

EXHIBIT B

DECLARATION OF DR. RICARDO VALERDI

I. INTRODUCTION

1. I, Ricardo Valerdi, have been asked by Ameranth, Inc. ("Ameranth") to opine on the technological innovations described in U.S. Patent 9,747,651 ("651 patent") dated August 29, 2017. I have been also asked to opine on the state of the art of computer technology at the time of the '651 patent and how improvements disclosed in the '651 patent improved the state of the art of computer technology at the time of the '651 patent.

II. EXPERIENCE AND QUALIFICATIONS

2. The details of my education, work experience, research, and publications (including publications authored in the last 10 years) are summarized in my curriculum vitae ("CV") attached hereto as Attachment A of this declaration.

3. I received a Bachelor of Science degree in Electrical Engineering from the University of San Diego, a Masters in Systems Architecture and Engineering from the University of Southern California, and a Ph.D. in Industrial and Systems Engineering from University of Southern California.

4. I am a Full Professor, with tenure, at the University of Arizona in the Department of Systems & Industrial Engineering. Previously, I was on the faculty at the Massachusetts Institute of Technology in Cambridge, MA and was a Visiting Professor at the United States Military Academy in West Point, NY.

5. I have provided consultant services for the United States Government (i.e., Department of Defense and Department of Energy), and other governments and major contractors in the areas of product development. I also teach university classes – cost estimation and sports analytics – and have supervised dozens of graduate students in engineering and given presentations on product development and related topics in Mexico, Costa Rica, Brazil, Spain, Italy, England, India, China, and Australia.

6. My industry experience includes a variety of engineering roles at Motorola (in the wireless communications division) and SpaceX (in the space rocket production department). My experience at Motorola included the development of voice and data systems connected via wireless communication networks. This is similar to the '651 patent in the areas of wireless computing, handheld and remote communications to databases, fixed and free format messaging, and audio quality validation over fixed and mobile wireless networks.

7. I am a Senior Member of the Institute of Electrical and Electronics Engineers (IEEE), the largest engineering professional society in the world.

8. I have received numerous awards for my research including the Frank Freiman Award for Lifetime Achievement in Cost Estimation and Parametric Modeling (highest award given by the International Cost Estimating & Analysis Association), Distinguished Visiting Fellowship at the Royal Academy of Engineering (United Kingdom), and elected as a Foreign Member of the Mexican Academy of Engineering. I have received best paper awards in the Defense Acquisition Research Journal, Conference on Predictive Models in Software Engineering, and Symposium of the International Council on Systems Engineering.

9. I have over 100 publications in journals, magazines, and conferences relating to a broad range of technologies including cybersecurity, autonomous systems, virtual reality, and electronic medical records.

10. Of most relevance to this matter are the following publications:

Ryan, T., Valerdi, R., Total Cost of Ownership: An Approach for Estimating UAS Costs, in *Operations Research for Unmanned Systems*, Cares, J. R. and Dickmann, J. Q. (Eds.), Wiley, 2016.

This article describes various attributes of intelligent systems (e.g., military unmanned drones) that drive their total ownership costs.

Latt, L. D., Monreal, J., Smith, K., Mertz, J., Patterson, J., Valerdi, R., Head, K. L., "Impact of electronic medical record implementation on orthopaedic clinic workflow," 127th Meeting of the American Orthopaedic Association, Montréal, Canada, June 18-21, 2014.

This article describes a mobile application connected to a database utilized for storing time motion data of physicians in an orthopaedic clinic.

Thebeau, D., Reidy, B., Valerdi, R., Gudagib, A., Kurra, H., Al-Nashifb, Y., Hariri, S., Sheldon, F., "Improving cyber resiliency of cloud application services by applying Software Behavior Encryption (SBE)," Conference on Systems Engineering Research, Redondo Beach, CA, March 21-22, 2014.

This article describes in part an intelligent algorithm for improving computer security using a moving target defense strategy.

Hess, J., Agarwal, G., Cowart, K., Deonandan, I., Kenley, C. R., Mikaelian, T. and Valerdi, R., "Normative and Descriptive Models for Test & Evaluation of Unmanned and Autonomous Systems of Systems," 20th INCOSE Symposium, Chicago, IL, July 2010.

This article describes a framework for testing intelligent systems with emergent behaviors (e.g., military unmanned drones).

Deonandan, I., Valerdi, R., Lane, J. and Macias, F., "Cost and Risk Considerations for Test and Evaluation of Unmanned and Autonomous Systems of Systems," 5th IEEE International Conference on Systems of Systems Engineering, Loughborough, UK, June 2010.

This article describes in part an intelligent decision support system for testing military unmanned drones.

III. COMPENSATION

11. The rate of compensation for my work in this case is \$650 per hour. My compensation is based solely on the amount of time that I devote to activity related to this matter and is in no way affected by any opinions that I render or the outcome of any particular matter.

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