

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SAMSUNG ELECTRONICS CO., LTD. and SAMSUNG ELECTRONICS  
AMERICA, INC.,  
Petitioners

v.

MOBILE DATA TECHNOLOGIES LLC,  
Patent Owner

IPR2025-00536

**DECLARATION OF GEORGE EDWARDS**

IN REGARD TO THE PETITIONS FOR *INTER PARTES* REVIEW OF  
U.S. PATENT NO. 9,032,039

1. I have been retained as an expert in computer science to provide analysis and opinions related to whether certain claims of U.S. Patent No. 9,032,039 (“the ’039 Patent”) are rendered obvious by prior art asserted by Petitioner Samsung. I understand that Samsung has asserted that claims 1-4, 8-9, 13-15, 17-19, 22-25, and 28-30 are rendered obvious by the combination of Patent WO02/17652 (“Randall”) and Patent US7,047,030 (“Forsyth”) under 35 U.S.C. §113.

2. I submit this declaration as a statement of the opinions I have formed and the factual basis for the opinions. I understand that this declaration is submitted in regard to IPR2025-00536. I am prepared to testify as to the matters discussed here.

3. My employer, Quandary Peak Research, is paid a consulting fee for my time working on this matter. I have no personal interest in this matter, and my compensation does not depend in any way on the opinions I express or the outcome.

4. A detailed list of my qualifications is set forth in my *curriculum vitae*, a copy of which is attached as Exhibit A. Within the broad field of computer science, my specific areas of expertise encompass software engineering, distributed systems, software architecture, software analysis, computer programming, mobile device software, Internet software, computer networks, location-based systems, and embedded software. I have direct experience building and analyzing web applications, mobile apps, cellular networks, email and multimedia messaging

services, and databases. Therefore, I believe I am qualified to express expert opinions related to the '039 Patent.

5. In forming my opinions, I have considered:

- U.S. Patent No. 9,032,039 (“the '039 Patent”);
- Samsung’s Petition for Inter Partes Review and attached exhibits (the “Petition”);
- Samsung’s Defendants’ Invalidity Contentions of U.S. Patent 9,032,039 in *Mobile Data Technologies, LLC v. Samsung Electronics Co. Ltd., and Samsung Electronics America, Inc.* No. 2:24-cv-00435-JRG-RSP (E.D. Tex.) (Samsung’s “Invalidity Contentions”);
- my education, training, and experience in the field; and
- other materials cited in this declaration.

6. Patent WO02/17652 (“Randall”) is assigned to Symbian Ltd. I am informed and understand that it is being asserted in IPR2025-00536 as prior art to the '039 patent. I am informed and understand that Petitioner alleges that the reference discloses a mobile client-server architecture utilizing an extensible database system; a “Forums” service in which mobile users may engage in messaging or content sharing; client and server programs that operate on Symbian OS to facilitate asynchronous communication between mobile devices; and the foundational

infrastructure of the claimed mobile information channel, including support for dynamic content sharing and message delivery.

7. Patent US7,047,030 (“Forsyth”) is also assigned to Symbian Ltd. I am informed and understand that it is also being asserted in IPR2025-00536 as prior art to the ’039 patent. I am informed and understand that Petitioner alleges that the reference discloses the concept of “group objects” to enable enhanced group-based communication among mobile device users; use of persistent data and object-oriented storage to organize messages, multimedia files, and user interactions; support for various group messaging scenarios, including sharing images, scheduling events, and maintaining collaborative records; and interfaces and mechanisms that could be combined with Randall’s Forums infrastructure to provide a full-featured mobile information channel as claimed in the ’039 patent.

8. I am informed and understand that Samsung has served its Invalidity Contentions in the parallel proceeding in case 2:24-cv-00435-JRG-RSP (E.D. Tex.). In these Invalidity Contentions, it asserts a Nokia 9210 Communicator phone enabled with internet access (the “Nokia 9210 System”) as prior art and alleges that it invalidates the ’039 patent. Samsung alleges that the Nokia 9210 System discloses mobile messaging; content capture and sharing of messages, images, audio, and documents via contacts, email threads, or groups; group messaging features and

document/media handling via forums, newsgroups, and web-based channels. (Ex. 2027, p. 35–36.)

