

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Petitioner,

v.

CENTRIPETAL NETWORKS, INC.,
Patent Owner.

Inter Partes Review No.: Unassigned

Patent No. 10,193,917

**DECLARATION OF JOHN M. HENDRICKS IN SUPPORT OF PETITION
FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 10,193,917**

I, John M. Hendricks, make the following Declaration pursuant to 28 U.S.C. § 1746:

1. I am employed at Reed Smith LLP as a Research Services Librarian. I have been working at Reed Smith LLP for approximately 6 years. My responsibilities at Reed Smith LLP include conducting library research for all U.S. practice groups and offices, training new firm attorneys and staff in research resources, and providing focused research in intellectual property matters. I previously worked for over 9 years as a librarian for the U.S. District Court for the Northern District of California. If called as a witness, I could and would testify competently to the information set forth in this declaration.

2. EX-1001 is a true and accurate copy of U.S. Patent 10,193,917 that I downloaded on April 28, 2022 from the website <https://www.patsnap.com/> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

3. EX-1002 is a true and accurate copy of File History of U.S. Patent No. 10,193,917 that I downloaded on April 28, 2022 from the website <https://portal.uspto.gov/pair/PublicPair> using a web browser. This document

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

4. EX-1004 is a true and accurate copy of “Sourcefire 3D System User Guide” Version 4.10 that I downloaded on April 28, 2022 from the website <https://www.scribd.com/document/96860221/Sourcefire-3D-System-User-Guide-v4-10> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

5. EX-1005 is a true and accurate copy of Declaration of John Leone that I downloaded on May 25, 2022 from PTABE2E using a web browser in the *inter partes* review proceeding IPR2018-01760. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

6. EX-1007 is a true and accurate copy of “A Brief History of the Internet” by Barry M. Leiner that I downloaded on April 28, 2022 from the website https://www.internetsociety.org/wp-content/uploads/2017/09/ISOC-History-of-the-Internet_1997.pdf using a web browser. This document has

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

7. EX-1008 is a true and accurate copy of U.S. Patent 7,032,031 that I downloaded on April 28, 2022 from the website <https://www.patsnap.com/> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

8. EX-1009 is a true and accurate copy of “The Internet Worm Program” by E.H. Spafford that I downloaded on April 28, 2022 from the website <https://spaf.cerias.purdue.edu/tech-reps/823.pdf> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

9. EX-1010 is a true and accurate copy of “With Microscope and Tweezers: The Worm from MIT’s Perspective” by Eichin, M.W. and Rochlis, J.A. that I downloaded on April 28, 2022 from the website https://www.cs.jhu.edu/~fabian/courses/CS600.624/Rochlis_morris.pdf using a web browser. This document has been marked with an exhibit label and

page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

10. EX-1011 is a true and accurate copy of “The Cornell Commission: On Morris and the Worm” by T. Eisenberg that I downloaded on April 28, 2022 from the website

<https://www.cs.cornell.edu/courses/cs1110/2009sp/assignments/a1/p706-eisenberg.pdf> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

11. EX-1012 is a true and accurate copy of “Simple and Flexible Datagram Access Controls for Unix-based Gateways” by J.C. Mogul that I downloaded on April 28, 2022 from the website

<https://www.hpl.hp.com/techreports/Compaq-DEC/WRL-89-4.pdf> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

12. EX-1013 is a true and accurate copy of “FireWall-1 User Interface from 3.0” that I downloaded on April 28, 2022 from the website

<https://web.archive.org/web/20140102143305/http://phoneboy.net> using a web

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

13. EX-1014 is a true and accurate copy of “SonicWALL Global Management System: Centralized Network Monitoring and Management Solution” that I downloaded on April 28, 2022 from the website https://web.archive.org/web/20081207003303/http://www.sonicwall.com/downloads/EC_GMS_DS_US.pdf using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

14. EX-1015 is a true and accurate copy of “SonicWALL ViewPoint 6.0 Administrator’s Guide” that I downloaded on April 28, 2022 from the website https://web.archive.org/web/20100821022839/http://www.sonicwall.com:80/downloads/SonicWALL_ViewPoint_6_0_Admin_Guide.pdf using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

15. EX-1016 is a true and accurate copy of “A Network Security Monitor” that I downloaded on May 25, 2022 from the website <https://ieeexplore.ieee.org/document/63859> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

