

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

WTS Paradigm, LLC,

Petitioner

v.

EdgeAQ, LLC,

Patent Owner

Case IPR: Unassigned

Patent 7,805,461

DECLARATION OF LOUIS A. KLAPP IN SUPPORT OF
PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 7,805,461

I, Louis A. Klapp, do hereby declare as follows:

1. I am an attorney at Quarles & Brady LLP and counsel for Petitioner. I make this declaration based on personal knowledge.

2. Exhibit 1002 is a true and correct copy of the *curriculum vitae* of Deborah McGuinness as received from Deborah McGuinness.

3. Exhibit 1004 is a true and correct copy of U.S. Patent No. 7,805,461, the patent that is the subject of the present Petition.

4. Exhibit 1005 is a true and correct copy of U.S. Patent No. 6,397,221.

5. Exhibit 1006 is a true and correct copy of U.S. Patent No. 6,810,401.

6. Exhibit 1007 is a true and correct copy of Fikes & Kehler, *The Role of Frame Based Representation in Reasoning* (1985) from Communications of the ACM, Volume 28, Number 9, September 1985.

7. Exhibit 1008 is a true and correct copy of excerpts from Alison Cawsey, *The Essence of Artificial Intelligence* (1998), a book published by Prentice Hall.

8. Exhibit 1009 is a true and correct copy of U.S. Patent No. 6,108,670.

9. Exhibit 1010 is a true and correct copy of U.S. Patent No. 5,953,726.

10. Exhibit 1011 is a true and correct copy of U.S. Patent No. 5,467,471.

11. Exhibit 1012 is a true and correct copy of U.S. Patent No. 6,442,566.

12. Exhibit 1013 is a true and correct copy of Jon R. Wright et al., *A Knowledge-Based Configurator That Supports Sales, Engineering, and Manufacturing at AT&T Network Systems* (1993) from AI Magazine Volume 14 Number 3 as downloaded from the AAI website at <http://www.aaai.org/ojs/index.php/aimagazine/article/view/1055/973>.

13. All statements made herein are of my own knowledge and true, and all statements made on information and belief are believed to be true. I have been and am hereby warned that willful false statements and the like are punishable by fine or imprisonment, or both (18 U.S.C. § 1001) and may jeopardize the petition which this declaration supports. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 16, 2015

/Louis A. Klapp/
Louis A. Klapp