

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

Inter Partes Review No.: not yet assigned
Inter Partes Review of: U.S. Patent No. 5,832,494
Petitioner: Facebook, Inc.; LinkedIn Corp.; Twitter Inc.
Inventors: Daniel Egger; Shawn Cannon; Ronald D. Sauers
Patent Title: METHOD AND APPARATUS FOR INDEXING,
SEARCHING AND DISPLAYING DATA
Patent Filing Date: May 17, 1996
Patent Issue Date: November 3, 1998
Patent Assignee: Software Rights Archive, LLC
Petition for Review Filed: July 29, 2013

DECLARATION OF ROGER THOMPSON, PH.D.

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I, Roger Thompson, Ph.D., hereby declare as follows:

I. INTRODUCTION AND QUALIFICATIONS

1. My name is Roger H. Thompson. I live with my wife in Hilliard, Ohio. We have two children.

2. In 1974, I earned my B.A. degree in Computer Science from the University of California at Berkeley.

3. From 1974-1977, I attended a biblical leadership training program – The Way Corps, offered by The Way International.

4. In 1979, I earned my M.S. in Computer Science from New Mexico State University in Las Cruces, New Mexico.

5. From September 1979 through August 1980, and September 1981 through December 1986, I attended University of Massachusetts Amherst working on my Ph.D. degree in Computer Science.

6. From September 1980 through August 1981 I worked at Headquarters of "The Way International" doing data processing.

7. From 1986 - December 1989 I worked for Hughes Aircraft in the Ground Systems Group in Fullerton, California.

8. In 1989, I earned by Ph.D. degree in Computer Science from the University of Massachusetts Amherst. My specialty area was information retrieval.

9. While in graduate school, I was a member of the special interest group of information retrieval and a member of the Association for Computing Machinery.

10. From 1990 to the present I have worked at OCLC, Online Computer Library Center, Inc., Office of Research in Dublin, Ohio. OCLC is a nonprofit, membership, computer library service and research organization dedicated to the public purposes of furthering access to the world's information and reducing information costs. My work focuses on knowledge organization. In this area, I work with OCLC's WorldCat database to discover relationships among various subject content descriptors such as classification numbers, controlled subject headings, and free text. Additionally, I explore the aggregation of bibliographic data into larger "works" using principles based on FRBR (Functional Requirements for Bibliographic Records).

11. My curriculum vitae is attached hereto, including publications on information retrieval.

12. I have been retained by Cooley LLP, counsel for Facebook, Inc. ("Petitioner") in connection with this matter.

13. I am being compensated at \$200 an hour. My compensation is not dependent upon the outcome of the Petition for *Inter Partes* Review that I understand Petitioners' attorneys are filing along with this Declaration. Nor is my

compensation dependent upon the outcome of any related litigation proceedings, the opinions I express, or my testimony.

14. Additional information may become available which would further support or modify the conclusions that I have reached to date. Accordingly, I reserve the right to modify and/or enlarge this opinion or the bases thereof upon consideration of any further discovery, testimony, or other evidence, including any issues raised by any expert or witness of the patentee, Software Rights Archive, LLC, or based upon interpretations of or conclusions about any claim term by the Patent Office different than those proposed in this declaration.

II. SCOPE OF ASSIGNMENT

15. I have been asked to provide factual information regarding my prior work, including my work on my 1989 Ph.D. thesis. I have also been asked to opine on the validity of U.S. Patent No. 5,544,352 (the “’352 Patent”) and U.S. Patent No. 5,832,494 (the “’494 Patent”) (the “Egger Patents”).

16. I have studied the ’352 Patent and the ’494 Patent (Ex. 1201), my observations follow.

17. The ’352 Patent was filed June 14, 1993. It makes no claims of priority. It was issued on August 6, 1996, listing assignee Libertech, Inc. It was issued with 52 claims. I understand the ’352 Patent went through *ex parte* reexamination and the Ex Parte Reexamination certificate issued on September 20,

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