

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADOBE INC.
Petitioner

v.

SYNKLOUD TECHNOLOGIES, LLC
Patent Owner

Patent No. 9,239,686

DECLARATION OF WINSTON LIAW IN SUPPORT OF PETITION FOR

***INTER PARTES* REVIEW OF U.S. PATENT NO. 9,239, 686**

Petition 2 of 2 (claims 12-20)

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. 9,239,686:

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 1110 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 1111 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 1112 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 1113 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 1114 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 1115 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 1116 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

1117 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 1118 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 1119 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

1124 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 1125 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 1127 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 1128 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

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