

IN THE UNITED STATES PATENT & TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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COMMAND WEB OFFSET COMPANY, INC.; WORZALLA PUBLISHING  
COMPANY; SANDY ALEXANDER, INC.; PUBLICATION PRINTERS CORP.;  
SPECIALTY PROMOTIONS, INC.;  
AND TREND OFFSET PRINTING SERVICES INC.,

Petitioners,

v.

CTP INNOVATIONS, LLC,

Patent Owner.

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Case IPR2016-\_\_\_\_\_ (U.S. Patent 6,611,349)

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DECLARATION OF MICHAEL JAHN

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Pursuant to 28 U.S.C. § 1746 and 37 C.F.R. § 1.68 I, Michael Jahn, the undersigned, hereby declare as follows:

(1.) My name is Michael Jahn. This declaration is submitted in support of the *inter partes* review of U.S. Patent No. 6,611,349 (“the ‘349 patent”) filed in the names of Command Web Offset Company, Inc.; Worzalla Publishing Company; Sandy Alexander, Inc.; Publication Printers Corp.; Specialty Promotions, Inc., d/b/a Specialty Print Communications; and Trend Offset Printing Services Inc. (collectively, “Petitioners”).

## **I. INTRODUCTION**

### **A. Qualifications**

(2.) My Professional career has spanned close to 30 years. During this time, I have continually gained extensive experience in design, consulting, purchasing, licensing, marketing and working with Independent Software Developers (“ISVs”), Original Equipment Manufacturers, (“OEMs”) and consumable vendors in the general fields of graphic arts, data processing, commercial printing and publishing of catalogs, books, magazines.

(3.) I currently work for Datatech SmartSoft, Inc. (“SmartSoft”). I have worked here since November 1, 2011. My title is Manager of Implementation and Support. I am responsible for PressWise installation, product training and developing custom solutions for clients, as well as product road mapping and

future development projects for the PressWise Print MIS production workflow system. PressWise provides a single browser-based print management system that automates the digital workflow and incorporates imposition. I have been working with digital workflows since June 1985, which I will discuss in greater detail below.

(4.) I started my career in 1985 as a prepress workflow specialist when I worked in Buffalo, NY for Digicon. Digicon offer prepress services for Advertising agencies and local companies like Fisher Price Toys. We prepared digital files of advertisements and sent them to magazine publishers digitally (we were “early adopters” of this digital process). A few magazines back then were experimenting with inserting advertisements digitally, and file formats like PostScript (introduced in 1982) were quite new. Few people understood how to create them reliably during this time, and exchanging them between two parties was quite difficult, as it was “platform dependent”—that is, if one party was using a Microsoft Windows PC, and another party was using a IBM AS400 (as was popular back then) it was nearly impossible to exchange PostScript files between the two parties. There would be encoding errors, and the files would become corrupt and unusable. Special attention and specialized software was required as well as a high level of skill to accomplish this “reliable exchange.” I spent a great

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