UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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RPX Corporation,
Petitioner

v.

Applications In Internet Time LLC,
Patent Owner.

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

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Inter Partes Patent Review No. 2015-01750, 2015-01751; 2015-01752

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Declaration of James Flynn

U.S. Patent No. 7,356,482
Inter Partes Review
Patent Owner's Response

Case No. IPR2015-01750
IPR2015-01751
IPR2015-01752

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I.   Introduction

1.   I, James Flynn, am one of the authors for the article, "How JAVA Makes Network-Centric Computing REAL," which appeared in *Java Complete!*, Datamation, March 1, 1996, pp. 42-43 ("Java Complete").

2.   I graduated *magna cum laude* in 1983 from Manhattan College in New York with a Bachelor of Science degree. My major area of concentration was Computer Information Systems. In 1990, I received a Master of Business Administration from New York University Stern School of Business, located in New York.

3.   In 1996, I co-authored one of the first books on the Java programming language, "Visual J++ Java Programming." I have authored a number of patents, one of which has issued, and I have published articles in well-respected technology, trade and scholarly journals. I have been certified as a Certified Document Imaging Architect and a Microsoft Certified Professional.

4.   Since 2012, I have been the President and Founder of Overlook, LLC ("Overlook"), located in Northampton, MA. Overlook creates niche Internet TV channels that run on its proprietary software platform, all of which was designed by me. All of the application software code comprising the platform was either

developed by me personally, or by developers under my direct supervision. These TV channels are live on multiple platforms, including iOS and Windows.

5.   Prior to Overlook, I was the CEO of EZTakes, a vendor in the movie download space. Prior to co-founding EZTakes, I was the Chief Operating Officer at Pitney Bowes subsidiary that provided software and services for business-to-consumer electronic communications and Internet commerce.

6.   I have been retained by the Patent Owner ("PO"), Applications in Internet Time, 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

7.   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.

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

8.   Attached hereto as Appendix A is a true and correct copy of my

Curriculum Vitae.

9.   I am being compensated at the rate of $300 per hour for my work as

an expert in this case. My compensation is not dependent on the content of my

opinions or the outcome of this case.

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

Exhibit	Description
1001	U.S. Patent No. 8,484,111 patent (IPR20015-01750)
1001	U.S. Patent No. 7,356,482 patent (IPR2015-01751; IPR2015-01752)
1004	U.S. Patent No. 6,249,291 ("Popp")
1005	Srdjan Kovacevic, *Flexible, Dynamic User Interfaces for Web-Delivered Training,* Proceedings of the Workshop on Advanced Visual Interfaces, 1996 ("Kovacevic")
1006	U.S. Patent No. 5,806,071 ("Balderrama")
1007	*Java Complete!*, Datamation, March 1, 1996, pp. 28-49 ("Java Complete")
1008	E. F. Codd, *Does your DBMS run by the rules?*, ComputerWorld, October 21, 1985, pp. 49-60 ("Codd")
1009	U.S. Patent No. 5,710,900 ("Anand")

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