

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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In re *Inter Partes* Review of:  
U.S. Patent No. 8,306,993

For: METHOD, SYSTEM AND COMPUTER  
READABLE MEDIUM FOR  
ADDRESSING HANDLING FROM AN  
OPERATING SYSTEM

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**DECLARATION OF PAUL C. CLARK, D.SC.**

**Mail Stop PATENT BOARD**  
Patent Trial and Appeal Board  
US Patent and Trademark Office  
PO Box 1450  
Alexandria, Virginia 22313-1450

I, Paul C. Clark, hereby declare and state as follows:

1. I have been retained as a technical consultant on behalf of Samsung Electronics Co., Ltd., the petitioner in the present proceeding, and I am being compensated at my usual and customary hourly rate. The petition names Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC as real parties-in-interest. I have no financial interest in, or affiliation with, the petitioner, real parties-in-interest, or the patent owner, which I understand to be ARENDI S.A.R.L. My

compensation is not dependent upon the outcome of, or my testimony in, the present *inter partes* review or any litigation proceedings.

2. I have reviewed each of the following:

- a. U.S. Patent No. 8,306,993 (“the ’993 Patent”), including the claims, description, prosecution history, and the certified translation of Norwegian patent application NO 984066 to which the ’993 Patent claims priority (which are identified in the Petition as Exhibits 1001, 1002 and 1009, respectively);
- b. Bonura, T. and J. Miller, “*Drop Zones, An Extension to LiveDoc,*” SIGCHI Bulletin, Vol. 30, No. 2, April 1998, pp. 59-63 (which is identified in the Petition as Exhibit 1003; hereinafter “Drop Zones”);
- c. Pensoft Perspective Handbook (which is identified in the Petition as Exhibit 1004; hereinafter “Pensoft”);
- d. Bonura, T. and J. Miller, “*From Documents to Objects, An Overview of LiveDoc,*” SIGCHI Bulletin, Vol. 30, No. 2, April 1998, pp. 53-58 (which is identified in the Petition as Exhibit 1005; hereinafter “LiveDoc”);
- e. U.S. Patent No. 6,112,099 to P. Ketola (which is identified in the petition as Exhibit 1006; hereinafter “the ’099 patent”);

- f. U.S. Patent No. 6,005,549 to D.K. Forest (which is identified in the petition as Exhibit 1007; hereinafter “the ’549 patent”); and
  - g. U.S. Patent No. 5,434,777 to Luciw (which is identified in the petition as Exhibit 1014; hereinafter “the ’777 patent”).
3. Upon reviewing the ’993 Patent, I understand that a Norwegian patent application (NO 984066; “Norwegian Application”) was filed on September 3, 1998, and a non-provisional application was filed on September 3, 1999 (Appl. No. 09/390,303), which is the parent application to Appl. No. 11/745,186, filed May 7, 2007, that issued as the ’993 Patent. For the purposes of my analysis, I assume the time of the purported invention to be the years 1998 and 1999.
4. A person of ordinary skill in the art at the time would typically have had an undergraduate degree in computer science in addition to two or more years of work experience relating to the field of computerized information processing or equivalent graduate education or work experience. I was a person of skill in this art in 1998.
5. My background, qualifications, and experience relevant to the issues in proceeding are summarized below. My curriculum vitae is submitted herewith as Samsung Exhibit 1011.

6. In 1986, I received a Bachelor of Science degree in Mathematics from the University of California, Irvine. In 1988, I received a Master of Science degree in Electrical Engineering and Computer Science from the University of Southern California. In 1994, I received a Doctor of Science degree in Computer Science from George Washington University.
7. From 1985 to 1989, I worked as a Systems Engineer at Ultrasystems Defense and Space. As more fully set forth in my curriculum vitae, at Ultrasystems I designed and implemented large-scale simulation and network-based systems for the United States Department of Defense (DOD). A high-speed database server I designed and implemented was used for real-time intelligence collection by the National Security Agency (NSA).
8. From 1989 to September 1990, as more fully set forth in my curriculum vitae, I worked as a Technical Lead at GTE Government Systems. While at GTE, I designed and implemented network and load generators for OS/2 LAN Manager to measure network-performance load metrics for the Central Intelligence Agency (CIA). I also developed X Windows interfaces for a large-scale event-driven network system for the NSA.
9. From 1990 to 1995, as more fully set forth in my curriculum vitae, I worked as a Senior Security Engineer at Trusted Information Systems. While at

Trusted Information Systems I designed and implemented high-assurance security systems, including cryptographic systems and applications for the NSA and the Defense Advanced Research Projects Agency (DARPA). My work at Trusted Information Systems involved cryptography, operating systems, smartcards, and other security technology developments and implementations.

10. From 1995 to 1999, as more fully set forth in my curriculum vitae, I worked as Chief Scientist at DynCorp Network Solutions, where I served as senior internal security consultant for a variety of projects. For example, I was architect and Technical Director of the IRS Secure Submission and Retrieval System that allowed the digitally signed and encrypted submission of tax data over the Internet. The successful deployment of this system resulted in three Al Gore Hammer Awards. I also created a suite of security products for providing secure wide area user access to servers that was marketed and sold to the DOD and other parts of the federal government.

11. From 1999 to the present, I have served as President and Chief Technology Officer of SecureMethods, Inc. and Paul C. Clark LLC. SecureMethods specializes in the design, implementation, and deployment of advanced secure network applications for commercial and government clients,

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