

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

Case: IPR2018-00535
Patent 9,454,748 B2

Before MICHELLE N. WORMMEESTER, SHEILA F. McSHANE, and JOHN R.
KENNY, *Administrative Patent Judges*.

DECLARATION OF JONATHAN I. DETRIXHE

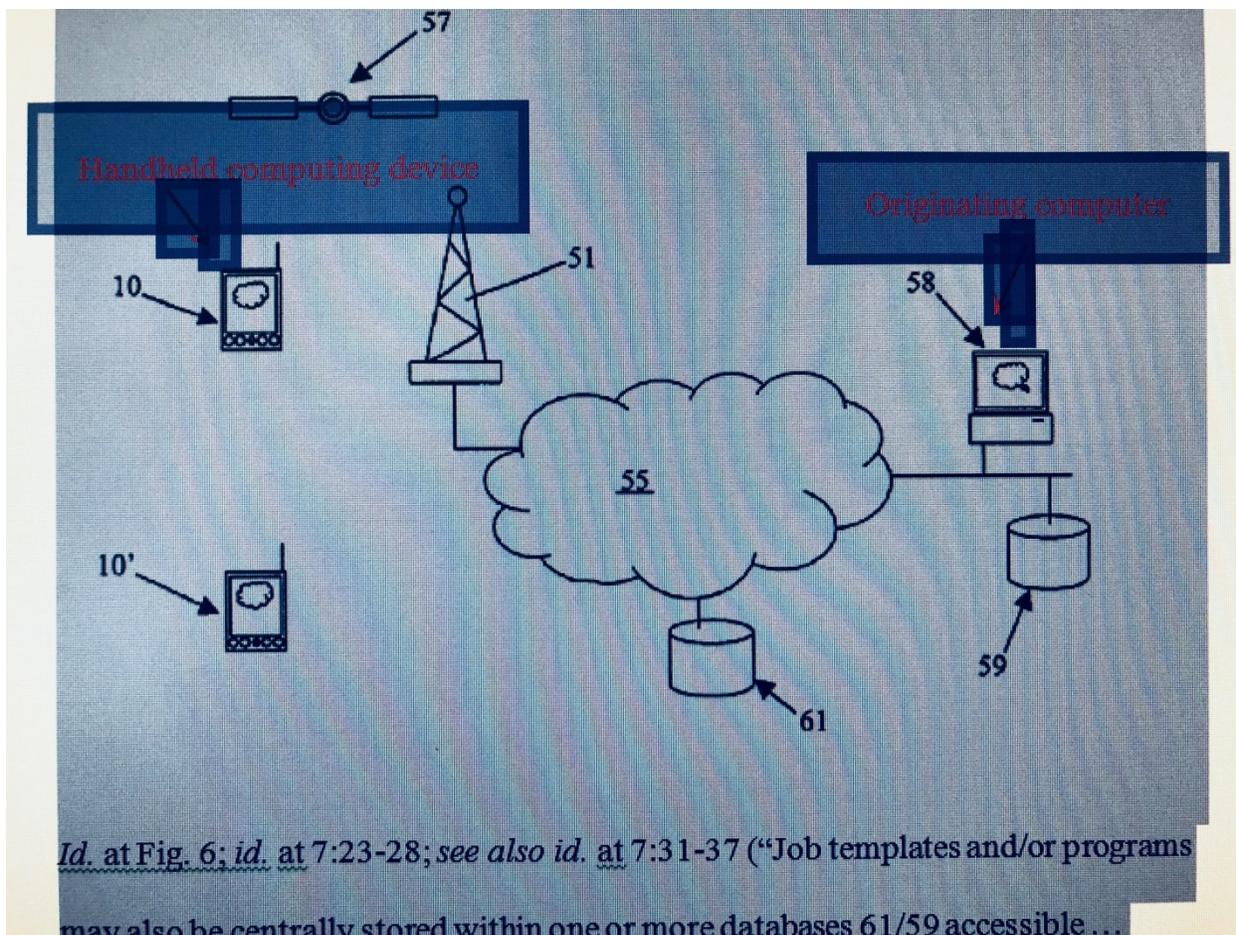
I, Jonathan I. Detrixhe, declare the following:

1. I am an associate at Reed Smith, LLP and represent Uber Technologies, Inc. and Choice Hotels International, Inc. (collectively, “Petitioners”) in this proceeding. I submit this Declaration in support of Petitioners Response to the May 21, 2018 Order by the Board. I have personal knowledge of the matters set forth in this Declaration. If called as a witness, I could and would competently testify to these matters.

