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

DECLARATION OF ZAYDOON ("JAY") JAWADI
IN SUPPORT OF PATENT OWNER'S RESPONSE

IPR2020-00316
Exhibit 2001
Microsoft Corporation and HP Inc. v. SynKloud Technologies, LLC

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF CONTENTS

I. BACKGROUND AND QUALIFICATIONS 1

II. MATERIALS REVIEWED 6

III. LEGAL UNDERSTANDING 7

IV. CLAIM CONSTRUCTION 8

V. OPINIONS 8

A. Claims 1-5, 9, 11, 12, 16, and 18-20 Are Not Obvious in View of McCown (EX1005) and Dutta (EX1006) 9

a. Claims 1 and 11: Cache Storage in/of the Wireless Device 9

i. McCown Does Not Disclose Cache Storage in/of the Wireless Device 9

ii. Dutta Does Not Disclose Cache Storage in/of the Wireless Device 13

iii. The Combination of McCown and Dutta Does Not Disclose Cache Storage in/of the Wireless Device 16

b. Claims 1 and 11: Utilizing Download Information for the File Stored in Cache Storage of the Wireless Device 17

i. McCown Does Not Disclose Utilizing Download Information for the File Stored in Cache Storage of the Wireless Device 18

ii. McCown Does Not Disclose Cache in the Wireless Device 19

iii. McCown Does Not Disclose Storing Download Information in Cache 19

iv. There Is No Need in McCown to Store Download Information in Cache 21

v. There Are Reasons in McCown to NOT Store Download Information in Cache .. 22

vi. McCown Does Not Disclose Retrieving Download Information from Cache 28

vii. McCown Does Not Disclose Later Retrieving of Download Information from Cache31

viii. The Web Page Containing the McCown URLs Must Be Cacheable to Be Stored in Cache 35

ix. Not All Web Pages Are Cacheable or Cached 35

x. A McCown User Cannot Tell if a Web Page Displayed by the Web Browser Is from Cache or Stored in Cache 38

xi. Dutta Does Not Cure McCown's Deficiencies and Does Not Disclose Utilizing Download Information for the File Stored in Cache Storage of the Wireless Device 40

xii. Dutta Does Not Disclose Cache in the Wireless Device 41

xiii. Dutta Does Not Disclose Storing Download Information in Cache 42

DOCKET ALARM

Find authenticated court documents without watermarks at docketalarm.com.

xiv. There Is No Need in Dutta to Store Download Information in Cache 43
xv. Dutta Does Not Cure the Reasons in McCown to NOT Store Download Information in Cache 43
xvi. Dutta Does Not Disclose Retrieving Download Information from Cache 44
xvii. Dutta Does Not Disclose Later Retrieving of Download Information from Cache 45
xviii. Dutta Does Not Cure Cacheability Constraints 46
xix. Dutta Offers No Way for a User to Tell if a Web Page Displayed by the Web Browser Is from Cache or Stored in Cache 47
xx. The Combination of McCown and Dutta Does Not Disclose Utilizing Download Information for the File Stored in Cache Storage of the Wireless Device 48
c. Claims 1 and 11: Cache Offers No Advantage in McCown and No Advantage in the Combination of McCown and Dutta 49
d. Claims 1 and 11: Predefined Capacity 56
i. McCown Does Not Disclose Predefined Capacity 58
ii. Dutta Does Not Disclose Predefined Capacity 62
iii. The Combination of McCown and Dutta Does Not Disclose Predefined Capacity 64
e. Independent Claims 1 and 11 Are Not Obvious in View of McCown (EX1005) and Dutta (EX1006) 64
f. Dependent Claims 2-5, 9, 12, 16, and 18-20 Are Not Obvious in View of McCown (EX1005) and Dutta (EX1006) 65
g. Dependent Claims 3 and 20: One of the Storage Devices Being Configured With the Storage Space Assigned Exclusively to the User 66
h. A POSITA Would Not Have Been Motivated to Combine McCown and Dutta for Cache Storage 67
B. Dependent Claims 6-8, 10, 13-15, and 17 Are Not Obvious in View of McCown (EX1005), Dutta (EX1006), and Coates (EX1007) 69
VI. CONCLUSION 70

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

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

DOCKET ALARM Find authenticated court documents without watermarks at docketalarm.com.

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, data storage manufacturing systems and software, and data networking.

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 ALARM Find authenticated court documents without watermarks at docketalarm.com.

DOCKET ALARM

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.