

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.,

Petitioner,

v.

SYNKLOUD TECHNOLOGIES, LLC,

Patent Owner.

Case IPR2019-01655

U.S. Patent No. 9,098,526

**SECOND DECLARATION OF ZAYDOON (“JAY”) JAWADI
IN SUPPORT OF PATENT OWNER’S RESPONSE**

IPR 2019-01655

Exhibit 2007

Unified Patents v.

SynKloud Technologies, LLC

TABLE OF CONTENTS

I. BACKGROUND AND QUALIFICATIONS	1
A. Supplement to First Declaration	6
II. MATERIALS REVIEWED	7
A. Supplemental Materials Reviewed	7
III. LEGAL UNDERSTANDING	8
IV. CLAIM CONSTRUCTION	8
V. OPINIONS	9
A. Institution Decision	9
B. Ground 1: Claims 1-3, 5-11, and 13-20 Are Not Obvious in View of Prust (Ex-1006) and Major (Ex-1007)	9
a. Claims 1 and 11: Copy-and-Paste (or Typing) with Web Browser Cache Does Not Disclose Utilizing Download Information Stored in Cache	9
i. Purpose of the '526 Cache	13
ii. No Reason to Add Cache to Prust	14
iii. The '526 Patent Does Not Teach Copy-and-Paste	19
iv. Major Does Not Teach Copy-and-Paste	19
v. Prust Does Not Teach Copy-and-Paste	19
vi. Major and Prust, Alone and/or in Combination, Do Not Teach Copy-and-Paste	21
vii. The Steps of Using Copy-and-Paste from Web Browser Cache in Wireless Device Are Not Conventional and Not Obvious	22
viii. The User (Not the Code) Performs the Copy-and-Paste	25
ix. URLs of Data Objects Are Not Displayed by the Browser and Cannot be Copied Directly Using Copy-and-Paste	29
x. The Web Page Containing the URL Must Be Cacheable	33
xi. Not All Web Pages Are Cacheable or Cached	33
xii. A User Cannot Tell if a Web Page Displayed by the Web Browser Is from Cache or Stored in Cache	36
xiii. Prust Does Not Disclose Where the URL for the Purported Out-of-Band Download Is Obtained from	38
xiv. Prust Does Not Disclose Cache Storage	39
xv. Prust Does Not Disclose Out-Of-Band Download through Browser or through Operating System	39

xvi.	Typing Is Impractical	42
xvii.	Petitioner’s Theory Regarding Utilizing Download Information Stored in Cache is Far Fetched	43
xviii.	Purpose of Major’s Cache Does Not Match the ’526 Cache	45
xix.	Ground 1 – Utilizing Download Information Stored in Cache: Claims 1-3, 5-11, and 13-20 Are Not Obvious in View of Prust (Ex 1006) and Major (Ex 1007).....	46
b.	Claims 1 and 11: Prust and Major Do Not Disclose Predefined Capacity	47
i.	Predefined Capacity in the ’526 Patent	47
ii.	Prust’s RAID Does Not Disclose ’526 Predefined Capacity	50
iii.	Prust’s Billing Address Does Not Disclose ’526 Predefined Capacity	56
iv.	Prust Does Not Disclose Capacity	57
v.	Prust Does Not Disclose Predefined Capacity	58
vi.	Major Does Not Disclose Predefined Capacity	61
vii.	The Combination of Prust and Major Does Not Disclose Predefined Capacity.....	61
viii.	Ground 1 – Defined Capacity: Claims 1-3, 5-11, and 13-20 Are Not Obvious in View of Prust (Ex 1006) and Major (Ex 1007).....	61
c.	Claims 1 and 11: Prust’s Email Does Not Disclose Coupling	62
d.	Claims 1 and 11: Prust’s Email Does Not Disclose Retrieving	64
e.	Claims 1 and 11: Prust’s Email Does Not Disclose Storing and Retrieving.....	66
f.	Dependent Claims 3 and 20	67
g.	A POSITA Would Not Have Been Motivated to Combine Prust with Major	70
i.	No Reason to Add Major’s Cache to Prust.....	72
ii.	Major’s Teachings Discourage Wireless Device Access to External Storage.....	72
iii.	Major Stores Data Objects in Cache, Negating the Need for External Storage	75
iv.	Prust Discourages Using Only One Mode to Access Remote Storage.....	75
v.	Prust Does Not Disclose Out-Of-Band Download through Browser	76
C.	Ground 2: Claims 1-20 Are Not Obvious in View of Chaganti (Ex-1008) and Major (Ex-1007).....	77
a.	Claims 1 and 11: Chaganti’s Drag-and-Drop (or Copy-and-Paste) with Major’s Web Browser Cache Does Not Disclose Utilizing Download Information Stored in Cache	77
i.	Chaganti’s User Does Not Send a Hyperlink to the Server.....	77
ii.	Chaganti’s Digital Item Is Not a Hyperlink (Download Information)	84
iii.	Chaganti’s Dragging and Dropping Does Not Disclose Sending Hyperlinks	85
iv.	Chaganti’s Server Does Not Utilize Download Information	90
v.	Chaganti’s FIG. 6 Does Not Disclose Download Information	93

