

**UNITED STATES PATENT AND TRADEMARK OFFICE**

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

MICROSOFT CORPORATION

Petitioner,

v.

IRON OAK TECHNOLOGIES, LLC.,

Patent Owner.

Patent No. 5,699,275

Issued: December 16, 1997

Filed: April 12, 1995

Inventors: Dale E. Beasley et al.

Title: SYSTEM AND METHOD FOR REMOTE PATCHING OF OPERATING  
CODE LOCATED IN A MOBILE UNIT

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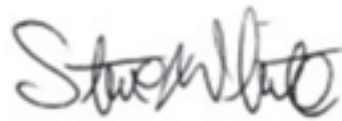
*Inter Partes* Review No. IPR2019-00106

**DECLARATION OF DR. STEVE R. WHITE REGARDING U.S. PATENT  
NO. 5,699,275**

Declaration of Dr. Steve R. White

I, Steve R. White, do hereby declare and state, that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; 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, under Section 1001 of Title 18 of the United States Code.

Executed on: October 25, 2018

A handwritten signature in black ink, appearing to read "Steve R. White", written over a horizontal line.

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## I. INTRODUCTION

### A. Engagement

1. I have been retained by counsel for Microsoft as an expert witness in the above-captioned proceeding. I have been asked to provide my opinion about the state of the art of the technology described in U.S. Patent No. 5,699,275 (“the 275 Patent”) (Ex. 1001) and on the patentability of the claims of this patent. The following is my written report on these topics.

### B. Background and Qualifications

2. Exhibit 1004 is my *curriculum vitae*. I earned a Bachelor of Arts degree in Physics from the University of California, Santa Barbara, California, and a Ph.D. in Theoretical Condensed Matter Physics from the University of California, San Diego, California.

3. I am an expert in the field of computer science and, in particular, distributed computer systems. A distributed system is a system in which components located on networked computers communicate and coordinate their actions by passing messages. Throughout, this declaration, I will refer to the field of distributed systems as the relevant field or the relevant art. In formulating my opinions, I have relied upon my training, knowledge, and experience in the relevant art. My current curriculum vitae provide a comprehensive description of my academic and employment history and my publications for the previous 35 years.

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