

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DOLBY LABORATORIES, INC.,
Petitioner

v.

INTERTRUST TECHNOLOGIES CORPORATION,
Patent Owner

Case IPR2020-00660
Patent 6,785,815

**DECLARATION OF CRENA PACHECO IN SUPPORT OF
PETITION FOR INTER PARTES REVIEW OF U.S. PATENT 6,785,815**

I, Crena Pacheco, make the following declaration pursuant to 28 U.S.C.
§1746:

1. I am a Senior IP Paralegal at the law firm of Ropes & Gray LLP.
2. I provide this Declaration in connection with the above-identified Inter Partes Review proceeding that is before the United States Patent and Trademark Office (“USPTO”). Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Exhibit 1005 is a true and correct copy of a redline comparison between the specification of U.S. Provisional Application 60/138,171 (from Exhibit 1004) and the specification of U.S. Application No. 09/588,652 (from Ex. 1001). This redline was generated by me on February 6, 2020. This document has been marked with an exhibit label and page numbers on each page. However, no alterations, other than these noted markings, have been made to this document.

4. Exhibit 1017 is a true and correct copy of “One-Way Hash Functions: Using cryptographic algorithms for hashing” by Bruce Schneier. Dr. Dobbs's Journal, Sep. 1991, pp. 148-151. This article was obtained under my direction from the British Library on February 21, 2020. This document has been marked with an exhibit label and page numbers on each page. However, no alterations, other than these noted markings, have been made to this document.

5. I understand that willful false statements and the like are punishable by fine or imprisonment, or both. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

6. I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of March, 2020, in Boston, Massachusetts.

/Crena Pacheco/
Crena Pacheco