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LICENSING IP INTERNATIONAL S.À.R.L.,
9219-1568 QUÉBEC INC. d/b/a ENTREPRISE MINDGEEK CANADA, and
COLBETTE II LTD.,

Petitioners

v.

UNIVERSITY OF SOUTHERN CALIFORNIA

PRESERVATION TECHNOLOGIES LLC

Patent No. 6,092,080

Issue Date: July 18, 2000

Title: Digital Library System

DECLARATION OF H V JAGADISH, PH.D.

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I, H V Jagadish, hereby declare the following:

1. I have been asked to provide my opinions concerning claims 1-16 of U.S. Patent No. 6,092,080 (“’080 Patent”) (Exhibit 1001). I am being compensated for my time in preparing this declaration, but my compensation is not tied to the outcome of this matter and my compensation is not based on the substance of the opinions rendered here.

I. Introduction and Qualifications

2. All of my opinions stated in this declaration are based on my own personal knowledge and professional judgment. In forming my opinions, I have relied on my knowledge and experience in software development practices, and on the documents and information referenced in this report. I am competent to testify as to the matters set forth herein.

3. I am the Bernard A. Galler Collegiate Professor of Electrical Engineering and Computer Science at the University of Michigan. I am part of the database group and the software systems laboratory at the University. As a professor, I teach courses related to database management, the web, and data structures and algorithms.

4. My research focuses on how to build database systems and query models so that they are truly usable and how to design analytics processes so that they can deliver real insights to non-technical decision makers. My research is

focused on building computing and data systems that have the “right” end-to-end capability, in terms of meeting the users’ needs effectively, with minimum effort on their part.

5. Attached hereto as Exhibit 1007 is a true and correct copy of my Curriculum Vitae.

6. I obtained my Ph.D. from Stanford University in 1985, and worked many years for AT&T where I eventually headed the database department. I began my work at the University of Michigan in the fall of 1999, and also performed work at the University of Illinois.

7. I have published extensively, and am recognized as a leading researcher in the area of databases.

8. I am a Fellow of the ACM, a Fellow of AAAS, and named inventor on 37 United States patents.

9. I am being compensated at the rate of \$670 per hour for my work as an expert in this case. My compensation is not dependent on the content of my opinions or the outcome of this case.

10. The references I considered in preparing this declaration are listed below.

- U.S Patent No. 6,092,080.
- File history for U.S Patent No. 6,092,080.

- U.S. Patent No. 6,181,336 to Chiu.
- U.S. Patent No. 5,907,837 to Ferrel.
- U.S. Patent No. 6,199,060.
- File history for U.S. Patent No. 6,199,060.
- U.S. Patent No. 6,212,527.
- File History for U.S. Patent No. 6,212,527.
- Canadian Patent Application No. 2,128,667 to Jones-Lee.
- Objective video quality assessment system based on human perception to Webster et al.
- U.S. Patent No. 5,630,121 to Braden-Harder et al.
- European Patent Application Pub. No. 0 609 517 to Braden-Harder et al.
- U.S. Patent No. 5,668,897 to Stolfo.
- U.S. Patent No. 5,307,266 to Hayashi et al.
- U.S. Patent No. 6,574,638 to Gustman
- File History for U.S. Patent No. 6,574,638.
- U.S. Patent No. 5,832,495 to Gustman.
- Any references cited herein.

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