UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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Ford Motor Company
Petitioner,

v.

Versata Software, Inc.
Patent Owner.

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U.S. Patent No. 8,805,825

CMB Case No.: 2016-00100

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DECLARATION OF DEBORAH L. McGUINNESS, Ph.D.

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List of Exhibits

Exhibit No.	Description	Identifier
1001	U.S. Patent No. 8,805,825	'825 Patent
1002	Declaration of Deborah McGuinness	
1003	Federal Register – August 14, 2012 (Part IV)	
1004	*A Guide to the Legislative History of the America Invents Act; Part II of II*, 21 Fed. Cir. Bar J. No. 4 (2002), pp. 539-653	AIA Legislative History Guide
1005	Federal Register – August 14, 2012 (Part V)	
1006	'825 Patent File History	
1007	2002 Lincoln Continental Order Guide	
1008	2002 Lincoln Continental Price List	
1009	Versata Claim Construction Disclosure Document	
1010	McGuinness *Curriculum Vitae*	
1011	Stefik, *Introduction to Knowledge Systems* (1995)	Stefik
1012	McDermott, *R1: an Expert in the Computer Systems Domain*, Proceedings AAAI-80 (1980)	McDermott
1013	McGuinness et al., *An Industrial-Strength Description Logic-Based Configurator Platform*, IEEE Intelligent Systems (1998)	
1014	McGuinness et al., *Description Logic in Practice: A CLASSIC: Application*, Proceedings of the 14th International Joint Conference on Artificial Intelligence, Montreal, Canada, (August 1995)	
1015	Versata Complaint in the *Versata* lawsuit	
1016	Versata Counterclaim in the *Ford* lawsuit	

I, Deborah L. McGuinness, Ph.D., hereby declare as follows:

I.   Introduction

1.   I am making this declaration at the request of Ford Motor Company in a Covered Business Method Review proceeding concerning U.S. Patent No. 8,805,825 ("the '825 Patent").

2.   I am being compensated for my work in this matter at my standard consulting rate of $500 per hour and, when working while traveling, $600. My compensation does not depend on the outcome of this proceeding.

3.   I have been asked to provide my opinion on the patentability of claims 1-20 of the '825 Patent.

4.   In preparation of this declaration, I have studied Exhibits 1001 and 1006-1009 and 1011-1014 as listed in the Exhibit List shown above in my report.

5.   In forming the opinions expressed below, I have considered:

    (a)   The patents and file histories identified in the List of Exhibits;

    (b)   The relevant legal standards as described to me by counsel, and any additional legal standards set forth in the body of this declaration; and

    (c)   My knowledge and experience based upon my work and study as described below, considering the patentability of the '825 Patent from the viewpoint of a person having ordinary skill in the relevant art as of the priority date of the '825 Patent, which I am told is January 12, 2005.

II.   Qualifications and professional experience

6.   I have provided my full background in the curriculum vitae that is attached as Ex. 1010, which more fully details my 30-plus years of experience in computer science and electrical engineering. I am also an inventor on five patents, four of which directly relate to product configuration: U.S. Patent Nos. 5,720,008, 5,974,405, 6,256,627, 6,385,600, and 6,457,002.

7.   My academic training includes completing the requirements for a Bachelor of Science in Computer Science and a Bachelor of Arts in Mathematics from Duke University in 1980. I completed a Master of Science degree from the Electrical Engineering and Computer Science Department of the University of California at Berkeley in 1981. I also completed a Ph.D. in Computer Science from Rutgers University in 1996.

8.   I began my professional career immediately after my Bachelor's degree and began work for AT&T Bell Laboratories in 1980. I was immediately accepted into the Bell Laboratories "One Year on Campus" program which supported me to be a full time Master's student at Berkeley. Upon completion of my M.S. in 1981, I returned to Bell Laboratories and began work at the Home of the Future at the Home Information Systems Laboratory. In 1984, I transferred to the Computing Environments and Artificial Intelligence Department in New Jersey. While there, I was accepted into the Bell Laboratories Ph.D. program,

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