

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADOBE INC.,

Petitioner,

v.

SYNKLOUD TECHNOLOGIES, LLC,

Patent Owner.

Case IPR2020-01393

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

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

IPR2020-01393

Exhibit 2001

Adobe Inc. v. SynKloud Technologies, LLC

TABLE OF CONTENTS

I. BACKGROUND AND QUALIFICATIONS	1
II. MATERIALS REVIEWED	6
III. LEGAL UNDERSTANDING	7
IV. CLAIM CONSTRUCTION	7
A. Petitioner’s Construction of “cached in the first wireless device” Is Flawed.....	8
V. OPINIONS.....	13
A. Independent Claim 12 Is Not Obvious in View of Prust Alone or in Combination with Jewett	14
a. Claim 12: Prust and Jewett Do Not Disclose Predefined Capacity.....	14
i. Predefined Capacity in the ’686 Patent	15
ii. Prust’s RAID Does Not Disclose ’686 Predefined Capacity.....	18
iii. Prust’s Billing Address Does Not Disclose ’686 Predefined Capacity	23
iv. Prust Does Not Disclose Capacity	24
v. Prust Does Not Disclose Predefined Capacity.....	25
vi. Jewett Does Not Disclose Predefined Capacity.....	28
vii. The Combination of Prust and Jewett Does Not Disclose Predefined Capacity	32
viii. Claims 12-20 Are Not Obvious in View of Prust (Ex 1104) and Jewett (Ex 1109) 32	
b. Claim 12: Prust’s Email Does Not Disclose Establishing a Communication Link for the Wireless Device to Remotely Access the Storage Space.....	33
c. Claim 12: Prust’s Email Does Not Disclose Retrieving	37
d. Claim 12: Prust’s Email Does Not Disclose Storing and Retrieving.....	39
e. A POSITA Would Not Have Been Motivated to Combine Prust with Jewett.....	40
B. Dependent Claim 13 Is Not Obvious in View of Prust Alone or in Combination with Jewett and Further in View of Major or Kraft	41
a. Claim 13: Utilizing Download Information for the File Cached in the First Wireless Device Is Not Disclosed in Prust Alone and/or in Combination with Jewett and Further in Combination with Major and/or Kraft	42
i. Prust Does Not Disclose Storing Download Information in Cache Storage or Retrieving Download Information from Cache Storage.....	42
ii. Prust Does Not Disclose Where Download Information Is Obtained from.....	43

iii. Petitioner’s Theory with Three Hypotheses Regarding Utilizing Download Information for the File Cached in the First Wireless Device	44
iv. Petitioner’s First Hypothesis That Download Information Is Obtained from a Web Page is Flawed and Unsupported by Prust.....	44
v. Petitioner’s Second Hypothesis That Download Information Is Cached Is Flawed and Unsupported by Prust.....	47
vi. It Would Not Have Been Obvious to a POSITA That The Download Information in Prust’s Email Is from a Web Page Cached in the Wireless Device.....	49
vii. Petitioner’s Third Hypothesis That the User’s Typing or Copying of Download Information Discloses Cached Download Information Is Flawed and Unsupported by Prust	50
viii. Petitioner’s Third Hypothesis (Typing Scenario) That the User’s Typing of Download Information Discloses Cached Download Information Is Flawed and Unsupported by Prust.....	51
ix. Petitioner’s Third Hypothesis (Copying Scenario) That the User’s Copying of Download Information Discloses Cached Download Information Is Flawed and Unsupported by Prust.....	52
x. Caching the Download Information in Prust Is Unnecessary and Wasteful.....	55
xi. Prust and Major.....	59
xii. Prust and Kraft	60
xiii. Therefore, Claim 13 Is Not Obvious in View of Prust Alone or in Combination with Jewett and Major or Kraft.....	62
b. Dependent Claims 15-20 Are Not Obvious in View of Prust Alone or in Combination with Jewett, and Dependent Claim 14 Is Not Obvious Further in View of Major or Kraft and McCown.....	62
C. Independent Claim 12 Is Not Obvious in View of Nomoto Alone or in Combination with Jewett	63
a. Claim 12: Nomoto Does Not Disclose Predefined Capacity	63
b. Claim 12: Nomoto and Jewett Do Not Disclose Predefined Capacity.....	64
c. A POSITA Would Not Have Been Motivated to Combine Nomoto with Jewett.....	64
D. Dependent Claim 13 Is Not Obvious in View of Nomoto Alone or in Combination with Jewett and Major or Kraft.....	66
a. Claim 13: Utilizing Download Information for the File Cached in the First Wireless Device Is Not Disclosed in Nomoto Alone or in Combination with Jewett and Major or Kraft	66
i. Nomoto Does Not Disclose Storing Download Information in Cache Storage or Retrieving Download Information from Cache Storage.....	66
ii. Nomoto Does Not Disclose Where Download Information Is Obtained from.....	67

iii. Petitioner’s Theory with Three Hypotheses Regarding Utilizing Download Information for the File Cached in a Cache Storage in the First Wireless Device	69
iv. Petitioner’s First Hypothesis That Download Information Is Obtained from a Web Page is Flawed and Unsupported by Nomoto	69
v. Petitioner’s Second Hypothesis That Download Information Is Cached Is Flawed and Unsupported by Nomoto	71
vi. It Would Not Have Been Obvious to a POSITA That The Download Information in Nomoto Is from a Web Page Cached in the Wireless Device	73
vii. Petitioner’s Third Hypothesis That the User’s Typing or Copying of Download Information Discloses Cached Download Information Is Flawed and Unsupported by Nomoto	74
viii. Petitioner’s Third Hypothesis (Typing Scenario) That the User’s Typing of Download Information Discloses Cached Download Information Is Flawed and Unsupported by Nomoto	75
ix. Petitioner’s Third Hypothesis (Copying Scenario) That the User’s Copying of Download Information Discloses Cached Download Information Is Flawed and Unsupported by Nomoto	76
x. Caching the Download Information in Nomoto Is Unnecessary and Wasteful	79
xi. Nomoto and Major	82
xii. Nomoto and Kraft	84
xiii. Therefore, Claim 13 Is Not Obvious in View of Nomoto Alone or in Combination with Jewett and Major or Kraft	86
b. Dependent Claims 15-20 Are Not Obvious in View of Nomoto Alone or in Combination with Jewett, and Dependent Claim 14 Is Not Obvious Further in View of Major or Kraft and McCown	86
E. Major’s Teachings Discourage Combining with Prust or Nomoto	87
a. Major’s Teachings Discourage Wireless Device Access to External Storage	87
b. Major Stores Data Objects in Cache, Negating the Need for External Storage	89
VI. CONCLUSION	90

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* Reviews (IPRs) 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.