

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 IPR2023-00329

U.S. Patent No. 6,792,575

**DECLARATION OF JONATHAN BRADFORD
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW
OF UNITED STATES PATENT NO. 6,792,575**

1. I, Jonathan Bradford, make the following Declaration pursuant to 28 U.S.C. § 1746: I am a Senior IP Paralegal at the law firm of Ropes & Gray LLP.

2. I provide this Declaration in connection with the above-identified *Inter Partes* Review proceeding that is before the United States Patent and Trademark Office (“USPTO”). Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Ex. 1001 is a true and correct copy of U.S. Patent No. 6,792,575 (“’575”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

4. Ex. 1002 is a true and correct copy of File History of U.S. Application no. 09/425,326 (“’575 FH”), which led to U.S. Patent No. 6,792,575, which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

5. Ex. 1004 is a true and correct copy of U.S. Patent No. 6,192,382 (“Lafer”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at

the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

6. Ex. 1005 is a true and correct copy of U.S. Patent No. 6,421,733 (“Tso”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

7. Ex. 1006 is a true and correct copy of Pei Cao & Chengjie Liu, *Maintaining strong cache consistency in the World Wide Web*, 47 IEEE TRANSACTIONS ON COMPUTS. 445 - 457 (1998), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

8. Ex. 1007 is a true and correct copy of U.S. Patent 6,310,601 (“Moore”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

9. Ex. 1010 is a true and correct copy of U.S. Patent 5,420,967 (“Delp”), which was obtained from the USPTO’s Patent Center system. This document has

been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

10. Ex. 1011 is a true and correct copy of U.S. Patent 6,144,996 (“Starnes”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

11. Ex. 1012 is a true and correct copy of Bharadvaj et al., An Active Transcoding Proxy to Support Mobile Web Access (Oct. 1998), available at <https://ieeexplore.ieee.org/document/740482>, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

12. Ex. 1013 is a true and correct copy of U.S. Patent 6,745,368 (“Boucher”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

13. Ex. 1014 is a true and correct copy of Rakesh Mohan et al., *Adapting Multimedia Internet Content for Universal Access*, 1 IEEE TRANSACTIONS ON MULTIMEDIA 104 (1999), available at <https://ieeexplore.ieee.org/document/748175>, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

14. Ex. 1015 is a true and correct copy of Armando Fox et al., *Adapting to Network and Client Variation Using Infrastructural Proxies: Lessons and Perspectives*, 5 IEEE Pers. Commc'ns. 10 (1998), available at <https://ieeexplore.ieee.org/abstract/document/709365>, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

15. Ex. 1016 is a true and correct copy of U.S. Patent 5,581,704 (“Barbará”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

16. Ex. 1017 is a true and correct copy of Fielding et al., *Hypertext Transfer Protocol – HTTP/1.1*, RFC 2068, Jan. 1997, available at <https://www.rfc->

editor.org/rfc/rfc2068, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

17. Ex. 1019 is a true and correct copy of Chaman L. Sabharwal and Sanjiv K. Bhatia, *Image databases and near-perfect hash table*, 30 PATTERN RECOGNITION 1867 (November 19, 1997), available at <https://www.sciencedirect.com/science/article/pii/S0031320396001872>, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

18. Ex. 1022 is a true and correct copy of IEEE Transactions on Computers | About Journal | IEEE Xplore (part 1), available at <https://ieeexplore.ieee.org/xpl/aboutJournal.jsp?punumber=12>, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

19. Ex. 1023 is a true and correct copy of IEEE Transactions on Computers | About Journal | IEEE Xplore (part 2), available at <https://ieeexplore.ieee.org/xpl/aboutJournal.jsp?punumber=12>, which was obtained

at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

20. Ex. 1024 is a true and correct copy of IEEE Transactions on Computers | About Journal | IEEE Xplore (part 3), available at <https://ieeexplore.ieee.org/xpl/aboutJournal.jsp?punumber=12>, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

21. Ex. 1025 is a true and correct copy of IEEE Transactions on Computers | All Issues | IEEE Xplore, available at <https://ieeexplore.ieee.org/xpl/issues?punumber=12&isnumber=9984045>, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

22. Ex. 1026 is a true and correct copy of Table of Contents, 47 IEEE TRANSACTIONS ON COMPUTS., available at <https://ieeexplore.ieee.org/xpl/tocresult.jsp?isnumber=14873&punumber=12>, which was obtained at my direction. This document has been marked with an

exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

23. Ex. 1027 is a true and correct copy of Maintaining strong cache consistency in the World Wide Web | IEEE Journals & Magazine | IEEE Xplore, Citations by Papers, available at <https://ieeexplore.ieee.org/document/675713/citations?tabFilter=papers#citations>, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

24. Ex. 1028 is a true and correct copy of Maintaining strong cache consistency in the World Wide Web | IEEE Journals & Magazine | IEEE Xplore, Citations by Patents, available at <https://ieeexplore.ieee.org/document/675713/citations?tabFilter=patents#citations>, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

25. Ex. 1029 is a true and correct copy of Maarten van Steen et al., *A scalable middleware solution for advanced wide-area Web services*, 6 DISTRIBUTED SYS. ENG'G 34 (1999), available at <https://iopscience.iop.org/article/10.1088/0967-1846/6/1/304>, which was obtained

at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

26. Ex. 1030 is a true and correct copy of James B. Lim & Ali R. Hurson, *Data duplication and consistency in a mobile, multidatabase environment*, PROCS. 1998 INT'L CONF. ON PARALLEL AND DISTRIBUTED SYS. 50 (1998) (Cat. No.98TB100250), available at <https://ieeexplore.ieee.org/document/800066>, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

27. Ex. 1031 is a true and correct copy of Xiangping Chen & Prasant Mohapatra, *Lifetime behavior and its impact on Web caching*, PROCS. 1999 IEEE WORKSHOP ON INTERNET APPLICATIONS 54 (1999) (Cat. No.PR00197), available at <https://ieeexplore.ieee.org/document/788017>, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

28. Ex. 1032 is a true and correct copy of K.Y. Wong, K.H. Yeung, *Site-based approach in HTTP proxy design*, PROCS. 1999 ICPP WORKSHOPS ON COLLABORATION AND MOBILE COMPUTING (1999), available at

<https://ieeexplore.ieee.org/document/800066>, which was obtained at my direction.

This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

29. Ex. 1033 is a true and correct copy of U.S. Patent No.6,088,721 (“Lin”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

30. Ex. 1034 is a true and correct copy of PCT International Publication No. WO2000062185 (“Lea”), which was downloaded from WIPO – World Intellectual Property Organization PATENTSCOPE database. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

31. Certain pages have been resized to 8.5 x 11 inches. No content was removed by this resizing.

32. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the

knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

33. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of January, 2023, in Boston, Massachusetts.

/Jonathan Bradford/

Jonathan Bradford
ROPES & GRAY LLP