

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ENS LABS LTD

Petitioner,

v.

UNSTOPPABLE DOMAINS INC.

Patent Owner.

IPR2024-00872

U.S. Patent No. 11,558,344

**DECLARATION OF RICHARD NEWMAN
UNDER 37 C.F.R. § 1.68 IN SUPPORT OF
PATENT OWNER'S PRELIMINARY RESPONSE**

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I, Richard Newman, do hereby declare as follows:

I. INTRODUCTION

1. I am making this declaration at the request of Unstoppable Domains, Inc. in the matter of the *Inter Partes* Review of U.S. Patent No. 11,558,344 (“the ’344 patent”) to Pezeshki *et al.*

2. I am being compensated for my work in this matter at my standard hourly rate. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the outcome of this matter or the specifics of my testimony.

3. I have been asked to provide my opinions regarding whether claims 1-20 (“the Challenged Claims”) of the ’344 patent would have been obvious to a person having ordinary skill in the art (“POSITA”) at the time in light of the prior art. It is my opinion that none of the Challenged Claims would have been obvious to a POSITA.

4. In forming the opinions expressed below, I have considered the ’344 patent and the prosecution history for the ’344 patent. I have also considered the papers and exhibits filed in IPR2024-00872. In addition, I have drawn on my own knowledge and experience based upon my work in the technical field of the ’344 patent, and any additional documents as cited in the body of this declaration.

5. Unless otherwise noted, all emphasis in any quoted material has been

added.

II. QUALIFICATIONS AND PROFESSIONAL EXPERIENCE

6. My qualifications and professional experience are described in my *Curriculum Vitae*, a copy of which can be found in Exhibit 2002. The following is a brief summary of my relevant qualifications and professional experience.

7. I earned my undergraduate degree in Mathematics from New College, FL, in 1981. I earned a Master of Science in Computer Science from the University of Rochester, NY, in 1983. I earned a Ph.D. in Computer Science from the University of Rochester, NY, in 1986.

8. I joined the graduate faculty of the Computer and Information Science and Engineering of the College of Engineering at the University of Florida in 1986, where I taught and conducted research in computer systems, networks, distributed systems, and security until 2021 when I retired and joined a startup.

9. At the University of Florida, I helped create and introduce in the curriculum undergraduate and graduate courses in distributed systems, computer and network security, computer and information security, network and system security, and cryptography. In addition, I taught special topic courses in cryptographic protocols, anonymity, and blockchain technology and applications.

10. I also supervised research in security protocols and applications of cryptography, as well as access control models and systems, firewalls, anonymity,

steganography, and applications of blockchain technology to cloud security and carbon credit tracking systems. Joint work with students and colleagues resulted in eight refereed publications specifically in blockchain technology, and over thirty other refereed publications in various aspects of computer and network security.

11. I have also provided consulting for government and industry research and development projects in communication protocols, security protocols for commercial systems, intrusion detection systems, and information hiding. I am named as an inventor on seventeen patents and patent applications. I have also participated in the development of the HomePlug Powerline Alliance, HomePlug 1.1, AV, and GreenPHY standards, as well as IEEE P.1901 and P.1905 standards, with major contributions to the security protocols used therein.

12. I have worked generally on distributed systems since the 1980s and have years of experience with blockchain technologies and software programming.

III. LEVEL OF ORDINARY SKILL IN THE ART

13. I understand that I should perform my analysis from the viewpoint of a person of ordinary skill in the art. I understand that this hypothetical person of ordinary skill in the art is considered to have the normal skills of a person in a certain technical field. I understand there are multiple factors relevant to determining the level of ordinary skill in the pertinent art, including (1) the levels of education and experience of persons working in the field at the time of the

invention; (2) the sophistication of the technology; (3) the types of problems encountered in the field; and (4) the prior art solutions to those problems.

14. I understand that Petitioner’s proposed level of ordinary skill in the art includes: “a Bachelor’s degree (or international equivalent) in computer science, mathematics, or related fields, and at least 2 years of experience with software programming projects including at least six months experience with blockchain technologies” or alternatively “[no] Bachelor’s degree (or equivalent) so long as that person had sufficient relevant industry experience, such as an additional two years more of experience with software programming projects (making the minimum for this person four years of such experience)...[but] would still need to have at least six months experience with blockchain technologies.” Pet. at 13.

