

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CiM Maintenance Inc.
Petitioner

v.

P&RO Solutions Group, Inc.
Patent Owner

Inter Partes Review IPR2017-00516
Patent 8,209,205

DECLARATION OF SCOTT BENNETT, Ph.D.
15 August 2017

TABLE OF CONTENTS

	Page
I. INTRODUCTION.....	1
II. BACKGROUND AND QUALIFICATIONS.....	1
III. PRELIMINARIES.....	3
IV. OPINIONS REGARDING INDIVIDUAL DOCUMENTS.....	8
V. ATTACHMENTS	13
VI. CONCLUSION	14

I, Scott Bennett, hereby declare under penalty of perjury:

I. INTRODUCTION

1. I have personal knowledge of the facts and opinions set forth in this declaration, I believe them to be true, and if called upon to do so, I would testify competently to them. I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both.

2. I am a retired academic librarian working as a Managing Partner of the firm Prior Art Documentation LLC at 711 South Race Street, Urbana, IL, 61801-4132. Attached as Appendix A is a true and correct copy of my Curriculum Vitae describing my background and experience. Further information about my firm, Prior Art Documentation Services LLC, is available at www.priorartdocumentation.com.

3. I have been retained by Erise IP, PA to authenticate and establish the dates of public accessibility of certain documents in an *inter partes* review proceedings for U.S. Patent No. 8,209,205. For this service, I am being paid my usual hourly fee of \$91/hour. My compensation in no way depends on the substance of my testimony or the outcome of this proceeding.

II. BACKGROUND AND QUALIFICATIONS

4. I was previously employed as follows:

- University Librarian, Yale University, New Haven, CT, 1994-2001;

- Director, The Milton S. Eisenhower Library, The Johns Hopkins University, Baltimore, MD, 1989-1994;
- Assistant University Librarian for Collection Management, Northwestern University, Evanston, IL, 1981-1989;
- Instructor, Assistant, and Associate Professor of Library Administration, University of Illinois at Urbana-Champaign, Urbana, IL, 1974-1981; and
- Assistant Professor of English, University of Illinois at Urbana-Champaign, 1967-1974.

5. Over the course of my work as a librarian, professor of English, researcher, and author of nearly fifty scholarly papers and other publications, I have had extensive experience with catalog records and online library management systems built around Machine-Readable Cataloging (MARC) standards. I also have substantial experience in authenticating printed documents and establishing the date when they were accessible to researchers.

6. In the course of more than fifty years of academic life, I have myself been an active researcher. I have collaborated with many individual researchers and, as a librarian, worked in the services of thousands of researchers at four prominent research universities. Over the years, I have read some of the voluminous professional literature on the information seeking behaviors of

academic researchers. And as an educator, I have a broad knowledge of the ways in which students in a variety of disciplines learn to master the bibliographic resources used in their disciplines. In all of these ways, I have a general knowledge of how researchers work.

III. PRELIMINARIES

7. *Scope of this declaration.* I am not a lawyer and I am not rendering an opinion on the legal question of whether any particular document is, or is not, a “printed publication” under the law.

8. I am, however, rendering my expert opinion on the authenticity of the documents referenced herein and on when and how each of these documents was disseminated or otherwise made available to the extent that persons interested and ordinarily skilled in the subject matter or art, exercising reasonable diligence, could have located the documents before 22 May 2002.

9. I am informed by counsel that an item is considered authentic if there is sufficient evidence to support a finding that the item is what it is claims to be. I am also informed that authenticity can be established based on the contents of the documents themselves, such as the appearance, contents, substance, internal patterns, or other distinctive characteristics of the item, taken together with all of the circumstances. I am further informed that an item is considered authentic if it

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.