UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UBER TECHNOLOGIES, INC. AND

CHOICE HOTELS INTERNATIONAL, INC.,

Petitioners

v.

FALL LINE PATENTS, LLC,

Patent Owner

Patent No. 9,454,748

DECLARATION OF KENDYL A. ROMÁN
IN SUPPORT OF PETITION FOR
***INTER PARTES* REVIEW OF U.S. PATENT 9,454,748**

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I, Kendyl A. Román, declare as follows:

I. INTRODUCTION

A. Engagement

1. I have been engaged by counsel for Petitioners Uber Technologies, Inc. and Choice Hotels International, Inc. as an expert witness for the above-captioned *inter partes* review (IPR) proceeding. I have been asked to provide my opinions about the state of the art of the technology described in United States Patent No. 9,454,748, entitled "System and method for data management," by J. David Payne, filed October 22, 2010, and issued September 22, 2016 (the "'748 Patent"). I also have been asked to provide my opinions on the patentability of claims 1, 2, 5, 9, 11, 13, and 15-22 (the "Challenged Claims") of the '748 Patent. The following is my written report on these topics. I understand that the '748 Patent has been provided as Ex. 1001.

2. I understand that the '748 Patent has been provided as Ex. 1001. I understand that the '748 Patent claims priority to provisional application No. 60/404,491, filed August 19, 2002. For the purposes of this review, I assume the earliest possible priority date of the '748 Patent is the August 19, 2002 filing date to which the '748 Patent claims priority. I understand that the '748 Patent is currently assigned to Fall Line Patents, LLC. ("P.O." or "Fall Line").

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