

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. 9,239,686
Issued: January 19, 2016
Filed: September 25, 2013

Inventor: Sheng Tai Tsao

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

Inter Partes Review No. IPR2020-01271


**DECLARATION OF HENRY HOUH
REGARDING U.S. PATENT NO. 9,239,686**

Petitioners Microsoft Corporation and HP Inc. – Ex. 1003, Cover

Declaration of Henry Houh Regarding U.S. Patent No. 9,239,686

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: July 16, 2020


Henry Houh

Petitioners Microsoft Corporation and HP Inc. – Ex. 1003, p. i

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 686 PATENT 14

 A. Effective Filing Date 14

 B. Level of Ordinary Skill 15

 C. Overview of 686 Patent 15

 D. Prosecution History of 686 Patent 20

 E. Challenged Claims of the 686 Patent 20

 F. Claim Construction 24

 1. “cached” 24

 2. “utilizing download information . . . ” 28

 3. “folder structure” 30

Declaration of Henry Houh Regarding U.S. Patent No. 9,239,686

IV.	OVERVIEW OF THE PRIOR ART	31
A.	McCown (EX1005)	31
B.	Dutta (EX1006)	36
C.	Coates (EX1007)	38
V.	COMPARISON OF THE 686 PATENT TO THE PRIOR ART.....	42
A.	The Challenged Claims Are Unpatentable Over McCown in View of Dutta, or McCown in view of Dutta, in Further View of Coates.....	42
1.	Claim 1 is Unpatentable	42
a.	Preamble	42
b.	Plurality of Storage Spaces.....	43
c.	Non-transitory Computer Readable Medium	43
(i)	Program Instructions	44
(ii)	Cause the Server Delivering the Storage Space.....	47
d.	The Claimed Program Instructions.....	48
(i)	Exclusive Allocation	50
(ii)	Establishing a Communication Link.....	57
(iii)	Presenting the Remote Storage Space.....	60
(iv)	Updating the Storage Space	65
(a)	In response to the user	76

Declaration of Henry Houh Regarding U.S. Patent No. 9,239,686

(b) Performing the Operation81

(v) The Wherein Clause82

(a) Storing/Retrieving Data82

(b) Downloading a File from a Remote Server the Internet.....83

(c) Utilizing Information84

(d) In Response to the User95

2. Claim 2 is Unpatentable.....96

a. Obtaining the Information96

b. Transmitting the Information.....97

c. Cause the Server to Download the File102

3. Claim 3 is Unpatentable.....103

4. Claim 4 is Unpatentable.....103

5. Claim 5 is Unpatentable.....105

6. Claim 6 is Unpatentable.....110

7. Claim 7 is Unpatentable.....116

8. Claim 8 is Unpatentable.....121

9. Claim 9 is Unpatentable.....125

10. Claim 10 is Unpatentable.....134

11. Claim 11 is Unpatentable.....135

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.