15. For purposes of this Declaration, in general, and unless otherwise noted, my statements and opinions (and specifically related to the references discussed herein) are given from the perspective of a POSITA as of the priority date of the ’344 patent.

IV. RELEVANT LEGAL STANDARDS

16. I am not an attorney. In preparing and expressing my opinions and considering the subject matter of the ’344 patent, I am relying on certain basic legal principles that counsel has explained to me. These principles are discussed below.

17. I understand that prior art to the '344 patent includes patents and printed publications in the relevant art that predate the priority date of the '344 patent. For purposes of this Declaration, I am applying September 28, 2020, as the earliest possible priority date of the '344 patent.

18. I have been informed that a claimed invention is unpatentable under 35 U.S.C. § 103 if the differences between the invention and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which the subject matter pertains. I have also been informed by counsel that the obviousness analysis takes into account factual inquiries including the level of ordinary skill in the art, the scope and content of the prior art, and the differences between the prior art and the claimed subject matter.

19. I have been informed by counsel that the Supreme Court has recognized several rationales for combining references or modifying a reference to show obviousness of claimed subject matter. Some of these rationales include the following: (a) combining prior art elements according to known methods to yield predictable results; (b) simple substitution of one known element for another to obtain predictable results; (c) use of a known technique to improve a similar device (method, or product) in the same way; (d) applying a known technique to a known device (method, or product) ready for improvement to yield predictable results; (e)

choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success; and (f) some teaching, suggestion, or motivation in the prior art that would have led one of ordinary skill to modify the prior art reference or to combine prior art reference teachings to arrive at the claimed invention.

V. CLAIM CONSTRUCTION

20. It is my understanding that in order to properly evaluate the '344 patent, the terms of the claims must first be interpreted. It is my understanding that for the purposes of this *inter partes* review, the claims are to be construed under the so-called *Phillips* standard, under which claim terms are given their ordinary and customary meaning as would be understood by one of ordinary skill in the art in light of the specification and prosecution history, unless the inventor has set forth a special meaning for a term. I have also been informed that claim terms only need to be construed to the extent necessary to resolve the obviousness inquiry. Consistent with the Petition, for purposes of this Declaration only, I have applied the so-called *Phillips* standard.

