EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

P&RO SOLUTIONS GROUP, INC.,	§	
	§	
Plaintiff,	§	**Civ. Action No. 6:16-cv-00095-RWS**
	§	**Jury Trial Demanded**
v.	§	
	§	
CiM Maintenance Inc.,	§	
	§	
Defendant.	§	

Declaration of Alan T. Sherman, Ph. D.
Submitted in Support of P&RO Solution Group, Inc.'s Claim Construction Brief

Date: November 30, 2016

Alan T. Sherman

Alan T. Sherman, Ph. D.

I, Alan T. Sherman, Ph. D., declare as follows:

I.   Introduction

1.   I have been retained by Blank Rome LLP, counsel for P&RO Solutions Group, Inc. to provide an expert opinion related to the following term: "dragging and dropping the work orders," as summarized in Table 1 below. I am compensated for my time at my usual consulting rate, which is $500 per hour. This compensation is not dependent on the opinions I reach nor the outcome of this case or any other event.

TABLE 1

Claim Term (in claim)	Construction	Relevant Asserted Claims
"dragging and dropping the work orders"	moving a graphical representation of work orders, resulting in a recalculation of relationally linked data	Claim 1 of U.S. Patent No. 8,209,205

2.   I have reviewed the Asserted Patent, U.S. Patent No. 8,209,205 ("the '205 Patent"), its prosecution history, and sections of *Maintenance Planning and Scheduling Handbook*, by Doc Palmer (ISBN 0-07-048264-0). In reaching my conclusions for the foregoing issues in this case, I have relied on these documents and references cited in this Declaration. My opinions may rely on excerpts from the documents that are not specifically identified in this Declaration.

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III.   Summary

3.   My opinion with respect to "dragging and dropping" in the '205 Patent may be summarized as follows: based on my review of the intrinsic evidence, the claim term, "dragging and dropping the work orders," should be construed to mean "moving a graphical representation of work orders, resulting in a recalculation of relationally linked data."

III.   Qualifications

A.   Education

4.   I received my PhD in Computer Science from the Massachusetts Institute of Technology, specializing in cryptology. My dissertation was entitled "Cryptology and VLSI (a two-part dissertation): I. Detecting and exploiting algebraic weaknesses in cryptosystems II. Algorithms for placing modules on a custom VLSI chip." My mentor was Ronald Rivest, an inventor of the RSA public-key cryptosystem.

B.   Career Synopsis

5.   My current employment is as a tenured Professor of Computer Science at the University of Maryland, Baltimore County (UMBC). In that capacity I conduct research, teach BS, MS, and PhD level courses in computer science, mentor graduate students doing research, and direct PhD dissertations in computer science. I also direct the UMBC Center for Information Security and Assurance (CISA), whose activities have resulted in UMBC being designated as a National Center of Academic Excellence in Information Assurance/Cybersecurity Education and Research (CAE, CAE-R) by the National Security Agency (NSA) and the Department of Homeland Security (DHS). Courses I have taught include cryptography, information assurance,

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cybersecurity research, algorithms, and discrete math. My research focuses on high-integrity voting systems, cryptology, information assurance, discrete algorithms, and cybersecurity.

6.   Concurrently with my PhD at MIT in 1987, I served as an Instructor of Computer Science at Tufts University. I was promoted to the position of Assistant Professor in September of 1986. At Tufts, I taught classes including cryptography, algorithms, and computer programming.

7.   I joined the University of Maryland, Baltimore County in 1989 as an Assistant Professor of Computer Science. In 1995, I was promoted to Associate Professor with tenure, and again promoted to full professor in July 2014, in the Department of Computer Science and Electrical Engineering.

8.   In addition to my academic career, I have extensive experience in legal consulting as well as contracting with both public and private entities in the development of computer and network technologies and their security protocols. My legal consulting career spans over ten years, and I have been called upon as an expert witness in patent litigation matters for such entities as Apple, Inc., Sony Corp., IBM, McAfee, Wowza, Microsoft, and RSA. In that capacity, I have not only provided expert opinions but also served as a cryptologic expert on invalidity, non-infringement, and damages involving cryptographic patents.

9.   My cryptologic consulting work experience has spanned over twenty-five years, involving the development of network security, cryptology, and authentication protocols. For example, in that capacity, I have analyzed software security and conducted cryptologic research at NAI Labs under contracts from the Defense Advanced Project Agency (DARPA) and other government agencies, including designing new fast authentication systems. Furthermore, I have conducted evaluations of security protocols in software products at Phoenix Technologies and

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