

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 IPR2023-00332

U.S. Patent No. 9,158,745

**DECLARATION OF VIJAY K. MADISETTI IN SUPPORT OF PETITION
FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 9,158,745**

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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. 9,158,745 (the “’745 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 claims 1-7 of the ’745 patent (the “Challenged Claims”) are disclosed by and/or obvious in view of the prior art references identified below.

2. I understand the ’745 patent is titled “Optimization of Media Content Using Generated Intermediate Media Content,” identifies as its named inventors Sean Barger, Brian Rice, Matt Butler, and David Pochron, and is currently owned by Equil IP Holdings LLC. I have considered the ’745 patent.

3. I understand that the file history of the ’745 patent has been designated as Exhibit 1002. I have considered this file history, and I will refer to it as the “’745 File History” or by its exhibit number.

4. I understand the ’745 patent was filed as U.S. Patent Application 13/752,110 on January 28, 2013.

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

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