

Filed on behalf of: Askeladden LLC

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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Askeladden LLC  
Petitioner

v.

Loyalty Conversion Systems Corporation  
Patent Owner

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Case \_\_\_\_\_  
U.S. Patent No. 8,540,152

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DECLARATION OF MATTHEW CALMAN

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I, Matthew Calman, of Charlotte, North Carolina, declare that:

**I. Introduction**

1. In view of my scientific and technical knowledge relating to financial services, I have been retained in this *Inter Partes* Review as an independent expert to provide my opinions on the subject matter recited in the claims of U.S. Patent No. 8,540,152 (“152 Patent”), particularly in view of the state of the field at the time of the filing of that patent and various publications (“references”) that predate the priority date.

**II. Professional Background**

2. I am currently Managing Director of Calman & Co. LLC, a consulting practice focused on innovation management and intellectual property for financial services. I am a member of the steering committee of the Federal Reserve Mobile Payments Industry Workgroup, which was formed by the Federal Reserve Banks of Boston and Atlanta to facilitate formations of an effective and secure mobile payments environment in the United States. I am also a board member of the Association of Managers of Innovation and its affiliated AMI Foundation.

**A. Education**

3. I attended Carnegie Mellon University from 1982-1985 for applied mathematics. In 1999, I obtained my Master of Business Administration from Georgia State University's Executive MBA program.

**B. Professional Career**

4. From 1985 until 1986, I was employed as a systems converter at Premier Systems. During this period, I worked on a variety of bank system conversion projects for a product called "BondMaster", which performed bondholder and corporate debt recordkeeping functions for banks in the Corporate Trust business. In that work, I was involved in both hardware and software installation, configuration and programming, data conversion, and training. Generally, these projects concerned bondholder account computer systems and software for a variety of banks, including Indiana National Bank, Commerce Union Bank and Bank of America. These client banks paid for timesharing services of BondMaster and had the ability to program and customize the BondMaster system to suit their business needs.

5. From 1986 until 1995, I was the Vice President of Corporate Trust Automation for Commerce Union Bank and its successors (Sovran Bank, C&S/Sovran Bank, and NationsBank). During this time, I managed computer operations for a datacenter with multiple Prime minicomputers running

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