

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADOBE INC.
Petitioner

v.

SYNKLOUD TECHNOLOGIES, LLC
Patent Owner

Patent No. 9,219,780

**DECLARATION OF WINSTON LIAW IN SUPPORT OF PETITION FOR
INTER PARTES REVIEW OF U.S. PATENT NO. 9,219,780**

I, Winston Liaw, make the following declaration in support of the petition by Adobe Inc. (“Petitioner”) for *inter partes* review of U.S. Patent No. 9,219,780:

1. I am an attorney with the law firm of Farella Braun + Martel LLP, counsel for Petitioner. Unless otherwise stated, the facts stated in this declaration are based on my personal knowledge.

2. The document submitted with the petition and identified as Exhibit 1009 is a true and correct copy of Request for Comments (RFC) 1738, titled “Uniform Resource Locators (URL),” retrieved from the IETF website at <https://tools.ietf.org/html/rfc1738> on or around July 10, 2020.

3. The document submitted with the petition and identified as Exhibit 1010 is a true and correct copy of Request for Comments (RFC) 793, titled “TRANSMISSION CONTROL PROTOCOL, DARPA INTERNET PROGRAM, PROTOCOL SPECIFICATION,” retrieved from the IETF website at <https://tools.ietf.org/html/rfc793> on or around June 30, 2020.

4. The document submitted with the petition and identified as Exhibit 1011 is a true and correct copy of Request for Comments (RFC) 959, titled “FILE TRANSFER PROTOCOL (FTP),” retrieved from the IETF website at <https://tools.ietf.org/html/rfc959> on or around June 30, 2020.

5. The document submitted with the petition and identified as Exhibit 1012 is a true and correct copy of Request for Comments (RFC) 1945, titled

“Hypertext Transfer Protocol -- HTTP/1.0,” retrieved from the IETF website at <https://tools.ietf.org/html/rfc1945> on or around June 30, 2020.

6. The document submitted with the petition and identified as Exhibit 1013 is a true and correct copy of Request for Comments (RFC) 2518, titled “HTTP Extensions for Distributed Authoring – WEBDAV,” retrieved from the IETF website at <https://tools.ietf.org/html/rfc2518> on or around June 30, 2020.

7. The document submitted with the petition and identified as Exhibit 1014 is a true and correct copy of “Disconnected Operation in the Coda File System,” by James J. Kistler and M. Satyanarayanan, retrieved from <https://dl.acm.org/doi/10.1145/146941.146942> on or around July 1, 2020, which indicates on its face that it was published in ACM Transactions on Computer Systems, Vol. 10, No. 1, pages 3-25, dated February 1992.

8. The document submitted with the petition and identified as Exhibit 1015 is a true and correct copy of “TranSquid: Transcoding and Caching Proxy for Heterogenous E-Commerce Environments,” by Maheshwari et al., retrieved from <https://ieeexplore.ieee.org/document/995098> on or around July 1, 2020, which indicates on its face that it was published in the Proceedings of the 12th International Workshop on Research Issues in Data Engineering: Engineering e-Commerce/e-Business Systems (RIDE '02), dated 2002.

9. The document submitted with the petition and identified as Exhibit

1016 is a true and correct copy of “Managing Update Conflicts in Bayou, a Weakly Connected Replicated Storage System,” by Terry et al., retrieved from <https://dl.acm.org/doi/abs/10.1145/224056.224070> on or around July 1, 2020, which indicates on its face that it was published in SIGOPS '95, December 1995, described by the ACM website as SOSP '95: Proceedings of the fifteenth ACM symposium on Operating Systems Principles, dated December 1995.

10. The document submitted with the petition and identified as Exhibit 1017 is a true and correct copy of “A Mobility-Aware File System for Partially Connected Operation,” by Dwyer et al., retrieved from <https://dl.acm.org/doi/10.1145/254784.254789> on or around July 1, 2020, which the ACM website states that published in ACM SIGOPS Operating Systems Review, dated January 1997.

11. The document submitted with the petition and identified as Exhibit 1018 is a true and correct copy of “Reducing File System Latency using a Predictive Approach,” by Griffioen et al., retrieved from <https://dl.acm.org/doi/abs/10.5555/1267257.1267270> on or around July 1, 2020, which the ACM websites states was published in USTC'94: Proceedings of the USENIX Summer 1994 Technical Conference on USENIX Summer 1994 Technical Conference - Volume 1, dated June 1994.

12. The document submitted with the petition and identified as Exhibit

1022 is a true and correct copy of “Wireless Application Protocol Architecture Specification” (Version Apr. 30, 1998), retrieved from <http://www.openmobilealliance.org/wp/Affiliates/WAP.html> (specifically, <http://www.openmobilealliance.org/tech/affiliates/wap/technical%5B1%5D.zip>) on or around July 1, 2020, which indicates on page 4 that it is available online at <http://www.wapforum.org>.

13. The document submitted with the petition and identified as Exhibit 1023 is a true and correct copy of “WebDAV: What It Is, What It Does, Why You Need It,” by Hernández, et al., retrieved from <https://dl.acm.org/doi/10.1145/947469.947535>, which indicates on its face that it was published in SIGUCCS '03, September 21-24, 2003, described by the ACM website as SIGUCCS '03: Proceedings of the 31st annual ACM SIGUCCS Fall Conference, September 2003.

14. The document submitted with the petition and identified as Exhibit 1025 is a true and correct copy of excerpts from Newton’s Telecom Dictionary, 15th Edition, Miller Freeman, Inc., dated 1999.

15. The document submitted with the petition and identified as Exhibit 1026 is a true and correct copy of excerpts from Microsoft Press Computer Dictionary, Third Edition, Microsoft Press, dated 1997.

16. The document submitted with the petition and identified as Exhibit

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.