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.

Patent No. 10,015,254
Issued: July 3, 2018
Filed: December 21, 2015

Inventor: Sheng Tai Tsao

Title: SYSTEM AND METHOD FOR WIRELESS DEVICE ACCESS TO EXTERNAL STORAGE

Inter Partes Review No. IPR2020-01031 and IPR2020-01032

DECLARATION OF HENRY HOUH REGARDING U.S. PATENT NO. 10,015,254

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

I, Henry Houh, 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: June 4, 2020

Henry H. Houh

Henry Houh

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

TABLE OF CONTENTS

I. INTRODUCTION 1

A. Engagement 1

B. Background and Qualifications 1

C. Compensation and Prior Testimony 4

D. Information Considered 4

II. LEGAL STANDARDS FOR PATENTABILITY 5

A. Anticipation 7

B. Obviousness 8

III. THE 254 PATENT 14

A. Effective Filing Date 14

B. Level of Ordinary Skill 15

C. Overview of 254 Patent 15

D. Prosecution History of 254 Patent 20

E. Challenged Claims of the 254 Patent 21

F. Claim Construction 28

1. "cache storage . . ." 28

2. "utilizing information . . . " 32

3. "folder or directory structure" 34

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

4. "configure the wireless device . . ." 35

5. "updating . . . the storage spaces . . ." 37

6. "web console" 40

IV. OVERVIEW OF THE PRIOR ART 41

A. McCown (EX1005) 41

B. Dutta (EX1006) 47

C. Coates (EX1007) 49

V. COMPARISON OF THE 254 PATENT TO THE PRIOR ART.....53

A. The Challenged Claims Are Unpatentable Over McCown in View of Dutta, or McCown in view of Dutta, in Further View of Coates.....53

1. Claim 1 is Unpatentable.....53

a. Preamble 53

b. Cache Storage 54

c. Computer-Readable Storage Device 61

(i) Program Instructions 62

(ii) Configure the Wireless Device 64

d. The Claimed Program Instructions.....65

(i) Establishing a Communication Link.....67

(ii) Displaying the Remote Storage Space.....69

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

(iii) Coupling with the First Server 72

(iv) The Wherein Clause 74

2. Claim 2 is Unpatentable 81

a. Obtaining the Information 84

b. Transmitting the Information 85

c. Cause the Server to Download the File 89

3. Claim 3 is Unpatentable 90

4. Claim 4 is Unpatentable 102

5. Claim 5 is Unpatentable 103

6. Claim 6 is Unpatentable 104

a. File/Directory Operations 104

b. Via a Wireless Link 106

c. The Obvious Combination 107

7. Claim 7 is Unpatentable 110

8. Claim 8 is Unpatentable 118

9. Claim 9 is Unpatentable 120

a. Preamble 120

b. Plurality of Storage Spaces and Devices 121

c. Computer-Readable Storage Device 122

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.