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

In re *Inter Partes* Review of: U.S. Patent No. 7,917,843

For: METHOD, SYSTEM AND COMPUTER READABLE MEDIUM FOR ADDRESSING HANDLING FROM A COMPUTER PROGRAM

DECLARATION OF PAUL C. CLARK, D.SC.

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

 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 partiesin-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.

Background

- 2. 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.
- 3. 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).
- 4. 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 an X Windows interface for the Minstrel System. I also developed and taught DEC Windows and X Windows

classes for GTE technical personnel. In addition, I developed X Windows interfaces for a large-scale event-driven network system for the NSA.

- 5. 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.
- 6. 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.

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7. 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, including the DOD. SecureMethods provides a comprehensive scalable, Commercial-Off-The-Shelf (COTS) secure architecture, implemented through the use of the SM Gateway. The SM Gateway is a next-generation security appliance developed by SecureMethods that is available on UNIXbased platforms using commercial, government, and Type I cryptography, implemented in both hardware and software. In my capacity as President and Chief Technology Officer of SecureMethods, I have technical and operational oversight of all projects and corporate technical operations. I provide guidance to senior technical personnel for design, implementation, and troubleshooting for a wide range of systems both internal and external. My work includes network systems and security, cryptographic applications, certification, key management, authentication, and integrity strategies for network applications. I also provide a wide range of high-end technical and legal consulting services. My firm specializes in complex software and hardware systems for commercial and DoD clients.

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- 8. I was also a member of the Federal Advisory Committee for Key Management Infrastructure (KMI), serving as Chairman of the Interoperability Working Group for Cryptographic Key Recovery. I have also served as an adjunct professor in the Computer Science Department at The George Washington University, where I have taught doctoral-level cryptography, network and computer security courses. I also appeared before a Congressional committee to provide testimony on "Advanced Technology for Border Control."
- 9. I have co-authored a number of publications in the computer and security areas. I am also a named inventor on two United States Patents, U.S. Patent Nos. 5,448,045 and 5,892,902. My curriculum vitae is attached to the Petition as Exhibit 1008.

Materials Considered

- 10. I have reviewed each of the following:
 - a. U.S. Patent No. 7,496,843 ("the '843 Patent"), including the claims, description, and prosecution history (which are identified in the Petition as Exhibits 1001 and 1002, respectively);
 - b. U.S. Patent No. 5,859,636 to M.S. Pandit (which is identified in the Petition as Exhibit 1005; hereinafter "Pandit");

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