

CASE IPR2019-01279
Patent No. 8,510,407

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LENOVO HOLDING COMPANY, INC.,
LENOVO (UNITED STATES) INC., and
MOTOROLA MOBILITY LLC,
Petitioners,

v.

DODOTS LICENSING SOLUTIONS LLC,
Patent Owner.

CASE IPR2019-01279
Patent No. 8,510,407

DECLARATION OF RAKESH RAMDE

DoDots Exhibit 2003

I declare as follows:

1. I was the sole in-house counsel of DoDots, Inc. for approximately nine months in the 2000-2001 timeframe after having served as DoDots' outside counsel while at a law firm. I am submitting this declaration to provide information about the commercial success of the invention described in U.S. Patent No. 8,510,407 (the "'407 Patent").
2. Led by twin brothers John and George Kembel, the team of scientists from Stanford who invented the groundbreaking technology described in the '407 patent were true internet pioneers. In 1999, more than nine years before the Apple app store opened, these inventors conceived of a novel approach for creating an ecosystem of apps (which they called "Dots") that enabled the delivery of custom-tailored content from the internet without using a web browser and without the need for each Dot to be a standalone application.
3. DoDots, Inc. was able to build a company around the then-patent-pending technology that at its peak was valued at \$275 million. DoDots, Inc. built Dots for dozens of companies, including ABC, Edmunds, CNET and many others. Attached as Exhibit A is a copy of the company's customer listing from its website in 2000.
4. I recall that DoDots received much praise and recognition from others for the

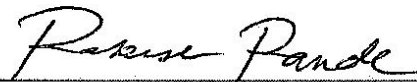
technology described in the '407 Patent. Attached as Exhibit B is a true and correct copy of a CNN article dated April 7, 2000 entitled "DoDots: The Web without a browser," which demonstrates that what DoDots was doing at the time was newsworthy.

5. The success the company had was directly related to its technology, as the sole product/service of the company was the DoDots platform described in the specification of the '407 Patent.
6. Unfortunately, the industry-wide dot com crash sank the company, allowing later entrants to eclipse the trailblazing work done by DoDots, Inc. DoDots, Inc. was forced to sell its patent portfolio, which remained dormant for various reasons until recent years.
7. I was one of the owners of a company that owned the patent portfolio after DoDots, Inc., and I continue to have a stake under certain circumstances in any eventual recovery.
8. Stanford Business School put together a case study of DoDots, Inc. in July 2000. A copy of that case study is attached as Exhibit C. The case study includes various attachments, including the summary of a Proposed Private Placement dated March 10, 2000 in which DoDots, Inc. was valued at \$275 million. I was still General Counsel of DoDots, Inc. at that time, and was aware of the negotiations relating to the Proposed Private Placement.

9. I have a Bachelor of Science degree in Electrical Engineering from UCLA, a Master of Science Degree in Engineering from USC, a JD degree from the University of Pittsburgh and an MBA from Carnegie Mellon University.
10. Currently, I manage business development, venture investment, software advisory, strategic alliances joint ventures from start-ups to established companies. I also develop and manage corporate and business development activities and initiatives, technology evaluation and diligence, product development/program management, go-to-market and other matters in a wide range of technology and commercial areas for tech clients, law firms and VC clients.

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

Executed on April 27, 2020 in Los Altos, California.



Rakesh Ramde

EXHIBIT A

Explore Litigation Insights

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