16. EX-1017 is a true and accurate copy of “NetRanger Network Security Management System User Guide” that I downloaded on May 25, 2022 from PTABE2E using a web browser in the *inter partes* review proceeding IPR2018-01760. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

17. EX-1018 is a true and accurate copy of “Snort: Lightweight Intrusion Detection for Networks” that I downloaded on April 28, 2022 from the website https://www.usenix.org/legacy/event/lisa99/full_papers/roesch/roesch.pdf using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

18. EX-1019 is a true and accurate copy of U.S. Patent 8,370,936 that I downloaded on April 28, 2022 from the website <https://www.patsnap.com/> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

19. EX-1020 is a true and accurate copy of “W32.hllw.Doomjuice Technical Description, Symantec Security Center” that I downloaded on May 25, 2022 from PTABE2E using a web browser in the *inter partes* review proceeding IPR2018-01760. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

20. EX-1021 is a true and accurate copy of “(Vendor Issues Fix) Re: Helix Universal Server and RealServer URL Parsing Flaw in View Source Plug-in Lets Remote Users Execute Arbitrary Code with Root Privileges” that I downloaded on May 25, 2022 from the website <https://web.archive.org/web/20040123004734/http://www.securitytracker.com/alerts/2003/Sep/1007692.html> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom

right corner. No alterations, other than these noted markings, have been made to this document.

21. EX-1022 is a true and accurate copy of “Transmission Control Protocol” that I downloaded on April 28, 2022 from the website <https://web.archive.org/web/20070202201546/https://tools.ietf.org/html/rfc793> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

22. EX-1023 is a true and accurate copy of “Internet Protocol” that I downloaded on April 28, 2022 from the website <https://web.archive.org/web/20070204151303/http://tools.ietf.org/html/rfc791> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

23. EX-1024 is a true and accurate copy of “File Transfer Protocol” that I downloaded on April 28, 2022 from the website <https://web.archive.org/web/20070206005843/https://tools.ietf.org/html/rfc765> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

24. EX-1025 is a true and accurate copy of “The Original HTTP as defined in 1991” that I downloaded on April 28, 2022 from the website <https://web.archive.org/web/19970605071155/https://www.w3.org/Protocols/HTTP/AsImplemented.html> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

25. EX-1026 is a true and accurate copy of U.S. Patent 9,413,722 that I downloaded on April 28, 2022 from the website <https://www.patsnap.com/> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

26. EX-1027 is a true and accurate copy of “SSL Inspection” that I downloaded on April 28, 2022 from the website <https://web.archive.org/web/20101220151851/http://www.sourcefire.com/security-technologies/cyber-security-products/3d-system/ssl-encryption-decryption> using a web browser. This document has been marked with an exhibit label

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

27. EX-1028 is a true and accurate copy of “Sourcefire SSL Appliances data sheet” that I downloaded on April 28, 2022 from the website <https://web.archive.org/web/20120316165725/http://www.ndm.net:80/sourcefirestore/downloads/Sourcefire%20SSL%20Appliance%20Fact%20Sheet%20%28English%29.pdf> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

28. EX-1029 is a true and accurate copy of U.S. Patent Publication No. 2015/0207809 that I downloaded on April 28, 2022 from the website <https://www.patsnap.com/> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

29. EX-1030 is a true and accurate copy of the Final Written Decision issued by the Patent Trial & Appeal Board in *Cisco Systems, Inc., v. Centripetal Networks, Inc.*, IPR2018-01760 that I downloaded on May 26, 2022 from PTABE2E using a web browser in the *inter partes* review

proceeding IPR2018-01760. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

30. EX-1031 is a true and accurate copy of the Federal Circuit decision issued in *Centripetal Networks, Inc. v. Cisco Sys.*, 847 Fed. Appx. 881 (Fed. Cir. Mar. 10, 2021) that I downloaded on April 28, 2022 from the Lexis database using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

31. EX-1032 is a true and accurate copy of “A History and Survey of Network Firewalls” that I downloaded on April 28, 2022 from the website <https://www.cs.unm.edu/~treport/tr/02-12/firewall.pdf> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

32. EX-1033 is a true and accurate copy of “Sourcefire Support Website Webpage” that I downloaded on April 28, 2022 from the website <https://web.archive.org/web/20110430194135/https://support.sourcefire.com/>

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

33. EX-1034 is a true and accurate copy of “Sourcefire Expands IPS Solutions Portfolio, Adding FirePOWER to the Industry’s Leading Protection” that I downloaded on April 28, 2022 from the website <https://www.businesswire.com/news/home/20110418005189/en/Sourcefire-Expands-IPS-Solutions-Portfolio-Adding-FirePOWER> using a web browser.

