

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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VOLUSION, INC.  
Petitioner

v.

VERSATA SOFTWARE, INC. AND  
VERSATA DEVELOPMENT GROUP, INC.  
Patent Owner

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Case CBM2013-00017  
U.S. Patent No. 6,834,282 B1

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Before HOWARD B. BLANKENSHIP, SALLY C. MEDLEY, and  
KEVIN F. TURNER, *Administrative Patent Judges*.

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**DECLARATION OF PHILIP GREENSPUN, PH.D IN SUPPORT OF  
VOLUSION'S OPPOSITION TO PATENT OWNER'S  
MOTION TO AMEND (UNDER 37 C.F.R. § 1.68)**

VOLUSION EXHIBIT 1018 <i>Volusion v. Versata</i> CBM2013-00017
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**TABLE OF CONTENTS**

- I. BACKGROUND .....1
- II. RETENTION AND MATERIALS REVIEWED .....6
- III. GENERAL DISAGREEMENT .....7
- IV. LEVEL OF SKILL IN THE ART .....8
- V. SUBJECT OF THE PATENT .....10
- VI. CLAIM CONSTRUCTION .....11
- VII. ANALYSIS OF PROPOSED SUBSTITUTE CLAIMS.....21
  - A. Dr. Nettles’ definition of the abstract idea is overly broad.....21
  - B. Dr. Nettles’ recitation of limitations merely describes well-known, routine and conventional uses of a general purpose computer .....22
  - C. Intricate and detailed computer programming is not required by the substitute claims .....28
  - D. Additional Limitations Added in the Substitute Claims Do Not .....29
  - E. Alleged Support for the Proposed Substitute Claims.....32

Pursuant to 28 U.S.C. § 1746 and 37 C.F.R. § 1.68, I, Philip Greenspun, do hereby declare:

**I. BACKGROUND**

1. My name is Philip Greenspun. I am competent to make this declaration based on my personal knowledge.
2. Attached as Exhibit 1023 is a copy of my curriculum vitae, which includes the publications I have authored in the previous 10 years, either listed directly or by reference to <http://philip.greenspun.com>.
3. In terms of my background and experiences that qualify me as an expert in this case, I earned a Ph.D. in Computer Science from Massachusetts Institute of Technology in 1999. I also obtained a Bachelor of Science Degree in Mathematics from Massachusetts Institute of Technology in 1982 and a Master of Science Degree in Electrical Engineering and Computer Science from Massachusetts Institute of Technology in 1993.
4. In 1999, I received a Ph.D. in Electrical Engineering and Computer Science from the Massachusetts Institute of Technology. My thesis concerned the engineering of large online Internet communities with a Web browser front-end and a relational database management system (RDBMS) containing site content and user data.

5. I have authored five computer science textbooks in total, including Database Backed Web Sites (Macmillan), Software Engineering for Internet Applications, and a SQL language tutorial.

6. I have served as an independent member of various advisory and corporate boards, mostly for technology companies. For example, I joined the corporate board of an MIT materials science spin-off in late 2005 during a \$550,000 seed capital phase. I stepped down when the company secured \$10 million in venture capital in mid-2007.

7. I began working full-time as a computer programmer in 1978, developing a database management system for the Pioneer Venus Orbiter at the National Aeronautics and Space Administration's Goddard Space Flight Center.

8. I developed my first program using a relational database management system in 1994. It was a Web interface to the Children's Hospital Oracle RDBMS version 6. This enabled doctors at the hospital to view patient clinical data using any computer equipped with a Web browser.

9. In 1995, I led an effort by Hearst Corporation to set up an infrastructure for Internet Applications across all of their newspaper, magazine, radio, and television properties. This infrastructure included software for managing users, shopping carts, electronic commerce, advertising, and user tracking.

10. Between 1995 and 1997, I significantly expanded the photo.net online community that I had started, in 1993, in order to help people teach each other to become better photographers. I began distributing the source code behind photo.net to other programmers as a free open-source toolkit, called “ArsDigita Community System.”

11. In May 1997, Macmillan published my first textbook on Internet Application development, “Database Backed Web Sites.”

12. In 1997, I started a company, ArsDigita, to provide support and service for the free open-source toolkit. Between 1997 and the middle of 2000, I managed the growth of ArsDigita to 80 people, almost all programmers, and \$20 million per year in annual revenue. This involved supervising dozens of software development projects, nearly all of which were Internet Applications with a Web front-end and an Oracle RDBMS back-end. Approximately one third of these projects were related to electronic commerce, *e.g.*, a front-end for a Levi Strauss factory making custom-cut khaki pants, traditional catalog-shopping sites, a site selling last-minute travel projects. In 1999, I supervised the packaging up of much of our ecommerce-related code into the “ecommerce” module of the ArsDigita Community System. As the founder, CEO, and chief technical employee of the company, I personally developed functional specifications, SQL data models (Structured Query Language, or “SQL”, is the standard programming language for

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