UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC,
Petitioner,

v.

MOZIDO, INC.,
Patent Owner.
_____

U.S. Patent No. 9,189,785

_____

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

TABLE OF CONTENTS

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. 9,189,785 ("the '785 Patent") to Liberty *et al*.

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 1-21 ("the Challenged Claims") of the '785 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 '785 Patent, Ex.1001;

b.   the prosecution history of the '785 Patent ("'785 File History"), Ex.1002;

c.   U.S. Patent Publication No. 2011/0208659 to Easterly *et al*. ("Easterly"), Ex.1005;

d.   U.S. Patent Publication No. 2013/0346291 to Vellozo Luz et al.

("Luz"), Ex.1006;

5.   In forming the opinions expressed below, I have considered:

a.   the documents listed above;

b.   the relevant legal standards, including the standard for obviousness,

and any additional authoritative documents as cited in the body of this declaration;

and

c.   my own knowledge and experience based upon my work in the field

of networking as described below, as well as the following materials.

d.   U.S. Patent No. 9,317,850 to Keresman ("Keresman"), Ex.1007;

e.   U.S. Patent No. 8,380,177 to Laracey ("Laracey"), Ex.1008; and

f.   U.S. Patent No. 7,536,352 to Lapsley ("Lapsley"), Ex.1009.

6.   Unless otherwise noted, all emphasis in any quoted material has been

added.

II.   QUALIFICATIONS AND PROFESSIONAL EXPERIENCE

7.   My complete qualifications and professional experience are described

in my *Curriculum Vitae*, a copy of which can be found in Exhibit 1004. The

following is a brief summary of my relevant qualifications and professional

experience.

8.   I received a Ph.D. in Electrical Engineering and Computer Science

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