

Declaration of Tal Lavian, Ph.D., in Support of
Petition for Covered Business Method Review of
U.S. Patent No. 7,925,981

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ServiceNow, Inc.
Petitioner

v.

Hewlett-Packard Company
Patent Owner

U.S. Patent No. 7,925,981
Filing Date: May 14, 2003
Issue Date: April 12, 2011

TITLE: SYSTEMS AND METHODS FOR MANAGING WEB SERVICES
VIA A FRAMEWORK OF INTERFACES

DECLARATION OF TAL LAVIAN, PH.D.

Covered Business Method Review No. 2015-__

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I, Tal Lavian, Ph.D., declare as follows:

1. I have personal knowledge of the facts stated in this declaration, and could and would testify to these facts under oath if called upon to do so.

2. I have been retained by counsel for ServiceNow, Inc. (Petitioner) in this case as an expert in the relevant art.

3. I have been asked to provide my opinions relating to claims 1, 22 and 23 of U.S. Patent No. 7,925,981 to M. Homayoun Pourheidari et al. (“the ‘981 patent”), which I understand is owned by Hewlett-Packard, Inc. (“Patent Owner” or “HP”).

4. I previously submitted a declaration in IPR2015-00707 (filed February 5, 2015) regarding claims 1, 22 and 23 of the ‘981 patent. My opinions regarding the level of ordinary skill in the art and the construction of certain claim terms are the same as those in my earlier declaration. My analysis of the prior art that I apply to the claims in this Declaration is consistent with my earlier analysis.

I. BRIEF SUMMARY OF MY OPINIONS

5. Claims 1, 22 and 23 purport to disclose a system and computer program product for managing a “Web service.” They do not describe anything that was new or non-obvious by the time the application for the ‘981 patent was

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