DOCKET NO: 0100157-00244

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

PATENT: 6,415,280

INVENTOR: DAVID A. FARBER
AND RONALD D. LACHMAN

FILED: APRIL 1, 1999   ISSUED: JULY 2, 2002

TITLE: IDENTIFYING AND
REQUESTING DATA IN A
NETWORK USING IDENTIFIERS
WHICH ARE BASED ON THE
CONTENT OF THE DATA

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

DECLARATION OF KEITH MOORE

1.   I, Keith Moore, declare as follows:

2.   I have been asked by Petitioner to provide this Declaration regarding

certain factual issues that are common to six Inter Partes Review proceedings, Case

Nos. IPR2013-00082, -00083, -00084, -00085, -00086 and -00087.

I.   Background

3.   I received a Bachelor of Science degree in Electrical Engineering from Tennessee Technological University in 1984, and a Master of Science degree in Computer Science from the University of Tennessee, Knoxville in 1996. My Master's thesis was entitled "Design and Evaluation of a Multiprotocol Electronic Mail Switching System," and related to the switching of electronic mail between dissimilar environments.

4.   From October 1985 to December 1986, I was employed as a Senior Engineer at Philips Subsystems and Peripherals, Knoxville, Tennessee, working on the implementation of firmware, device drivers, and diagnostic software for SCSI CD-ROM drives.

5.   From April 1987 to December 1990, I was a Graduate Research Assistant in the Computer Science Department, University of Tennessee, Knoxville, and from September 1991 to February 2007, I was a Research Associate in the Innovative Computing Laboratory, Computer Science Department, University of Tennessee, Knoxville. While at the University of Tennessee, I worked on a number of projects in different fields, including computer networking, distributed storage, management of distributed software repositories, cataloging of Internet resources, and parallel computing.

6.   Since March 2007, I have been self-employed, consulting in technical

fields including computer networking, security, and system administration.

7.   I have been involved with the Internet Engineering Task Force (IETF)

since 1990. Specifically, I participated in several IETF standardization working

groups, including efforts to define the MIME format for electronic mail messages,

extensions to the SMTP protocol for negotiation of the message size and for

delivery reporting options, definition of a standard format for reporting electronic

mail delivery successes and failures (delivery status notifications or DSNs),

definition and resolution mechanisms for Uniform Resource Names (URNs),

transition mechanisms for Internet Protocol version 6, email authentication, and

DNS internationalization.

8.   Within IETF, I served on the Internet Engineering Steering Group

(IESG) for four years (1996-2000) as one of two Area Directors for the

Applications Area. This included co-management of approximately twenty-six

working groups; reviewing and commenting on drafts of IETF protocol standards

and informational documents from all areas of IETF; assisting in the forming and

chartering of new working groups; and arranging collaboration within IETF areas,

between working groups, and between IETF and other standards-making

organizations. I also served as IESG's liaison to the Internet Architecture Board

(IAB) for approximately three years. I contributed to several workshops on areas

of concern for Internet architecture, including security, routing, addressing, and mobility. Prior to serving on IESG, I served as Chair of the IETF DRUMS working group tasked with revising the Internet electronic mail protocol specifications. I was an invited panel speaker at the FTC/NIST Email Authentication Summit, November 2004, on the topic of the utility of email authentication as an anti-spam measure.

9.   A complete curriculum vitae, including a list of my publications, is attached hereto as Appendix B.

10.   The testimony I provide in this Declaration is based on my personal knowledge of the relevant facts. A list of the materials that I reviewed in preparation for this Declaration is attached hereto as Appendix A. In addition, I reviewed each of the materials cited or referred to in this Declaration, even if not listed in Appendix A.

II.   The Usenet References

11.   I have been asked to provide my understanding of certain facts relating to the following documents:

- Albert Langer, "Re: dl/describe (File descriptions)" (August 7, 1991) (the "Langer Reference," EMCVMW 1003);

- Ross Williams, "An algorithm for matching text (possibly original)" (January 27, 1992) (the "Williams Reference," EMCVMW 1027);

- Brian Miller, "ziplab on bbses other" (Mar. 30, 1992) (the "Miller Reference," EMCVMW 1045);

- Norman Hirsch, "Pirated software on server. Who's liable?" (July 2, 1994) (the "Hirsch Reference," EMCVMW 1046) (collectively, the "Usenet References").

12. It is my belief that the each of the Usenet References is a true and correct copy of the document that Petitioner claims it is. It is also my belief that each of the Usenet References was publicly accessible prior to April 11, 1995.

13. Both the Langer Reference and the Williams Reference are Usenet articles, and they are dated August 7, 1991 and January 27, 1992, respectively. In the 1991–1992 time frame, I was familiar with Usenet. Usenet was a network of computers, or "nodes," that individuals could use to send and receive "articles" covering a variety of subjects. Articles were grouped into "newsgroups," each newsgroup covering a specific topic (both technical and non-technical). Usenet nodes automatically communicated among themselves to propagate articles to the entire network, which included many thousands of nodes worldwide. As the name

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