

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ERICSSON INC. AND
TELEFONAKTIEBOLAGET LM ERICSSON, INC.
Petitioners

v.

INTELLECTUAL VENTURES II LLC
Patent Owner

Case IPR2018-01380
Patent 8,682,357 B2

DECLARATION OF JONATHAN WELLS, PH.D.

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 A. *“the message having an allocation of resources for a shared channel and a radio network temporary identity (RNTI) associated with a plurality of UEs”* 20

 B. *“first network device,” “second network device,” and “network device”* 23

VII. THE ASSERTED REFERENCES 24

 A. CATT 24

 B. LG 28

 C. CATT2 29

 D. HUAWEI 31

VIII. THE CHALLENGED CLAIMS ARE PATENTABLE 32

 A. CATT in view of LG fails to disclose *“a radio network temporary identity (RNTI) associated with a plurality of UEs”* as recited in independent claims 11, 30, and 47 33

B. CATT in view of LG fails to disclose a “*message having an allocation of resources for a shared channel*” as recited in independent claims 11, 30, and 47.43

C. A POSITA would not have been motivated to include an IMSI or a TMSI in CATT’s paging message.51

IX. CONCLUSION.....59

I, Jonathan Wells, declare as follows:

I. BACKGROUND

1. I have been retained by Sterne, Kessler, Goldstein & Fox, P.L.L.C. (“SKGF”), which represents Intellectual Ventures II LLC (“IV” and/or “Patent Owner”) in connection with this *inter partes review* of U.S. Patent No. 8,682,357 to Worrall, titled *Paging in a Wireless Network* (Ex. 1001, “’357 patent”).

2. I have reviewed and am familiar with the ’357 patent, which was filed on May 2, 2006 and issued on March 25, 2014. I understand that the ’357 patent includes 54 claims. Claims 1, 11, 21, 30, and 47 are the independent claims.

3. It is my understanding that the Petition in IPR2018-01380 seeks to cancel claims 11-14, 19, 30-33, 38, 47-50, and 54 of the ’357 patent (“the challenged claims”) based on the following grounds. My analysis and opinions will focus on the challenged claims and the asserted grounds.

Ground	References	Claims
1	CATT ¹ and LG ²	11, 13, 30, 32, 47, 49
2	CATT, LG, and CATT2 ³	12, 19, 31, 38, 48, 54
3	CATT, LG, Huawei ⁴	14, 33, 50

4. I have been asked to consider how a person of ordinary skill in the art (“POSITA”) would have understood the challenged claims in light of the specification of the ’357 patent. I have also been asked to consider how a POSITA would have understood the prior art. Further, I have been asked to consider and provide my technical review, analysis, insights, and opinions on whether: (1)

¹ CATT, PCH mapping and Paging control, 3GPP RAN1/RAN2 Joint meeting on LTE (Ex. 1005).

² LG Electronics, Discussion on LTE Paging and DRX, Joint RAN WG1 and RAN WG2 on LTE (Ex. 1006).

³ CATT & RITT (“CATT2”), Access procedure for TDD, 3GPP RAN1/RAN2 Joint Meeting on LTE (Ex. 1007).

⁴ Huawei, Inter-cell Interference Mitigation, 3GPP TSG RAN WG1 Ad Hoc on LTE (Ex. 1008).

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