

# Exhibit 18

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.

**VOIP-PAL.COM, INC.,**

Patent Owner

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Case No. IPR2016-01201

U.S. Patent 8,542,815

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**DECLARATION IN SUPPORT PATENT OWNER  
RESPONSE TO INTER PARTES PETITION**

Voip Pal.Com 2016

IPR2016-01201  
Apple Inc. v. Voip-Pal

I, William Henry Mangione-Smith, declare as follows:

**I. INTRODUCTION**

1. During the preparation of this Declaration, I have reviewed the following, as well as the other documents discussed in this Declaration:

- a. U.S. Patent No. 8,542,815 (“the ‘815 Patent”) and its file history;
- b. U.S. Patent No. 9,179,005 (“the ‘005 Patent”) and its file history;
- c. Apple, Inc.’s Petition For *Inter Partes* Review Of U.S. Patent No. 8,542,815, including attached Declaration Of Henry H. Houh, PhD;
- d. Apple, Inc.’s Petition For *Inter Partes* Review Of U.S. Patent No. 9,179,005, including attached Declaration Of Henry H. Houh, PhD;
- e. Declaration of Ryan Purita (**Ex. 2011**);
- f. Declaration of Johan Emil Viktor Bjorsell (**Ex. 2012**);
- g. Declaration of Clay Perreault (**Ex. 2013**);
- h. Declaration of David Terry (**Ex. 2018**);
- i. Deposition Transcript of Henry H. Houh, Ph.D. Volumes I and I (**Ex. 2043, 2044**);
- j. Subversion repository svn.tar file;
- k. U.S. Patent No. 7,486,684 to Chu (“the Chu ‘684 Patent”);

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#### **IV. LEVEL OF ORDINARY SKILL IN THE ART**

14. Based on my review of the '815 Patent and the '005 Patent and my background and experience in the field of computer science, it is my opinion that one of ordinary skill in the art as of the priority date would be someone with an undergraduate degree in either Computer Science, Computer Engineering, Electrical Engineering, or a closely related discipline. Furthermore, I believe that such a person would also have 2 years of experience in system-level software development. In my opinion a greater degree of professional experience could serve to replace some degree of formal education. I also believe that some greater degree of formal education could serve to replace some degree of professional work experience.

15. Based on my education and experience, I am familiar with the level of knowledge that one of ordinary skill would have possessed during the relevant period of time. By the priority date of the '815 Patent and the '005 Patent, I was a person who had more than ordinary skill in the art.


#### **V. OVERVIEW OF THE '815 AND '005 PATENTS**

16. The '815 and '005 Patents disclose a method and apparatus for routing communications, such as voice calls or video calls, between an internet network (i.e. a network based on the Internet Protocol, or IP) and a public switched telephone network (PSTN), and between two endpoints on an IP network. The

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89. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 2/10/17

By:   
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