

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RPX Corporation,
Petitioner

v.

Applications In Internet Time LLC,
Patent Owner.

US Patent No. 7,356,482
Issue Date: April 8, 2008
Title: Integrated Change Management Unit

US Patent No. 8,484,111
Issue Date: July 9, 2013
Title: Integrated Change Management Unit

Inter Partes Patent Review Nos. 2015-01750, 2015-01751, 2015-01752

Declaration of H.V. Jagadish

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I. Introduction

1. I am a professor of Electrical Engineering and Computer Science at the University of Michigan. I have personal knowledge of the matters stated below, and, if called to testify, I could and would testify competently thereto.

2. I have been retained by the Patent Owner, Applications in Internet Time (“AIT”), LLC, in this matter. This Declaration sets forth my opinions and the bases for those opinions regarding the validity of the instituted claims of U.S. Patent No. 7,356,482 (the “’482 patent”) and U.S. Patent No. 8,484,111 (the “’111 patent”)¹.

II. Qualifications

3. All of my opinions stated in this declaration are based on my own personal knowledge and professional judgment. In forming my opinions, I have relied on my knowledge and experience in software development practices, and on the documents and information referenced in this report. I am competent to testify as to the matters set forth herein.

4. I am the Bernard A. Galler Collegiate Professor of Electrical Engineering and Computer Science at the University of Michigan. I am part of the database group and the software systems laboratory at the University. As a

¹ All references herein are to the ‘482 patent, unless otherwise noted. The ‘482 patent and the ‘111 patent share a specification.

professor, I teach courses related to database management, the web, and data structures and algorithms.

5. My research focuses on how to build database systems and query models so that they are truly usable and how to design analytics processes so that they can deliver real insights to non-technical decision makers. My research is focused on building computing and data systems that have the “right” end-to-end capability, in terms of meeting the users’ needs effectively, with minimum effort on their part.

6. Attached hereto as Appendix A is a true and correct copy of my Curriculum Vitae.

7. I obtained my Ph.D. from Stanford University in 1985, and worked many years for AT&T where I eventually headed the database department. I began my work at the University of Michigan in the fall of 1999, and also performed work at the University of Illinois.

8. I have published extensively, and am recognized as a leading researcher in the area of databases.

9. I am a Fellow of the ACM, and named inventor on 37 United States patents.

10. I am being compensated at the rate of \$660 per hour for my work as an expert in this case. I am giving my opinion with respect to two related patents, No. 7,356,482 and No. 8,484,111. My compensation is not dependent on the content of my opinions or the outcome of this case.

11. The references I reviewed in preparing this declaration were:

Exhibit	Description
1001	U.S. Patent No. 7,356,482 patent
1002	Crovella declaration
1004	U.S. Patent No. 6,249,291 ("Popp")
1005	Srdjan Kovacevic, <i>Flexible, Dynamic User Interfaces for Web-Delivered Training</i> , Proceedings of the Workshop on Advanced Visual Interfaces, 1996 ("Kovacevic")
1006	U.S. Patent No. 5,806,071 ("Balderrama")
1007	<i>Java Complete!</i> , Datamation, March 1, 1996, pp. 28-49 ("Java Complete")
1008	E. F. Codd, <i>Does your DBMS run by the rules?</i> , ComputerWorld, October 21, 1985, pp. 49-60 ("Codd")

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