UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BROADSIGN INTERNATIONAL, LLC
Petitioners

v.

T-REX PROPERTY AB,
Patent Owner

U.S. Patent No. RE39,470

Inter Partes Review Case No. 2016-01869

DECLARATION OF ZAYDOON JAWADI
IN SUPPORT OF PATENT OWNER'S PRELIMINARY RESPONSE
PURSUANT TO 37 C.F.R. § 42.107(a)

Barco, Inc. v. T-Rex Property AB
IPR2017-01909
EXHIBIT
TREX-2001

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A. "dynamically updating," "permitting said exposure list to be dynamically updated," and "means for . . . dynamically updating an exposure list" 8

VII. GROUND 1 – ALLEGED OBVIOUS OVER NAKAMURA AND LOBAN 13

A. Nakamura and Loban do not disclose "dynamically updating an exposure list," "permitting said exposure list to be dynamically updated," or "means for . . . dynamically updating an exposure list." 13

B. Nakamura and Loban do not disclose "interrupting said display of material by said select projectors when said display is hidden, obstructed, or otherwise visibly unavailable in said public place." 19

VIII. GROUND 2 - ALLEGED OBVIOUSNESS OVER NAKAMURA, LOBAN, AND REILLY 20

A. The Nakamura-Loban-Reilly combination in Petitioners' theory for claims 7, 9, 19, and 21 does not practice "dynamically updating an exposure list" 20

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IX. GROUND 3 - ALLEGED ANTICIPATION OF NAKAMURA 21

X. CONCLUSION..... 22

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I, Zaydoon Jawadi, hereby declare as follows:

I. INTRODUCTION

1. I have been retained by T-Rex Property AB, in this action. My credentials are described in my CV, which is Exhibit 2002. I offer this report on the technology at issue in U.S. Patent No. RE39,470 in response to the Petition for *Inter Partes* Review, Case No. 2016-01869, filed by Petitioner BroadSign International, LLC.

2. I have been asked by T-Rex's counsel to offer technical opinions relating to U.S. Patent No. RE39,470 and the alleged prior art and arguments presented by the Petitioners and their expert. I am being compensated for my work. My compensation is not related to the outcome of this case.

II. SUMMARY OF CONCLUSIONS

3. As a result of performing the analysis described herein, and applying the standards outlined below in Section IV, I have determined that, in my opinion, none of Petitioners' proposed Grounds 1-3 provide a basis for concluding that any of the claims of the '470 Patent should be found invalid. My opinion is supported by the evidence in the patent specification, figures and claims, as well as the disclosures of the alleged prior art and the other documents cited below.

III. BACKGROUND AND QUALIFICATIONS

4. As shown in my CV (Exhibit 2002), I have a Bachelor of Science in Electrical Engineering from Mosul University, a Master of Science in Computer

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Science from Columbia University, and over 35 years of experience in software development, engineering, consulting, and management in the fields of computing systems, Internet, web technologies, data storage, data networking, software applications, telephony, and telecommunication.

5. In 2010, I cofounded and am the President of Rate Speeches, Inc., an Internet company providing online communication rating and evaluation services.

6. From 2001 to 2006, I was President and cofounder of CoAssure, Inc., a provider of automated web-based telecommunication test services.

7. From 1999 to 2001, I was CEO, Chairman, and founder of Can Do, Inc. an Internet eCommerce and community company.

8. From 1992 to 1996, I was President and founder of Zadian Technologies, Inc., a supplier of data storage test systems, with over 50,000 units installed worldwide.

9. In 1996, Zadian Technologies was acquired by Xyratex International LTD (NASDAQ: XRTX, which was acquired by Seagate, NASDAQ: STX, in 2014). Following Zadian's acquisition by Xyratex, I became a general manager at Xyratex until 1998. At Xyratex, I was responsible for a data networking analysis tools business unit, which designed and built Gigabit Ethernet network protocol analysis and monitoring products, which were sold, under OEM agreement, by the largest network protocol analysis and monitoring products supplier.

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