

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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Broadsign International, LLC,

Petitioner

v.

T-Rex Property AB,

Patent Owner

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U.S. Patent Number 7,382,334

Issue Date: June 3, 2008

Title: DIGITAL INFORMATION SYSTEM

Case Number: IPR2017-00006

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**DECLARATION OF JAIME G. CARBONELL, PH.D.**

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IPR2017-00006 – Ex. 1009

Broadsign International, LLC, Petitioner

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I, Jaime G. Carbonell, Ph.D., hereby declare and state as follows:

## **I. Introduction and Qualifications**

### **A. Summary of My Opinions**

(1) U.S. Pat. No. 7,382,334 (hereinafter, the “’334 Patent”) purports to describe a system for selectively displaying digital information at one or more of a plurality of locations. The ’334 Patent contains Claims 1–42 (hereinafter, the Challenged Claims), each of which I address below. As I explain further, the Challenged Claims do not recite any feature that would have been regarded as novel or nonobvious to a person of ordinary skill in the art.

(2) Around April of 1996, the alleged foreign priority date of the ’334 Patent, display information systems described by the ’334 Patent were well-known. One particular reference, Japanese Patent Application Heisei 07-168544 to Nakamura (hereinafter “Nakamura”) was filed on December 15, 1993 and published on July 4, 1995, well before the ’334 Patent. Nakamura discloses a display control system that allows registered users (e.g. advertisers) to input display information to selectively show an advertisement on one or more displays, also located remotely. Nakamura discloses or suggests all of the supposedly inventive features of the ’334 Patent. As I will explain below, all of the Challenged Claims would have been anticipated or obvious based on the prior art.

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