9. In my opinion, the Nokia 9210 System is, for the purposes that Samsung relies on it in their Invalidity Contentions, the same prior art as the combined Randall and Forsyth references. As an initial matter, the Nokia 9210 System operates on Symbian OS, which emerged from a strategic joint venture formed in June 1998 by Psion, Ericsson, Motorola, and Nokia to establish Symbian Ltd. (Ex. 2037, p. 5.) The objective of this collaboration was to develop a standardized operating system for mobile devices called Symbian OS. (*Id.*) The Nokia 9210 Communicator was the first commercially available device to utilize Symbian OS, featuring Nokia’s Series 80 user interface, which stemmed from Symbian Ltd.’s internal ‘Crystal’ design initiative. (*Id.*, p. 5–6, 10.) Accordingly, the Nokia 9210 System is a Symbian OS-based device.

10. The Nokia 9210 System features that Samsung relied on in their Invalidity Contentions are adequately described in Randall and Forsyth as they both discuss Symbian OS, the base of the Series 80 v1.0 Operating System of the Nokia 9210 System. Randall describes a client server architecture foundational to Symbian OS utilizing an “extensible database” system. (Randall, p. 7, 15-p. 8, 4.) Randall then discusses a “Forums” service that “allows several people to be part of a ‘channel’ or room,” facilitating asynchronous communication between mobile devices. (Randall,

p. 40, 15-26.) Similarly, Forsyth discusses object-oriented storage and persistent data management enabling persistent groups. This allows the use of “group objects” to implemented “in a distributed manner across a client server architecture” to enable enhanced group-based communication among users (Forsyth, 2:61-3:34.) Symbian OS is also directly named in Forsyth as an “object based operating system” in an implementation of “Forums,” a service enabling “group based communication services” “between mobile devices.”

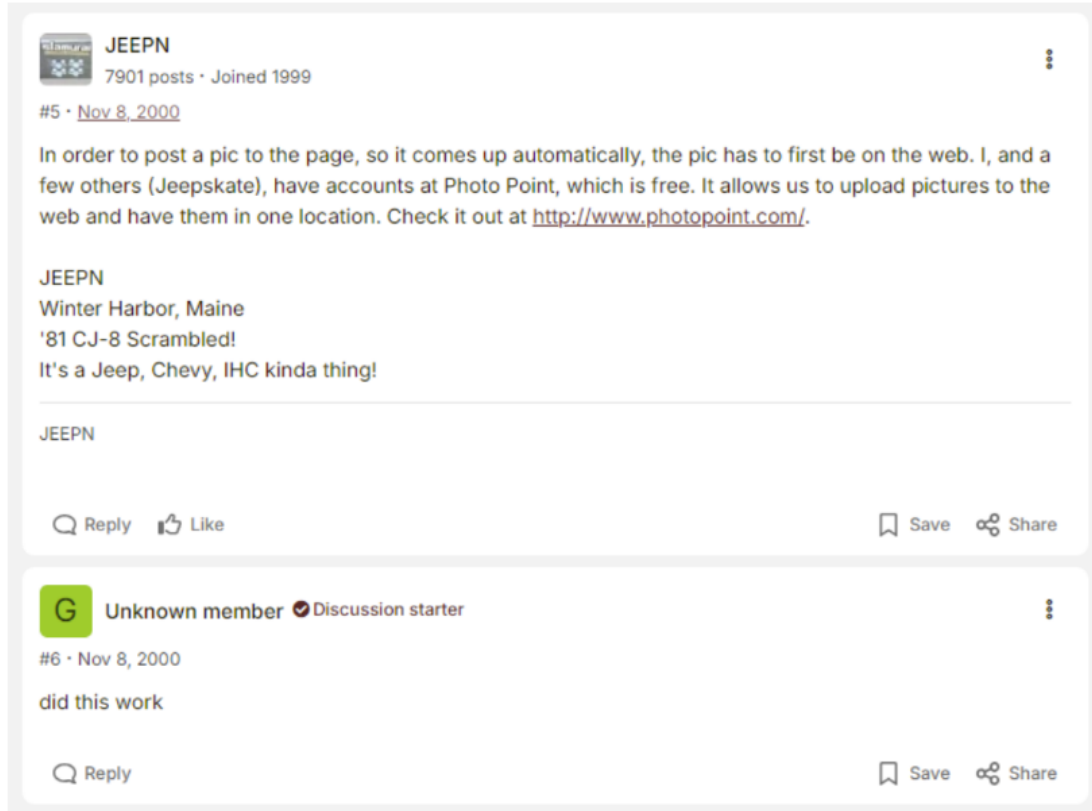
11. My detailed analysis of the Invalidity Contentions confirms this point. For instance, with respect to limitation 1[A], Samsung’s Invalidity Contentions for the Nokia 9210 System assert that the “Nokia 9210 System allowed users to capture content in the form of messages.” (Ex. 2033, p. 5–7.) This capability is also disclosed in both the Randall and Forsyth references. Randall explains that “Short Message Service (SMS), Enhanced Messaging Service (EMS), Bio Messaging (BIO) and Smart Messaging can all use GSM’s signaling channel, which provides relatively slow but lightweight transport for messages required by the ServML Framework.” (Randall, 58:5–8; see also Forsyth, 3:24–31.) Notably, in the Petition, Petitioners specifically rely on Forsyth’s disclosure of “capturing a message at a wireless device.” (Petition at 23.) Additionally, Petitioners’ reliance on Forsyth’s “group based text messaging” for limitation 1[A] (Petition at 23) is also paralleled in the Invalidity Contentions, such as with a reference to the Nokia 9210 User Guide,

