UNITED STATES PATENT AND TRADEMARK OFFICE _____

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION and HP INC., Petitioners,

V.

SYNKLOUD TECHNOLOGIES, LLC,

Patent Owner.

Case IPR2020-00316 U.S. Patent No. 9,098,526

SECOND DECLARATION OF ZAYDOON ("JAY") JAWADI

IN SUPPORT OF PATENT OWNER'S RESPONSE

IPR2020-00316 Exhibit 2014 Microsoft Corporation and HP Inc. v. SynKloud Technologies, LLC



TABLE OF CONTENTS

I	BACKGROUND AND QUALIFICATIONS	1
A.	A. Supplement to First Declaration	6
II.	MATERIALS REVIEWED	7
III.	LEGAL UNDERSTANDING	9
IV.	CLAIM CONSTRUCTION	10
V.	OPINIONS	10
A.	A. Institution Decision	11
B.	3. Independent Claims 1 and 11 Are Not Obvious in Vie	w of McCown and Dutta11
	a. Claims 1 and 11: Utilizing Download Information for the Wireless Device	
	i. Purpose of the '526 Cache	
	ii. McCown Does Not Disclose, Suggest, or Imply Cache Storage	•
	iii. Dutta Does Not Disclose a Purpose for Cache	14
	iv. Dutta Does Not Disclose, Suggest, or Imply Uti Information in Cache Storage	
	v. The Combination of McCown and Dutta Does N Storing Download Information in Cache Storage	, 66 , 1 ,
	vi. Petitioners Rely Solely on Expert's Opinion Th Store the Download Information in Cache	
	vii. Petitioners' Theory for the Motivation for Storic Cache 17	ng the Download Information in
	viii. McCown Contradicts Petitioners' Theory for Download Information in Cache	
	ix. McCown Stores the Files in the Storage Site, Futhe Download Information in Cache	5 5
	x. Dutta Does Not Disclose a Reason to Store Dov	vnload Information in Cache 24
	xi. Petitioners' Second Reason to Store Download	Information in Cache
	xii. A POSITA Would Not Be Motivated to Store I the Wireless Device	
	xiii. Utilizing Download Information Stored in Ca Are Not Obvious in View of McCown and Dutta	nche: Independent Claims 1 and 11



b. De	The state of the s	ss 30
	i. Predefined Capacity in the '526 Patent	30
	ii. McCown's Provisioning and Authentication Do Not Disclose Predefined Capacit Assigned Exclusively to a User of the Wireless Device by a Storage Server	_
	iii. McCown with Memory Partitioning Does Not Disclose Predefined Capacity Assigned Exclusively to a User of the Wireless Device by a Storage Server	34
	iv. Dutta Does Not Disclose Predefined Capacity Assigned Exclusively to a User of the Wireless Device by a Storage Server	
	v. Predefined Capacity Assigned Exclusively to a User of the Wireless Device by a Storage Server: Independent Claims 1 and 11 Are Not Obvious in View of McCown and Dutta 41	d
	Dependent Claims 2-10 and 12-20 Are Not Obvious in View of McCown and Dutta and Not Obvious in View of McCown, Dutta, and Coates	
и со	ONCLUSION	1Ω



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 2015), 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



employment at Emirtel, among other things, I worked on telephony and telecommunication products and services, and I developed software in assembly and high-level languages for archiving, storing, and retrieving data to and from data storage devices, such as disk drives and tape drives.

- 6. From 1981 to 1983, I worked as a software engineer for Amdahl Corporation (now Fujitsu), a California-based major supplier of computers, systems, and data storage subsystems.
- 7. From 1984 to 1994, I worked as a software, data storage, and systems consultant to various data storage and computer companies in California, the United States, Asia, and Europe. I provided technical consulting services in data storage, data storage systems, data storage devices, software design and development, system software, device driver software, data storage device firmware, data storage software, data storage chips, data storage tools, data storage test systems and test software, data storage and I/O protocol development systems, data storage and I/O protocol analyzers, data storage and I/O monitoring systems, and data storage manufacturing systems and software.
- 8. From 1992 to 1996, I was President and founder of Zadian Technologies, Inc., a California-based leading supplier of networked data storage test systems, with over 50,000 units installed worldwide in mission-critical customer operations with premier high-technology customers, such as Conner



DOCKET

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.

