

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LIBERTY MUTUAL INSURANCE CO.
Petitioner

v.

PROGRESSIVE CASUALTY INSURANCE CO.
Patent Owner

Case CBM2013-00009
Patent 8,140,358

DECLARATION OF IVAN ZATKOVICH

Progressive Exhibit 2020
Liberty Mutual v. Progressive
CBM2013-00009

DECLARATION OF IVAN ZATKOVICH

I, Ivan Zatkovich, hereby declare under penalty of perjury:

I. Introduction

A. Scope of Assignment

1. I was retained by the law firm of Jones Day, on behalf of the Progressive Casualty Insurance Company (“Progressive”), to render opinions regarding technology described and claimed in U.S. Patent No. 8,140,358 (the “’358 patent”) and certain references cited as prior art against the ’358 patent claims.

B. Scope of Declaration

2. The following are materials discussed in this declaration:
- a. The ’358 patent.
 - b. Petition for Review of U.S. Patent No. 8,140,358 in CBM2013-00009 (Paper 2) (“Petition”).
 - c. Decision Instituting Covered Business Method Patent Review in CBM2013-00009 (Paper 10) (“Institution Decision”).
 - d. Geostar, Understanding Radio Determination Satellite Service (Jane Pierce & Marilyn Finley eds.) (Ex. 1004) (“RDSS”).

- e. Geostar Corp., Annual Report (Form 10-K) (April 16, 1990) (Ex. 1005) (“Geostar 10-K”).
 - f. Japan Patent Application H4-182868 (Ex. 1003) (“Kosaka”).
 - g. Declaration of Scott Andrews for CBM2013-00009 (Ex. 1014) (“Andrews Declaration”).
 - h. Declaration of Mark Ehsani for CBM2013-00009 (Ex. 2016) (“Ehsani Declaration”).
3. I have been asked to render opinions regarding technology described and claimed in the ’358 patent and the RDSS and Geostar 10-K references cited as prior art against the ’358 patent claims.

C. Background and Experience

4. The following is a summary of my professional experience and qualifications. My complete *curriculum vitae* is provided as Exhibit 2021.
- I have more than 4 years experience designing and implementing vehicle telematics systems and have designed and implemented ecommerce computer systems for the insurance industry, such as for Geico and Hartford.
 - I have over thirty-one years experience in computer science, network communications, and software development, which includes eight years of experience in the design and development of financial and insurance

business applications including development of claims processing systems, policyholder systems, financial network products, and electronic transaction products.

- I received a Bachelor's degree in Computer Science, with a minor in Electrical Engineering Digital Circuit Design, from the University of Pittsburgh in 1980. I completed a master's thesis in Computer Networks.
- In addition to a master's thesis, my other publications include articles on network design in Byte Magazine and programming techniques and tutorials in Sync Magazine. I also presented a paper concerning High Volume Web Content at the Momentum conference in August 2003. I have given presentations on ICGS Computer Graphic Standards at the Institute of Electrical and Electronics Engineers (IEEE) SigGraph Conference, as well as on Internet publishing standards at the Momentum Conference.
- My professional memberships include IEEE, International Internet Society, and Association for Computing Machinery.
- I have served as a committee member for ISO and ANSI standards organizations where I had the responsibility of defining disk and network communication standards.
- My certifications include IBM Websphere Certified Solutions Expert,

Capability Maturity Model (CMM), and Project Management Professional (PMP).

5. Specific systems that I have designed and developed include:
- Utility Partners – Customized Wireless Telematics Systems for Gas and Electric Utility Companies. These systems contained:
 - Wireless communications between the field service trucks and the remote central dispatch system.
 - Monitoring of the status of the field service representatives and truck location.
 - Wireless transmission and receiving of work order information and status to and from the field service truck.
 - GEICO – Designed and developed eCommerce website for GEICO Policyholders to:
 - Allow policyholders to retrieve policy information, coverage and premium information.
 - Recommend and change policy parameters and re-estimate premiums.
 - Provide on-line policy quotes to new visitors.
 - Hartford Insurance – Designed and developed eCommerce website for Policyholders and Claims Adjusters for:

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