or more requests for a session to the user equipment, each request comprising the composition session identifier.....87
7. Claim 10. The method according to claim 1, wherein combined streams of the two or more associated sessions are presented to the user equipment as a personalized composed multimedia stream.89
8. Claim 11. The method according to claim 1, wherein the network further comprises storage, the method further comprising: the network element storing the composition session identifier and two or more associated session identifiers in the storage.91
9. Claim 12. The method according to claim 1, the method further comprising: modifying the composition session by at least one of (i) modifying at least one of the two or more sessions in the composition session, or (ii) transferring at least one of the two or more sessions from the composition session to a further composition session or outside the composition session.....91
10. Claim 2193
 - i. [21p] A method for managing associated sessions in a network, the network having a network element configured for managing associated sessions between the network and at least one user equipment, the method comprising 93
 1. [21a] providing a composition session identifier for associating sessions in the network 93
 2. [21b] after providing the composition session identifier, exchanging the composition session identifier between a user equipment and the network element a first time 93
 3. [21c] associating two or more sessions with the composition session identifier by exchanging the composition session identifier at least a second time, wherein exchanging the composition session identifier at least a second time comprises the

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.