

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Kuo et al.
Inter Partes Review: IPR2024-00509
U.S. Patent No.: RE47,842
Issue Date: February 4, 2020
Appl. Serial No.: 16/218,841
Filing Date: December 13, 2018
Attorney Docket No.: 90007-161IPR
Title: SYSTEM AND METHOD OF IDENTIFYING
NETWORKED DEVICE FOR ESTABLISHING A P2P
CONNECTION

DECLARATION OF YEN-KUANG CHEN

I, Yen-Kuang Chen, Ph.D., declare that:

1. I am over the age of 18. I have received my B.S. in electrical engineering from National Taiwan University in 1992, and I further received my Ph.D. in Electrical Engineering in 1998 from Princeton University.
2. After receiving my Ph.D. in 1998 from Princeton University, I worked for Intel Corporation for over 20 years. I then was working with Alibaba Group as a Senior Director and Chief Scientist of Computer Technology. I am currently back to Intel Corporation as a Senior Principal Engineer.
3. I was also an adjunct professor at Santa Clara University, National Taiwan University, and National Chiao Tung University. In particular, I lectured the topic of “Introduction to Machine-to-Machine” at National Taiwan University from 2011

to 2013, “IoT/M2M Application System Implementation” at National Chiao Tung University in 2013, “Special Topics on Internet of Things” at National Taiwan University from 2013 to 2015, “Internet of Things” at Satna Clara University in 2024, which directly relates to the point-to-point (P2P) practice. In 2002 and 2023, I published papers on “Multimedia Technology Infrastructure for Emerging Peer-to-Peer Applications and Services” which directly relates to the peer-to-peer practice.

4. I have been recognized by IEEE Circuits and Systems Society as the Distinguished Lecturer, and received the honor of the IEEE Fellow. Being named an IEEE Fellow is an esteemed achievement that signifies the pinnacle of professional recognition. Reserved for only 0.1% of IEEE's membership annually, this honor is awarded to members who demonstrate "extraordinary accomplishments" across IEEE's fields of interest, encompassing electrical engineering, computer science, and related areas.

5. I am an inventor for 125 issued patents worldwide, and I am familiar with the U.S. patent system.

6. I am also an author of over 100 peer-review journals/conference papers.

7. I have been continuously involved in the latest technological development and commercial practices of the industry upon my education and my direct industrial involvement.

8. Based on my education, research, and work experience, I am knowledgeable about the subject matter of the '842 patent and the related prior art.

9. I have cursorily reviewed Dr. Bims's declaration regarding the invention referenced above, along with Dr. Bims's background and qualifications. I am aware

of that Dr. Bims is a Senior Member of the IEEE, which ranks below the IEEE Fellow.

10. The '842 patent generally describes techniques for forming P2P connections between devices such as an IP camera and a smartphone, and the '842 patent has the earliest priority date as early 2013, which was the time I lectured the topic "Introduction to Machine-to-Machine".

11. During the years 2011 to 2013, communication technology experienced rapid growth and transformation, marking a pivotal period in its development. Initially popularized for file-sharing networks, communication technology evolved to become a foundation for decentralized applications and services across various industries.

12. Bluetooth's peer-to-peer, Peer-to-Peer, and Point-to-Point are three different communication technology with different architectures.

13. Bluetooth is a wireless communication technology designed for short-range connectivity between devices. Operating in the 2.4 GHz ISM (Industrial, Scientific, and Medical) band, Bluetooth allows devices like smartphones, laptops, headphones, and other nearby electronics to communicate with each other directly without physical cables and any intermediate device.

14. Peer-to-Peer is popularized for file-sharing networks. Peer-to-Peer networks like Napster, LimeWire, and BitTorrent all have demonstrated the power of decentralized systems for sharing files and information.

15. Point-to-Point is for decentralized and resilient networks which involves a central server for authentication and then two devices communicate with each other

without relying the central server.

16. As Bluetooth, Peer-to-Peer, and Point-to-Point are three different communication technologies with different architectures for different scenarios, any enhancement on one of the communication technologies does not automatically become adaptable to another communication technologies or render it obvious to be applied on another communication technologies.

17. The hole-puncture technique by itself is not new in the industry at the time when the '842 patent's earliest application was filed.

18. Image recognition related technology is also not new in the industry at the time when the '842 patent's earliest application was filed. Bar code, QR code, and even figure print recognition all have been widely practiced before the '842 patent.

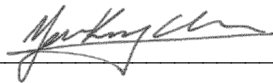
19. However, adapting the image recognition related technique, for enhancing users' experience in establishing the Point-to-Point connection is novel, and is not per se obvious at the time when the '842 patent's earliest application was filed.

20. As I have lectured the related topic during 2011-2013, and also directed the similar project at my professional capacity, I had not come across any other enhancement contributed to the Point-to-Point experienter during this time frame as prominent as the '842 patent.

21. I have not seen or encounter any suggestion, both in academic field and professional capacity, to adapting any image recognition technique onto the Point-to-Point practice and to enhance the users' experience on establishing Point-to-Point connection at the time when the '842 patent's earliest application was filed.

22. I hereby declare that all statements made are of my own knowledge, are true and that all statements made on information and belief are believed to be true. I further declare that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of the Title 18 of the United States Code and that such willful false statements may jeopardize the validity of this proceeding.

Date 11/14/2024

By: 

Yen-Kuang Chen, Ph.D.