

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the *Inter Partes* Review of:

Trial Number: To Be Assigned

U.S. Patent No. 6,978,346

Filed: December 29, 2000

Issued: December 20, 2005

Inventor(s): Sung-Hoon Baek, Joon-Bae Kim, Yong-Youn Kim

Assignee: Electronics and
Telecommunications Research Institute

Title: Apparatus For Redundant
Interconnection Between Multiple Hosts
And RAID

Panel: To Be Assigned

Mail Stop *Inter Partes* Review
Commissions for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

DECLARATION OF TODD M. FRIEDMAN

I, Todd M. Friedman, do hereby declare as follows:

1. I am an attorney at the law firm of Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, and serve as counsel for Petitioners International Business Machines Corporation (“IBM”) and Oracle America, Inc. (“Oracle”). I submit this declaration in support of IBM and Oracle’s Petition for *Inter Partes* Review Under 37 C.F.R. § 42.100 of U.S. Patent No. 6,978,346 (“Petition”). I am over twenty-one years of age and not under any legal disability. I have personal knowledge of the following facts and, if called as a witness, could and would testify competently thereto.
2. Attached hereto as Exhibit 1004 is a true and correct copy of U.S. Pat. No. 6,978,346 (“the ’346 Patent”).
3. Attached hereto as Exhibit 1005 is a true and correct copy of U.S. Pat. No. 6,070,251 to Chong (“Chong US”).
4. Attached hereto as Exhibit 1006 is a true and correct copy of Japanese Pat. No. JPH11120092A to Chong (“Chong JP”).
5. Attached hereto as Exhibit 1007 is a true and correct copy of a certified translation of Chong JP.
6. Attached hereto as Exhibit 1008 is a true a correct copy of selected excerpts from the Prosecution History of the ’346 patent, U.S. Appl. No. 09/753,245.

7. 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. § 1001.

Date: June 18, 2014

Respectfully submitted,

/s/Todd M. Friedman

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