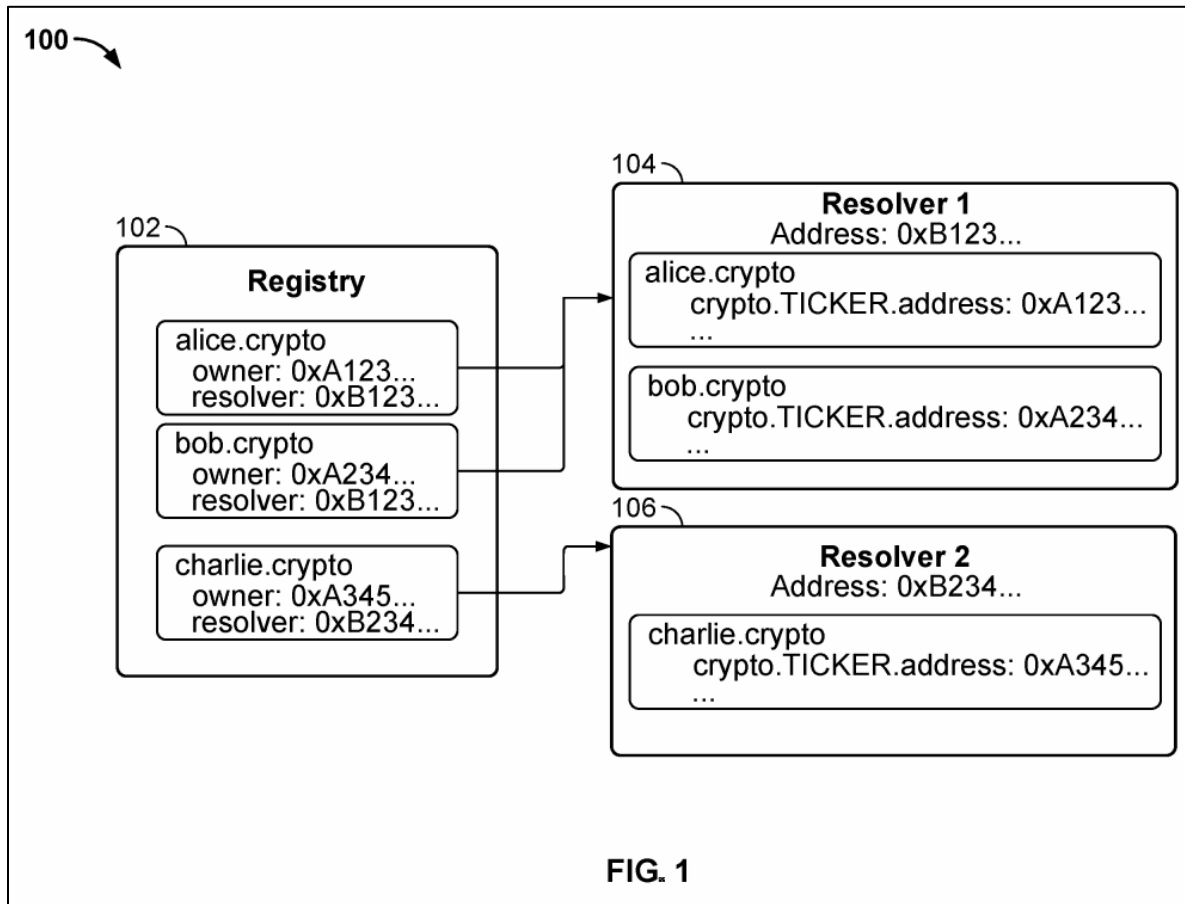
VI. THE '344 PATENT

21. The '344 patent is directed to methods and systems for resolving a name of a blockchain domain. EX1001, 1:6-10, 2:25-65, Abstract.

22. According to the '344 patent, the traditional domain name system

(DNS) is centralized and may not be able to fulfill its duty. “For example, the central entity may become a central point of failure, stifle innovation, or unjustly institute policies that prevent flow of information.” EX1001, 1:29-31. As such, “there exists a need for a way to enable [a] web browser to resolve these domains using [a] new mechanism.” EX1001, 1:33-36.

23. To address this need, the ’344 patent discloses a decentralized name service using smart contracts. EX1001, 3:12-13. The ’344 patent’s “smart contract includes self-executing code that functions to implement an agreement deployed to store state and execute code on the blockchain.” EX1001, 13-15. According to the ’344 patent, the “smart contracts of the decentralized name service govern how domains are created, managed, and utilized” and “every domain is issued a non-fungible token on the blockchain.” EX1001, 3:15-22. An exemplary smart contract 102 that stores entries associated with three domains is depicted at Figure 1, which is shown below. EX1001, 4:9-11; FIG. 1.



24. An example of a list of record types able to be stored includes, among others, the following standard record types allowing “standard interpretation by clients”:

