

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 IPR2020-01271

U.S. Patent No. 9,239,686

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

IPR2020-01271

Exhibit 2001

Microsoft Corporation and HP Inc. v. SynKloud Technologies, LLC

TABLE OF CONTENTS

I. BACKGROUND AND QUALIFICATIONS	1
II. MATERIALS REVIEWED	6
III. LEGAL UNDERSTANDING	6
IV. CLAIM CONSTRUCTION	7
V. OPINIONS	7
A. Independent Claim 1 Is Not Obvious in View of McCown and Dutta	8
a. Independent Claim 1: Utilizing Download Information for the File Cached in the Wireless Device	8
i. Summary of Why McCown in View of Dutta Does Not Disclose Utilizing Download Information for the File Cached in the Wireless Device	8
ii. Petitioners' Interpretation of Utilizing Download Information for the File Cached in the Wireless Device in the '686 Patent	13
iii. Steps of Utilizing Download Information for the File Cached in the Wireless Device in the '686 Patent	14
iv. McCown Does Not Disclose, Suggest, or Imply Storing Download Information in Cache or Retrieving Download Information from Cache	15
v. Dutta Does Not Disclose How Any Data in Its Cache Is Used	16
vi. Dutta Does Not Disclose, Suggest, or Imply Storing Download Information in Cache or Retrieving Download Information from Cache	18
vii. The Combination of McCown and Dutta Does Not Disclose, Suggest, or Imply Storing Download Information in Cache or Retrieving Download Information from Cache	19
viii. 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	20
ix. Petitioners' Readily Accessible Theory for the Motivation for Storing the Download Information in Cache	20
x. McCown Contradicts Petitioners' Theory for the Motivation for Storing the Download Information in Cache	21
xi. Petitioners' Description of McCown's Steps Contradicts Petitioners' Theory for the Motivation for Storing the Download Information in Cache	24
xii. McCown Stores the Files in the Storage Site, Further Negating the Need to Store the Download Information in Cache	27

xiii.	'686 Patent vs. McCown's Steps of Utilizing Download Information for the File Cached in the Wireless Device	29
xiv.	Difference between Retrieving from Cache and Retrieving from Displayed Web Page 32	
xv.	Download Information for the File (Singular).....	34
xvi.	Dutta Does Not Cure McCown's Deficiencies in Storing Download Information in Cache and Retrieving Download Information from Cache	35
xvii.	Petitioners' Second Purported Reason (Re-Opening the Webpage) to Store Download Information in Cache.....	36
xviii.	Storing McCown's URLs in Cache Is Unnecessary, Wasteful, Counterintuitive, and Not Obvious	39
xix.	Coates Does Not Cure McCown's and Dutta's Deficiencies in Storing Download Information in Cache and Retrieving Download Information from Cache	40
xx.	Utilizing Download Information Cached in the Wireless Device: Independent Claim 1 Is Not Obvious in View of McCown and Dutta.....	40
b.	Dependent Claim 2: Cached Downloading Information	41
c.	Dependent Claim 9: Predefined Capacity	41
d.	Dependent Claims 2-11 Are Not Obvious in View of McCown and Dutta and Are Not Obvious in View of McCown, Dutta, and Coates	42
B.	Independent Claims 1 and 12 Are Not Obvious in View of McCown, Dutta, and Coates	42
a.	Independent Claim 1: Utilizing Download Information for the File Cached in the Wireless Device	42
b.	Dependent Claim 2: Cached Downloading Information	43
c.	Dependent Claim 9: Predefined Capacity	43
d.	Dependent Claims 2-11 Are Not Obvious in View of McCown and Dutta and Are Not Obvious in View of McCown, Dutta, and Coates	44
e.	Independent Claim 12: Allocating Exclusively a Storage Space of a Predefined Capacity to a User of a Wireless Device	44
i.	Predefined Capacity.....	44
ii.	McCown Does Not Disclose Predefined Capacity Allocated Exclusively to a User of a Wireless Device	45
iii.	Petitioners' Memory Partitioning and Allocation Techniques Do Not Disclose Predefined Capacity Allocated Exclusively to a User of a Wireless Device.....	47
iv.	Dutta Does Not Disclose Predefined Capacity Allocated Exclusively to a User of a Wireless Device	54
v.	Coates Does Not Disclose Predefined Capacity Allocated Exclusively to a User of a Wireless Device	56

vi.	The Combination of McCown, Dutta, and Coates Does Not Disclose Predefined Capacity Allocated Exclusively to a User of a Wireless Device	56
f.	Dependent Claim 13: Utilizing Download Information for the File Cached in the Wireless Device	56
g.	Dependent Claim 14: Cached Download Information	57
h.	Dependent Claims 13-20 Are Not Obvious in View of McCown, Dutta, and Coates	57
VI.	CONCLUSION.....	58

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. 9,239,686 (“’686 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

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.