

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

MOZIDO CORFIRE – KOREA, LTD.
Patent Owner.

IPR2022-01149
U.S. Patent No. 10,223,692

**DECLARATION OF DR. HENRY HOUH,
UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION FOR
INTER PARTES REVIEW**

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I, Henry Houh, do hereby declare as follows:

I. INTRODUCTION

1. I am making this declaration at the request of Apple, Inc. in the matter of the *Inter Partes* Review of U.S. Patent No. 10,223,692 (“the ’692 Patent”) to Min Hwan Jeon.

2. I am being compensated for my work in this matter at my standard hourly rate. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the outcome of this matter or the specifics of my testimony.

3. I have been asked to provide my opinions regarding whether claims 1-13 (“the Challenged Claims”) of the ’692 Patent are unpatentable as they would have been obvious to a person having ordinary skill in the art (“POSITA”) at the time of the alleged invention, in light of the prior art. It is my opinion that all of the limitations of the challenged claims would have been obvious to a POSITA.

4. In the preparation of this declaration, I have studied:

- a. the ’692 Patent, APPL-1001;
- b. the prosecution history of the ’692 Patent (“’692 File History”), APPL-1002;
- c. U.S. Patent Publication No. 2009/0288012 to Hertel et al. (“Hertel”), APPL-1005;

- d. U.S. Patent Publication No. 2009/0037326 to Chitti et al. (“Chitti”), APPL-1006;
- e. U.S. Patent 8,296,686 to Tedesco et al. (“Tedesco”), APPL-1007;
- f. U.S. Patent Publication No. 2012/0123937 to Spodak (“Spodak”), APPL-1008;
- g. U.S. Patent 7,967,196 to Bierbaum et al. (“Bierbaum”), APPL-1010;
- h. U.S. Patent Publication No. U.S. Patent Publication No. 2012/0197743 to Grigg et al. (“Grigg”), APPL-1012;
- i. U.S. Patent Publication No. 2009/0183120 (“Ording”), APPL-1016;
and
- j. U.S. Patent 9,116,596 (“Roman”), APPL-1017.
- k. In forming the opinions expressed below, I have considered:
 - the documents listed above;
 - the relevant legal standards, including the standard for obviousness,and any additional authoritative documents as cited in the body of this declaration; and
 - my own knowledge and experience based upon my work in the field of software and telecommunications as described below, as well as the following materials:
 - a. U.S. Patent 7,090,577 to Serizawa et al., APPL-1009;

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