UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS, LLC
Petitioner

v.

MEMORYWEB, LLC
Patent Owner

IPR2021-01413
U.S. PATENT 10,621,228

DECLARATION OF BENJAMIN B. BEDERSON, PH.D.

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I, Benjamin B. Bederson, declare as follows:

I. INTRODUCTION

1. My name is Benjamin B. Bederson, and I am over 21 years and otherwise competent to make this Declaration. 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 have been asked by Unified Patents, LLC ("Petitioner") to provide technical assistance in connection with the *Inter Partes* Review of U.S. Patent 10,621,228 (which I refer to as the "'228 Patent"). I have been informed that, according to public records, MemoryWeb, LLC ("Patent Owner") is the owner of the '228 Patent.

3. I have reviewed, had input into, and endorse the technological discussions in the Petitioner's Petition for *Inter Partes* Review of U.S. Patent 10,621,228 challenging claims 1-7, including the statements in the Petition regarding the '228 Patent, the scope of the claims, the prior art's disclosure of the claims, and the statements throughout the Petition regarding a person of ordinary skill in the art's (POSITA's) knowledge and understanding.

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4. In addition, this declaration is a statement of my opinions on issues related to the patentability of claim 1-7 of the '228 Patent (collectively, the "Challenged Claims").

5. My compensation is not based on the content of my opinions or the resolution of this matter. I have no financial interest in Petitioner or Patent Owner, and I have no other interest in the outcome of this matter.

II. BACKGROUND AND QUALIFICATIONS

6. In formulating my opinions, I have relied on my knowledge, training, and experience in the relevant field, which I have summarized below. My curriculum vitae is included in **Attachment A.**

7. I hold Ph.D. (1992), M.S. (1989), and B.S. (1986) degrees in Computer Science. I also earned an undergraduate minor in electrical engineering. I received the Janet Fabri Memorial Award for Outstanding Doctoral Dissertation for my Ph.D. work in robotics and computer vision. I have combined my hardware and software skills throughout my career in Human-Computer Interaction research, building various interactive electrical and mechanical systems that couple with software to provide an innovative user experience.

8. Since 1998, I have been a Professor of Computer Science at the University of Maryland ("UMD"), where I have joint appointments at the Institute

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