

EXHIBIT M

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

E-NUMERATE SOLUTIONS, INC. and
E-NUMERATE, LLC,

Plaintiffs,

v.

THE UNITED STATES,

Defendant.

No. 19-859 C

Judge Ryan T. Holte

**DECLARATION OF DR. DAVID MARTIN IN SUPPORT OF DEFENDANT’S
PROPOSED PRELIMINARY CLAIM CONSTRUCTIONS**

TABLE OF CONTENTS

I. Personal Qualifications3

II. Scope of Opinion and Legal Standards.....5

III. Patent Backgrounds9

IV. Technology Background.....10

V. Person of Ordinary Skill in the Art.....11

VI. Terms from the '355 Patent11

 A. “the step of receiving...” (claims 15, 42 of the '355 Patent).....11

VII. Terms from the '816 Patent12

 A. “markup language” (claim 12 of the '816 Patent)12

 B. “means for receiving a first markup document...of the second markup document” (claim 26 of the '816 Patent).....13

 C. “means for automatically transforming the numerical values...a common format;” (claim 26 of the '816 Patent).....16

 D. “means for combining the first markup document and the second markup document into a single data” (claim 26, '816 Patent)20

E. “means for displaying the single data set” (claim 26 of the ’816 Patent).....21

VIII. Terms from the ’383 Patent24

A. “means for identifying a first markup document including first numerical values and first tags reflecting ... associated with the second unit of measure” (claim 18 of the ’383 Patent)24

B. “means for automatically transforming at least a portion of the first or second numerical values... have a common unit of measure” (claim 18 of the ’383 Patent)28

C. “means for processing at least a part of the first markup document and at least a part of the second markup document, resulting in a single markup document” (claim 18 of the ’383 Patent)32

D. “means for causing a display of at least a portion of the single markup document” (claim 18 of the ’383 Patent).....34

IX. Terms from the ’748 Patent37

A. “code for storing a plurality of original documents including a plurality of original values, including a first document including first values and a second document including second values” (claim 11 of the ’748 Patent)37

B. “code for processing at least a part of the first document and at least a part of the second document, ... of the plurality of original documents” (claim 11 of the ’748 Patent).....39

C. “code for receiving a user selection of one or more computer-readable semantic tags” (claim 11 of the ’748 Patent)42

D. “code for receiving a user selection of one or more of the original values” (claim 11 of the ’748 Patent)44

E. “code for mapping the one or more of the computer-readable semantic tags to the one or more of the original values” (claim 11 of the ’748 Patent)47

F. “code for outputting a report... results in a corresponding change in an instance of the report” (claim 11 of the ’748 Patent)49

G. “code for outputting at least one computer-readable Extensible Markup Language (XML)-compliant data document... results in a corresponding change in an instance of the at least one computer-readable XML-compliant data document” (claim 11 of the ’748 Patent).....51

X. Terms from Multiple Patents54

 A. “multiple hierarchical relationships between two line items of corresponding numerical values” (claims 7, 8, 15, of the ’383 Patent; claim 1 of the ’748 Patent; claim 29 of the ’842 Patent; claims 1, 10, 17 of the ’708 Patent)54

 B. “rule” (claims 9, 10 of the ’383 Patent; claims 1, 12, 13, 14 of the ’748 Patent; claim 29 of the ’842 Patent; claims 1, 10, and 17 of the ’708 Patent).....58

XI. Signature59

I, David Martin, declare and state as follows:

1. I am over the age of twenty-one, competent to make this declaration and have personal knowledge of the matters stated herein. I make this declaration in support of Defendant United States’ (“U.S.” or “Government”) preliminary claim constructions.

I. Personal Qualifications

2. I have over 40 years of professional experience with computer software. Following informal study in computer science at Iowa State University in the late 70s, I was first hired as a programmer in 1979. After high school in 1984, I worked for two startups as a software designer and programmer and delivered custom software to Lucasfilm Ltd. under contract. I have worked with the Internet and associated technologies since the late 1980s. I began using web browsers in 1993. I taught computer science to graduate and undergraduate computer science students for 10 years. I earned a Ph.D. in Computer Science from Boston University in 1999. My Ph.D. research was in the area of Internet security and privacy. I earned a Bachelor of Science degree with distinction in Computer Science and Mathematics from Iowa State University in 1993. I have worked at the University of Denver as an Assistant Professor, at Boston University as a Research Assistant Professor, and at the University of Massachusetts Lowell as an Assistant Professor. In

these positions, I performed research in the areas of computer security and privacy on the Internet. I am currently an independent software consultant.

3. My experience also includes teaching courses in Introduction to Object Oriented Programming (C++); Foundations of (Theoretical) Computer Science; Computer Security I: Principles of Cryptography and Network Security; Computer Security II: Applied Computer Security; Unix Software Tools; Computer Networking; Introduction to Computer Science II (C++); Introduction to Computer Science I (C++); Special Topics in Systems: Computer Security; Advanced Unix Programming; Formal Languages and Automata; Introduction to Computer Science (C).

4. I have received the following honors throughout my academic and professional career: Teaching Excellence Award for U. Mass Lowell Computer Science Department (2007); Teaching Excellence Award for U. Mass Lowell Computer Science Department (2004); One of four nominees for Outstanding Research in Privacy Enhancing Technology Award (2003); Outstanding Teaching Fellow, Department of Computer Science, Boston University (1996); University Graduate Fellowship, Boston University (1993-1994); Top Graduating Senior in Mathematics, Iowa State University, Spring (1993); Top Graduating Senior in Computer Science, Iowa State University, Spring (1993); Honorable Mention, National Science Foundation Graduate Fellowship (1993); Honorable Mention, Department of Defense Graduate Fellowship (1993); Phi Beta Kappa membership (liberal arts honor society) (1990); Phi Kappa Phi membership (engineering honor society) (1990); Pi Mu Epsilon (mathematics honor society) (1990); Upsilon Pi Epsilon (computer science honor society) (1990); Arthur Collins Foundation Scholarship, Spring (1992); Dio L. Holl Award for Outstanding Senior, Spring (1992); Shell Oil Foundation Scholarship, Spring (1991); Barry Goldwater Scholarship (1989-1990).

5. I have been a member of the following professional societies: the Association for Computing Machinery and the Institute for Electrical and Electronics Engineers.

6. I was first engaged as a software expert over 20 years ago. I have extensive experience analyzing software and descriptions of software. For example, I have analyzed source code from Amazon, Apple, Google, Microsoft, Samsung, Yahoo!, Zillow, and other companies, and have written expert reports and testified about their implementations.

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