IN THE UNITED STATES PATENT & TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIPTELA, INC.,

Petitioner,

v.

FATPIPE NETWORKS PRIVATE LIMITED,

Patent Owner.

Case IPR2017-00684
Patent U.S. 6,775,235

DECLARATION OF JOEL WILLIAMS

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I. Introduction

1. My name is Joel Williams.

2. I have been engaged by the Exclusive Licensee FatPipe, Inc. ("FatPipe") to investigate and opine on certain issues relating to U.S. Patent No. 6,775,235 B2 ("the '235 patent") in connection with FatPipe's Response to Petition for *Inter Partes* Review in IPR2017-00684.

3. I understand that FatPipe has asserted the '235 patent against Viptela in an on-going patent infringement lawsuit, *FatPipe, Inc. v. Viptela, Inc.*, which was originally filed as Case No. DED-1-16-cv-00182 in the United States District Court for Delaware.

4. In this declaration, I will first discuss the technology background related to the '235 patent and then provide my analyses and opinions on claims 6 and 22-24 for the '235 patent.

5. This declaration is based on the information currently available to me. To the extent that additional information becomes available, I reserve the right to continue my investigation and study, which may include a review of documents and information that may be produced, as well as testimony from depositions that may not yet be taken.

6. In forming my opinions, I have relied on information and evidence identified in this declaration, including the '235 patent, the prosecution history, and

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prior art references listed in the Grounds of Petitioner's challenges, and the declarations submitted by Dr. Forys.

II. Qualifications and Experience

A. Education and work experience

7. Attached as Exhibit A to this declaration is a copy of my curriculum vitae, which provides a substantially complete list of my education, experience and publications that are relevant to the subject matter of this report.

8. I received a B.S. in Computer Science from the Ohio State University in 1978.

9. I have worked on the design of numerous network routers and other network devices for a number of major Silicon Valley companies, including HP, Cisco, Space Systems Loral, and a number of small start-up companies.

10. I worked for Bell Telephone Laboratories from 1970 to 1978. As an Associate Member of the Technical Staff, I participated in the development of network management systems and central office interfaces.

11. While working for Bell Telephone Laboratories, I attended Ohio State University, receiving a Bachelor of Science in Computer Science in 1978.

12. From 1978 to 1982, I worked at the Vidar Division of TRW as a Supervisor of Software Engineering, where I was responsible for the design and implementation of telephone central office switching and transmission equipment.

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