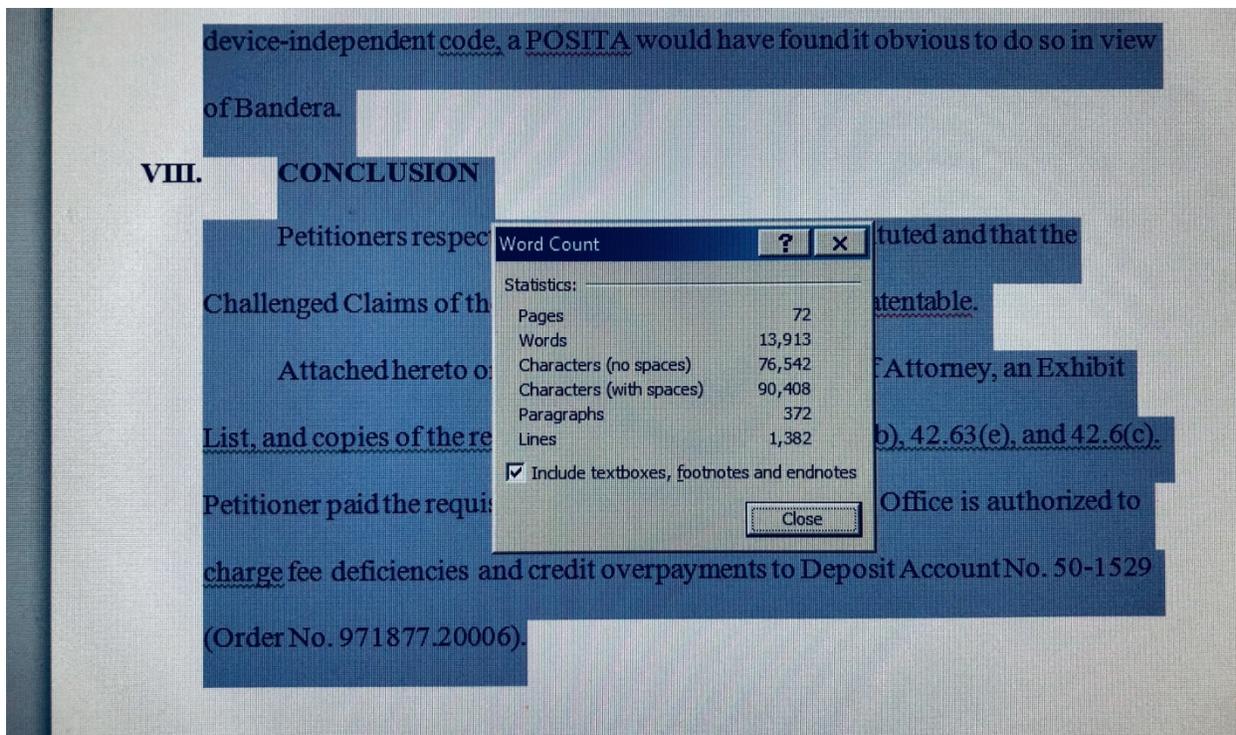
2. I prepared the word-count certification for the Petition filed in this proceeding, IPR2018-00535 (“Petition”). In doing so, I relied on Microsoft Word’s (“Word”) word-count feature. In particular, I relied on Word’s word-count feature to count the words in Sections I and III-VIII. I did not include Section II, which addresses mandatory notices, because it is exempt under 37 CFR § 42.24(a).

3. To perform this word count, first I selected the words in Section I. Then, I clicked on Word’s word count feature, which provided 86 words, as shown below¹:

¹ I obtained the images in ¶¶ 3-5 of this declaration by repeating the steps I used to prepare the certification for the Petition.



5. After selecting the words in Sections III-VIII, I clicked on Word’s word count feature, which provided 13,913 words, as shown below. Because I had selected the box to “[i]nclude textboxes, footnotes and endnotes,” and because each textbox was included in my selection, I believed that the count of 13,913 words for Sections III-VIII included every annotated word typed in a textbox.



6. I obtained the final word count of 13,999 to which I certified by adding the count of 86 words for Section I to the count of 13,913 words for Sections III-VIII.

7. After reviewing the allegations in Patent Owner's Preliminary Response, I provided Patent Owner a Word version of the Petition to allow it to verify the accuracy of my word count. In addition, during a call with Patent Owner's counsel, I explained how I had relied on Word's word-count feature to obtain the total count of 13,999. Not satisfied, Patent Owner's counsel requested a Word copy of the Petition that included only those words I had selected for inclusion in the word count. I prepared and provided such a copy. When I selected

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.