UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

STARBUCKS CORPORATION
Petitioner

v.

AMERANTH, INC.
Patent Owner

CASE: To Be Assigned
Patent No. 6,871,325 B1

DECLARATION OF ABDELSALAM HELAL, PH.D.
IN SUPPORT OF PETITION FOR
COVERED BUSINESS METHOD PATENT
REVIEW OF U.S. PATENT NO. 6,871,325 B1

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I. INTRODUCTION

1. My name is Abdelsalam Helal. I am a Professor in the Computer and Information Science and Engineering Department at the University of Florida (1998 – present), and a Finland Distinguished Professor at Aalto University, Finland (2011-2013).

2. I have been engaged by Starbucks Corporation ("Starbucks") as a consultant in connection with Starbucks' Petition for Covered Business Method Patent Review ("Starbucks CBM Petition") of U.S. Patent No. 6,871,325 B1 (the "'325 patent").

3. I understand that the '325 patent has been assigned to Ameranth, Inc. ("Ameranth"). Ameranth is also referred to as the "Patent Owner" in this declaration.

4. This declaration is based on the information currently available to me. To the extent that additional information becomes available, I reserve the right to continue my investigation and study, which may include a review of documents and information that may be produced, as well as testimony from depositions that not yet been taken.

5. In forming my opinions, I have relied on information and evidence identified in this declaration, including the '325 patent, the prosecution history of the '325 patent, and prior art references including Japanese Published Appl. No.

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