

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In the *Inter Partes* Review of:

U.S. Patent No. 8,645,558

Filed: June 15, 2006 (PCT filing date)

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Named Inventor(s): Steven Leslie Pope,  
Derek Edward Roberts, David James  
Riddoch, Greg Law, Steve Grantham,  
Matthew Slattery

Recorded Assignee: Solarflare  
Communications, Inc.

Title: Reception According To A Data  
Transfer Protocol Of Data Directed To  
Any Of A Plurality Of Destination  
Entities For Data Extraction

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P.O. Box 1450  
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**DECLARATION OF KEVIN JEFFAY, PH.D.**

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## **I. INTRODUCTION**

1. I submit this Declaration to offer my expert opinion regarding the unpatentability of claims 1–12 of U.S. Patent No. 8,654,558. I understand that Solarflare Inc. (“Solarflare”) has sued Petitioner Exablaze Pty Ltd. (“Petitioner”) in the U.S. District Court for the District of New Jersey for allegedly infringing the ’558 Patent.
2. I have set forth my professional qualifications and relevant experience in Section II of this Declaration and have attached a copy of my curriculum vitae. (Ex. 1012.)
3. In forming the opinions in this Declaration, I considered:
  - U.S. Patent No. 8,654,558
  - File History of U.S. Patent Application No. 11/916,973
  - “Engineering a User-Level TCP for the CLAN Network” by Kieran Mansley
  - “Distributed Computing with the CLAN Network” by David Riddoch, Kieran Mansley, and Steve Pope
4. In addition, I relied on my own knowledge, training, and more than 30 years of experience researching and teaching the design and implementation of computer networks and computer networking technology.

## **II. BACKGROUND AND QUALIFICATIONS**

5. I am currently the Gillian Cell Distinguished Professor of Computer Science in the Department of Computer Science at the University of North Carolina

at Chapel Hill. I also presently serve as the Chairman of the department. I have been a faculty member at UNC since 1989.

6. I received a Ph.D. in Computer Science from the University of Washington in 1989. Prior to that, I received a B.S. in Mathematics with Highest Distinction from the University of Illinois at Urbana-Champaign in 1982 and a M.Sc. in Computer Science from the University of Toronto in 1984.
7. I have been involved in the research, development, design, and implementation of networked computing systems for over thirty years. In my research and teaching I have considered problems of the design and implementation of computer networks. My areas of research include computer networks, real-time systems, operating systems, multimedia networking, network performance evaluation, and aspects of router design. A major theme of my research has been the measurement and analysis of traffic patterns and traffic performance in computer networks. As an active network and operating systems researcher, I regularly attend the major international conferences and symposia where networking research is presented.
8. For example, I attended the conferences where the research described in the primary reference discussed in this Declaration, Mansley (Ex. 1003), and a related work considered by Mansley (Ex. 1004, Druschel), were presented.

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