UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DOCKER INC.,
Petitioner,

v.

INTELLECTUAL VENTURES II LLC,
Patent Owner.

Case No. IPR2025-00840

U.S. Patent No. 8,332,844

Declaration of Erez Zadok in Support of
Petition for *Inter Partes* Review of U.S. Patent No. 8,332,844

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4. Claim 4: The system as recited in claim 1 further comprising: a plurality of union block devices configured to interface between respective compute nodes and said

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first storage unit, respective second storage units, and said cache to distribute application environments to the compute nodes, wherein said union block devices are configured to create said application environments by merging the blocks of said root image with the blocks of respective leaf images.....145

5. Claim 5: The system as recited in claim 4 wherein said union block devices comprise low-level drivers for interfacing between the file systems of respective compute nodes and said first storage unit, respective second storage units, and said cache. 147

6. Claim 6: The system as recited in claim 1 wherein said first storage unit is read-only. 149

7. Claim 7 149

8. Claim 8: The method as recited in claim 7 further comprising: receiving a read request from at least one of said compute nodes, wherein a first portion of the data requested is currently stored in said cache memory; and providing said first portion of said data to said at least one of said compute nodes from said cache memory. 150

9. Claim 9: The method as recited in claim 8 further comprising: updating said cache memory based on said read request. 151

10. Claim 10: The method as recited in claim 9 wherein a second portion of the data requested is not currently stored in said cache memory and said updating comprises: caching said second portion in said cache memory; and removing the least recently accessed data from said cache memory if the amount of data in said cache memory is above a threshold value. 152

11. Claim 11: The method as recited in claim 7 further comprising: merging the blocks of said root image with the blocks of respective leaf images to create cohesive respective application environments. 153

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12. Claim 12: The method as recited in claim 11 wherein said merging occurs at an operational level between file systems of the respective compute nodes and said first storage unit, respective second storage units, and said cache memory. 153

13. Claim 13: The method as recited in claim 7 wherein said first storage unit is read-only. 153

B. Ground 2: Menage in View of Murphy Renders Claims 14-27 Obvious 153

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3. Claim 15: The system as recited in claim 14 wherein said first storage unit and said second storage units are contained within a single storage appliance. 163

4. Claim 16: The system as recited in claim 14 further comprising: a plurality of union block devices configured to interface between respective compute nodes and said first storage unit and respective second storage units, said union block devices configured to distribute application environments to the compute nodes, wherein said union block devices are configured to create said application environments by merging the blocks of said root image with the blocks of respective leaf images. 163

5. Claim 17: The system as recited in claim 16 wherein said union block devices comprise low-level drivers for interfacing between the file systems of respective compute nodes and said first storage unit, respective second storage units, and said cache. 163

6. Claim 18: The system as recited in claim 14 wherein said first storage unit is read-only. 164

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