

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

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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

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