

**UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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WTS Paradigm, LLC,

Petitioner

v.

EdgeAQ, LLC,

Patent Owner

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Case IPR: Unassigned

Patent 7,805,461

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**DECLARATION OF DEBORAH MCGUINNESS IN SUPPORT OF**  
**PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 7,805,461**

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I, Deborah McGuinness, do hereby declare as follows:

## **I. INTRODUCTION**

1. I have been retained as an expert witness on behalf of WTS Paradigm LLC (“Petitioner”) for the above-captioned Petition for Inter Partes Review (“IPR”) of U.S. Patent No. 7,805,461 (“the ’461 Patent”). I am being compensated for my time in connection with this IPR at my standard consulting rate of \$500 per hour and, when working while traveling, \$600. My compensation is not affected by the outcome of this matter.

2. I have been asked to provide my opinion on the validity of Claims 1–11 of the ’461 Patent (“the Challenged Claims”).

3. The ’461 Patent issued on September 28, 2010. I have been asked to assume that the priority date of the ’461 Patent is December 5, 2003.

4. In preparing this Declaration, I have reviewed the ’461 Patent; the related U.S. Patent No. 7,219,100 (“the ’100 patent”); the related U.S. Patent No. 6,810,401 (“the ’401 Patent”); the file histories of the ’461 Patent, the ’401 Patent, and the ’100 Patent; various prior art references; and my knowledge of the field of the invention at and before the patent’s priority date.

5. I understand that claims in a IPR are given their broadest reasonable interpretation in view of the patent specification and the understandings of one having ordinary skill in the relevant art.

6. In forming the opinions expressed in this Declaration, I relied upon my education and experience in the relevant field of the art, and I have considered the viewpoint of a person of ordinary skill in the relevant art, as of December 5, 2003.

## **II. BACKGROUND AND QUALIFICATIONS**

7. My academic training includes completing the requirements for a Bachelor of Science in Computer Science and a Bachelor of Arts in Mathematics from Duke University in 1980. I completed a Master of Science degree from the Electrical Engineering and Computer Science Department of the University of California at Berkeley in 1981. I also completed a Ph. D. in Computer Science from Rutgers University in 1996.

8. I began my professional career immediately after my Bachelor's degree and began work for AT&T Bell Laboratories in 1980. I was immediately accepted into the Bell Laboratories "One Year on Campus" program which supported me to be a full time Master's student at Berkeley. Upon completion of my M.S. in 1981, I returned to Bell Laboratories and began work at the Home of the Future at the Home Information Systems Laboratory. In 1984, I transferred to the Computing Environments and Artificial Intelligence Department in New Jersey. While there, I was accepted into the Bell Laboratories Ph.D. program, which supported me while I pursued a Ph.D. I simultaneously was accepted into

the Computer Science Ph.D. program at Rutgers. In 1985, I became the first employee in the Artificial Intelligence Research department of Bell Laboratories. It was during this time period that I first began to work on a type of artificial intelligence system, a type of frame-representation systems, called description logic-based systems. I would end up doing my dissertation in description logics and I spent approximately a decade involved with description logic-based systems and related artificial intelligence systems and configuration problems. In 1989 I and some Bell Labs colleagues began publishing our work on description logics and in the mid early 90s, we began publishing our work using frame-based systems for configuration problems.

9. Our configuration systems have been used by AT&T and Lucent to configure over 6 billion dollars worth of AT&T and Lucent products. I have been involved in a number of academic configuration activities including co-organizing two configuration workshops and acting as a guest editor for a special journal issue on configuration.

10. While at Bell Labs and AT&T, I focused on frame-based representation foundations, explanation environments for knowledge systems, and application environments, including configuration application environments, for frame-based systems.

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