crypto.*-Records related to crypto payments

dns.*-DNS resolution records

dweb.*-Resolution records related to distributed content

network protocols

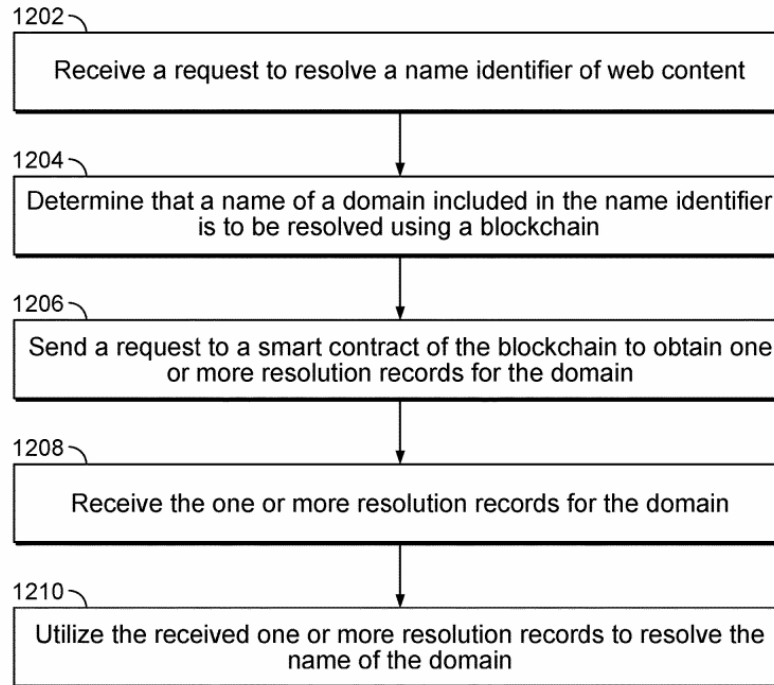
browser.*-Resolution configuration/preference records

for web browser

EX1001, 6:3-11.

25. The '344 patent's method discloses that “a request is made to a smart

contract of the blockchain for one or more resolution records for the domain, and at 1208, the requested record(s) are received.” EX1001, 17:25-27, FIG. 12. “For example a call is made to a function of the smart contract to request resolution records of a specified domain.” EX1001, 17:28-29. “The smart contract includes self-executing code that functions to implement an agreement deployed to store state and execute code on the blockchain.” EX1001, 17:32-34. “[T]he smart contract can be invoked to obtain one or more records that can be used to resolve the domain of the name identifier to obtain the corresponding web resource.” EX1001, 17:38-41. “[W]hen the request is made to the smart contract of the blockchain, the smart contract returns the one or more resolution records managed in the blockchain for the domain of the name identifier to be resolved.” EX1001, 17:41-45.



26. The '344 patent's resolution records that are received by the client are described as follows:

Examples of the resolution records include any traditional DNS record (e.g., redirect address/URL of a redirect record, IP address of a dns.A record, or any other record supported by the DNS protocol), any decentralized web record (e.g., hash value of any supported decentralized web protocol), and configuration record(s) (e.g., record specifying a list of preferred protocols in a preferred order such that if multiple protocols are supported by the destination of the resolved domain, the protocol to be utilized is selected based on the order of the list).

EX1001, 17:46-55.

27. The '344 patent's one or more resolution records "allow[s] standard

interpretation by [the] clients,” to thereby resolve the name of the domain.

EX1001, 6:3-4.

VII. JOHNSON

28. Johnson is titled “ENS Documentation Release 0.1,” that is marked on its cover page with the date “Mar 30, 2019.” EX1003, 1. In contrast to the ’344 patent, which provides resolution records to the client that resolves the name of the domain, Johnson’s ENS registry resolvers “are responsible for the actual process of translating names into addresses.” EX1003, 3. Johnson does not provide the actual ENS records externally, but rather provides data extracted from the record.

29. I disagree with Petitioner and Mr. McDonald that “Johnson would have been publicly accessible to a PHOSITA as of at least December 13, 2019, if not by March 30, 2019, because Johnson is what is known as a developer’s guide....[that] was published by Ethereum Name Service on Read the Docs’ website that was widely known to software developers.” EX1002, ¶59.

30. I was an expert at the time on the subject matter of the ’344 patent. I was actively involved in the crypto community, including teaching courses on blockchain and Ethereum, writing papers related to blockchain and Ethereum technologies, and attending crypto related conferences. Notwithstanding, during the course of my extensive experience with blockchain and crypto technology, I personally did not become aware that Ethereum Name Service published a

developer's guide on Read the Docs' website and I also did not know that this website included an ENS developers guide that was accessed by others in the art. As such, based on my technical experience and interaction with others in the art, I disagree with Mr. McDonald that "a PHOSITA would have accessed Johnson in the course of keeping up with latest developments in Ethereum," since I personally kept up with the latest developments in Ethereum and yet never accessed ENS documents on the Read the Docs' website. Nor am I aware of anyone else in the art that had accessed Read the Docs' website to obtain ENS documents therefrom.

