

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

STARBUCKS CORPORATION
Petitioner

v.

AMERANTH, INC.
Patent Owner

CASE: CBM2015-00091
Patent No. 6,384,850 B1

CASE: CBM2015-00099
Patent No. No. 6,871,325

**DECLARATION OF ABDELSALAM HELAL, PH.D.
IN SUPPORT OF PETITIONER REPLIES TO PATENT OWNER
RESPONSES**

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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 was a Finland Distinguished Professor at Aalto University, Finland (2011 – 2013).

2. I have been engaged by Starbucks Corp. (“Starbucks”) to investigate and opine on certain issues relating to U.S. Patent No. 6,384,850 (the “’850 patent”) and U.S. Patent No. 6,871,325 (the “’325 patent”), both of which are being asserted against Petitioner Starbucks in a patent infringement lawsuit, *Ameranth, Inc. v. Starbucks Corp.*, No. 13CV1072 DMS (WVG), filed in the U.S. District Court, Southern District of California, on May 6, 2013.

3. I previously provided a declaration in support of Starbucks’ Petition for CBM Review on the ’850 patent which was filed on March 2, 2015 (“’850 Petition”). My 2015 declaration is Exhibit 1003 in the ’850 case (CBM2015-00091). My 2015 declaration provides an explanation of my credentials and experience, a discussion of the technology relevant to the ’850 patent, and my opinions with respect to the ’850 patent.

4. I also previously provided a declaration in support of Starbucks’ Petition for CBM Review of the ’325 patent which was filed on March 6, 2015. My 2015 declaration is Exhibit 1003 in the ’325 case (CBM2015-00099). My

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