

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ESTECH SYSTEMS, INC.,

Plaintiff,

v.

TARGET CORPORATION,

PLAINSCAPITAL BANK,

BOKF, NATIONAL ASSOCIATION,

BBVA USA, and

WELLS FARGO & COMPANY, AND
WELLS FARGO BANK, N.A.,

Defendants.

C.A. 2:20-cv-00123-JRG (lead case)

JURY TRIAL DEMANDED

C.A. 2:20-cv-00122-JRG

C.A. 2:20-cv-00126-JRG

C.A. 2:20-cv-00127-JRG

C.A. 2:20-cv-00128-JRG

**EXPERT REPORT OF DR. SHUKRI SOURI REGARDING
INVALIDITY OF THE ASSERTED PATENTS**

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I. INTRODUCTION

1. Exponent, Inc. (“Exponent”) has been retained by K&L Gates, LLP (“K&L Gates”) on behalf of Cisco System, Inc. (“Cisco”) to provide technical services and independent opinions on certain issues relating to the United States patent no. 8,391,298 (“the ’298 patent”), United States patent no. 7,068,684 (“the ’684 patent”), United States patent no. 6,067,349 (“the ’349 patent”), and United States patent no. 7,123,699 (“the ’699 patent”) (collectively the “Asserted Patents”).

2. In particular, I, Shukri Souri, was requested to review the subject material of the patents listed above, along with certain of the claims therein, and opine as to whether the requirements of these claims are disclosed by various prior art references. The opinions and comments formulated during this assessment are based on observations and information available at the time of the investigation. The findings presented herein are made to a reasonable degree of scientific certainty. I have made every effort to accurately and completely investigate all areas of concern identified during our investigation. I reserve the right to supplement this report if and when new information becomes available after this report is signed, including, but not limited to, additional discovery or documents, opinions of the court, and the opinions and testimony of other experts in this case. I reserve the right to respond to any opinions offered by other experts and to any testimony offered at trial. And, I reserve the right to create graphics or demonstratives to support my opinions if called to testify at a hearing.

II. EXPERIENCE

3. I am a salaried employee of Exponent. Exponent charges \$650 per hour for my time plus expenses for work performed in connection with this project. I have received no additional compensation for work in this case, and my compensation does not depend upon the contents of this report, any testimony I may provide, or the ultimate outcome of the case.

4. Exponent is an engineering and science consulting firm headquartered at 149 Commonwealth Drive, Menlo Park, California, 94025. Exponent has been retained by counsel for Cisco in this matter to provide independent technical expert consulting services. I, Shukri Souri, am the investigator for the subject matter in this report.

5. I am a Principal and a Corporate Vice President at Exponent. I am based in, and Director of, Exponent's New York office. I am also the Director of Exponent's Electrical Engineering and Computer Science practice.

6. I received my B.A. (Honors) and M.A. in Engineering Science from Oxford University, United Kingdom; my Master's degree in Electrical Engineering from Stanford University, California; and my Ph.D. in Electrical Engineering, also from Stanford University, California.

7. Before returning to Stanford for my Ph.D., I was a member of the staff at Raychem's Corporate Research and Development Laboratories, where I designed and built electronic systems to target safe operation of commercial and industrial equipment. My work resulted in patents awarded by the United States, European, Japanese, and World Intellectual Property Organization patent offices.

8. Prior to Exponent, I co-founded two software firms, arcadiaOne, Inc. ("arcadiaOne") and Merenga, Inc., where I directed development teams and contributed to architecture and design, source code development, testing, and deployment of enterprise-level software. At arcadiaOne, I was an Engineering Manager with responsibilities for the development of software for the synchronous transfer of digital assets between enterprises, such as from content providers to content portals over arcadiaOne's real-time messaging platform. At Merenga, Inc., I was Chief Executive Officer and President with responsibilities for the firm's operations in delivering an Internet platform for the optimization of asset allocation to investors.

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