31. To gain an understanding of ENS documents posted on Read the Docs' website, I accessed the website as it currently exists. Using currently available search functions on Read the Docs' website, I performed a search for "Nick Johnson," which yielded 108 results but none of which led to the Johnson reference filed by Petitioner. A true and correct copy of the search results is attached as exhibit EX2006. Instead of the author's name, I attempted to find Petitioner's Johnson using other search terms, so I also performed a search for the title of Johnson "ENS Documentation Release 0.1" which yielded "0 results," as shown below.



EX2007. Additionally, I searched for “Ethereum Name Service” and received 530 results, none of which corresponded to Johnson. I have attached exhibits EX2007 and EX2008, which are true and correct copies of the above noted search results.

32. It is unclear why the numerous searches that I performed failed to turn up Petitioner’s Johnson reference, in view of the fact that it is currently available at “<https://buildmedia.readthedocs.org/media/pdf/ens/latest/ens.pdf>.” Since the currently available search capabilities on the Read the Docs’ website cannot locate Petitioner’s Johnson, it is unlikely that the website’s search capabilities were better at the time. Usually searching capabilities improve over time rather than diminish. The totality of the above noted facts lead me to understand that a POSITA using the Read the Docs’ website search capabilities at the time (to the extent that it was even available) would not have located Johnson.

VIII. MILLEGAN

33. Millegan appears to be a blog authored by Brantly Millegan regarding Ethereum Name Service. EX1004, 1. In contrast to the ’344 patent, which provides resolution records to the client, a POSITA would have understood that in Millegan the ENS system resolves the name of the domain by “grabbing the .onion address” from an ENS record. In contrast to the ’344 patent’s claimed invention (which recites using one or more received resolution records to resolve the name of the domain), only the .onion address is returned and the actual ENS record is not.

See EX1004, 2 (“MetaMask does a look-up on ENS on Ethereum, grabbing the .onion address...in the ENS record...and returning it to the address bar in the Tor Browser.”). A POSITA would have understood that Millegan’s ENS system resolves the name of the domain and no further resolution takes place based on the .onion address—in direct contrast to what is claimed in the ’344 patent.

34. I disagree with Petitioner and Mr. McDonald that “Millegan would have been publicly accessible to a PHOSITA as of at least August 2019, because Brantly Millegan was known as one of the core team at the ENS Labs at this time, and was also known for authoring several articles describing ENS and its aspects....on medium.com...which was a common platform for discussion of ENS aspects, features and uses at the time.” EX1002, ¶68.

35. As I already noted, I was an expert at the time and was actively involved in the crypto community, including teaching courses on blockchain and Ethereum, writing papers related to blockchain and Ethereum technologies, and attending crypto related conferences. Notwithstanding, I personally never became aware of Brantly Millegan or that he authored articles or blogged about ENS or related crypto technology. The fact that I was not aware of Brantly Millegan or reviewed any article or blog authored by him, even though I was active in the cryptocurrency space, indicates that Brantly Millegan’s oeuvre was not part of the background knowledge of a person of skill as the McDonald Declaration asserts.

Also, the website medium.com was not known to me personally, either generally or professionally as a platform for discussion of ENS topics.

36. To gain an understanding, I accessed the currently available medium.com website. Based on my review, the medium.com website appears to be a generic blog site potentially covering thousands of different unrelated topics that are not specifically relevant to persons of ordinary skill in the art relevant to the '344 patent. I have no reason to believe that this website was more focused on technical issues at the time when Millegan was allegedly available. For example, looking at Internet Archive capture from August 13, 2019 (when Millegan was allegedly available), the medium.com website provided a list of “Featured stories” that covered different unrelated topics, ranging from tribal death penalty decisions, menopause, human psychology, exercising, and political commentaries, among others.



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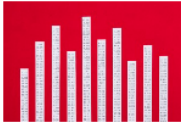


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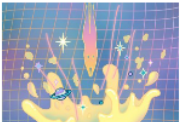


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EX2005, 1-3.

