

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADOBE INC.

Petitioner

v.

JONATHAN E. JAFFE

Patent Owner

U.S. Patent No. 6,757,828

DECLARATION OF VICTORIA CONSTANCE HUANG

I, Victoria Constance Huang, declare as follows:

1. I am an attorney with the law firm of Farella Braun + Martel LLP, counsel for petitioner Adobe Inc. Unless otherwise stated, the facts stated in this declaration are based on my personal knowledge.

2. The document submitted with the petition and identified as EX1008 is a duplicate of Exhibit B attached to the Declaration of Kenneth Parulski (EX1010). The only difference between the documents is exhibit and page numbering in the footer for this proceeding.

3. The document submitted with the petition and identified as EX1009 is a duplicate of Exhibit D attached to the Declaration of Kenneth Parulski (EX1010). The only difference between the documents is exhibit and page numbering in the footer for this proceeding.

4. The document submitted with the petition and identified as EX1012 is a true and correct copy of portions of the book by Bruce Schneier entitled “Applied Cryptography” (2d ed. 1996), including the cover, first few pages, and chapters 8 and 18.

5. The document submitted with the petition and identified as EX1013 is a true and correct copy of a document by R. Rivest entitled “The MD5 Message-Digest Algorithm” and dated April 1992.

6. The document submitted with the petition and identified as EX1020 is a true and correct copy of a Tentative Claim Construction Order in *Jaffe v. Adobe Inc.*, Case No. 2:23-cv-06224-JWH(MAAX) (C.D. Cal.). We received EX1020 from the district court judge's courtroom deputy via email.

7. The document submitted with the petition and identified as EX1021 is a true and correct copy of Plaintiff Jonathan E. Jaffe's Disclosure of Asserted Claims and Infringement Contentions in *Jaffe v. Adobe Inc.*, Case No. 2:23-cv-06224-JWH(MAAX) (C.D. Cal.). Counsel for Mr. Jaffe served EX1021 to us in the case.

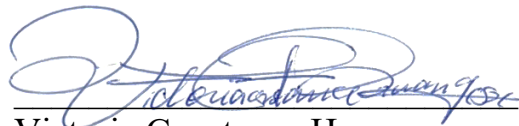
8. The document submitted with the petition and identified as EX1022 is a true and correct copy of Plaintiff's Initial Claim Construction Brief filed in *Jaffe v. Adobe Inc.*, Case No. 2:23-cv-06224-JWH(MAAX) (C.D. Cal.).

9. The document submitted with the petition and identified as EX1023 is a true and correct copy of Plaintiff's Responsive Claim Construction Brief filed in *Jaffe v. Adobe Inc.*, Case No. 2:23-cv-06224-JWH(MAAX) (C.D. Cal.).

10. The document submitted with the petition and identified as EX1024 is a true and correct copy of Plaintiff's Objections and Responses to Defendant's Claim Construction Interrogatories in *Jaffe v. Adobe Inc.*, Case No. 2:23-cv-06224-JWH(MAAX) (C.D. Cal.). Counsel for Mr. Jaffe served EX1024 to us in the case.

11. The document submitted with the petition and identified as EX1025 is a true and correct copy of Plaintiff Jonathan E. Jaffe's First Amended Complaint for Patent Infringement filed in *Jaffe v. Adobe Inc.*, Case No. 2:23-cv-06224-JWH(MAAX) (C.D. Cal.).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on August 27, 2024 in San Mateo, California.



Victoria Constance Huang