IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CISCO SYSTEMS, INC.
Petitioner,

v.

CENTRIPETAL NETWORKS, INC.
Patent Owner.

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U.S. Patent No. 9,124,552
Issue Date: September 1, 2015
Title: Filtering Network Data Transfers

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Inter Partes Review No.: <u>Unassigned</u>

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<u>DECLARATION OF JOHN LEONE</u>

I, John Leone, hereby declare:

1.   My name is John Leone. I am currently an employee of Cisco Systems, Inc. ("Cisco"), a petitioner for *inter partes* review before the Patent Trial and Appeal Board and the Senior Manager for Technical Documentation for the Security Business Unit of Cisco. I have held numerous other positions at Cisco and at a company which was acquired by Cisco, Sourcefire, Inc. ("SF"). At SF, I was a Technical Writer (September 2002 to February 2005) and Documentation Manager and Director of Technical Publications and Certifications (February 2005 to August 2013).

2.   I have been continuously employed by Cisco since the SF acquisition on or about August 2013. Prior to that, I was continuously employed by SF between September 2002 and August 2013. In my roles as a Technical Writer and Documentation Manager and Director of Technical Publications and Certifications, I have personal knowledge about SF's prior products and offerings, in the United States, which pertain to network security systems, including SF's 3D System (hereinafter the "SF 3D System"), the various versions of software for such products and offerings, and the supporting technical documentation that was created by SF for customers with each version of SF software for such products and offerings. In these roles, I have personal knowledge about the practices and procedures for writing and delivering such documentation to SF representatives in

SF's Support and Manufacturing Departments for distribution and otherwise making such documentation publicly accessible.

3.   I am over the age of eighteen (18) and otherwise competent to make this declaration. The statements made in this declaration are to the best of my knowledge and recollection. I have personal knowledge of the facts set forth in this Declaration, and, for facts stated on information and belief, I have been provided with information by a person having personal knowledge of such facts. If called as a witness, I could and would testify competently under oath to the facts stated in this declaration. By making this declaration, it is not my intent, nor the intent of Sourcefire, Inc. or Cisco, to waive the attorney-client privilege, attorney work product doctrine, or any other applicable privilege.

4.   In my roles as Technical Writer and Documentation Manager and Director of Technical Publications and Certifications, I participated in and supervised the process for writing SF's supporting technical documentation and coordinated with representatives in SF's Support, Engineering, and Manufacturing Departments to deliver such documentation to consumers of SF products with SF's release of a new software version for the SF 3D System.

5.   For each new feature in a new software version release for the SF 3D System, the assigned Technical Writers reviewed design specifications, attended design review meetings, interviewed subject matter experts, and tested

such functionality using development builds of the version of the SF 3D System

software running on SF's test hardware to confirm product behavior. The assigned

Technical Writers updated the technical documentation (*e.g.*, user guide, release

notes) for the prospective new software version release to include documentation

of the new feature as appropriate. The assigned Technical Writers provided drafts

of the technical documentation to the engineers who designed and coded the

software for review, and made any changes requested by the reviewing engineers.

6.   When the assigned Technical Writers were working on

technical documentation updates for a prospective new software version release for

the SF 3D System, the source files for each technical document (*e.g.*, SF 3D

System user guide) were kept in a "*version*-Current" working directory in SF's

files. When the content for each technical document (*e.g.*, SF 3D System user

guide) was complete for a prospective new software version release for the SF 3D

System and had been approved by engineering, one of the assigned Technical

Writers saved the document, using Adobe Acrobat, as a PDF-formatted file that

included security settings to prevent future modification of the document. This

writer then copied this secured PDF document into a folder labeled

"final_docs_with_metadata" for that new software version which was retained

within an internal directory in SF's files. This writer also then archived the final

source files that were used to create the PDF-formatted file of this technical

document to a "*version-number*" directory under the

"Documentation_source_Files" directory in SF's files based on the corresponding

new software version number for the SF 3D System.

7.   Once the secured PDF file for each technical document (*e.g.*,

SF 3D System user guide) had been copied into the "final_docs_with_metadata"

folder for that new software version, the assigned Technical Writers (1) zipped the

secured PDF files from the final_docs_with_metadata folder and checked such

files into a concurrent versioning system ("CVS") repository for distribution by the

SF Manufacturing Department, and (2) posted all of the secured PDF files from the

final_docs_with_metadata folder to a staging directory on another SF file server

for distribution by the SF Support Department.

8.   The assigned Technical Writers provided the zipped PDF files

from the final_docs_with_metadata folder to the SF Manufacturing Department as

an ISO image. SF's Manufacturing Department printed the documentation ISO to

a CD-ROM or DVD disk and included this documentation disk in the packaging

with each SF 3D System appliance (*e.g.*, 3D Sensor, Defense Center) purchased by

a customer.

9.   The assigned Technical Writers also created release notes for

each new software version release for the SF 3D System. While other

documentation (*e.g.*, the SF 3D System user guide) was typically completed,

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