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

34. EX-1036 is a true and accurate copy of the *Markman* decision issued in *Centripetal Networks, Inc. v. Keysight Techs., Inc.*, 2:17cv383, Dkt. No. 484 by the U.S. District Court for the Eastern District of Virginia that I downloaded on April 28, 2022 from the PACER system using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

35. EX-1037 is a true and accurate copy of pages from “*Understanding the New SQL: A Complete Guide*” that I obtained on May 25,

2022 as scanned by the Wisconsin TechSearch service. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

36. EX-1038 is a true and accurate copy of “*A Common Intrusion Specification Language (CISL)*” that I downloaded on May 9, 2022 from the website

<https://web.archive.org/web/20030502051801/https://gost.isi.edu/cidf/drafts/language.txt> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

37. EX-1039 is a true and accurate copy of the Declaration of Dr. Stuart Staniford in Support of Petition for Inter Partes Review of US Patent No. 9,413,722 that I downloaded on May 26, 2022 from PTABE2E using a web browser in the *inter partes* review proceeding IPR2018-01760. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

38. EX-1041 is a true and accurate copy of “*A Relational Model of Data for Large Shared Data Banks*” that I downloaded on May 9, 2022 from the website <https://www.seas.upenn.edu/~zives/03f/cis550/codd.pdf> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

39. EX-1042 is a true and accurate copy of “Sourcefire Annual Report 2012” that I downloaded on May 9, 2022 from the website <https://www.sec.gov/Archives/edgar/vpr/1300/13002391.pdf> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

40. EX-1043 is a true and accurate copy of U.S. Patent No. 9,342,691 that I downloaded on May 10, 2022 from the website <https://www.patsnap.com/> using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

41. EX-1044 is a true and accurate copy of “The Intrusion Detection Message Exchange Format (IDMEF)” that I downloaded on May

10, 2022 from the website

<https://web.archive.org/web/20071012114928/https://www.ietf.org/rfc/rfc4765>

[.txt](#) using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

42. EX-1045 is a true and accurate copy of the Declaration of Christopher Butler that I downloaded on May 26, 2022 from PTABE2E using a web browser in the *inter partes* review proceeding IPR2018-01760. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

43. EX-1046 is a true and accurate copy of the Declaration of Jacob H. Baugher III that I downloaded on May 26, 2022 from PTABE2E using a web browser in the *inter partes* review proceeding IPR2018-01760. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings, have been made to this document.

44. EX-1047 is a true and accurate copy of “USITC News Release instituting Inv. No. 337-TA-1314” that I downloaded on May 23,

2022 from the website

https://www.usitc.gov/press_room/news_release/2022/er051811939.htm?source=govdelivery&utm_medium=email&utm_source=govdelivery using a web

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

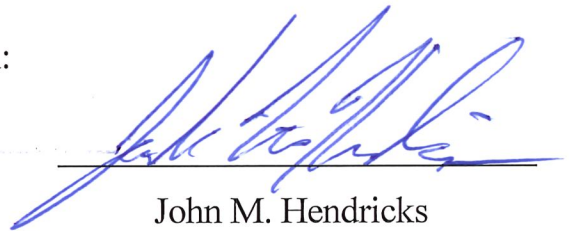
45. EX-1048 is a true and accurate copy of the Complaint of Centripetal Networks, Inc. Under Section 337 Of The Tariff Act of 1930 filed in United States International Trade Commission, Investigation Number 337-1314, that I downloaded on May 26, 2022 from the ITC EDIS system using a web browser. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. No alterations, other than these noted markings and the removal of the cover letter and public interest statement, have been made to this document.

I declare and state 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
Section 1001 of Title 18 of the United States Code.

I declare under penalty of perjury under the laws of the United
States of America that the foregoing is true and correct.

Executed on May 27, 2022, in San Francisco, CA:



John M. Hendricks