

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.

Cases IPR2020-01031 and IPR2020-01032

U.S. Patent No. 10,015,254

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

IPR2020-01031 and IPR2020-01032

Exhibit 2003

TABLE OF CONTENTS

I. BACKGROUND AND QUALIFICATIONS	1
II. MATERIALS REVIEWED	6
III. LEGAL UNDERSTANDING	7
IV. CLAIM CONSTRUCTION	7
V. OPINIONS.....	7
A. Independent Claims 1, 9, and 16 Are Not Obvious in View of McCown and Dutta	8
a. Claims 1, 9, and 16: Utilizing Information for the File Cached in Cache Storage in the Wireless Device	9
i. Responses to PTAB Decision Regarding Utilizing Information for the File Cached in Cache Storage in the Wireless Device	10
ii. Summary of Why McCown in View of Dutta Does Not Disclose Utilizing Download Information for the File Cached in Cache Storage in the Wireless Device	23
iii. Petitioners' Interpretation of Utilizing Download Information for the File Cached in Cache Storage in the Wireless Device in the '254 Patent.....	27
iv. Steps of Utilizing Download Information for the File Cached in Cache Storage in the Wireless Device in the '254 Patent	29
v. McCown Does Not Disclose, Suggest, or Imply Storing Download Information in Cache Storage or Retrieving Download Information from Cache Storage	30
vi. Dutta Does Not Disclose How Any Data in Its Cache Is Used	30
vii. Dutta Does Not Disclose, Suggest, or Imply Storing Download Information in Cache Storage or Retrieving Download Information from Cache Storage	33
viii. The Combination of McCown and Dutta Does Not Disclose, Suggest, or Imply Storing Download Information in Cache Storage or Retrieving Download Information from Cache Storage.....	34
ix. Petitioners Rely Solely on Expert's Opinion That It Would Have Been Obvious to Store the Download Information in Cache and to Retrieve the Download Information from Cache.....	34
x. Petitioners' Readily Accessible Theory for the Motivation for Storing the Download Information in Cache.....	36
xi. McCown Contradicts Petitioners' Theory for the Motivation for Storing the Download Information in Cache.....	36
xii. Petitioners' Description of McCown's Steps Contradicts Petitioners' Theory for the Motivation for Storing the Download Information in Cache.....	39
xiii. McCown Stores the Files in the Storage Site, Further Negating the Need to Store the Download Information in Cache.....	43

..

xiv. '254 Patent vs. McCown's Steps of Utilizing Download Information for the File Cached in Cache Storage in the Wireless Device.....	45
xv. Difference between Retrieving from Cache and Retrieving from Displayed Web Page 48	
xvi. Download Information for the File (Singular).....	50
xvii. Dutta Does Not Cure McCown's Deficiencies in Storing Download Information in Cache and Retrieving Download Information from Cache	51
xviii. Petitioners' Second Purported Reason (Re-Opening the Webpage) to Store Download Information in Cache.....	52
xix. Storing McCown's URLs in Cache Is Unnecessary, Wasteful, Counterintuitive, and Not Obvious	55
xx. Coates Does Not Cure McCown's and Dutta's Deficiencies in Storing Download Information in Cache and Retrieving Download Information from Cache	56
xxi. Utilizing Download Information Stored in Cache: Independent Claims 1, 9, and 16 Are Not Obvious in View of McCown and Dutta	56
b. Dependent Claims 2, 3, 10, and 17: Download Information Cached in the Wireless Device	57
B. Dependent Claims 2-8, 10-15, 17-20 Are Not Obvious in View of McCown and Dutta and Are Not Obvious in View of McCown, Dutta, and Coates.....	58
C. Dependent Claim 13 Is Not Obvious in View of McCown, Is Not Obvious in View of McCown and Dutta, and Is Not Obvious in View of McCown, Dutta, and Coates	58
VI. CONCLUSION.....	65

...

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. 10,015,254 (“’254 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

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

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.