

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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**H&S MANUFACTURING COMPANY, INC.**

Petitioner,

v.

**OXBO INTERNATIONAL CORPORATION**

Patent Owner.

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Case IPR2016-00950  
Patent 8,166,739

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**DECLARATION OF BENJAMIN LEGATT**

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Oxbo International Corporation, Patent Owner  
Exhibit 2019  
H&S Manufacturing Company, Inc. v. Oxbo  
International Corporation  
IPR2016-00950

I, Benjamin Legatt, declare as follows:

1. I am Vice President of Consulting Services of Shepherd Data Services. I have worked at Shepherd Data Services since 2010.
2. Shepherd Data Services is an e-discovery vendor located in Minneapolis, Minnesota.
3. Merchant & Gould is a client of Shepherd Data Services. Merchant & Gould contracts with Shepherd Data Services for e-discovery services including use of Relativity database software. Relativity is a commonly-used software platform that permits companies and law firms to manage large volumes of electronic data for review, analysis and production in litigation.
4. I am a certified Relativity Instructor, and I have worked extensively with Relativity software for approximately six years. I regularly train and advise clients, including Merchant & Gould paralegals and attorneys, on how to best use Relativity and how to run advanced searches on keywords and metadata.
5. I have worked directly with the paralegal and attorney team at Merchant & Gould on the Relativity database in the matter of *Oxbo Int'l. Corp. v. H&S Manufacturing Co., Inc.*, Case No. 15-292-jdp (W.D. Wis.). I am familiar with that database, including how it was set up and the metadata fields contained therein.

6. One of the metadata fields is “Date Created.” The “Date Created” metadata field means the date on which the document was created.
7. I have reviewed H&S 152469-H&S 152495 (**Exhibit 2014**). This set of documents was produced by H&S in the District Court case. The metadata corresponding to the documents in this set show a “Date Created” of November 14, 2008.
8. I have reviewed H&S152672-H&S152727 (**Exhibit 2012**). The metadata corresponding to the documents in this set show a “Date Created” of March 10, 2009.
9. I have reviewed H&S 153873-H&S 153943 (**Exhibit 2013**). The metadata corresponding to the documents in this set show a “Date Created” of October 12, 2010.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true to the best of my knowledge.

February 28, 2017

  
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Benjamin Legatt