

IN THE UNITED STATES PATENT & TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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.

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

DECLARATION OF JODI L. GREGORY

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

(1.) My name is Jodi L. Gregory. I am over 21 years of age and otherwise competent to make this declaration. I am being compensated for my time in preparing this declaration at my standard hourly rate of \$125.00/hr. My compensation is in no way contingent on the results of these or any other proceeding relating to the outcome of the concurrently filed petition for *inter partes* review (“IPR”) against U.S. Patent No. 6,611,349 (“the ‘349 patent”), or any related litigation or administrative proceeding. All statements herein made of my own knowledge are true, and all statements herein made based on information and belief are believed to be true.

(2.) I am the founder and President of Access Information Services, Inc., which provides customized business research and analyses. I have been the owner there since 1988. My duties include research and analysis, and I conduct workshops on Internet research. I am regularly engaged by a wide variety of companies to conduct research regarding the availability of scientific literature. In the year 2014, Access Information Services Inc. merged with Seek Information Services, an intellectual property research firm.

(3.) From 1989 to 1994, I was also Manager of the Information & Analysis Center with UES Inc., a research, development, and technology creation

and transfer company. My work duties there included creating and managing a centralized information resource center, managing research on over 200 companies and their competitors, and acquiring online databases, end-user tools, collection development systems, and database management systems.

(4.) I have served on the Association of Independent Information Professionals' Board of Directors, and I have held the positions of President-Elect and President of the Association.

(5.) A true and correct copy of my Curriculum Vitae is attached hereto as Attachment A.

(6.) I have been asked to provide an opinion regarding the public accessibility of the references listed below:

- Volume 26, Number 11 of the Seybold Report on Publishing Systems ("Seybold," Ex. 1018 to the petition for IPR); and
- *I-Media: An Integrated Media Server and Media Database as a Basic Component of a Cross Media Publishing System*, published in *Computer & Graphics*, Vol. 21, No. 6 ("I-Media," Ex. 1019 to the petition for IPR).

(7.) For the reasons detailed below, based on my research in this matter, it is my opinion that Seybold was made publicly accessible (at the latest) by March, 1997, so that interested members of the public could have obtained the periodical with reasonable diligence if they so desired. I-Media was made publicly accessible

(at the latest) by February, 1998, so that interested members of the public could have obtained the article with reasonable diligence if they so desired.

Seybold

(8.) The Seybold Report on Publishing Systems was published by Seybold Publications (Media, PA) with 22 issues a year. Like most periodicals, The Seybold Report on Publishing Systems was a paid-for subscription. Ex. 1018 filed with the petition for IPR is a copy of Volume 26, Number 11 (ISSN: 0736-7260) to The Seybold Report on Publishing Systems, with an issue date of February 24, 1997.

(9.) I can confirm that Ex. 1018 was disseminated by Seybold Publications on or near the issue date of February 24, 1997. A catalogued and date-stamped copy of the periodical from March, 1997 from the library of the University of Central Missouri (formerly Central Missouri State University) is attached hereto as Attachment B. Attachment B is an excerpt of the copy of Volume 26, Number 11 of the Seybold Report on Publishing Systems maintained at the library of the University of Central Missouri.

(10.) The library of the University of Central Missouri indexed and catalogued Volume 26, Number 11 of the Seybold Report on Publishing Systems on March, 1997. The cataloguing process at the library of the University of Central Missouri is as follows: Periodicals are, and have always been, shelved

alphabetically by title. At the time the Seybold periodical was “checked-in” or noted as received by the library, the library stamped the cover with a date and its property stamp. (*See* first page of Attachment B). Thereafter, the periodical was placed in the periodical section and made available to the public. This cataloging process is followed for all such periodicals.

(11.) This library cataloging procedure comports with common library practice, which is that when an article, periodical, book, etc. was received, the librarian entered the work into their catalogue, date stamped it, and then the work was made available as part of the library’s collection. Therefore, the March, 1997 date stamp represents the time after which interested members of the public could have obtained the article by looking it up alphabetically. Central Missouri State University’s policy is to permit all members of the public to photocopy and obtain copies of journals in its collection.

I-Media

(12.) I-Media, Ex. 1019 filed with the petition for IPR, is a copy of the article published at pages 693-702 (of 689-859) of Computers & Graphics Volume 21, Issue 6, Graphics in Electronic Printing and Publishing edition (November-December 1997). The Computers & Graphics journal is published by Elsevier Ltd.

(13.) I can confirm that Ex. 1019 was disseminated as part of Computers & Graphics Volume 21, Issue 6 by February 10, 1998 (at the latest). A catalogued

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