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

FORD MOTOR COMPANY Petitioner,

v.

VERSATA DEVELOPMENT GROUP, INC. Patent Owner.

\_\_\_\_\_

U.S. Patent No. 7,882,057

Case No.: IPR2017-00150

\_\_\_\_

DECLARATION OF DR. PHILIP GREENSPUN IN SUPPORT OF *INTER PARTES* REVIEW UNDER 35 U.S.C. § 311 *ET SEQ*. AND 37 C.F.R. § 42.100 *ET SEQ*. (CLAIMS 17, 30, AND 44-46 OF U.S. PATENT NO. 7,882,057)



Attorney Docket No.: FPGP0129IPR4

### **TABLE OF CONTENTS**

List c	of Exh	ibits			3		
I.	Qualifications and Professional Experience						
II.	Relevant Legal Standards						
III.	Leve	of O	rdinar	y Skill in the Art	14		
IV.	The	'057 P	atent		15		
V.	The	'057 P	atent I	Prosecution History	25		
VI.	Challenged Claims of the '057 Patent Viewed in their Broadest Reasonable Interpretation						
VII.	Scop	e and	Conte	nt of the Prior Art (Summary)	26		
VIII.	Prior	Art: I	_ooma	ns, U.S. Patent 7,873,503	41		
IX.	Prior Art: "A Customization Approach for Structure Products in Electronic Shops" ("Stahl")						
X.	Grounds for Challenge						
	A. Ground 1 – Claims 17, 30, 44 And 45-46 Obvious Based On Loomans In View Of Stahl And The General Knowledge Of A Person Having Ordinary Skill In The Art						
		1.		lysis of Claims 17, 30, and 44			
			a.	Claim 17			
			b.	Reasons to Combine Loomans with Stahl	94		
			c.	Claim 30	98		
			d.	Claim 44	113		
		2.	Ana	lysis of Claims 45 and 46	119		
			a.	Claim 45	119		
			b.	Claim 46	165		
XI.	Conc	clusion	1		169		



Case No.: IPR2017-00150 Attorney Docket No.: FPGP0129IPR4

## **List of Exhibits**

Exhibit			
No.	Description	Date	Identifier
1301	U.S. Patent No. 7,882,057	Feb. 1, 2011	'057 Patent
1302	Expert Declaration of Dr. Philip	n/a	Greenspun
	Greenspun		Decl.
1303	Curriculum Vitae of Dr. Philip	n/a	Greenspun CV
	Greenspun		
1304	U.S. Patent No. 7,882,057 File History	n/a	'057 Patent File
			History
1305	U.S. Patent No. 7,873,503 to Loomans	Jan. 18, 2011	Loomans
	et al.		
1306	A. Stahl, R. Bergmann, S. Schmitt, A	Jun. 2000	Stahl
	Customization Approach for		
	Structured Products in Electronic		
	Shops, Electronic Commerce: The		
	End of the Beginning, 13th		
	International Bled Electronic		
	Commerce Conference (June 19-21,		
	2000)		
1307	Alexander Kott, Gerald Agin, David	1992	Kott
	Fawcett, Configuration Tree Solver: A		
	Technology for Automated Design		
	and Configuration, ASME Journal of		
	<i>Mechanical Design</i> 114(1): 187-195		
1200	(1992)	2002	A 1
1308	L. Anselma, D. Magro, and P.	2003	Anselma
	Torasso, <u>Automatically Decomposing</u>		
	Configuration Problems, AI*IA 2003:		
	Advances in Artificial Intelligence,		
	Lecture Notes in Computer Science,		
	Volume 2829, pp. 39-52 (2003)		



Case No.: IPR2017-00150 Attorney Docket No.: FPGP0129IPR4

Exhibit			
No.	Description	Date	Identifier
1309	D. Magro and P. Torasso,	2002	Magro
	Decomposing and Distributing		
	Configuration Problems, Artificial		
	Intelligence: Methodology, Systems,		
	and Applications, Lecture Notes in		
	Computer Science, Volume 2443, pp.		
	81-90 (2002)		
1310	Judith Bachant, John McDermott, R1	1984	Bachant
	Revisited: Four Years in the Trenches,		
	AI Magazine Volume 5, Number 3		
	(1984)		
1311	John McDermott, R1: A Rule-Based	1982	McDermott
	Configurer of Computer Systems,		
	Artificial Intelligence (1982)		
1312	Bryan M. Kramer, <u>Knowledge-Based</u>	1991	Kramer
	Configuration of Computer Systems		
	Using Hierarchial Partial Choice,		
1010	IEEE (1991)	1000	X7
1313	Bei Yu and Hans Jorgen Skovgaard, A	1998	Yu
	Configuration Tool to Increase		
	Product Competitiveness, IEEE		
	Intelligent Systems, 34-41		
1314	(July/August 1998) U.S. Patent Application Publication	Oct. 2, 2003	Rising
1314	No. 2003/0187950 to Rising	Oct. 2, 2003	Kising
1315	Martin R. Wagner, <u>Understanding the</u>	1990	ICAD
1313	ICAD System, ICAD, Inc., 1990	1770	ICIAD
1316	Oracle Configurator Developer, User's		
1510	Guide, Release 11 <i>i</i> for Windows	April 2002	Oracle
	95/98/2000 and Windows NT 4.0	- 1p - 1 - 2 - 0 - 2	
1317	Stefan Schulz, CBR-Works A State-		
	of-the-Art Shell for Case-Based	1000	CBR Works
	Application Building, TECINNO	1999	Paper
	GmbH, 1999		



Patent No. 7,882,057

Case No.: IPR2017-00150 Attorney Docket No.: FPGP0129IPR4

Exhibit			
No.	Description	Date	Identifier
1318 Richard M. Stallman and Gerald Jay			
	Sussman, Forward Reasoning and		
	Dependency-Directed Backtracking In		
	a System for Computer-Aided Circuit	Sept. 1976	Stallman
	Analysis, MIT Artificial Intelligence	_	
	Laboratory, Memo No. 380, Sept.		
	1976		
1319	Bergmann Declaration	Oct. 14,	
		2016	
1320	Schmitt Declaration	Oct. 3, 2016	
1321	Winston Textbook	1992	
1322	Ford v. Versata, Versata Answer &	10/28/15	
	Counterclaims (Dkt. #59)	10/28/13	
1323	Versata v. Ford, Versata Complaint	5/7/15	
	(Dkt. #1)	3///13	
1324	Ford v. Versata, Opinion and Order	10/14/15	
	Denying Motion to Dismiss (Dkt. #55)	10/14/13	
1325	Versata v. Ford, Order to File Notice	11/5/15	
	of Good Cause (Dkt. #68)	11/3/13	
1326	Versata v. Ford, Versata Notice	11/30/15	
	Regarding Dismissal (Dkt. #69)	11/30/13	
1327	Versata v. Ford, Order of Dismissal	12/3/15	
	(Dkt. #70)	14/3/13	
1328	Ford v. Versata, Amended Complaint	3/16/15	
	(Dkt. #6)	3/10/13	



# DOCKET

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

# **Real-Time Litigation Alerts**



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

#### **Advanced Docket Research**



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## **Analytics At Your Fingertips**



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

#### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

#### **LAW FIRMS**

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

#### **FINANCIAL INSTITUTIONS**

Litigation and bankruptcy checks for companies and debtors.

#### **E-DISCOVERY AND LEGAL VENDORS**

Sync your system to PACER to automate legal marketing.

