

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DECLARATION OF EREZ ZADOK, PH.D.

IN SUPPORT OF PETITION FOR INTER PARTES REVIEW OF

U.S. PATENT 8,504,746

Apple 1003
IPR2017-00158

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I. Introduction.

I, Dr. Erez Zadok, declare as follows:

1. I have been retained on behalf of Apple Inc. for the above-captioned *inter partes* review proceeding. I understand that this proceeding involves U.S. Patent No. 8,504,746 (“the ’746 patent”) titled “Flexible Interface for Communication Between a Host and an Analog I/O Device Connected to the Interface Regardless the Type of the I/O Device” by Michael Tasler, and that the ’746 patent is currently assigned to Papst Licensing GmbH & Co. KG.

2. In preparing this declaration, I have reviewed and am familiar with all the references cited herein.

3. The ’746 patent describes an interface device that “simulates, both in terms of hardware and software, the way in which a conventional input/output device functions, preferably that of a hard disk drive.” (’746 patent, 4:14–17.) I am familiar with the technology described in the ’746 patent as of its September 27, 2010 filing date and its claimed March 4, 1997 priority date.

4. I have been asked to provide my independent technical review, analysis, insights, and opinions regarding the ’746 patent and the references that form the basis for the four grounds of rejection set forth in the Petition for *Inter Partes* Review of the ’746 patent.

II. Qualifications.

5. As indicated in my *curriculum vitae*, attached as Ex. 1004, I am a Professor in the Computer Science Department at Stony Brook University (part of the State University of New York (“SUNY”) system). I direct the File Systems and Storage Lab (FSL) at Stony Brook’s Computer Science Department. My research interests include file systems and storage systems, operating systems, energy efficiency, performance and benchmarking, information technology and system administration, security, networking, compilers, and software engineering.

6. I studied at a professional high school in Israel, focusing on electrical engineering (“EE”), and graduated in 1982; for my final high-school EE project, I developed a system and custom protocol to exchange data between a Commodore CBM-9000 6502-processor-based personal-computer and a custom-built Intel 8080 processor based embedded system. I spent one more year at the high school’s college division, receiving a special Certified Technician’s degree in electrical engineering. I then went on to serve in the Israeli Defense Forces for three years (1983–1986). I received my Bachelor of Science degree in computer science (“CS”) in 1991, my Master’s degree in CS in 1994, and my Ph.D. in CS in 2001— all from Columbia University in New York.

7. In 1981, while still in high school studying electrical engineering, I became the lab manager for a newly established computer lab. During that time, I

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