

Declaration of Dr. Christopher Jules White
U.S. Patent No. 8,671,132

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION
Petitioner

v.

DAEDALUS BLUE, LLC
Patent Owner

Case IPR2021-00831

U.S. Patent No. 8,671,132
Title: SYSTEM, METHOD, AND APPARATUS FOR POLICY-BASED DATA
MANAGEMENT
Filing Date: 03/14/2003
Issue Date: 03/11/2014

**DECLARATION OF DR. CHRISTOPHER JULES WHITE IN SUPPORT
OF PATENT OWNER DAEDALUS BLUE, LLC'S PATENT OWNER
RESPONSE**

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2. *Gelb* is not reasonably pertinent to the problems addressed by the '132 Patent.43

B. Ground 1, Claims 15-21 and 23-25: The limitation “receiving one or more attributes of a file from one of a plurality of clients, the clients comprising at least two different computing platforms” would not have been obvious over *Gelb* in view of *Tivoli*.58

1. *Gelb* alone does not disclose “receiving one or more attributes of a file from one of a plurality of clients, the clients comprising at least two different computing platforms.”59

2. A person of ordinary skill in the art would not have sought to combine *Gelb* with *Tivoli* in the way described in the petition for the limitation “receiving one or more attributes of a file from one of a plurality of clients, the clients comprising at least two different computing platforms.”.....60

C. Ground 1, Claim 18: The limitation “assigning the storage pool to the file comprises applying the storage pool rule to the characteristics of the available storage pools to assign the storage pool to the file” would not have been obvious over *Gelb* in view of *Tivoli*.67

D. Ground 2, Claim 22: The limitation “wherein the computing platforms are selected from the group consisting of Windows, AIX, Linux, Solaris, Unix, Mac OS, OS/2, DOS, HP, IRIX, and OS/390, wherein the method further comprises translating the one or more attributes” would not have been obvious over *Gelb* in view of *Tivoli* and *Callaghan*.75

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1.	Microsoft did not show that a person of ordinary skill in the art would have sought out references related to Network File Share (NFS), such as <i>Callaghan</i>	75
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I. Introduction

I, Dr. Christopher Jules White, a resident of Nashville, Tennessee over 18 years of age, hereby declare as follows.

1. My name is Dr. Christopher Jules White, and I am currently an Associate Professor in the Department of Computer Science, as well as the Associate Dean for Strategic Learning Programs at Vanderbilt University.

2. I have personal knowledge of the facts and opinions set forth in this declaration, and, if called upon to do so, I would testify competently thereto.

3. I have been asked by Patent Owner Daedalus Blue, LLC (“Daedalus”) to provide my opinions and analysis responsive to certain issues raised by the Petition for Inter Partes Review of U.S. Patent No. 8,671,132 (“Petition”) by Petitioner Microsoft Corporation (“Microsoft” or “Petitioner”) and the supporting Declaration of Dr. Erez Zadok (“Zadok Declaration”). For this work I am being compensated at my normal hourly rate of \$450 per hour plus reasonable expenses. The amount of my compensation is not dependent upon the substance of my opinions or upon the outcome of this matter. I am working as a private consultant on this matter and the opinions presented here are my own.

4. I have prepared this declaration at the request of Daedalus and its counsel. For purposes of this declaration, I have been asked to provide my opinions on certain aspects of Petitioner’s theories regarding patentability of Claims 15-25 of

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