
BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,

Petitioner

v.

FATPIPE NETWORKS PRIVATE LIMITED

Patent Owner

Case IPR2017-01845

Patent 6,775,235

DECLARATION OF ROBERT HILTON

2. I am lead counsel for Viptela, LLC, formerly known as Viptela, Inc., in IPR2017-00684 and IPR2017-01125. I managed a team at McGuireWoods that was involved in all aspects of the preparation of the petitions for *inter partes* review, including the search for relevant prior art.

3. As part of the analysis and preparation for IPR2017-00684 and IPR2017-01125, McGuireWoods engaged a professional search firm, Cardinal IP, to search for prior art relevant to U.S. Patent No. 6,775,235. Attached as Exhibit 1023 is a copy of the Patent Search Report provided by Cardinal IP on November 23, 2016. Ex. 1023. The Patent Search Report includes the search results provided by Cardinal IP (Ex. 1023, pp. 2-25) and the search history performed by Cardinal IP (Ex. 1023, pp. 26-33). The Cardinal IP Patent Search Report does not list U.S. Patent No. 6,243,754 to Guerin (“Guerin”), which I understand is Exhibit 1006 in IPR2017-01845.

4. I was not aware of Guerin prior to its appearance in Cisco’s public filing of IPR2017-01845, and I would have known if any member of my team was aware of Guerin.

and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Executed on this 22nd day of November, 2017.



Robert C. Hilton
Dallas, Texas