

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CAVIUM, INC.

Petitioner,

v.

ALACRITECH, INC.

Patent Owner

Case IPR. No. Unassigned

U.S. Patent No. 7,124,205

Title: NETWORK INTERFACE DEVICE THAT FAST-PATH
PROCESSES SOLICITED SESSION LAYER READ COMMANDS

DECLARATION OF INGRID HSIEH-YEE, Ph.D

I, Ingrid Hsieh-Yee, declare as follows:

1. I have been retained as an independent expert witness on behalf of Cavium Inc. (“Cavium”) related to Inter Partes Review IPR2017-01734 of U.S. Patent No. 7,124,205.

2. I am being compensated for my work in this matter at my accustomed hourly rate of \$160.00. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the results of my study, the substance of my opinions, or the outcome of this matter.

3. In the preparation of this declaration I have reviewed the exhibits referenced below, each of which is a type of material that experts in my field would reasonably rely upon when forming their opinions:

(1) select pages of *Protocols for X/Open PC Interworking: SMB, Version 2* (“*SMB Publication*”) held at the Radcliffe Science Library at the University of Oxford; **Exhibit CAVIUM 1079**.

(2) Sworn Affidavit of Edward John Pickard; **Exhibit CAVIUM 1078**.

(3) MARC record for “*SMB Publication*” retrieved from the online catalog of the University of Oxford at <https://solo-aleph->

prd.bodleian.ox.ac.uk/?func=direct&doc_number=010822643&format=001&local_base=BIB01; **Exhibit CAVIUM 1082.**

(4) Holdings record for “*SMB Publication*” held at the University of Oxford; **Exhibit CAVIUM 1081.**

(5) MARC record for “*SMB Publication*” retrieved from the online catalog of the British Library at http://primocat.bl.uk/F/?func=direct&local_base=PRIMO&doc_number=008158179&format=001&con_lng=eng&_ga=2.97852191.1056867193.1512088007-1701516937.1512088007; **Exhibit CAVIUM 1083.**

(6) MARC record for “*SMB Publication*” retrieved from the online catalog of the National Library of Scotland at <http://main-cat.nls.uk/vwebv/staffView?searchId=1169&recPointer=0&recCount=25&searchType=1&bibId=1911180>; **Exhibit CAVIUM 1084**

(7) MARC record for “*SMB Publication*” retrieved from the online catalog of Trinity College Dublin at <http://library.catalogue.tcd.ie/search~S9?/tprotocols+for+X%2FOpen+PC+interworking+SMB+version+2/tprotocols+for+x+open+pc+interworking+smb+version++++++2/1%2C1%2C1%2CB/mar>

c&FF=tprotocols+for+x+open+pc+interworking+smb+version++
++++++2&1%2C1%2C; **Exhibit CAVIUM 1085**

4. In forming the opinions expressed within this declaration, I have considered

- (1) The documents listed above;
- (2) The reference materials cited herein; and
- (3) My own academic background and professional experiences, as described below.

5. My complete qualifications and professional experience are described in my curriculum vitae, a copy of which is attached as **Appendix A**. The following is a brief summary of my relevant qualifications and professional experience.

6. I am currently a Professor in the Department of Library and Information Science at the Catholic University of America. I have experience working in an academic library, a medical library, and a legislative library and have been a professor for 27 years. I hold a Ph.D. in Library and Information Studies from the University of Wisconsin-Madison and a Masters in Library and Information Studies from the University of Wisconsin-Madison.

7. I am an expert on library cataloging and classification and have published two books on this subject, *Organizing Audiovisual and Electronic Resources for Access: A Cataloging Guide* (2000, 2006). I teach a variety of courses in the area of information organization and access, including “Cataloging and Classification,” “Advanced Cataloging and Classification,” “Organization of Internet Resources,” “Internet Searches and Web Design,” “Advanced Information Retrieval and Analysis Strategies,” “Digital Content Creation and Management,” and “Information Literacy Instruction.” My research interests cover cataloging and classification, information organization, metadata, information retrieval, information architecture, digital collections, scholarly communication, digital scholarship, data management, user interaction with information systems, and others.

8. I am fully familiar with a library cataloging encoding standard known as the “**M**achine-**R**eadable **C**ataloging” standards, also known as “MARC.” The standards were developed by Henriette Avram in the 1960s for libraries to create and share bibliographic records. MARC became the national standard for sharing bibliographic data in the United States by 1971 and the international standard by 1973. It is the primary metadata transmission standard for the transfer and storage of bibliographic metadata

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