

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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PLAID TECHNOLOGIES INC.  
Petitioner

v.

YODLEE, INC.  
Patent Owner

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Case CBM2016-00056  
Patent 6,510,451 B2

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**DECLARATION OF ZAYDOON JAWADI IN SUPPORT OF PATENT  
OWNER'S RESPONSE**

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I, Zaydoon Jawadi, declare as follows:

1. I am making this declaration at the request of the Patent Owner, Yodlee, Inc. (“Yodlee” or “Patent Owner”) in the matter of *Covered Business Methods* (“CBM”) Review of U.S. Patent No. 6,510,451 B2 (the ’451 Patent).

2. I am being compensated for my work. My compensation does not depend in any way on the outcome of this proceeding or upon the opinions or testimony that I provide.

3. In forming the opinions I express below, I considered all of the information I cite throughout my analysis, including:

- a. The ’451 Patent (Ex. 1001)
- b. The File History of the ’451 Patent (Exs. 1006-1013)
- c. Petition by Plaid Technologies, Inc. (Paper 2)
- d. Declaration of Petitioner’s Expert, Todd Mowry (Ex. 1002)
- e. U.S. Patent No. 5,819,284 to Farber, et al. (Ex. 1003)
- f. Bayardo, “Info-Sleuth: Agent-Based Semantic Integration of Information in Open and Dynamic Environments,” SIGMOD (1997) (“Bayardo”) (Ex. 1004)
- g. Zhao, “WebEntree: A Web Service Aggregator,” IBM Systems Journal 37(4) (1998) (“Zhao”) (Ex. 1005)
- h. Decision of Institution (Paper 10)

i. Deposition of Petitioner's Expert, Todd Mowry (Ex. 2002)

4. I summarize my relevant knowledge and experience below. My Curriculum Vitae contains additional information and is Ex. 2005.

5. I received a B.S. in Electrical Engineering from Mosul University in 1977. I received an M.S. in Computer Science from Columbia University in 1981, with a Citation for Outstanding Achievement – Dean's Honor Student.

6. I hold a California community college computer science lifelong instructor credential. I have taught various computer technologies to thousands of engineers and academic students.

7. Prior to 2007, I held a number of jobs in industry.

8. For example, from 2001 to 2006, I was President and cofounder of CoAssure, Inc., a provider of automated Web-based telecommunication test services serving Fortune-500 companies. The system included aggregating data from multiple data sources into an intermediary server and/or website, storing the aggregated data, and presenting the aggregated data to the end user's browser through the Internet.

9. Also, in 1999 I co-founded a company called Can Do, Inc. CanDo.com was a startup Internet eCommerce company targeting people with disabilities. The CanDo.com website had over 10,000 items for sale, and extensive consumer features, such as news, chat, messages, and product information. The

company was funded by leading venture capital firms. Technology included magnification software to make websites more usable by vision-impaired people and sound adaptation software to make websites more accessible by hearing-impaired individuals.

10. The CanDo.com website technology included capabilities for aggregating news and other articles, aggregating pricing and product information, aggregating order processing and inventory information, and other aggregation.

11. The CanDo.com hearing accessibility technology comprised adaptation, delivery, and real-time streaming of audio data files through the Internet to compensate for users' hearing loss, based on users' personal hearing profiles. Audio data is transmitted from audio sources to an intermediary server, which adapts the audio; the adapted audio is then transmitted to the client, which is typically the end user's browser.

12. Additionally, I have experience with data networking, including when I was General Manager, Data Networking Business Unit, Xyratex International LTD (NASDAQ: XRTX, now Seagate, NASDAQ: STX) from 1997 to 1998, where I was responsible for Gigabit Ethernet network protocol analyzer products used to monitor and analyze network traffic, including TCP/IP packets and other Internet traffic.

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