vi.	Petitioner’s Citations Do Not Show Sending a Hyperlink to the Server and Do Not Show the Server Utilizing a Hyperlink	97
vii.	The Steps of Using Copy-and-Paste from Web Browser Cache in Wireless Device Are Not Conventional and Not Obvious.....	98
viii.	The User (Not the Code) Performs the Drag-and-Drop (or Copy-and-Paste)	98
ix.	URLs of Data Objects Are Not Displayed by the Browser and Cannot be Copied Directly Using Drag-and-Drop (or Copy-and-Paste).....	99
x.	The Web Page Containing the URL Must Be Cacheable	99
xi.	Not All Web Pages Are Cacheable or Cached.....	99
xii.	A User Cannot Tell if a Web Page Displayed by the Web Browser Is from Cache or Stored in Cache.....	100
xiii.	Chaganti Does Not Teach Drag-and-Drop (or Copy-and Paste) for Out-of-Band Downloads	100
xiv.	Chaganti Does Not Disclose Where the URL for the Purported Out-of-Band Download Is Obtained from.....	104
xv.	Chaganti Does Not Teach Cache for Out-of-Band Downloads.....	104
xvi.	Ground 2 – Utilizing Download Information Stored in Cache: Claims 1-20 Are Not Obvious in View of Chaganti (Ex 1008) and Major (Ex 1007).....	106
b.	Claims 1 and 11: Chaganti and Major Do Not Disclose Predefined Capacity by Server	106
i.	Chaganti Does Not Disclose ’526 Predefined Capacity	107
ii.	Ground 2: Defined Capacity: Claims 1-20 Are Not Obvious in View of Chaganti (Ex 1008) and Major (Ex 1007).....	113
c.	Dependent Claims 3 and 20	113
d.	Dependent Claims 4 and 12.....	114
e.	Dependent Claims 6, 7, 10, 13, 14, and 15	115
f.	A POSITA Would Not Have Been Motivated to Combine Chaganti with Major.....	118
i.	Major’s Teachings Discourage Wireless Device Access to External Storage	121
ii.	Combining Two Different Cache Implementations Is Difficult	122
VI.	CONCLUSION.....	123

I, Zaydoon (“Jay”) Jawadi, declare as follows:

I. BACKGROUND AND QUALIFICATIONS

1. My name is Zaydoon (“Jay”) Jawadi.

2. I am an independent expert and consultant. I have been retained as an expert witness on behalf of SynKloud Technologies, LLC (“SynKloud”) for the above-captioned *Inter Partes* Review (IPR) regarding U.S. Patent No. 9,098,526 (“526 Patent”).

3. As shown in my curriculum vitae (attached as Exhibit 2002), I have a Bachelor of Science in Electrical Engineering from Mosul University, a Master of Science in Computer Science from Columbia University with a Citation for Outstanding Achievement – Dean’s Honor Student, and over 40 years of experience in software and product design and development, engineering, consulting, and management in the fields of data storage, Internet, software, data networking, computing systems, and telecommunication.

4. I have worked with and possess expertise in numerous technologies, including data storage technologies and interfaces, Internet and website technologies, databases, data networking technologies and protocols, and telephony.

5. From 1978 to 1980, I worked as a telecommunication/electrical engineer for Emirtel (formerly Cable and Wireless, now Etisalat). During my

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.