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9 *Dell Inc., and Acer America Corporation*

10 UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
11 SOUTHERN DIVISION

12 PROXYCONN, INC.,

Plaintiff,

13 v.

14 MICROSOFT CORPORATION et al.,

15 Defendants.

CASE NO. SA CV11-1681 DOC (ANx)
[Consolidated With Case Nos. SA CV11-
1682 DOC (ANx), SA CV11-1683 DOC
(ANx), and SA CV11-1684 DOC (ANx)]

DECLARATION OF DARRELL D. E.
LONG IN SUPPORT OF DEFENDANTS
MICROSOFT CORPORATION,
HEWLETT-PACKARD COMPANY,
DELL INC., AND ACER AMERICA
CORPORATION'S MOTION FOR
SUMMARY JUDGMENT OF
INVALIDITY

Time: 8:30 a.m.
Date: August 20, 2012
Ctrm: 9D
Before: Hon. David O. Carter

MICROSOFT
EXHIBIT 1014

1 **Declaration of Professor Darrell D. E. Long**
2 **Regarding U.S. Patent No. 6,757,717**

3 **I. FIELD OF THE INVENTION**

4 The field of the purported inventions of this patent is comprised of the areas
5 of distributed data storage systems and networking, coding theory including error
6 detection and correction codes, and cryptographic hash functions commonly called
7 message digest functions. These were all mature fields in 1999.

8 **II. LEVEL OF SKILL IN THE ART IN 1999**

9 A person of ordinary skill in this art in 1999 would hold a B.S. degree in
10 computer science and would have as part of his study courses in operating systems,
11 networking, data compression and computer security. In addition he would have
12 several years of practical experience working in operating systems, in particular
13 the data storage subsystem.

14 A person of ordinary skill in the art would understand the storage subsystem
15 of computer operating systems. This topic is covered briefly in most undergraduate
16 operating systems courses, but few require the student to examine actual source
17 code. As a result, actual experience in working with this operating system
18 subsystem would normally occur after several years of experience working for a
19 company with a focus on systems software.

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1 Alternatively, a person would develop the level of ordinary skill in the art in
2 1999 by obtaining an M.S. in computer science and by writing his or her thesis in
3 an area related to data storage and/or computer security.

4 A person of ordinary skill in the art would understand network protocols.
5 This was normally part of undergraduate programs in computer science in 1999. A
6 person of ordinary skill in the art would also understand coding theory, in
7 particular error detection and correction codes, as well as cryptographic hash
8 functions and message digest functions. Introduction to basic hash functions is a
9 normal part of most undergraduate curricula, but coding theory is normally part of
10 specialized courses (although it is commonly part of electrical engineering
11 programs), and cryptographic hash functions would normally be taught only in
12 courses in computer security.

13 I have first-hand experience teaching and working with such persons of
14 ordinary skill in the art. For example, I have taught students having about that level
15 of skill in this art since at least as early as 1990.

16 **III. QUALIFICATIONS**

17 I am a Professor of Computer Science and have served as Associate Dean
18 for Research and Graduate Studies in the Jack Baskin School of Engineering at the
19 University of California at Santa Cruz. I hold the Kumar Malavalli Endowed Chair
20 of Storage Systems Research and I am the Director of the Storage Systems
21 Research Center, an internationally recognized center of excellence in data storage.

1 I am also the Director of the Working-group on Applied Security and Privacy
2 (WASP), the laboratory at the University of California at Santa Cruz that studies
3 computer security. I teach graduate and undergraduate courses in computer
4 security, operating systems, and have taught courses in networking and distributed
5 systems. I received my B.S. degree in Computer Science from San Diego State
6 University, and my M.S. and Ph.D. from the University of California, San Diego. I
7 am a Fellow of the Institute of Electrical and Electronics Engineers and of the
8 American Association for the Advancement of Science. My research interests
9 include data storage systems, operating systems, computer security, distributed
10 systems and networking. My qualifications are further described in my Curriculum
11 Vitae attached as Exhibit A.

12 I have published numerous papers including in the ACM Transactions on
13 Storage, and various IEEE journals, and I am the co-author of two books. These
14 publications are listed in Exhibit A. I am the founder of the premier conference in
15 the data storage field known as the Symposium on File Storage Technologies
16 (“FAST”). I have participated in organizing numerous academic conferences
17 including:

18 2012:

19 Steering Committee: Petascale Data Storage Workshop (PDSW),
20 Symposium on Modeling, Analysis and Simulation of Computer and
21

1 Telecommunication Systems (MASCOTS), Symposium on File and
2 Storage Systems Technology (FAST).

3 Program Committee: Symposium on File and Storage Systems
4 Technology (FAST).

5 2011:

6 Steering Committee: Petascale Data Storage Workshop (PDSW),
7 Symposium on Modeling, Analysis and Simulation of Computer and
8 Telecommunication Systems (MASCOTS), Symposium on File and
9 Storage Systems Technology (FAST).

10 Program Committee: Symposium on Modeling, Analysis and
11 Simulation of Computer and Telecommunication Systems
12 (MASCOTS).

13 2010:

14 Program Chair: Symposium on Modeling, Analysis and Simulation of
15 Computer and Telecommunication Systems (MASCOTS).

16 Steering Committee: Petascale Data Storage Workshop (PDSW),
17 Symposium on Modeling, Analysis and Simulation of Computer and
18 Telecommunication Systems (MASCOTS), Symposium on File and
19 Storage Systems Technology (FAST).

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