

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ServiceNow, Inc.
Petitioner

v.

Hewlett-Packard Company
Patent Owner

U.S. Patent No. 7,925,981
Filing Date: May 14, 2003
Issue Date: April 12, 2011

TITLE: SYSTEMS AND METHODS FOR MANAGING WEB SERVICES
VIA A FRAMEWORK OF INTERFACES

DECLARATION OF TAL LAVIAN, PH.D.

Inter Partes Review No. 2015-__

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could and would testify to these facts under oath if called upon to do so.

2. I have been retained by counsel for ServiceNow, Inc. (Petitioner) in this case as an expert in the relevant art.

3. I have been asked to provide my opinions relating to claims 1, 22 and 23 (“Challenged Claims”) of U.S. Patent No. 7,925,981 to M. Homayoun Pourheidari et al. (“the ’981 patent”), which I understand is owned by Hewlett-Packard, Inc. (“Patent Owner” or “HP”).

I. BRIEF SUMMARY OF MY OPINIONS

4. Claims 1, 22 and 23 purport to disclose a system and computer program product for managing a web service. They do not describe anything that was new or non-obvious by the time the application for the ’981 patent was filed in May 2003. As explained in detail in **Part VI** of this Declaration, the features described in these claims were disclosed in product manuals for a prior art product called “BEA WebLogic Collaborate,” which were published almost two years before the filing date of the patent. Because each element of each challenged claim is disclosed or suggested by the prior art as described below, and

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