

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., EVENTBRITE INC., STARWOOD HOTELS & RESORTS
WORLDWIDE, INC., EXPEDIA, INC., FANDANGO, LLC,
HOTELS.COM, L.P., HOTEL TONIGHT, INC., HOTWIRE, INC.,
KAYAK SOFTWARE CORP., OPENTABLE, INC., ORBITZ, LLC, PAPA
JOHN'S USA, INC., STUBHUB, INC., TICKETMASTER, LLC, LIVE
NATION ENTERTAINMENT, INC., TRAVELOCITY.COM LP,
WANDERSPOT LLC, AGILYSYS, INC., DOMINO'S PIZZA, INC.,
DOMINO'S PIZZA, LLC, HILKTON RESORTS CORPORATION,
HILTON WORLDWIDE, INC., HILTON INTERNATIONAL CO., MOBO
SYSTEMS, INC., PIZZA HUT OF AMERICA, INC., PIZZA HUT, INC.,
and USABLENET, INC.,
Petitioner

v.

AMERANTH, INC.,

Patent Owner.

Case CBM CBM2015-00080, CBM2015-00082¹
Patent Nos. 6,384,850, 6,871,325

Declaration of Bert Lee

¹ CBM2015-00096 and CBM2015-00097 have been consolidated with CBM2015-00080 and CBM2015-00082, respectively.

I, Bert Lee, do hereby declare:

1. I am an IP Administrative Specialist at DLA Piper US LLP, counsel for Petitioner Apple Inc. in this proceeding. If called as a witness, I could and would testify competently to the information set forth in this declaration.

2. On March 23, 2016, I filed Petitioner's Reply Brief and Exhibits 1068-1082 in CBM2015-00080 and CBM2015-00082 with the Patent Trials and Appeal Board electronic filing system.

3. Exhibit 1071 is a true and accurate copy of the online article available at: <http://www.economywatch.com/world-industries/hospitality>. On April 12, 2016, I compared the text of the article in Exhibit 1071 with the web page <http://www.economywatch.com/world-industries/hospitality> and confirmed that the contents of article reproduced in Exhibit 1071 are identical to the contents of the article on the web page.

4. Exhibit 1072 is a true and accurate copy of the online article available at: <http://www.besthospitalitydegrees.com/faq/what-exactly-is-the-hospitality-industry/>. On April 12, 2016, I compared the text of the article in Exhibit 1071 with the web page <http://www.besthospitalitydegrees.com/faq/what-exactly-is-the-hospitality-industry/> and confirmed that the contents of article reproduced in Exhibit 1072 are identical to the contents of the article on the web page.

5. Exhibit 1073 is a true and accurate copy of the online article available at: <http://blogs.msdn.com/b/bfridley/archive/2009/03/27/hospitality-industry-technology-strategist.aspx>. On April 12, 2016, I compared the text of the article in Exhibit 1073 with the web page <http://blogs.msdn.com/b/bfridley/archive/2009/03/27/hospitality-industry-technology-strategist.aspx> and confirmed that the contents of article reproduced in Exhibit 1073 are identical to the contents of the article on the web page.

6. Exhibit 1082 is a true and accurate copy of the website <http://www.cwhonors.org/involved/>. On April 12, 2016, I compared Exhibit 1082 with the web page <http://www.cwhonors.org/involved/> and confirmed that the contents of Exhibit 1082 are identical to the contents of the web page.

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 13th day of April, 2016.

By: 
Bert Lee