UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SERVICENOW, INC.,

Petitioner,

v.

HEWLETT-PACKARD COMPANY,

Patent Owner.

Case No. IPR2015-00523

U.S. Patent No. 6,321,229

DECLARATION OF PAUL ONNEN REGARDING CLAIMS 8-10, 13, 15, AND 17-20 OF U.S. PATENT NO. 6,321,229

Exhibit 2003

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1. All challenged claims require that a given derived containers corresponds with "a category of information stored in said information repository." 34

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2. Jones and Fox do not disclose a derived container that corresponds with "a given category of information stored in said information repository." 36

B. Jones and Fox do not disclose that contents of derived containers be "information extracted from said information repository" as required by claims 9-10 and 19-20 41

1. Claims 9-10 and 19-20 require that contents of derived containers be "information extracted from said information repository." 42

2. Jones and Fox do not disclose contents of derived containers to be "information extracted from said information repository." 45

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A. The claim term "derived container" should be construed as "a data structure capable of executing a query based on an attribute from one or more corresponding container definition nodes" (all challenged claims). 59

B. None of the cited references alone or in combination discloses or suggests a "derived container" (all claims) 64

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I, Paul Onnen, declare as follows:

I. INTRODUCTION

1. I have been retained by Hewlett-Packard Company ("HP" or "Patent Owner") to provide expert opinions in the matter referenced herein. This declaration sets forth my opinions regarding the validity of claims 8-10, 13, 15, and 17-20 of U.S. Patent No. 6,321,229 ("'229 patent") (Ex. 1001).

II. QUALIFICATIONS

2. Education: In 1984, I received a Bachelor of Arts degree with honors in Mathematics and Physics, with a Concentration in Computer Science from St. Olaf College in Northfield, MN. In 1986, I received a Master of Science degree in Computer Science from the University of Wisconsin-Madison. My emphasis in my graduate work was in fault-tolerant distributed database systems.

3. Career history: Since 1986, I have held positions of increasing responsibility in software development and system architecture, starting as a Member of Technical Staff at AT&T Information Systems Laboratories, and culminating almost 20 years later as Executive Vice President/Chief Technology Officer for Expedia, Inc., where I was responsible for all technology at all Expedia companies, including Expedia.com, HotWire, Hotels.com, TripAdvisor, and eLong (the second largest online travel agency in China). I have also held Chief

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Technology Officer positions at Nordstrom.com, WebMD, and several smaller startups. More recently, I led the infrastructure engineering teams in EMEA (Europe, Middle East, and Asia) for Google as Director of Infrastructure Engineering. For the past six years since leaving Google I have been an independent technology consultant. In 2009 I co-founded, invested, and served as CTO and CISO at The Federal Tax Authority, a Certified Service Provider for sales tax calculation and remittance for e-commerce transaction. I have focused exclusively on Internet related technologies, including IT Operations, data centers, networking, and security for the past 15 years.

4. As an independent technology consultant for the past six years, I have assisted both large and small companies with technology strategy, and I have served as an Interim CTO on several occasions.

5. I have extensive experience with both unstructured and structured data stored both in file systems and databases, and with the creation of dynamic web pages to display that data.

6. For example, as EVP Technology for Expedia, I was responsible for all technology at all Expedia companies, and implemented a new platform for the Expedia point-of-sale system. The Expedia platform consists of entirely custom-built software, with the exception of a standard Microsoft SQL Server database.

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