

Callaghan Declaration, IPR2018-00067  
U.S. Patent 8,577,813

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS INC.  
Petitioner

v.

UNIVERSAL SECURE REGISTRY LLC  
Patent Owner

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IPR2018-00067  
Patent 8,577,813

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**DECLARATION OF MICHELLE CALLAGHAN  
IN SUPPORT OF PETITIONER'S MOTION TO CORRECT**

**DECLARATION OF MICHELLE CALLAGHAN**

I, Michelle Callaghan, declare that the following statements made of my own knowledge are true, and that any statements below made on information and belief are believed to be true:

1. I am an associate attorney at Erise IP, P.A. I was admitted to the Colorado Bar on October 31, 2016.

2. Since approximately July 28, 2017, I have contributed to the preparation of the Petition for *Inter Partes Review* of U.S. patent 8,577,813 ('813 Patent) on behalf of Petitioner Unified Patents Inc. ("Petitioner").

3. Between July 2017 and September 2017, I reviewed various prior art patents and printed publication references related to the subject matter of the '813 Patent. As I reviewed this art, I mapped the teachings of prior art references against the claims and limitations of the '813 Patent using claim charts. Such references included, among others, U.S. Patent 6,016,476 to Maes *et al.* ("Maes"), U.S. Patent 5,870,723 to Pare *et al.* ("Pare"), U.S. Pub. US 2004/0107170 A1 to Labrou *et al.* ("Labrou"), and WO 2001/024123 to Burger *et al.* ("Burger"). For the limitations of Claim 1 (an independent claim) and Claim 5 (which depends from Claim 1), I mapped applicable teachings in *Maes*, *Pare*, *Labrou*, among other references, into the claim charts. For the limitations of Claim 6 (which depends from Claim 5), I mapped

applicable teachings in *Burger* into the claim charts. For the limitations of Claims 7-9 (which depend from Claim 6 either directly or indirectly), I mapped applicable teachings in *Maes*, a reference relied upon for limitations of Claim 1, into the claim charts. For the limitations of Claim 10 (which depends from Claim 7), I mapped applicable teachings in *Labrou*, another reference already relied upon for limitations of Claim 1, into the claim charts.

4. In September 2017, I began copying and pasting the content of the art mapped against the claims of the '813 Patent and their related arguments from the claim charts into a template petition. I was responsible for preparing a first draft petition, including the proposed Grounds 1 and 2.

5. On October 2, 2017, I sent a draft petition to my supervising attorney, Jason Mudd. In this draft, I mistakenly transcribed the mapping and arguments for *Maes* regarding claims 7-9 and for *Labrou* regarding claim 10 into Ground 1 instead of Ground 2, where they were intended to be inserted based on their direct or indirect dependency from claim 6, which was included in Ground 2.

6. Between October 3, 2017, and October 16, 2017, through various drafting iterations, I received various comments from Mr. Mudd and others to incorporate into the final version of the Petition ultimately filed on October 16, 2017, but none of these comments addressed my transcription error.

7. On February 7, 2018, I reviewed the Preliminary Response filed by Patent Owner Universal Secure Registry LLC. Upon reviewing the Preliminary Response, I first became aware of my clerical mistake with respect to the transcription of Claims 7-10 under Ground 1 instead of Ground 2 and alerted Mr. Mudd of the mistake.

I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 2, 2018

Respectfully submitted,

BY: /Michelle A. Callaghan/  
Michelle A. Callaghan