

Filed on behalf of Microsoft Corporation

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION
Petitioner

v.

PROXYCONN, INC.
Patent Owner

Patent 6,757,717 B1

MICROSOFT
EXHIBIT 1014

**DECLARATION OF SEAN-MICHAEL RILEY
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW
OF CLAIMS 6, 7, 9, 11, 12 and 14 OF U.S. PATENT NO. 6,757,717**

I, Sean-Michael Riley, declare as follows:

1. I am over 18 years of age, a paralegal employed by Klarquist Sparkman, LLP, counsel for Petitioner Microsoft Corporation, and I make this declaration based on my own knowledge, personal experience and belief; and if called upon can testify competently thereto.

2. I make this declaration in support of Microsoft Corporation's Second Petition for Inter Partes Review of Claims 6, 7, 9, 11, 12 and 14 of U.S. Patent No. 6,757,717 ("Petition"). This declaration is filed concurrently with Microsoft's Petition as Exhibit 1011.

3. Filed concurrently with Microsoft's Petition as Exhibit 1001 is a true and correct copy of Appendix A, which is a claim chart mapping the claims to prior art references HTTP DRP, Mattis and Yohe.

4. Filed concurrently with Microsoft's Petition as Exhibit 1002 is a true and correct copy of U.S. Patent No. 6,757,717, entitled "System and Method for Data Access," issued June 29, 2004, with Certificate of Correction, issued Aug. 14, 2012.

5. Filed concurrently with Microsoft's Petition as Exhibit 1003 is a true and correct copy of Arthur van Hoff, John Giannandrea, Mark Hapner, Steve Carter, and Milo Medin, "The HTTP Distribution and Replication Protocol," W3C Note, <http://www.w3.org/TR/NOTE-drp-19970825.html>, Aug. 1997

6. Filed concurrently with Microsoft's Petition as Ex. 1004 is a true and correct copy of United States Patent No. 6,292,880, entitled "Alias-Free Content-Indexed Object Cache," issued Sept. 18, 2001.

7. Filed concurrently with Microsoft's Petition as Ex. 1005 is a true and correct copy of U.S. Patent Application No. 09/060886, filed Apr. 15, 1998, issued as U.S. Patent No. 6,292,880.

8. Filed concurrently with Microsoft's Petition as Ex. 1006 is a true and correct copy of U.S. Patent No. 5,835,943, "Apparatus and Method for Increased Data Access in a Network File Oriented Caching System," issued Nov. 10, 1998.

9. Filed concurrently with Microsoft's Petition as Ex. 1007 is a true and correct copy of U.S. Patent Application No. 08/888,311, filed July 3, 1997, issued as U.S. Patent No. 5,835,943.

10. Filed concurrently with Microsoft's Petition as Ex. 1008 is a true and correct copy of Tim Berners-Lee, "W3C Staff Note on HTTP Distribution and Replication Protocol Submission,"

<http://www.w3.org/Submission/1997/10/Comment.html>, Aug. 28, 1997. This note was a response to the W3C Note of Ex. 1003.

11. Filed concurrently with Microsoft's Petition as Ex. 1009 is a true and correct copy of Tim Berners-Lee, "Acknowledged Submissions to W3C,"

<http://web.archive.org/web/19980213220701/http://www13.w3.org/Submission/>,

Feb. 13, 1998. This exhibit was downloaded from a “Wayback Machine” Web archived site dated Feb. 13, 1998, and references the August 1997, W3C Note of Ex. 1003.

12. Filed concurrently with Microsoft’s Petition as Ex. 1010 is a true and correct copy of Michael A. Goulde, “Network Caching Guide, Optimizing Web Content Delivery,” Patricia Seybold Group, March 1999.


13. Filed concurrently with Microsoft’s Petition as Ex. 1011 is a true and correct copy of Simon Spero, “HTTP-NG Architectural Overview,” <http://web.archive.org/web/19970606013159/http://www.w3.org/Protocols/HTTP-NG/http-ng-arch.html>. This exhibit was downloaded from a “Wayback Machine” Web archived site dated June 6, 1997.

14. Filed concurrently with Microsoft’s Petition as Ex. 1012 is a true and current copy of Proxyconn, Inc. and Microsoft Corporation’s Joint Stipulation Requesting Stay of Case Pending *Inter Partes* Review filed November 2, 2012.

15. Filed concurrently with Microsoft’s Petition as Ex. 1013 is a true and correct copy of the Expert declaration of Professor Darrell D. E. Long in Support of Microsoft’s Petition for *Inter Partes* Review of Claims 6, 7, 9, 11, 12 and 14 of U.S. Patent No. 6,757,717.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed this 10th day of January, 2013 in Portland, Oregon.



Sean-Michael Riley