

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RESMAN, LLC,
Petitioner,

v.

KARYA PROPERTY MANAGEMENT, LLC,
Patent Owner.

Case No. IPR2021-00844
U.S. Patent No. 7,636,687

DECLARATION OF PETER KENT

TABLE OF CONTENTS

I. INTRODUCTION1

II. QUALIFICATIONS1

III. MATERIALS CONSIDERED3

IV. UNDERSTANDING OF THE LAW4

 A. Person of Ordinary Skill in the Art4

 B. Legal Standard for Claim Construction.....6

 C. Legal Standard for Anticipation7

 D. Legal Standard for Obviousness.....7

V. OVERVIEW OF THE '687 PATENT9

VI. SUMMARY OF PRIOR ART FOR OBVIOUSNESS GROUNDS13

 A. Prior Art Considered.....13

 B. U.S. Patent 5,584,025 to Keithley13

 C. U.S. Patent 6,594,633 to Broerman.....17

 D. Motivation to Combine Keithley and Broerman.....20

 E. Additional Teachings of Keithley and Broerman22

VII. CLAIMS 1-21 ARE RENDERED OBVIOUS BY KEITHLEY AND BROERMAN24

 1. Independent Claim 124

 2. Dependent Claim 230

 3. Dependent Claim 332

 4. Dependent Claim 433

 5. Dependent Claim 535

 6. Dependent Claim 638

 7. Dependent Claim 739

 8. Dependent Claim 840

 9. Dependent Claim 942

 10. Independent Claim 1043

..

11. Dependent Claim 11.....	49
12. Dependent Claim 12.....	51
13. Dependent Claim 13.....	52
14. Dependent Claim 14.....	55
15. Dependent Claim 15.....	56
16. Dependent Claim 16.....	58
17. Independent Claim 17	58
18. Dependent Claim 18.....	66
19. Dependent Claim 19.....	68
20. Dependent Claim 20.....	69
21. Dependent Claim 21.....	70
VIII. CONCLUSION	70

...

I, Peter Kent, declare as follows:

I. INTRODUCTION

1. My name is Peter Kent. I have prepared this declaration as an independent expert consultant for ResMan, LLC (“ResMan” or “Petitioner”). I am over twenty-one years of age and, if called upon to do so, I would testify as to the matters set forth herein.

2. I have been asked by ResMan to assist in evaluating the claims and the disclosure of the ’687 Patent and to provide my opinions concerning whether the claims are obvious in view of the prior art.

3. This report contains statements of my opinions formed to date, and the bases and rationale for these opinions. I may offer additional opinions based on further review of materials in this case, including opinions and/or testimony of other expert witnesses.

4. For my efforts in connection with the preparation of this declaration, I have been compensated at a rate of \$550/hour. My compensation is in no way contingent on the results of these or any other proceedings related to the ’687 Patent. I have no financial interest in the outcome of this matter.

II. QUALIFICATIONS

5. I am a self-employed consultant, the Principal of Peter Kent Consulting, LLC. I have provided consulting services in the areas of online business, Web

development, and digital marketing strategies since 2002. I have over 26 years of experience in online business and marketing, including Web site development, web application development, user interface design, and e-commerce.

6. I have worked in the software development business since 1981. During this time, I founded/co-founded several companies related to web development, online marketing and business services, and E-commerce. From 1997-2003, I was the founder and President of Top Floor Publishing, a publisher of highly regarded books related to online business and marketing. From 1999-2001, I was a co-founder at BizBlast.com, which provided e-commerce software to small and medium-sized firms. From 2009-2011, I was the founder and CEO of LeadNation, LLP, which provided web site development services for businesses. I have also been employed in VP-level positions at several companies providing Internet business and marketing services.

7. My consulting clients have included Amazon.com, Lonely Planet, Honey Baked Ham, Denver Post, Dun & Bradstreet, TowerRecords.com, and literally hundreds of small- to medium-sized businesses in a wide range of arenas, from real estate to law firms, from construction equipment to plumbing.

8. In the real estate arena, I have consulted with firms such as Zillow.com, North America's top real-estate firm, RealtyList.com, SavingStreet.com, ReAnalyst.com, and numerous individual real-estate agents.

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.