

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

VOIP-PAL.COM, INC.,

Plaintiff,

v.

META PLATFORMS, INC. and
WHATSAPP LLC,

Defendants.

§
§
§
§
§
§
§
§
§
§

CASE NO. 6:20-cv-00267-ADA

JURY TRIAL DEMANDED

VOIP-PAL.COM, INC.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

§
§
§
§
§
§
§
§
§

CASE NO. 6:20-cv-00269-ADA

JURY TRIAL DEMANDED

VOIP-PAL.COM, INC.,

Plaintiff,

v.

AMAZON.COM, INC., et al.,

Defendants.

§
§
§
§
§
§
§
§
§

CASE NO. 6:20-cv-00272-ADA

JURY TRIAL DEMANDED

**DECLARATION OF ROBERT W. UNIKEL IN SUPPORT OF
DEFENDANTS' OPENING CLAIM CONSTRUCTION BRIEF**

I, Robert W. Unikel, declare as follows:

1. I am an attorney with the law firm Paul Hastings LLP and counsel for Defendant Google LLC (“Google”). I have personal knowledge of the facts contained in the declaration and, if called upon to do so, I could and would testify competently to the matters set forth herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of U.S. Patent No. 10,218,606 (issued Feb. 26, 2019).

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from Alexander Clemm, *Network Management Fundamentals* (2007), bearing the Bates range DEFS-VOIP-2020-CC-00000108 - DEFS-VOIP-2020-CC-00000112.

4. Attached hereto as Exhibit 3 is a true and correct copy of Siemens Networks GmbH, “Network Element Auto-configuration in a Managed Network,” IEEE (2007), bearing the Bates range DEFS-VOIP-2020-CC-00000057 - DEFS-VOIP-2020-CC-00000075.

5. Attached hereto as Exhibit 4 is a true and correct copy of Hong-Taek Ju et al., “An efficient and lightweight embedded Web server for Web-based network element management,” 10 Int. J. Network Mgmt 261 (2000), bearing the Bates range DEFS-VOIP-2020-CC-00000093 - DEFS-VOIP-2020-CC-00000107.

6. Attached hereto as Exhibit 5 is a true and correct copy of Network Working Group RFC 2216, “Network Element Service Specification Template” (Sept. 1997), bearing the Bates range DEFS-VOIP-2020-CC-00000113 - DEFS-VOIP-2020-CC-00000134.

7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the Telecommunications Act of 1996, bearing the Bates range DEFS-VOIP-2020-CC-00000135 - DEFS-VOIP-2020-CC-00000140.

8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from Andy Valdar, *Understanding Telecommunications Networks*, bearing the Bates range VOP_RBR0002426 - VOP_RBR0002428.

9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from Harri Holma and Antti Toskala, *WCDMA for UMTS: Radio Access for Third Generation Mobile Communications* (3rd ed. 2004), bearing the Bates range DEFS-VOIP-2020-CC-00000141 - DEFS-VOIP-2020-CC-00000148.

10. Attached hereto as Exhibit 9 is a true and correct copy of Tong Luo et al., "A Reliable CORBA-Based Network Management System," IEEE (1999), bearing the Bates range DEFS-VOIP-2020-CC-00000079 - DEFS-VOIP-2020-CC-00000092.

11. Attached hereto as Exhibit 10 is a true and correct copy of U.S. Patent Application No. 15/942,282, Information Disclosure Statement (filed Oct. 17, 2018), bearing the Bates range VOP_RBR0000160 - VOP_RBR0000221.

12. Attached hereto as Exhibit 11 is a true and correct copy of WIPO International Patent Application Publication No. WO 2004/008786 A1 (published Jan. 22, 2004), bearing the Bates range VOP_RBR0000490 - VOP_RBR0000576.

13. Attached hereto as Exhibit 12 is a true and correct copy of excerpts from the Joint Disputed Claim Construction Chart (Dkt. No. 93-2) in Case No. 5:20-cv-02995-LHK (N.D. Cal. July 27, 2021), bearing the Bates range DEFS-VOIP-2020-CC-00000001 - DEFS-VOIP-2020-CC-00000042.

14. Attached hereto as Exhibit 13 is a true and correct copy of excerpts from Federal Standard 1037C, "Telecommunications: Glossary of Telecommunication Terms" (1996),

prepared by the National Communications System Technology and Standards Division and bearing the Bates range DEFS-VOIP-2020-CC-00000043 - DEFS-VOIP-2020-CC-00000050.

15. Attached hereto as Exhibit 14 is a true and correct copy of excerpts from *Microsoft Computer Dictionary* (5th ed. 2002), bearing the Bates range DEFS-VOIP-2020-CC-00000051 - DEFS-VOIP-2020-CC-00000056.

16. Attached hereto as Exhibit 15 is a true and correct copy of excerpts from Althos Publishing, *Wireless Encyclopedia* (2007), bearing the Bates range DEFS-VOIP-2020-CC-00000076 - DEFS-VOIP-2020-CC-00000078.

17. Attached hereto as Exhibit 16 is a true and correct copy of U.S. Patent Application Publication No. US 2014/0024367 A1 (published Jan. 23, 2014).

18. Attached hereto as Exhibit 17 is a true and correct copy of WIPO International Patent Application Publication No. WO 01/089145 A2 (published Nov. 11, 2001).

19. Attached hereto as Exhibit 18 is a true and correct copy of excerpts from the Declaration of Dr. William Henry Mangione-Smith that was filed as Exhibit 2016 in IPR2016-01201, bearing the Bates range VOP_RBR0001897 - VOP_RBR0001978.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th day of March, 2022 in Chicago, Illinois.

/s/ Robert W. Unikel
Robert W. Unikel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on March 11, 2022, a true and correct copy of the foregoing document was served to all counsel of record who are deemed to have consented to electronic service via email due to the Court's ECF system being inoperable that day. The undersigned further certifies that, on March 14, 2022, a true and correct copy of the foregoing document was also served via the Court's ECF system on all counsel of record who are deemed to have consented to electronic service.

/s/ Daniel T. Shvodian

Daniel T. Shvodian