UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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RICOH AMERICAS CORPORATION & XEROX CORPORATION,
Petitioner

v.

MPHJ TECHNOLOGY INVESTMENTS, LLC
Patent owner

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CASE NO. IPR2013-00302
Patent 7,986,426 B1

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Declaration of Glenn E. Weadock

in Support of Patent Owner Response

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I.   Background and Qualifications

A.   Scope of Work

1.   I have been asked by counsel for MPHJ Technology Investments, LLC ("MPHJ") to analyze U.S. Patent No. 7,986,426 (the "'426 patent"), issued to inventor Laurence C. Klein, and submit this Declaration in Support of Patent Owner's Response in this IPR.

2.   The opinions provided are my own and are based on my analysis and work in this case and the education, experience, and skills I have acquired and developed throughout my career. Appendix B contains my Curriculum Vitae.

3.   In reaching my conclusions and opinions, I have relied upon my experience and training, my testing, and my review of the documents produced in this proceeding, and I have considered the documents and materials described in Appendix A in the process of forming my opinions.

4.   For the time I expend on this case, my company is currently being compensated at a rate of $475.00/hour less Teklicon's broker fee. My compensation is not in any way dependent on the outcome of the dispute.

B.   Expertise

5.   Details of my professional qualifications and background are set out in my curriculum vitae (Appendix B).

6.   I received a B.S. "with distinction" in General Engineering from Stanford University in 1980. In connection with that degree, I took several classes in computer science.

7.   I am currently the President and sole employee of Independent Software, Inc. ("ISI"), based in Lakewood, Colorado. ISI is an information technology consulting firm active since 1982; I have worked full-time at ISI since 1988. ISI has provided a wide variety of services, including technical education, systems integration, network maintenance, Web site design, database design and programming, performance analysis, and multimedia services. ISI's clients have

included many of the country's largest corporations and government agencies. In recent years, my focus has been on teaching technical seminars through Global Knowledge, and providing consulting in patent cases.

8. I have several years' experience creating software. I wrote data acquisition and billing analysis software in the 1981-1985 time period; a royalty calculating and reporting program for an oil and gas company in 1984-1986; database software for a travel magazine and for a credit collection bureau (1987-89). In the 2003-2008 timeframe, I co-developed a Web-based program to provide investor education ("MarketCoach"), designing a browser-based user interface, including menus and windows, with HTML, Flash, and JavaScript. I have also designed and deployed several Web sites for my own companies as well as for clients of ISI.

9. My experience in designing and installing networks for office automation extends from 1981 to the present day. I have planned and managed such projects on minicomputers, Novell networks, Macintosh networks, and Microsoft Windows networks.

10. I have written several books dealing with Windows, networking, and Web environments, including Bulletproof Your PC Network (1995), Bulletproofing NetWare (1996), Intranet Publishing For Dummies (1997), Bulletproofing Windows 95 (1997), Bulletproofing Client/Server Systems (1997), Bulletproofing Windows 98 (1998), Windows 95 Registry For Dummies (1998), Windows 98 Registry For Dummies (1998), Small Business Networking For Dummies (1998), MCSE Windows 98 For Dummies (1999), Windows 2000 Registry For Dummies (2000), Look & Learn Dreamweaver 4 (2001), MCSE Windows 2000 Professional (2000), MCSE Windows 2000 Network Infrastructure For Dummies (2000), MCSE Windows XP Professional For Dummies (2001), and (as contributing author) Using Macromedia Studio MX 2004 (2003).

11. I have written and delivered a large number of technical seminars on Windows, starting with Windows 3.0 in 1990 (through Data-Tech Institute) up through today's Windows 8 (through Global Knowledge, the world's largest independent provider of Microsoft training). I have written 26 technical seminars

in the IT field since 1988, and I have taught over 300 intensive technical courses. Many of these courses have dealt specifically with configuring, tailoring, and optimizing the subject operating systems. I continue to teach both instructor-led and Internet-based classes on a contract basis. I have also co-authored Microsoft Official Curricula (MOC) classes offered by Microsoft to its customers. I have taught seminars on Web design for Lucent Technologies and Avaya Communications.

12.   I was involved as writer, editor, and/or presenter with a variety of networking- and Internet-related professional video courses developed and marketed by Technology Interchange Group, including *Windows on NetWare* (1994), *Enabling Networks for Internet Access* (1995), *Windows 95 Advanced* (1995), and *Troubleshooting & Fine-Tuning the Networked PC* (1995).

13.   I am not an attorney, but I have experience with the patent system, both as a consultant and expert witness in patent cases, and as an inventor. I hold two US patents.

14.   I have considered the '426 patent for the purposes of providing my expert opinion regarding the meaning of certain claim terms and the validity of certain claims of the patent in view of certain prior art. The '426 patent generally relates to a "Virtual Copier" system involving the management of physical and electronic documents across multiple devices and applications in a computer network. Because of my background, training, and experience, I am qualified as an expert in the technical areas relevant to the '426 patent.

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