UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
GOOGLE INC., SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., LG ELECTRONICS, INC., AND LG ELECTRONICS U.S.A., INC., Petitioner,
v.
PARUS HOLDINGS, INC., Patent Owner.
Case No. IPR2020-00846 & IPR2020-00847 U.S. Patent No. 7,076,431 & 9,451,084

DECLARATION OF PAUL MULKA IN SUPPORT OF PATENT OWNER'S RESPONSE TO INTER PARTES REVIEW OF U.S. PATENT NOS. 7,076,431 & 9,451,084



I, Paul Mulka, hereby declare the following:

- 1. My name is Paul Mulka. I am a citizen of the United States over 21 years of age. I make this Declaration based on facts and matters within my own knowledge and on information provided to me by others, and if called as a witness, I could and would competently testify to the matters set forth herein.
- 2. I am a professional software engineer with over 20 years of work experience in the software industry. I graduated from college with a Bachelor of Science in Computer Science and Mathematics in the December 1998. After graduating college, I joined Webley Systems as a software engineer. Starting in July 1999, I was part of the team that developed the Webley Assistant. Through the remainder of 1999 and into 2000, I worked on debugging and developing software related to the Webley Assistant.
- 3. While working at Webley, I became personally acquainted with Alexander Kurganov and Valery Zhukoff.
- 4. Based on information provided to me from the management at Parus, Inc. (formerly Webley Systems) and a review of the source code management system, it is my understanding that Alex and Valery were employed by Webley Systems in 1999 and 2000. From at least November 1999 through January 2000, Alex and Valery were employed full time in developing the Webley Assistant's website access functionality, including weather, stock price, and other functionality.



- 5. From the time I started working at Webley Systems, the company used a source code management tool called CVS. CVS tracks when source code is checked into the system after creation or after edits have been made by users. The time of the check-in and the identity of the person who checked the source code in to the system is tracked by the system. Typically, a source code file is created by a software engineer and later checked into the CVS system.
- 6. Based on my review of the CVS records between December 1, 1999 and January 10, 2000 (attached as Exhibit A), Alex checked in 11 source code files related to speech recognition and functionality additions to the Webley Assistant and Valery checked in 47 source code files between December 1, 1999 and January 7, 2000 related to web server and agent code. Most, if not all, of the source code files checked in to the CVS system by Alex and Valery related to the website access component of the Webley Assistant. That supports my understanding that Alex and Valery were working full time on the website access aspects of the Webley Assistant.



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I declare that all statements made herein of my knowledge are true, and that all statements made on information and belief are believed to be true, and 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 Title 18 of the United States Code.

Date: 1-13-2021

By: Paul R Mulson

Paul Mulka