which describes that “[y]ou can create contact groups to save time by sending e-mails and short messages to all members of the contact group in one action.” (Ex. 2033, p. 8.)

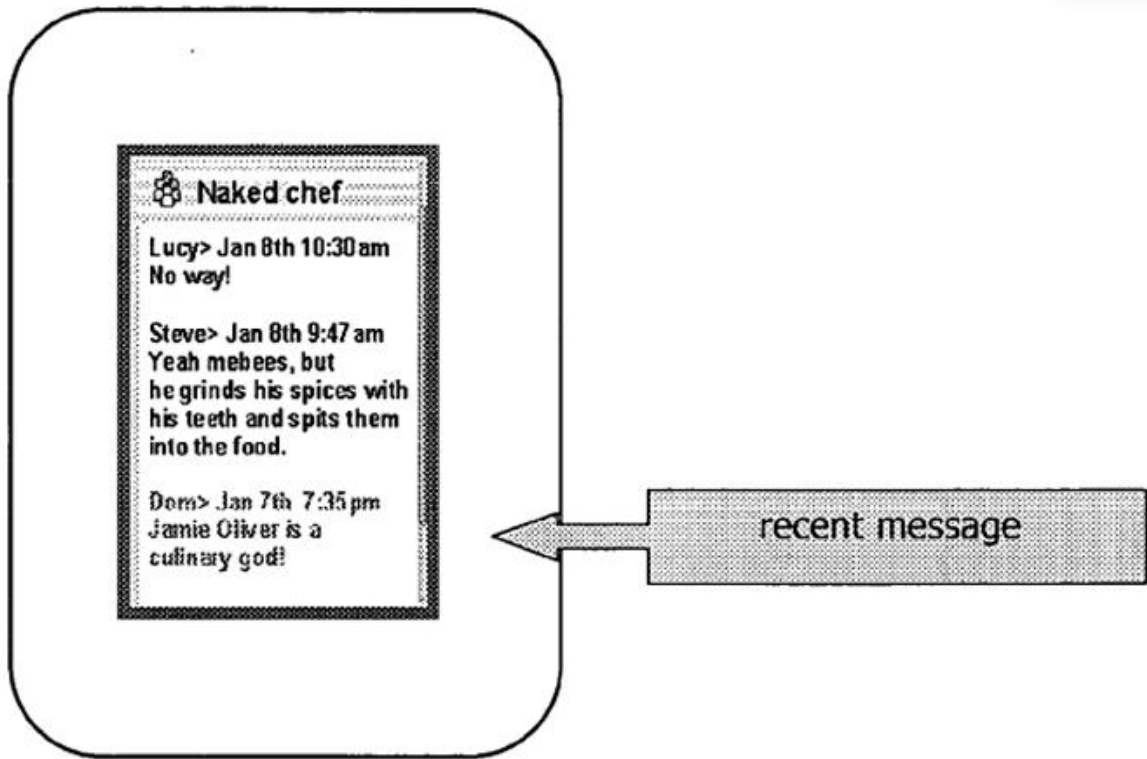
12. With respect to limitation 1[B], Samsung’s Invalidity Contentions cite the capability of the Nokia 9210 System’s “Contacts application to create, edit, and manage all contact information, such as phone numbers and addresses.” (Ex. 2033, p. 7.) A similar capability is clearly disclosed in Forsyth. Specifically, Forsyth describes a “group object” as a structure comprising information that either contains or references the minimum necessary contact information for two or more entities (typically individuals, though potentially also multiple facets of a single individual) for purposes of facilitating interactions or content sharing. (Forsyth, 2:17–24.) Forsyth further elaborates that in the Forums context, a new group object may be instantiated when a user selects message recipients or, more broadly, when the user identifies intended participants for group-based communication. (Forsyth, 2:48–52.) The overlap between Forsyth and the Nokia 9210 System’s Contacts functionality is not incidental because both systems operate within the Symbian OS environment.

