UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC. and FORTINET, INC.,
Petitioners,

v.

INFOEXPRESS INC.,
Patent Owner.

IPR2024-00539
U.S. Patent No. 8,051,460

IPR2024-00675
U.S. Patent No. 7,523,484

IPR2024-00676
U.S. Patent No. 8,677,450

IPR2024-00677
U.S. Patent No. 8,578,444

IPR2024-00679
U.S. Patent No. 7,523,484

DECLARATION OF YUHSHIOW ALICE LEE

1. I, Yuhshiow Alice Lee, declare under penalty of perjury that the following statements are true and correct.

2. I make this declaration based upon my personal knowledge and my review of the documents referenced herein. I further make this declaration in support of Patent Owner InfoExpress, Inc.'s ("Patent Owner" or "InfoExpress") Responses to Cisco System, Inc. and Fortinet, Inc.'s Petitions for *Inter Partes* Review ("IPR") of U.S. Patent No. 8,051,460, 7,523,484, 8,677,450, and 8,578,444 (collectively, "the Challenged Patents"). All the statements made herein of my own knowledge are true, and all statements made herein based on information and belief are believed to be true.

I. BACKGROUND

3. I received a Master of Science degree in Computer Science from the University of California, Berkeley in 1986. Prior to joining InfoExpress, I worked at IBM from about 1988 to about 1993 and Octel Communications (acquired by Lucent Technologies) from about 1993 to about 2001. I joined InfoExpress around 2001.

4. I am a co-inventor of the Challenged Patents, along with Stacey Lum.

II. CONCEPTION

5. No later than the December 2, 2002, which I understand to be the earliest asserted priority date of the references cited references cited in this IPR, Mr. Lum and I collectively conceived of the claimed inventions in the Challenged Patents as further set forth in the corroborating evidence herein.

6. Mr. Lum, Mr. Ong (a party on various e-mails cited herein), Mr. Tsai (also a party on various e-mails cited herein), and I all worked in the same (open) office at least through 2002. Accordingly, it was both my practice to communicate orally with colleagues such as Mr. Lum,

Mr. Ong, and Mr. Tsai, for example, to communicate ideas, as well as the practice of others within InfoExpress to simply walk and speak with another team member to discuss matters where conversation was simpler than sending an e-mail. Further, Mr. Lum – as Chief Executive Officer of InfoExpress – would oftentimes provide Mr. Ong, Mr. Tsai, myself and other InfoExpress personnel instruction both orally and over e-mail.

A. Chronology

7. In [redacted], our InfoExpress team and I were considering the potential advantages of implementing policy enforcement and authentication via a gatekeeper over 802.1X and VLAN assignment.

[redacted]

[redacted]



[redacted].

[redacted]

18. I also note that I commonly made my comments in-line beginning with "Alice:" as depicted above.

[redacted]

both my comments (still under the username "Software Developer" as discussed above) as well as other colleagues' comments under the username "InfoExpress" as excerpted below.

[redacted]

20. Accordingly, this further confirms that I am the author of EX2011, which I created at the instruction and direction of Mr. Lum that details the invention claimed in the InfoExpress provisional applications and the Challenged Patents.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 7, 2025 in Saratoga, California.

Dated: January 7, 2025

Yuhshiow Alice Lee