

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AKAMAI TECHNOLOGIES, INC.,

Petitioner,

v.

EQUIL IP HOLDINGS LLC,

Patent Owner.

Case IPR2023-00330

U.S. Patent No. 8,495,242

DECLARATION OF VIJAY K. MADISETTI IN SUPPORT OF PETITION

FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,495,242

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I. INTRODUCTION

1. I have been retained by Akamai Technologies, Inc. (I will refer to them as “Akamai”) to provide my opinions on certain issues related to U.S. Patent No. 8,495,242 (the “’242 patent,” which I understand has been designated as Exhibit 1001) in connection with the above-captioned *inter partes* review (IPR) proceeding. In particular, I have been asked to provide my insights, analysis, and opinions regarding whether claim 9 of the ’242 patent (the “Challenged Claim”) is disclosed by and/or obvious in view of the prior art references identified below.

2. I understand the ’242 patent is titled “Automated Media Delivery System,” identifies as its named inventors Sean Barger, Steve Johnson, Matt Butler, Jerry Destremps, David Pochron, and Trent Brown, and is currently owned by Equil IP Holdings LLC. I have considered the ’242 patent.

3. I understand that the file history of the ’242 patent has been designated as Exhibit 1002. I have considered this file history, and I will refer to it as the “’242 File History” or by its exhibit number.

4. I understand that the ’242 patent was filed as U.S. Patent Application 12/713,637 on February 26, 2010.

5. I have considered the prior art cited in my declaration, including:

- a. **U.S. Patent No. 6,421,733** to Tso (“Tso”), titled “System for Dynamically Transcoding Data Transmitted Between Computers,” filed September 8, 1997 and issued July 16, 2002. I understand that a copy of this patent has been designated as Exhibit 1004.
- b. **U.S. Patent No. 6,438,576** to Huang (“Huang”), titled “Method and Apparatus of a Collaborative Proxy System for Distributed Deployment of Object Rendering,” filed on March 29, 1999, and issued August 20, 2002. I understand that a copy of this publication has been designated as Exhibit 1005.
- c. **U.S. Publication No. 2002/0078093** to Samaniego (“Samaniego”), titled “Automated Media Delivery System,” filed August 14, 2001, and published June 20, 2002. I understand that a copy of this publication has been designated as Exhibit 1007.

6. I am being compensated by Akamai at my standard hourly consulting rate of \$650 for my time on this matter. My compensation is not dependent on the outcome of this proceeding.

7. In forming my opinions, I relied on the documents cited in this declaration and the documents identified in the attached **Appendix B**. These

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