UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD
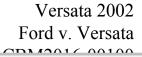
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FORD MOTOR COMPANY
Petitioner

v.

VERSATA DEVELOPMENT GROUP, INC.
Patent Owner

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Case CBM2016-00100
Patent No. 8,805,825

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**DECLARATION OF DR. DAVID W. FRANKE
IN SUPPORT OF
VERSATA'S PATENT OWNER PRELIMINARY RESPONSE**

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I, Dr. David W. Franke, hereby declare as follows:

I.   INTRODUCTION

1.   I understand that Ford Motor Company has filed a petition for covered business method review as to claims 1-20 of U.S. Patent No. 8,805,825 ("the '825 patent"). I understand that the '825 patent is titled "Attribute Prioritized Configuration Using a Combined Configuration-Attribute Data Model" by Brian K. Showers, Brandon M. Beck, and Nathan E. Little. I understand that the '825 patent is currently owned by Versata Development Group ("Versata").

2.   I have been retained by Versata to provide expert opinions in connection with this covered business method review proceeding. Specifically, I have been asked to provide my expert opinion relating to the technical features recited in claims 1-4, 6-9, 11-14, and 17-19 of the '825 patent.

II.   QUALIFICATIONS

3.   I am an expert in the field of configuration, data mining, and big data programming, having designed and implemented large scale configuration and data mining software.

4.   Currently, I am Chief Scientist at Vast.com in Austin, TX, where I lead the data science team in efforts related to data mining and data analysis for market insights, descriptive models, and predictive models for consumer considered purchases.

5.   I am also an Adjunct Associate Professor in the Department of Computer Science at The University of Texas at Austin where I teach courses in big data programming, and will be teaching a course in data mining. I also teach big data programming as part of the data management course in the Master of Science in Business Analytics program in the McCombs School of Business at UT Austin.

6.   I received my B.S. in Mathematics *Summa Cum Laude* in 1976 from The University of Oklahoma. I received my M.S. in Computer Science in 1977 from The Pennsylvania State University. And I received my Ph.D. in Computer Science in 1992 from The University of Texas at Austin.

7.   I was previously a Distinguished Technical Fellow at Trilogy Software, Inc. in Austin, TX. I was the principal architect and implementer on Trilogy's flagship SalesBUILDER product, a product configuration tool. I also performed product research and development and implemented data mining for Trilogy's Sales Optimizer tool.

8.   I have been awarded 14 U.S. patents in the areas of configuration systems and data caching and data mining.

9.   My Curriculum Vitae is submitted as Exhibit 2003, which contains further details on my education, experience, publications, and other qualifications to render an expert opinion. My work on this case is being billed at a rate of $400

per hour. My compensation is not contingent upon the outcome of this covered business method review.

III. MATERIALS CONSIDERED

10. In forming my expert opinions expressed in this declaration, I have considered and relied upon my education, background, and experience. I reviewed the Petition filed by Ford along with relevant exhibits to the Petition.

11. I have reviewed the specification of the '825 patent.

12. I understand that the '825 patent has been provided as Exhibit 1001. I will cite to the specification using the following format: (Ex. 1001, 1:1-10). This example citation points to the '825 patent at specification column 1, lines 1-10.

13. I have also reviewed and am familiar with the following documents:

Paper / Exhibit #	Description
1001	U.S. Patent No. 8,805,825 to Showers *et al*. ('825 patent)
1002	Declaration of Deborah McGuinness
1006	'825 Patent File History
1007	2002 Lincoln Continental Order Guide
1008	2002 Lincoln Continental Price List
1010	McGuinness *Curriculum Vitae*
1011	Stefik, *Introduction to Knowledge Systems* (1995)
1012	McDermott, *R1: an Expert in the Computer Systems Domain*, Proceedings AAAI-80 (1980)
1013	McGuinness et al., *An Industrial-Strength Description Logic-Based Configurator Platform*, IEEE Intelligent Systems (1998)

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