UNITED STATES PATENT AND TRADEMARK OFFICE
_____

BEFORE THE PATENT TRIAL AND APPEAL BOARD
_____

GOOGLE INC.,
Petitioner,

v.

ALFONSO CIOFFI, MEGAN ELIZABETH ROZMAN,
MELANIE ANN ROZMAN, AND MORGAN LEE ROZMAN,
Patent Owners.
_____

Cases CBM2017-00009, CBM2017-00016
Patent RE43,529

Cases CBM2017-00010, CBM2017-00015
Patent RE43,528

Cases CBM2017-00011, CBM2017-00014
Patent RE43,500

_____

EXHIBIT 2001

DECLARATION OF H.E. DUNSMORE IN SUPPORT OF PATENT OWNER'S
PRELIMINARY RESPONSE

TABLE OF CONTENTS

I, H.E. Dunsmore, do hereby state as follows:

I.   SCOPE OF ASSIGNMENT

1.   I have been retained by Alfonso Cioffi, Megan Rozman, Melanie Rozman, and Morgan Rozman (collectively, "Patent Owner") through its counsel to serve as an expert in covered business method ("CBM") review proceedings CBM2017-00009, CBM2017-00010, CBM2017-00011, CBM2017-00014, CBM2017-00015, and CBM2017-00016 (collectively, "Pending CBMs"), each of which have a pending petition filed by Google, Inc ("Petitioner").

2.   My assignment was to provide an explanation of the various patents challenged in the Pending CBMs and to provide my opinion whether the claimed subject matter of the patents individually as a whole solves a technical problem using a technical solution.

3.   I have not been asked to provide and have not provided any opinion regarding validity of any claim challenged by the Pending CBMs. I understand that, if the Pending CBMs are instituted, I may provide such an opinion at a later date, and therefore, I reserve the right to offer any opinion, and any supporting evidence, regarding validity of any and all claims challenged by the Pending CBMs.

II.   SUMMARY AND SCOPE OF OPINIONS

4.   I understand the following are the claims of U.S. Patent Nos. RE43,500 ("the '500 Patent"), RE43,528 ("the '528 Patent"), and RE43,529 ("the

'529 Patent") (collectively, the "Challenged Patents") challenged by the Pending

CBMs:

U.S. Patent No.	CBM Proceedings	Challenged Claims
The '500 Patent	CBM2017-00011 CBM2017-00014	Claims 21-24, 30-32, 39, 41-43, 66, and 70
The '528 Patent	CBM2017-00010 CBM2017-00015	Claims 1, 5, 8, 21-24, 30, 44, 64, and 67
The '529 Patent	CBM2017-00009 CBM2017-00016	Claims 21-23, 25, 26, 30, 36-38, 40-42, 45, and 49

5.   It is my opinion that the claimed subject matter of each claim of the

Challenged Patents as a whole solves a technical problem using a technical

solution.

6.   This declaration provides explanation why the claimed subject matter

of the Challenged Patents as a whole solves a technical problem using a technical

solution.

7.   This declaration, in addition to my education and experience in the

field, form the basis of my opinion. Citations to documents, exhibits, and

references in this declaration are exemplary, and I expect to rely on the entirety of

these documents and references cited, even if only certain excerpts are cited

explicitly in my declaration, since my opinions are based on these references, documents, and exhibits in their entirety. All of the information I am providing should be considered together; that is, information from the main body of this declaration may be relevant to my exhibits, information from one exhibit may be relevant to another exhibit, and information from my exhibits may be relevant to the declaration's main body included herein. I also base my opinions on my knowledge, experience, and training in the fields of technology related to these exhibits and products.

8.	Further, citation to one or more patents for support of an aspect or premise described herein may be exemplary and should not be construed as the only support in the one or more patents for the aspect or premise or that the aspect or premise is limited by the cited support.

9.	This summary of opinions is not intended to be limiting, as this declaration may contain additional or supplemental opinions or explanations.

## III.	EXPERT QUALIFICATIONS

10.	I am an Associate Professor of Computer Science at Purdue University in West Lafayette, Indiana. I have been working in the computer industry for more than thirty years. I received a B.S. in Mathematics and Physics from the University of Tennessee in Knoxville in 1968 with a concentration in Computer Science. In 1970, I received an M.S. degree in Computer Science

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.

fastcase
Smarter legal research.