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

T-REX PROPERTY AB,
 	
             Plaintiff,
 	
      v.
 	
REGAL ENTERTAINMENT GROUP
	Civil Action No.: 6:16-cv-00927-RWS
	
	CONSOLIDATED LEAD CASE

CLEAR CHANNEL OUTDOOR HOLDINGS, INC., CLEAR TV MEDIA USA, INC. AND MONSTER VISION, LLC D/B/A MONSTER MEDIA	6:16-cv-00974-RWS-KNM
AMC ENTERTAINMENT HOLDINGS, INC. Defendants.	6:16-cv-01029-RWS-KNM

DECLARATION OF ZAYDOON JAWADI
REGARDING CLAIM CONSTRUCTION

I, Zaydoon Jawadi, hereby declare as follows:

1.   My name is Zaydoon Jawadi. I submit this declaration in support of Plaintiff T-Rex Property AB ("T-Rex"). I have been asked to offer technical opinions relating to the claim construction of certain terms of U.S. Patent Nos. RE39,470; 7,382,334; and 6,430,603 ("the '470 Patent," "the '334 Patent," and "the '603 Patent," collectively "the patents-in-suit").

2.   I have a Bachelor of Science in Electrical Engineering from Mosul University, a Master of Science in Computer 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.

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

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

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

6.   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.

7.   In 1996, Zadian Technologies was acquired by Xyratex International LTD (NASDAQ: XRTX, which was acquired in 2014 by Seagate, NASDAQ: STX). 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

2

Gigabit Ethernet network protocol analysis and monitoring products, which were sold, under OEM agreement, by the largest network protocol analysis and monitoring products supplier.

8.   Prior to 1992, I worked as a software consultant, a software engineer, and an electrical engineer.

9.   My experience specifically relevant to the digital signage includes being general manager of a data networking analysis tools business unit at Xyratex, 1997-1998, being general manager of a manufacturing test systems division at Xyratex, 1996-1997, and being president of a manufacturing test systems supplier, Zadian Technologies, 1992-1996. The Xyratex and Zadian manufacturing test systems comprised multiple individual test units (each with an independent LCD display operated by an embedded system) connected through a network to a central control system; the central control system has the ability to control the displays of the individual test units. My experience (1984-1992) also included designing and implementing networked individual devices (each with an independent display operated by embedded system or PC) connected through a network to central control systems that control the display of the individual devices, and included designing and implementing database, applications, and system software as well as drivers and other software for controlling graphics and monitor displays. In addition to my technical work, my background includes being involved with direct marketing and advertising at Zadian Technologies (1992-1996), at Xyratex (1996-1998), at Can Do (1999-2001), at CoAssure (2001-2006), and at Rate Speeches (2010-present).

10.   I have attached a true and correct copy of my curriculum vitae as Exhibit A, which further sets forth my qualifications.

11.   I have no financial interest in either party or in the outcome of this proceeding. I am being paid for my work as an expert in these matters on an hourly basis. My compensation is

3

not dependent on the outcome of these proceedings or the content of my opinions. My opinions, as explained below, are based on my education, experience, and background in the fields discussed above, and my review of the patents-in-suit and their file histories, the materials cited by the parties in the Joint Claim Construction chart, petitioners' and patent-owners' submissions in the terminated and currently pending IPRs and CBM of the patents-in-suit (IPR 2016-01869, IPR 2017-00006, CBM 2017-00008, IPR 2017-01909, IPR 2017-01911, and IPR 2017-01915), and the other materials discussed herein.

12.   I understand that the purpose of claim construction is to determine the meaning and scope of the limitations of the claims, so that they may be properly understood and applied in considering issues such as infringement or validity.

13.   I understand that the claims themselves define the scope of the patented invention. I understand that, unless there is a clear disclaimer of claim scope, terms in the claims of a patent will generally be given their ordinary and customary meaning, as understood by one of ordinary skill in the art at the time of the invention in light of the intrinsic record. I also understand that the claims themselves can provide substantial guidance for the meaning of particular claim terms.

14.   I understand that it is generally improper to read limitations of the preferred embodiments from the specification into the terms of the claims. However, I also understand that the claims must be read in view of the specification, of which they are a part.

15.   I understand that the claims are generally interpreted so that they cover what was actually invented and what the inventor intended them to cover, and, in particular, that the claims will generally not be construed as excluding the preferred embodiments described in the specification.

16.   I understand that the specification is always highly relevant to the claim construction analysis, particularly where it: (i) contains an explicit disclaimer of subject matter as being outside the scope of the invention, (ii) distinguishes prior art or cites particular advantages of the invention over the prior art, (iii) defines the terms contained in the claims, and/or (iv) repeatedly and consistently characterizes "the invention" as having a certain limitation.

17.   I understand that the prosecution history is often considered less helpful evidence than the specification. I understand that this is because the prosecution history lacks the clarity provided in the specification as the prosecution history represents an ongoing negotiation between the applicant and the Patent Office. However, I understand that statements made in the prosecution history can control the construction of the claim language if they constitute a clear and unambiguous disclaimer of claim scope. I understand that, for the purposes of claim construction, the reexamination history of a patent can be consulted in the same manner as the original prosecution history.

18.   I understand that evidence extrinsic to the patent may be consulted in performing claim construction, including dictionaries or treatises, the prior art, and the testimony of experts. I understand that dictionaries may help in understanding the underlying technology, the manner in which one skilled in the art might use claim terms, and whether there is an established ordinary meaning of a claim term.

19.   I understand that expert testimony can be useful in connection with claim construction particularly to provide the background of the technology at issue, to explain how an invention works, and to explain that a particular term in the patent or the prior art has a particular meaning in the pertinent field.

5

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