UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., LG ELECTRONICS INC., and LG ELECTRONICS U.S.A., INC., Petitioners,

v.

PARUS HOLDINGS INC., Patent Owner.

Case No. IPR2020-00846 Patent No. 7,076,431

DECLARATION OF MARTIN WALKER

Google Exhibit 1053 Google v Parus IPR2020-00846



TABLE OF CONTENTS

I.	PERSONAL AND PROFESSIONAL BACKGROUND	1
II.	MATERIALS REVIEWED AND CONSIDERED	3
III.	MR. KURGANOV'S DECLARATION CITES NO EVIDENCE DEMONSTRATING THAT THE SOURCE CODE WAS COMPILED TO GENERATE AN EXECUTABLE PROGRAM THAT WAS RUN ON THE SERVER MAPPED TO THE CLAIMED "COMPUTER"	4
IV.	MR. KURGANOV'S DECLARATION CITES NO EVIDENCE DEMONSTRATING THAT THE VERSIONS OF THE SOURCE CODE FILES CITED IN THE DECLARATION WERE USED TOGETHER AT THE SAME TIME ON THE SAME COMPUTER	9
V.	BECAUSE THE GETWEATHER() FUNCTION CALL IS COMMENTED OUT, THE EVIDENCE DOES NOT DEMONSTRATE ANY EMBODIMENT MEETING THE CLAIMED FUNCTIONALITY	12
VI.	THE EVIDENCE MR. KURGANOV'S DECLARATION CITES DOES NOT CORROBORATE PRACTICE OF CLAIM 9	15
VII.	THE EVIDENCE MR. KURGANOV'S DECLARATION CITES DOES NOT CORROBORATE PRACTICE OF CLAIM 14	18
VIII	.MR. KURGANOV'S DECLARATION CITES NO EVIDENCE DEMONSTRATING THAT A WORKING EMBODIMENT WAS CONSTRUCTED	19
IX.	MR. KURGANOV'S DECLARATION CITES NO EVIDENCE ESTABLISHING WHAT VERSION OR DATE OF WEATHER.INI IS PROVIDED IN EX. 2033	20



- I, Martin Walker, declare:
- 1. I have been retained by Wolf, Greenfield & Sacks, P.C., counsel for Petitioners, to assess the Declaration of Alexander Kurganov (Ex. 2020) ("Kurganov-Decl.") in this *inter partes* review proceeding. I am being compensated for my time at a rate of \$515.00 per hour, plus actual expenses. My compensation is not dependent in any way upon the outcome of this proceeding.

I. PERSONAL AND PROFESSIONAL BACKGROUND

- 2. I received my Bachelor of Science degree in Electrical Engineering from the Massachusetts Institute of Technology in 1973. I received my Master of Science and Doctor of Philosophy degrees in Electrical Engineering in 1976 and 1979 from Stanford University.
- 3. I have over 40 years of experience with writing and analyzing computer software.
- 4. Beginning in 1981, I developed computer software to aid in the development of integrated circuits. From 1983 to 1989, I was the founder and Chief Technical Officer at Analog Design Tools, Inc. Analog Design Tools' primary product was software used to design integrated circuits. I was responsible for all technical aspects of product definition and development, including the software design.



- 5. From 1990 to 1994, I was a founder and Executive Vice President of Symmetry Design Systems, which specialized in software product design and consulting for the electronic design marketplace.
- 6. In 1995, I founded a company called Frequency Technology (later called Sequence Design) that developed software for the design of advanced system-on-a-chip integrated circuits. As Chief Executive Officer, director, and Chief Scientist at Sequence, I was involved in overseeing the development of the company's products and technologies.
- 7. In 2000, I became the Chief Technical Officer of Knowledge
 Networks, which was a market research company that leveraged internet
 technology to revolutionize the market research industry. I managed Knowledge
 Networks' engineering group, which designed web-based software for creating
 surveys, conducting interviews, and processing data.
- 8. Since 2001, I have been a consultant on various technology issues including software design and analysis. Since that time, I have served as an expert in nearly 100 cases.
- 9. From my career as an engineer and a consultant, I am experienced with various computer programming languages, including C and Perl. I have worked with C and Perl for around 40 years. I also have experience with source



code control systems including CVS ("Concurrent Versions System"), having worked on multiple projects that used CVS over 25 years.

10. My curriculum vitae is provided as Exhibit 1054.

II. MATERIALS REVIEWED AND CONSIDERED

11. My findings, as explained below, are based on my years of education, research, experience, and background in computer software, as well as my investigation and study of relevant materials for this declaration. In forming my opinions, I have considered the materials identified in the list below.

Exhibit	Description
2020	Declaration of Alexander Kurganov ("Kurganov-Decl.")
2021	10/13/1998 email
2022	4/22/1999 email
2023	www.pl
2024	RCRWireless
2025	mc_vm.c
2026	menuNew.grammar
2027	U.S. Patent No. 7,076,431 claim chart
2028	U.S. Patent No. 9,451,084 claim chart
2029	Webley Homepage
2030	Webley How to Use page
2031	Frequently Asked Questions page
2032	webget.pl
2033	weather.ini
2034	Webley Index page
2035	Nuance 6



DOCKET

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.