37. These are clearly nontechnical topics, which indicates that a POSITA in the subject matter of the '344 patent would not use the medium.com website for technical information. Indeed, although I was active in the relevant technical field, I found no reason to access the medium.com website at the time (I was not even aware of the website). Accordingly, it is my opinion that a person in the art would have no reason to look to or access the medium.com website in their professional capacity, since the website is a generic blog site that covers a wide range of unrelated topics and does not appear to be a source of information specifically directed to those in the art to which the '344 patent pertains.

38. Once I accessed the currently available medium.com website, using currently available search functions (which the McDonald Declaration does not evidence were available at the time), I performed a search for the name “Brantly Millegan” and was unable to locate any blog or article authored by Brantly Millegan. A true and correct copy of the search results for “Brantly Millegan” is attached as exhibit EX2003. I also performed a search for the title of Millegan, i.e., “ENS Now Supports Tor .Onion Address Resolution” and again was unable to locate Petitioner’s Millegan. A true and correct copy of the search results for Millegan’s title is attached as exhibit EX2004.

39. Thus, it is my opinion that even if a POSITA would have known of Brantly Millegan and of the medium.com website (an assertion with which I

disagree), it is unlikely that an interested person would have been able to locate Petitioner's Millegan reference on the medium.com website at the time.

IX. THE COMBINATION OF JOHNSON AND MILLEGAN DOES NOT RENDER THE CLAIMS OBVIOUS

40. It is my opinion that the asserted combination of Johnson and Millegan does not render obvious the Challenged Claims of the '344 patent, for at least the reasons provided below.

A. The asserted references do not disclose “*receiving the one or more resolution records of the domain.*”

41. Each independent claims 1, 19, and 20 recites “*receiving the one or more resolution records of the domain.*” I disagree with the Petition and Mr. McDonald that “Johnson discloses this limitation in the form of the user code receiving from the resolver the resource associated with the queried ENS name.” Pet. 34; EX1002, ¶¶143-146. Additionally, I disagree that the assertion that “Millegan also discloses receiving a website address (e.g., a .onion address) as a result of the ENS resolution” and that this teaching meets this limitation. Pet. 35; EX1002, ¶¶147-149.

42. In both instances, the Petition and Mr. McDonald do not identify the actual ENS records, disclosed in the references, as corresponding to the claimed “*resolution records,*” but rather rely on individual pieces of data extracted from the ENS record. Specifically, Petitioner's proposed mapping identifies Johnson's

“resource associated with” an ENS record as “correspond[ing] to the [claimed] ‘resolution record’” and not the record itself. Pet. 34-35. A similar argument is made with respect to Millegan, arguing that an “.onion address,” which is extracted from the “ENS record,” corresponds to the claimed “*record*.” Pet. 35; *see* Ex.1004, 2 (ENS system “grab[s] the .onion address...in the ENS record...and return[s] it to the address bar.”). These are a “result of ENS resolution” and therefore are not the records themselves, which is what the claim required. I note that resolving is recited as the last limitation in the claim and therefore is not part of this limitation.

43. The failure in analysis is confirmed by the Petition and Mr. McDonald, which purport to interpret the claim terms according to their “plain and ordinary meaning,” but then assert, without analysis or consideration of the claim language, that the claimed “resolution record is described in the ’344 Patent as what is returned from the resolver.” Pet. 13-14, 34-35 (citing EX1001, 17:28-55); *see also* EX1002, ¶55. In so doing, the Petition and Mr. McDonald demonstrate a fundamental misunderstanding of the ’344 patent’s specification and claims, which do not broadly indicate that any data returned by a resolver correspond to a “*resolution records*.”

44. A POSITA would have understood that in the ’344 patent, consistent with the plain and ordinary meaning, records are described as a type of data structure that includes multiple pieces of data or information that may be

interpreted by clients to resolve the domain name, as indicated below:

...a list of known standard records is defined to allow standard interpretation by clients. In some embodiments, standard record types include:

crypto.*-Records related to crypto payments

dns.*-DNS resolution records

dweb.*-Resolution records related to distributed content network protocols

browser.*-Resolution configuration/preference records for web browser

EX1001, 6:3-11.

