

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE, INC.,
Petitioner,

v.

UNILOC USA, INC. and UNILOC LUXEMBOURG S.A.,
Patent Owners.

Case IPR2017-01685
Patent 7,805,948

DECLARATION OF WILLIAM C EASTTOM II

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I, Chuck Easttom, hereby declare as follows:

I. INTRODUCTION

1. My name is William Charles Easttom II (Chuck Easttom) and I have been retained by Uniloc, USA, Inc., and Uniloc Luxembourg S.A. (“Uniloc” or the “Patent Owner”) to provide my expert opinions regarding U.S. Patent No. 7,804,948 (the ‘948 Patent). In particular, I have been asked to opine on whether a person of ordinary skill in the art (POSITA) at the time the inventions described in the ‘948 patent were conceived would have found Claims 1-4, 6-8, 18, 21, and 22 (“Challenged Claims”) as obvious in light of the following referenced cited in IPR2017-01685:

- EX1014, U.S. Patent No. 7,233,589 to Tanigawa (“*Tanigawa*”)
- EX1004, U.S. Patent Pub. No. 2002/0076025 to Liversidge (“*Liversidge*”)

2. Based on my review of the prior art then available, my understanding of the relevant of the relevant requirements of patent law, and my decades of experience in the field of computer science including communications systems, it is my opinion that the Challenged Claims would not have been obvious in light *Tanigawa* and *Liversidge*.

3. I am being compensated for my time at my standard consulting rate of \$300 per hour. I am also being reimbursed for expenses that I incur during the course of this work. Apart from that, I have no financial interest in

Uniloc. My compensation is not contingent upon the results of my study or the substance of my opinions.

II. BACKGROUND AND QUALIFICATIONS

4. In my over 25 years of computer industry experience I have had extensive experience in communications systems, including data networks in general that have messaging capabilities. I hold 42 industry certifications, which include (among others) certifications networking. I have authored 24 computer science books, several of which deal with networking topics. I am also the sole named inventor on thirteen patents.

5. A more detailed description of my professional qualifications, including a list of publications, teaching, and professional activities, is contained in my curriculum vitae, a copy of which is attached hereto as Exhibit A.

III. LEGAL STANARDS USED IN MY ANALYSIS

6. Although I am not an attorney and I do not offer any legal opinions in this proceeding, I have been informed of and relied on certain legal principles in reaching the opinions set forth in this Declaration.

A. Obviousness

7. I understand that a patent claim is invalid if the differences between the subject matter and the prior art are such that the subject matter as

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