

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Canon Inc., Canon U.S.A., Inc., and Axis Communications AB,

Petitioners,

v.

Avigilon Fortress Corporation,

Patent Owner.

Case No. IPR2019-00311

U.S. Patent No. 7,932,923

**DECLARATION OF JENNIFER A. BABBITT IN SUPPORT OF PATENT
OWNER'S OPPOSITION TO PETITIONERS' MOTION FOR
AUTHORIZATION TO COMPEL TESTIMONY AND/OR DOCUMENTS**

I, JENNIFER A. BABBITT, declare under penalty of perjury as follows:

1. I am an Electronic Services Librarian of the law firm Kirkland & Ellis, LLP.

2. I obtained a Masters in Library and Information Science from San Jose State University in 2013. In connection with that degree, I took multiple courses relating to library operations and catalog management.

3. From 2012 to 2014, I worked as an Archive Consultant at the Golden Gate National Recreation Area. I assisted in archival of Golden Gate National Recreation Area documents and maintenance of active division records. I also created finding aids for discrete collections, as well as preserving and arranging active records for multiple divisions within the Golden Gate National Recreation Area, including the superintendent's office.

4. From 2014 to present, I have been working as a Research Assistant at Kirkland & Ellis LLP. My primary responsibilities include the following: (1) maintain library catalog, including coordination of cataloging new material and routing of serial publications, (2) work with outside vendors to maintain/update standing orders and facilitate new orders, (3) coordinate interlibrary loans, (4) catalog and maintain technical book collection, and (5) research and document retrieval.

5. I make this Declaration in support of the petition for *inter partes* review of U.S. Patent No. 7,932,923 before the United States Patent and Trademark Office. I make this Declaration of my own personal knowledge.

6. Exhibit 2016 is a true and correct copy of Marilyn McSweeney's LinkedIn profile that I obtained from <https://www.linkedin.com/in/marilyn-mcsweeney-ab78439/> on August 23, 2019.

7. I declare under penalty of perjury under the laws of the United States of America 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 the Title 18 of the United States Code.

Executed on August 23, 2019, in San Francisco, California.


Jennifer A. Babbitt