UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD DROPBOX, INC.,

v.

Petitioner,

ENTANGLED MEDIA, LLC

Patent Owner.

Case No. IPR2024-00285 U.S. Patent No. 8,484,260

DECLARATION OF PATRICK D. MCDANIEL, PH.D.
U.S. PATENT NO. 8,484,260 (CLAIMS 1-8)

Dropbox Exhibit 1003



Dropbox Exhibit 1003

Contents

I.	EN	ENGAGEMENT1				
II.	PRO	PROFESSIONAL BACKGROUND				
III.	MATERIALS REVIEWED					
IV.	RE	DESCRIPTION OF THE RELEVANT TIMEFRAME, THE RELEVANT FIELD, AND A PERSON OF ORDINARY SKILL IN THE ART				
V.			DLOGY BACKGROUND			
	A.	Wha	t are "File Systems"?	8		
	B.	The	Evolution of File Systems	12		
		1.	From Files to Folders	12		
		2.	Remote Storage for File Systems	13		
		3.	Sharing Files with Peers			
	C.	The	Fundamentals of File Systems	18		
		1.	The File System API	19		
		2.	Modifying File Systems	21		
	D.	Dist	ributed File Systems in Peer-to-Peer Networks	24		
VI.	OV	ERVI	EW OF THE '260 PATENT	26		
VII.						
	A.	Have	ewala	28		
	B.	Adaı	ms	32		
	C.	Sario	dakis	34		
	D.	D. Rothman				
VIII.	CL	AIM C	CONSTRUCTION	36		
IX.	AN	ANTICIPATION3				
X.	OBVIOUSNESS3'					
XI.	OPINIONS REGARDING PATENTABILITY39					
XII.						
	'26	0 PAT	`ENT	41		



A.	My	My Opinions as to Claims 1, 4-8 concerning Havewala in view				
	of A	dams .		41		
	1.	Clair	n 1	41		
		a.	1[P]	43		
		b.	1[A]	53		
		c.	1[B]	56		
		d.	1[C]	66		
		e.	1[D]	70		
		f.	1[E]	76		
		g.	1[F]	80		
		h.	1[G]	85		
		i.	1[H]	90		
	2.	Clair	n 4	93		
	3.	Clair	n 5	95		
	4.	Clair	n 6	98		
	5.	Motivation to Combine Havewala and Adams99				
	6.	Clair	n 7	103		
		a.	7[P]	104		
		b.	7[A]-[H]	105		
	7.	Clair	n 8	107		
		a.	8[P]	108		
		b.	8[A]			
		c.	8[B]	109		
		d.	8[C]-[J]	110		
В.	My	Opinio	ns as to Claims 2 and 3 based on Havewala in view			
		of Adams and Saridakis112				
	1.	Clair	m 2	112		
	2.	Clair	m 3	114		



		3.	3. Motivation to Combine Havewala with Adams and Saridakis		
	C.	•			
		1.	Claim 1-8	116	
	2	2.	2. Motivation to Combine Havewala, Adams, Saridakis, and Rothman		
XIII.	CC	NCLU	JDING STATEMENTS	123	



EXHIBIT LIST

EXHIBITS FILED BY PETITIONER				
Ex-1001	U.S. Patent No. 8,484,260 (the "'260 patent")			
Ex-1002	File History of the '260 patent			
Ex-1003	Declaration of Dr. Patrick McDaniel			
Ex-1004	CV of Dr. Patrick McDaniel			
Ex-1005	U.S. Patent Application Publication 2007/0016621 ("Havewala")			
Ex-1006	U.S. Patent Application Publication 2002/0046232 ("Adams")			
Ex-1007	U.S. Patent No. 8,874,691 ("Saridakis")			
Ex-1008	U.S. Patent Application Publication 2005/0289218 ("Rothman")			
Ex-1009	Dropbox, Inc.'s Sotera Stipulation			
Ex-1010	The Linux Information Project, "Metadata Definition." 2006.			
Ex-1011	Wayback printout, "NTFS Master File Table (MFT)", NTFS.com			
Ex-1012	Eberspächer, Jörg and Schollmeier, Rüdiger. "Peer-to-Peer Systems and Applications." (2005), Chapter 5 First and Second Generation of Peer-to-Peer Systems.			
Ex-1013	Frystyk, Henrik. "The World-Wide Web." (1994).			
Ex-1014	Wayback printout, "POSIX® 1003.1 Frequently Asked Questions (FAQ Version 1.10)"			
Ex-1015	Sandberg, Russel. "The Sun Network Filesystem: Design, Implementation and Experience." (2001).			
Ex-1016	Wayback printout – "Filesystems"			

Dropbox Exhibit 1003



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

