

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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DELL TECHNOLOGIES INC. AND DELL INC.,  
Petitioners

v.

CLOUD BYTE LLC,  
Patent Owner

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Patent No. 9,482,632

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**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 EX1005 is an English translation of Japanese Patent Application JP 2009-277053A (“Hira”), translated by Herman Kahn.

3. The document submitted with the petition and identified as EX1006 is a Declaration of Herman Kahn, attesting to the translation of JP 2009-277053A (“Hira”) which is also submitted as EX1005.

4. The document submitted with the petition and identified as EX1007 is an English translation of the PCT application WO 2010/050080A1 (“Shiga”), translated by Herman Kahn.

5. The document submitted with the petition and identified as EX1008 is a Declaration of Herman Kahn, attesting to the translation of WO 2010/050080A1 (“Shiga”) which is also submitted as EX1007.

6. The document submitted with the petition and identified as EX1012 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).

7. The document submitted with the petition and identified as EX1013 is a true and correct copy of excerpts from “Microsoft Computer Dictionary” (Microsoft Press, 5th ed. 2002).

8. 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 EX1014 is a true and correct copy of the complaint in the related litigation (without attached exhibits).

9. The document submitted with the petition and identified as EX1015 is a true and correct copy of Cloud Byte’s Preliminary Infringement Contentions, with attached Exhibit 5, served in the related litigation.

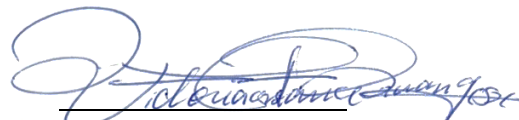
10. The document submitted with the petition and identified as EX1016 is a true and correct copy of the United States District Courts – National Judicial Caseload Profile for March 2025 obtained from <https://www.uscourts.gov/data-news/reports/statistical-reports/federal-court-management-statistics>.

11. The document submitted with the petition and identified as EX1017 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/>.

12. The document submitted with the petition and identified as EX1018 is a true and correct copy of screenshots made using Lex Machina showing all litigation matters involving U.S. Patent No. 9,482,632.

13. The document submitted with the petition and identified as EX1019 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