45. In view of this disclosure, a POSITA would have understood that within a specific resolution record a variety of data is included. For example, the '344 patent's DNS resolution record (dns.*) includes "redirect address/URL of a redirect record, IP address of a dns.A record, or any other record supported by the DNS protocol." EX1001, 17:46-55. A POSITA would not have understood the '344 patent as identifying a specific "address" included in the DNS record as the claimed "*resolution records*"—which is precisely what the Petition is doing. On the contrary, the DNS record would be understood to correspond to a resolution record that is received and used by the client to resolve the name of the domain. As another example, the '344 patent's browser configuration resolution record (browser.*) includes "a list of preferred protocols in a preferred order such that if multiple protocols are supported by the destination of the resolved domain, the

protocol to be utilized is selected based on the order of the list.” EX1001, 17:46-

55. In the context of a browser configuration resolution record, the ’344 patent’s disclosure does not support an interpretation where an individual piece of data, e.g., a preferred protocol, extracted from the browser configuration resolution record corresponds to the claimed “*resolution records*.” The ’344 patent’s browser configuration resolution record itself would be understood to correspond to what is claimed. A POSITA would not have understood an individual piece of data extracted from an ENS record meets this limitation.

46. Therefore, it is my opinion that Johnson and Millegan, considered either separately or in combination do not disclose “*receiving the one or more resolution records of the domain*,” as required by the claim.

B. The asserted references do not disclose “*utilizing the received one or more resolution records to resolve the name of the domain*.”

47. I disagree with the Petition and Mr. McDonald that the asserted references, separately or together, disclose “*utilizing the received one or more resolution records to resolve the name of the domain*,” as recited in independent claims 1, 19, and 20.

48. The Petition and Mr. McDonald assert, without analysis, that using

the received “.onion address[] to access the website”¹ teaches “*resolv[ing]*” the name of the domain. Pet. 35; EX1002, ¶¶150-152. Notably, the Petition and Mr. McDonald do not even attempt to explain the logic behind this broad reading of what it means to “*resolve.*”

49. It is my opinion that the proposed mapping is irreconcilable with what is claimed and how this term “*resolve*” would be understood in the art. I note that both Petition and Mr. McDonald concede that in the asserted art, the resolution of the name of the domain occurs on the ENS system itself. *See* Pet. 35 (“...result of the ENS resolution...”); EX1002, ¶¶147 (same). As such, the Petition’s assertion that the ENS system itself uses the ENS record to resolve the name of the domain and extract the ‘.onion address’ is contrary to the last claimed step of “*utilizing the received one or more resolution records to resolve the name of the domain.*” Ex.1001, 21:41-42; Ex.1004, 2 (ENS system “grab[s] the .onion address...in the ENS record....”).

¹ The Petition only asserts that “Millegan thus discloses the limitation” and does not assert that Johnson’s “resource” (identified at limitation [1e]) discloses limitation [1f]. Pet. 35-36. But even if considered, Johnson makes clear that its ENS registry resolvers “are responsible for the actual process of translating names into addresses,” which is contrary to what is claimed in the last step. EX1003, 3.

50. A POSITA would have understood that in order to “*resolve the name of the domain,*” as the claim requires, the received record is used at the client in an interpretation step to extract data from the record corresponding to the name of the domain. EX1001, 6:3-11 (“...allow standard *interpretation* by clients...”). Because in Millegan the ENS system is that which resolves the name of the domain by extracting the .onion address from the ENS record, no further resolution takes place at the client; this is why Millegan only discloses that it “return[s] [the .onion address] to the address bar” and discloses no further resolving step. EX1004, 2.

51. Therefore, because the asserted art resolution occurs only in the ENS system, it is my opinion that Johnson and Millegan, considered either separately or in combination, do not disclose “*utilizing the received one or more resolution records to resolve the name of the domain,*” as required by the claim

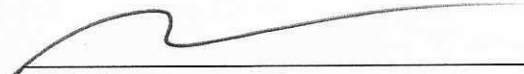
X. CONCLUSION

52. This declaration and my opinions herein are made to the best of my knowledge and understanding, and based on the material available to me, at the time of signing this declaration. I declare that all statements made herein on my own knowledge are true and that all statements made on information and belief are believed to be true, and further, 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 or Title 18 of the United States

Code.

Date: 26 August, 2024



Dr. Newman