IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

RPX Corporation

§ Petition for Inter Partes Review
§ of U.S. Patent No. 7,822,816

v.
§ Issued: October 26, 2010

Macrosolve, Inc.
§ Title: "System and Method for Data
§ Management"

Declaration of Dr. A.L. Narasimha Reddy

<u>Under 37 C.F.R. § 1.68</u>

- I, Dr. A.L. Narasimha Reddy, do hereby declare:
- 1. I am making this declaration at the request of RPX Corporation, in the matter of the Inter Partes Review of U.S. Patent No. 7,822,816 ("the '816 Patent") to Payne.
- **2.** I am being compensated for my work in this matter. My compensation in no way depends upon the outcome of this proceeding.
 - **3.** In the preparation of this declaration, I have studied:
 - a) the '816 Patent, RPX-1001;
 - b) the prosecution history of the '816 Patent, RPX-1002;
 - c) the file history to date of the pending *ex parte* reexamination of the '816 Patent, RPX-1003;
 - d) Dodgen, U.S. Patent No. 6,453,329, RPX-1011;
 - e) Debra Sancho & Ivan Phillips, THE OFFICIAL PENDRAGON



FORMS FOR PALMOS STARTER KIT (2000) ("Sancho"), RPX-1012;

- f) Richards, U.S. Pub. No. 2002/0147850, RPX-1014;
- g) Porter, U.S. Patent No. 6,163,811, RPX-1015;
- h) Desai, U.S. Patent No. 6,618,746, RPX-1016; and
- i) Jeter, WO 00/57976, RPX-1017.
- **4.** In forming the opinions expressed below, I have considered:
 - a) the documents listed above,
 - b) the additional documents and references cited in the analysis below,
 - c) the relevant legal standards, including the standard for obviousness provided in *KSR International Co. v. Teleflex, Inc.*, 550 U.S. 398 (2007) and any additional authoritative documents as cited in the body of this declaration, and
 - d) my knowledge and experience based upon my work in this area as described below.

Qualifications and Professional Experience

- **5.** My qualifications are set forth in my curriculum vitae, a copy of which is submitted as exhibit RPX-1005.
- **6.** I am currently the J.W. Runyon Professor of Electrical and Computer Engineering at Texas A&M University in College Station, Texas. I have over 20



years of experience in a wide variety of technologies and industries relating to data communications, storage systems, distributed systems, including development of tools for retrieving data from web servers and development of metasearch engines and research into mobile operating systems.

- 7. I received a Bachelor's of Technology degree in Electronics and Electrical Communications Engineering from the Indian Institute of Technology, in Kharagpur, India, in August 1985. I also received a Masters of Science and a Ph.D. degree in Computer Engineering from the University of Illinois at Urbana-Champaign in May 1987 and August 1990, respectively.
- 8. I am currently the J. W. Runyon Professor in the Department of Electrical and Computer Engineering at Texas A & M University. My research interests are in Computer Networks, Storage Systems, Multimedia systems, and Computer Architecture. During 1990-1995, I was a Research Staff Member at the IBM Almaden Research Center in San Jose, California, where I worked on projects related to disk arrays, multiprocessor communication, hierarchical storage systems and video servers.
- 9. I am listed as an inventor on five patents, and was awarded a technical accomplishment award while at IBM. I received an NSF Career Award in 1996. I was a faculty fellow of the College of Engineering at Texas A&M during 1999-2000. My honors include an outstanding professor award by the IEEE student



branch at Texas A&M during 1997-1998, an outstanding faculty award by the department of Electrical and Computer Engineering during 2003-2004, a Distinguished Achievement award for teaching from the former students association of Texas A&M University, and a citation "for one of the most influential papers from the 1st ACM Multimedia conference."

- **10.** I am a Fellow of the IEEE Computer Society, and a member of ACM.
- 11. I have been an author or co-author of over a hundred papers. I have also written other technical reports.
- 12. My recent presentations include the Keynote speech at International Conference on Information Technology-New Generations in 2013, the Keynote speech at IEEE International Symposium on Computers and Communications 2010, several invited talks including Georgia Tech (2013), COMSNETS Conference (2013), Int. Conf. on Networking and Communications (2012), Samsung (2011), Korea University (2011), Aijou University (2011), Catedra Series talk at University of Carlos III, Madrid (2009), Thomson Research, Paris (2009), Telefonica Research, Barcelona (2009) and a Distinguished seminar at IBM Austin Research Lab (2008).
- 13. My research is focused on high-performance storage and delivery over networks. It includes (a) systems research to better support storage, (b) network research to provide high-performance delivery of data, and (c) protecting



such network and systems infrastructure. Previous and current projects are listed in my CV.

- 14. I currently teach and/or have taught courses including, but not limited to, the following areas: computer communications and networking, computer architecture, multimedia systems and networks, topics in networking security, multimedia storage and delivery, as well as networking for multimedia applications.
- 15. I have worked on implementing an "Information Retrieval Assistant" (IRA) around 1998. IRA took input from a user on his/her interests and retrieved relevant documents from the web automatically. IRA was designed to learn user interests and was able to distinguish the context of user interests. For example, IRA could distinguish between "Apple" computer and the fruit "Apple". IRA also served as a personal newspaper, retrieving news articles of interest to user from various newspapers.
- 16. I also worked on implementing a metasearch engine for airline tickets around 1998. This engine presented one interface to the user to obtain user information, and contacted multiple web sites in the background to search for tickets at multiple websites and presented the obtained information to the user in one form. This was designed as a tool for a user, but provided much similar service as current sites such as kayak.com.



DOCKET

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