UNITED STATES PATENT AND TRADEMARK OFFICE

PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

CPC PATENT TECHNOLOGIES PTY, LTD.,
Patent Owner

CASE: IPR2022-00601
U.S. PATENT NO. 9,269,208

DECLARATION OF DR. WILLIAM C. EASTTOM III

TABLE OF CONTENTS

I, Dr. William C. Easttom III, do hereby declare and say:

I. INTRODUCTION

1. I am over the age of twenty-one (21) and competent to make this declaration. I am also qualified to give testimony under oath. The facts and opinions listed below are within my personal knowledge.

2. I have been engaged in this matter to provide my independent analysis of certain issues I understand arise in connection with the above-mentioned *Inter Partes* Review of U.S. Patent No. 9,269,208 (which I refer to as "the '208 Patent") (Ex. 1001).

3. I have considered the documents cited throughout this declaration, including the '208 Patent (Ex. 1001), and have been asked to provide my opinions on how those skilled in the art (as defined herein) would understand those documents. I provide my conclusions regarding the disclosures of these documents below.

4. I have also not formulated any opinions regarding patent validity in light of any prior art other than that cited by Petitioner Apple Inc. ("Petitioner" or "Apple"). For the cited prior art, I have examined that art in light of the arguments made by Apple, the opinions expressed by Dr. Andrew Sears ("Dr. Sears"), and the preliminary determination by the Patent Trial and Appeal Board ("Board") in instituting this *inter partes* review.

5. I am not offering any conclusions as to the ultimate determinations that I understand the Board will make in this proceeding. I am simply providing my opinion on the technical aspects of the documents.

II. BACKGROUND

6. I have 30 years of experience in the computer science industry including extensive experience with computer security, computer software, and computer networking. I have authored 37 computer science books, including textbooks used at over 60 universities around the world. I also have authored over 70 research papers and am an inventor with 25 patents, including patents related to computer networking.

7. I hold a Doctor of Science (D.Sc.) degree in Cyber Security from Capitol Technology University (Dissertation Topic: "A Comparative Study of Lattice Based Algorithms for Post Quantum Computing"). I also hold a Doctor of Philosophy (Ph.D.) in Technology (focused on nanotechnology. Dissertation Topic: "The Effects of Complexity on Carbon Nanotube Failures") from Capitol Technology University. I also have a Doctor of Philosophy (Ph.D.) in Computer Science from the University of Portsmouth (Dissertation Topic: topic "A Systematic Framework for Network Forensics Using Graph Theory"). I also hold three master's degrees (one in Applied Computer Science, one in Education, and one in Systems Engineering).

8. I am currently an Adjunct Lecturer for Georgetown teaching graduate courses in requirements engineering and cryptography. I am also an adjunct for Vanderbilt University teaching graduate computer science courses, specifically courses in quantum computing and digital forensics.

9. I am a Senior member and Distinguished Speaker for the Association of Computing Machinery (ACM) and a Senior Member and Distinguished Visitor of the Institute for Electrical and Electronics Engineering (IEEE). The IEEE is the world's largest and preeminent engineering organization. Among other activities, the IEEE creates industry standards for a wide range of engineering disciplines, including software development standards. I am also a Distinguished Visitor of the IEEE. I have been involved in IEEE standards creation for several years:

   a. I worked on the DevOps 2675 standards group from 2017 to 2019.

   b. I am also currently the Vice Chair of the IEEE p23026 Standards Group "Systems and Software Engineering -- Engineering and Management of Websites for Systems, Software, and Services Information."

   c. I am the Chair of IEEE P3123 Standard for Artificial Intelligence and Machine Learning (AI/ML) Terminology and Data Formats.

   d. I am a member of IEEE P2995 - Trial-Use Standard for a Quantum Algorithm Design and Development Standards Group from 2021 to

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