

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.

UNILOC 2017 LLC,  
Patent Owner

U.S. Patent No. 7,969,925

Filing Date: July 8, 2010

Issue Date: June 28, 2011

Title: Peer-to-Peer Mobile Data Transfer Method and Device

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*Inter Partes* Review No.: IPR2019-00702

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**DECLARATION OF DR. HENRY H. HOUH  
IN SUPPORT OF PETITIONER'S REPLY TO  
PATENT OWNER'S RESPONSE TO PETITION**

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## EXHIBITS continued

### EXHIBITS

Exhibit No.	Description
1001	U.S. Patent No. 7,969,925 to Lin (“ <b>925 patent</b> ”)
1002	Declaration of Dr. Henry Houh
1003	File History of U.S. Pat. No. 7,969,925 to Lin
1004	File History of U.S. Pat. No. 7,961,663 to Lin
1005	Certified Translation and Original of European Pat. App. Pub. EP 1 009 153 A1 (“ <b>Alos</b> ”)
1006	U.S. Pat. No. 6,847,632 (“ <b>Lee</b> ”)
1007	European Pat. App. Pub. EP 1 385 323 A1 (“ <b>Cordenier</b> ”)
1008	Complaint for Patent Infringement (“ <b>Uniloc Complaint</b> ”)
1009	<i>Declaration of Sandy Ginoza for IETF RFC 1122: Requirements for Internet Hosts - Communication Layers</i> with the exhibit RFC 1122, “Requirements for Internet Hosts - Communication Layers” (“ <b>RFC1122</b> ”)
1010	<i>Declaration of Sandy Ginoza for IETF RFC 793: Transmission Control Protocol</i> with the exhibit, RFC 793, “Transmission Control Protocol” (“ <b>RFC793</b> ”)
1011	U.S. Pat. App. Pub. No. 2003/0217174 (“ <b>Dorenbosch</b> ”)
1012	U.S. Patent No. 5,163,131 (“ <b>Row</b> ”)
1013	W. Richard Stevens, “Unix Network Programming,” Chapters 1, “Introduction”; 4, “A Network Primer”; 5, “Communication Protocols”; and, 6, “Berkeley Sockets”
1014	Information Disclose Statement Under 37 C.F.R. §§ 1.97 and 1.98 that includes “Universal Mobile Telecommunications System (UMTS); Technical realization of the Short Message Service (SMS) (3G TS 23.040 version 3.5.0 Release 1999)” and was submitted August 15, 2002, concurrently with U.S. Pat. App. 10/218,580, which application was published on February 27, 2003, as U.S. Pat. App. Pub. 2003/0040300 A1 (“ <b>SMS Specification</b> ”)

**EXHIBITS continued**

Exhibit No.	Description
1015	W. Richard Stevens, TCP/IP ILLUSTRATED, VOLUME 2: THE PROTOCOLS (1994)
1016	U.S. Pat. No. 8,018,877 to Lin
1017	U.S. Pat. Pub. No. 2005/0278448 to Mazor (“ <b>Mazor</b> ”)
1018	Declaration of Harold Ogle Regarding JSR-000120, “Wireless Messaging API (WMA) for Java™ 2 Micro Edition Version 1.0” with the exhibit JSR 120, “Wireless Messaging API (WMA) for Java™ 2 Micro Edition Version 1.0” (“ <b>WMA</b> ”)
1019	IBM Dictionary of Computing, 10th Ed. (1993)
1020	Newton’s Telecom Dictionary, 11th Ed. (1996)
1021	<i>Declaration of Sandy Ginoza for IETF RFC 2543: SIP: Session Initiation Protocol</i> with the exhibit RFC 2543, “SIP: Session Initiation Protocol” (“ <b>RFC2543</b> ”)
1022	<i>Declaration of Sandy Ginoza for IETF RFC 791: Internet Protocol</i> with the exhibit RFC 791, “Internet Protocol”
1023	U.S. Pat. Pub. No. 2003/0040300
1024	<i>Declaration of Sandy Ginoza for IETF RFC 2026: The Internet Standards Process – Revision 3</i> with the exhibit, RFC 2026: “The Internet Standards Process – Revision 3” (“ <b>Internet Standards Process</b> ”)
1025	U.S. Pat. No. 7,181,231
1026	<i>Declaration of Mr. Craig Bishop regarding ETSI TS 123 040 V3.5.0, “Universal Mobile Telecommunications System (UMTS); Technical Realization of the Short Message Service (SMS) (3GPP TS 23.040 version 3.50 Release 1999) with appendices A-D</i>
1027	<i>Declaration of Sandy Ginoza for IETF RFC 768: User Datagram Protocol</i> with the exhibit, RFC768: User Datagram Protocol
1028	Declaration of Dr. Henry Houh (for Petitioner’s Reply)

I, Dr. Henry H. Houh, do hereby declare:

## **I. INTRODUCTION**

1. As I discussed in the declaration dated February 22, 2019, that I provided for the Petition in this proceeding (Ex. 1002), I have been retained as an expert witness on behalf of petitioner Apple Inc. (“Apple”) for the above-captioned Petition for *Inter Partes* Review (“IPR”) of U.S. Patent No. 7,969,925 (“925 patent”). I am being compensated for my time in connection with this IPR at my standard consulting rate of \$620 per hour. My compensation is in no way dependent on the outcome of this matter.

## **II. BACKGROUND AND QUALIFICATION**

2. Section II of my prior declaration (Ex. 1002, ¶¶5-23) states my background and expertise that qualify me as an expert in the technical issues in this case. There are no relevant updates to that background or expertise.

## **III. MATERIALS CONSIDERED FOR THIS DECLARATION**

3. In addition to my general knowledge, education, and experience, and the prior art publications I listed in paragraphs 5 through 23 of Exhibit 1002, I considered the materials filed in this proceeding and the materials listed in the Exhibit List above in forming my opinions.

## **IV. UNDERSTANDING OF THE LAW**

4. Paragraphs 25 through 30 of Exhibit 1002 state the legal principles that Apple counsel explained to me and on which I rely.

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