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

PLAID TECHNOLOGIES INC. Petitioner
v.
YODLEE, INC. Patent Owner
Case IPR2016-00273 Patent 6,317,783

DECLARATION OF ZAYDOON JAWADI IN SUPPORT OF PATENT OWNER'S RESPONSE



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	A.	Sugiarto and Brandt do not disclose the "protocol for instructing the processor how to access the securely stored personal information via the network"		
	B.	Sugiarto and Brandt do not disclose "storing the retrieved personal information in [a/the] personal information store"		
	C.	Sugiarto and Brandt do not disclose "non-public personal information" if that term is given patentable weight26		
	D.	Sugiarto and Brandt do not disclose non-public personal information "also being accessible by the end user via the network independently of the system for delivering personal information"		
	E.	Petitioner's proposed combination fails31		
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IV.		TITIONER HAS ALSO FAILED TO SHOW THAT MANY OF DEPENDENT CLAIMS ARE INVALID36		
	A.	Sugiarto and Brandt do not disclose an "intermediary web site" (claims 14-17, 33-36)		
	B.	Sugiarto and Brandt do not disclose the "associated user interface format" / "format associated with the intermediary web site" / "format		



V.	CO	NCLUSION41
	C.	Sugiarto, Brandt, and Chow do not disclose "monitoring information providers for changes" (claims 2 and 21)40
		other than the format associated with the intermediary web site" (claims 14, 15, 17, 33, 34, 36)



I, Zaydoon Jawadi, declare as follows:

- 1. I am making this declaration at the request of the Patent Owner, Yodlee, Inc. ("Yodlee" or "Patent Owner") in the matter of *Inter Partes* Review of U.S. Patent No. 6,317,783 (the '783 Patent).
- 2. I am being compensated for my work. My compensation does not depend in any way on the outcome of this proceeding or upon the opinions or testimony that I provide.
- 3. In forming the opinions I express below, I considered all of the information I cite throughout my analysis, including:
 - a. The '783 Patent (Ex. 1001)
 - b. The File History of the '783 Patent (Ex. 1003)
 - c. Petition by Plaid Technologies, Inc. (Paper 1)
 - d. Declaration of Petitioner's Expert, Todd Mowry (Ex. 1008)
 - e. U.S. Patent No. 6,278,449 to Sugiarto, et al. (Ex. 1004)
 - f. U.S. Patent No. 5,892,905 to Brandt, et al. (Ex. 1005)
 - g. U.S. Patent No. 6,029,175 to Chow, et al. (Ex. 1006)
 - h. Decision of Institution (Paper 10)
 - i. Deposition of Petitioner's Expert, Todd Mowry (Ex. 2005)
- 4. I summarize my relevant knowledge and experience below. My Curriculum Vitae contains additional information and is Ex. 2008.



- 5. I received a B.S. in Electrical Engineering from Mosul University in 1977. I received an M.S. in Computer Science from Columbia University in 1981, with a Citation for Outstanding Achievement Dean's Honor Student.
- 6. I hold a California community college computer science lifelong instructor credential. I have taught various computer technologies to thousands of engineers and academic students.
 - 7. Prior to 2007, I held a number of jobs in industry.
- 8. For example, from 2001 to 2006, I was President and cofounder of CoAssure, Inc., a provider of automated web-based telecommunication test services serving Fortune-500 companies. The system included aggregating data from multiple data sources into an intermediary server and/or website, storing the aggregated data, and presenting the aggregated data to the end user's browser through the internet.
- 9. Also, in 1999 I co-founded a company called Can Do, Inc.

 CanDo.com was a startup Internet eCommerce company targeting people with disabilities. The CanDo.com website had over 10,000 items for sale, and extensive consumer features, such as news, chat, messages, and product information. The company was funded by leading venture capital firms. Technology included magnification software to make websites more usable by vision-impaired people



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