13. With respect to limitation 1[C], Samsung’s Invalidity Contentions assert that the Nokia 9210 System enables the determination of “information associated with wireless messaging such as username and date/time, such as in the following

exemplary forums, newsgroups, websites, and messengers.” (Ex. 2033, p. 16.) In support of this assertion, Samsung included the following excerpt (Ex. 2033, p. 16):



14. However, this is the same depiction found in Forsyth’s Figure 7, which Petitioners cite as evidence of message metadata, including the “user name, date/time and are associated with the Forum name.” (Petition, p. 33–34.)



**Symbian Forums—Forsyth, Figure 7**

15. For limitation 1[D], Samsung’s Invalidity Contentions cite server-related functionality described in the Nokia 9210 User Guide showing that the “Nokia 9210 System allowed users to provide captured content, such as messages, images, audio, video, or documents, to servers for insertion into Contacts, groups, and email threads.” (Ex. 2033, p. 19–20.) Similar functionality is disclosed in Forsyth and is explicitly relied upon by Petitioners in this proceeding, where Petitioner cites Forsyth as disclosing that “response messages, captured at the mobile device, are ‘sent to the server, which then forwards on the increment to all the people on the current (server-maintained) address list.’” (Petition, p. 38–39; Forsyth, p. 6:5–23.)

16. For limitation 1[E], Samsung's Invalidity Contentions rely on the Nokia 9210 System's capability to "allow users to receive content from other users, such as messages, images, audio files, video files, or documents, at a mobile device via Contacts or groups." (Ex. 2033, p. 28.) As previously discussed in connection with limitation 1[B], the "Contacts" and "group" functionalities are features specific to the Symbian platform and are thoroughly addressed in Forsyth. Moreover, Forsyth describes its "Forums" as offering significant benefits for group communication, emphasizing its intuitive messaging interface that enables open dialogue among participants and supports multiple simultaneous chat-style conversations. Forsyth also notes that "Forums is shared by all participants, so that any participant can invite someone new to the Forum." (Forsyth, p. 5:27–41.) These capabilities are illustrated within the context of Scenario 1—group-based text messaging.


17. Additionally, Samsung's Invalidity Contentions cite other Nokia 9210 System features, referencing the Nokia 9210 User Guide's disclosure of user notification upon receipt of a text message. (Ex. 2033, p. 28.) Such features are likewise expressly addressed in Forsyth, which discloses that when "a user receives notification of a Forum message, he can check the status of his Forums." (Forsyth, p. 6:28–31.) Randall also describes the use of client and server programs to facilitate content creation and editing, allowing users to "create, edit, and delete content" and manage such permissions for each user, including the owner of the content and guest

users. (Randall, p. 34, 20-26.) Randall also describes the “extensible” nature of the system that allows “new data service functionality” to be “dynamically added to existing client resident applications,” enabling the storage and sharing of various types of information or media. (Randall, p. 9, 25-p. 10, 3.) Forsyth describes “group based activities” allowing users to organize messages multimedia files using persistent data structures. (Forsyth, 13:54-56.) This enables mechanisms for sharing multimedia content within group communication scenarios, allowing users to both engage in collaborative content creation, document editing, and sharing of multimedia content.

18. In conclusion, it is my opinion that the Nokia 9210 System is, for the purposes that Samsung relies on it in the Invalidity Contentions, the same prior art as the combined Randall and Forsyth references. This is because the cited Nokia 9210 System features in the Invalidity Contentions filed against the '039 Patent are all primarily based in Symbian OS, which is also the core of the Randall and Forsyth references used in IPR2025-00536.

19. I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that all statements made of my own knowledge are true and that all statements made on information and belief are believed to be true. I understand that willful false statements are punishable by fine or imprisonment or both. *See* 18 U.S.C. Section 1001.

Dated: May 14th, 2025

  
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George Edwards, PhD