

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORP.,

Petitioner,

v.

DAEDALUS BLUE, LLC

Patent Owner

Case No. IPR2021-00832
U.S. Patent No. 8,381,209
Issue Date: February 19, 2013

Title: MOVEABLE ACCESS CONTROL LIST (ACL) MECHANISMS FOR
HYPERVISORS AND VIRTUAL MACHINES AND VIRTUAL PORT
FIREWALLS

**DECLARATION OF MARKUS JAKOBSSON, PH.D. IN SUPPORT OF
PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,381,209**

Declaration of Markus Jakobsson, Ph.D., in Support of the
Petition for *Inter Partes* Review of U.S. Patent No. 8,381,209

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I, Markus Jakobsson, Ph.D., hereby declare as follows:

I. INTRODUCTION

1. My name is Markus Jakobsson, and I have been retained by Petitioner Microsoft Corporation (“Microsoft” or “Petitioner”) to evaluate and offer opinions regarding U.S. Patent No. 8,381,209 (Ex. 1001, “the ’209 patent”). Specifically, I have been asked to consider the patentability of Claims 1-8 of the ’209 patent (“the Challenged Claims”) in view of prior art and the understanding of a person of ordinary skill in the art (“POSITA”). If called upon to do so, I would testify competently to the facts and opinions herein. I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both.

2. I am being compensated for my time at my standard consulting rate. I am also being reimbursed for expenses that I incur during the course of this work. My compensation is not contingent upon the results of my study, the substance of my opinions, or the outcome of any proceeding involving the Challenged Claims. I have no financial interest in the outcome of this matter or in the pending litigation between Petitioner and the Patent Owner.

3. My opinions are based on my years of education, research, and experience, as well as my investigation and study of relevant materials, including those cited herein.

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4. I may rely upon these materials, my knowledge and experience, and/or additional materials to rebut arguments raised by the Patent Owner. Further, I may also consider additional documents and information in forming any necessary opinions, including documents that may not yet have been provided to me.

5. My analysis of the materials produced in this proceeding is ongoing and I will continue to review any new material as it is provided. This declaration represents only those opinions I have formed to date. I reserve the right to revise, supplement, and/or amend my opinions stated herein based on new information and on my continuing analysis of the materials already provided.

**II. EDUCATION BACKGROUND, PROFESSIONAL EXPERIENCE,
AND OTHER QUALIFICATIONS**

6. My qualifications can be found in my Curriculum Vitae, *see* Ex. 1004, which includes my detailed employment background, professional experience, and list of technical publications and patents.

7. I am currently CTO at ZapFraud, a fraud-detection startup focused on detecting deception. At ZapFraud, I design and develop security solutions for enterprise email. We use deception and risk analysis to protect the data and email of businesses—including quarantining, discarding, alerting, or delivering suspicious messages. My work primarily involves identifying risks, developing

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