

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HEWLETT-PACKARD COMPANY,
Petitioner

v.

YYZ, LLC,
Patent Owner

CBM No. Unassigned

**DECLARATION OF STEPHEN CRAGGS
IN SUPPORT OF PETITION FOR
COVERED BUSINESS METHOD REVIEW**

U.S. PATENT NO. 7,062,749

I, Stephen Craggs, do hereby declare that:

1. I have been retained by counsel for Petitioner to provide assistance regarding U.S. Patent No. 7,062,749 (“the ’749 patent” or “the patent”).

Professional Background

2. I have over thirty-five years of experience in software product design, development, management and thought leadership in business computing systems including transaction processing, integration middleware, monitoring, process automation, event processing, service oriented architecture and enterprise application integration.

3. I am currently Research Director at Lustratus, a market analysis and advisory firm specializing in all forms of computing middleware and infrastructure software. I regularly publish papers and articles on all aspects of integration, middleware and infrastructure software and appliances.

4. I graduated from Oxford University in Mathematics with Honours in 1977 before joining the IBM development laboratory in Hursley, England that same year. I worked at IBM until late 1996. During my time at IBM, I held a variety of roles in CICS development and Transaction Systems before taking up the opportunity to lead a new business line for IBM called MQSeries (now called WebSphereMQ). From approximately 1993 to 1996 I held the title of MQSeries Manager. In this role I had worldwide responsibility for MQSeries strategy, design,

development, branding, marketing and sales enablement. Having successfully established MQSeries in the marketplace as the leading example of the new software market category of ‘Messaging Middleware,’ resulting in my being referred to as ‘the Father of Messaging’ by the global press, I left IBM at the end of 1996 to join Candle Corporation, a global monitoring and management software vendor based in California.

5. From 1997 to 2000, I was Vice-President, Application Solutions at Candle, responsible for building and delivering a suite of monitoring and middleware products and creating a messaging-based business for Candle spanning products and consultancy services. These included Candle Command Centre for MQSeries and MQSeries Integrator, a monitoring product for monitoring and managing asynchronous IBM MQ messaging and the IBM broker, and the CandleNet eBusiness Platform powered by Roma which was a messaging-based process and application integration solution including system and application monitoring. Roma was acknowledged by Gartner Group as the first Enterprise Service Bus in the world, offering integration broking in a new bus architecture form.

6. While working for Lustratus (originally known as Saint) I have received global acknowledgement as a thought leader in integration middleware. I co-founded the ESB (Enterprise Service Bus) messaging market segment, publishing

the inaugural paper on ESBs in 2002, and was regarded as a leading worldwide authority on the Service-Oriented-Architecture (SOA) and integration middleware markets. My many papers on areas such as Messaging Middleware, Business Process Management, Decision Management and mBrokers have received much acclaim and are still regularly downloaded from the Lustratus site.

7. In the late 1990s I served as IBM's representative to the Message-Oriented Middleware Association, and in 2000 I was appointed Vice-Chairman of the Integration Consortium, a not-for-profit industry consortium of vendors and users of business integration solutions. Since 2002 I have been a member of the GLG Council, providing advice on the global integration and middleware industry to investment firms worldwide. I regularly serve as an independent judge on industry awards panels such as the CityCompass Financial Industry Benchmarking panel, Financial-i's supply chain awards and most recently the IBM Beacon Awards.

8. I have received numerous IBM awards for my work on CICS and MQSeries, and since founding Lustratus I have been involved in key business integration projects and products with companies such as IBM, Staffware, SAP, SoftwareAG, webMethods, TIBCO, Axway, Progress Software and many others. I have written many papers on the integration industry, and in 2013 I co-authored "Operational Decision Management for Dummies" published by Wiley.

Assignment & Materials Considered

9. Counsel for Petitioner requested that I provide analysis pertinent to the '749 patent.

10. For time spent in connection with this case, I am being compensated at my customary rate. My compensation is not dependent upon the outcome of this petition or any issues involved in or related to the '749 patent, and I have no other financial stake in this matter.

11. The patent-related materials I considered include: the '749 patent (Exhibit 1001); the original prosecution history for the '749 patent (Exhibit 1002); and the reexamination file history for the '749 patent (Exhibit 1003).

12. The MQSeries Integrator prior art related materials that I considered include: MQSeries Primer, IBM MQSeries EAI Center, October 1999 ("MQSeries Primer") (Exhibit 1017); Using the IBM MQSeries Integrator Version 1.0, IBM International Technical Support Organization, SG24-5386-00, May 1999 ("MQSeries Integrator 1.0 Reference") (Exhibit 1018); MQSeries Integrator - Using the Control Center – Version 2 Release 0, First Edition, March 2000, GC34-5602 ("MQSeries Control Center") (Exhibit 1022); MQSeries Integrator – Introduction and Planning – Version 2 Release 0, First Edition, April 2000, GC34-5599-00 ("MQSeries Planning") (Exhibit 1023); MQSeries Integrator – Programming Guide – Version 2 Release 0, First Edition, April 2000, SC34-5603-00 ("MQSeries

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.