

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DELL TECHNOLOGIES INC. AND DELL INC.,
Petitioners

v.

CLOUD BYTE LLC,
Patent Owner

Patent No. 9,629,265

DECLARATION OF VICTORIA C. HUANG

I, Victoria C. Huang, declare as follows:

1. I am an attorney with the law firm of Farella Braun + Martel LLP, counsel for Dell Technologies Inc. and Dell 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 EX1012 is a true and correct copy of excerpts from “New Oxford American Dictionary” (Oxford University Press, Inc., 3rd ed. 2010).

3. The document submitted with the petition and identified as EX1013 is a true and correct copy of excerpts from “The American Heritage Dictionary of the English Language” (Houghton Mifflin Harcourt Publishing Company, 5th ed. 2011).

4. The document submitted with the petition and identified as EX1014 is a true and correct copy of excerpts from “Collins Dictionary” (HarperCollins Publishers, 10th ed. 2010).

5. The document submitted with the petition and identified as EX1015 is a true and correct copy of excerpts from “Merriam-Webster’s Collegiate Dictionary” (Merriam-Webster, Incorporated, 11th ed. 2009).

6. The document submitted with the petition and identified as EX1016 is a true and correct copy of excerpts from “The New Penguin Dictionary of Civil Engineering,” David Blockley (Penguin Group, 2005).

7. The document submitted with the petition and identified as EX1017 is a true and correct copy of excerpts from “Microsoft Computer Dictionary” (Microsoft Press, 5th ed. 2002).

8. The document submitted with the petition and identified as EX1018 is a true and correct copy of excerpts from “Random House Webster’s Computer & Internet Dictionary,” Philip E. Margolis (Random House, Inc., 3rd ed. 1999).

9. The document submitted with the petition and identified as EX1019 is a true and correct copy of excerpts from “Dictionary of Computer and Internet Terms,” Douglas A. Downing et al. (Barron’s Educational Series, Inc., 10th ed. 2009).

10. The document submitted with the petition and identified as EX1020 is a true and correct copy of excerpts from “A Dictionary of Computing” (Oxford University Press, 6th ed. 2008).

11. I am familiar with the related litigation entitled *Cloud Byte LLC v. Dell Inc. and Dell Technologies Inc.*, Case No. 2:24-cv-00637-JRG (E.D. Tex.). The document submitted with the petition and identified as EX1027 is a true and correct copy of the complaint in the related litigation (without attached exhibits).

12. The document submitted with the petition and identified as EX1028 is a true and correct copy of Cloud Byte’s Preliminary Infringement Contentions, with attached Exhibits 7 and 8, served in the related litigation.

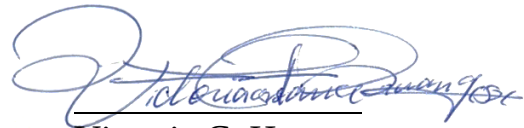
13. The document submitted with the petition and identified as EX1029 is a true and correct copy of the United States District Courts – National Judicial Caseload Profile for March 2025 obtained from <https://www.uscourts.gov/data-news/reports/statistical-reports/federal-court-management-statistics>.

14. The document submitted with the petition and identified as EX1030 is a true and correct copy of a document obtained using the U.S. Patent and Trademark Office’s assignment database from <https://legacy-assignments.uspto.gov/assignments/assignment-pat-67944-332.pdf>.

15. The document submitted with the petition and identified as EX1031 is a true and correct copy of screenshots made using Lex Machina showing all litigation matters involving U.S. Patent No. 9,629,265.

16. The document submitted with the petition and identified as EX1032 is a true and correct copy of Patent Owner Cloud Byte’s Disclosure of Proposed Claim Constructions and Extrinsic Evidence with attached Exhibit A, served on July 7, 2025.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on July 14, 2025, in San Francisco, California.



Victoria C. Huang

Farella Braun + Martel LLP