

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Patent of: Christopher J. Desmond, et al.  
U.S. Patent No.: 10,423,658 Attorney Docket No.: 39843-0116IP1  
Issue Date: September 24, 2019  
Appl. Serial No.: 15/375,927  
Filing Date: December 12, 2016  
Title: METHOD AND APPARATUS FOR MANAGING DIGITAL FILES

**DECLARATION OF DR. PHILIP GREENSPUN**

**Declaration**

I declare that all statements made herein on my own knowledge are true and that all statements made on information and belief are believed to be true, and further, that these statements were made with the knowledge that willful false statements and the like so made are punishable under Section 1001 of Title 18 of the United States Code.

By: 

Philip Greenspun, Ph.D.

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## **I. QUALIFICATIONS AND BACKGROUND INFORMATION**

1. I have been retained on behalf of Samsung Electronics Co., Ltd. (“Petitioner”) and asked to review and provide my opinion on the patentability of claims 1-15 of U.S. Patent No. 10,423,658 (“the ’658 patent”).
2. I am a salaried employee of Fifth Chance Media LLC, which I understand is being compensated for my work in this matter. I am not an owner of Fifth Chance Media LLC, and my compensation is not contingent on the outcome of this matter or the specifics of my testimony. I am being compensated for my work as an expert on an hourly basis. My compensation is not dependent on the outcome of these proceedings or the content of my opinions.
3. A detailed description of my professional qualifications, including a listing of my specialties/expertise and professional activities, is contained in my curriculum vitae, a copy of which is provided as Ex. 1004. In what follows, I provide a short summary of my professional qualifications.
4. In terms of my background and experiences that qualify me as an expert in this case, I earned a Ph.D. in Electrical Engineering and Computer Science from Massachusetts Institute of Technology in 1999. I also obtained a Bachelor of Science Degree in Mathematics from Massachusetts Institute of Technology in 1982 and a Master of Science Degree in Electrical Engineering and Computer Science from Massachusetts Institute of Technology in 1993.

5. My Ph.D. thesis concerned the engineering of large online Internet communities with a Web browser front-end and a relational database management system (RDBMS) containing site content and user data.
6. I have authored five computer science textbooks in total, including Database Backed Web Sites (Macmillan), Software Engineering for Internet Applications (MIT Press), and a SQL language tutorial.
7. I have served as an independent member of various advisory and corporate boards, mostly for technology companies. For example, I joined the corporate board of an MIT materials science spin-off in late 2005 during a \$550,000 seed capital phase. I stepped down when the company secured \$10 million in venture capital in mid-2007.
8. I have previously served as an expert witness for Amazon.com, IBM, Microsoft, Xerox, and Google, among others, in patent cases.
9. I began working full-time as a computer programmer in 1978, developing a database management system for the Pioneer Venus Orbiter at the National Aeronautics and Space Administration's Goddard Space Flight Center.
10. I developed my first computer-supported mapping applications in the mid-1980s, starting with an anti-tank warfare simulator for the U.S. Department of Defense (as a subcontractor to Textron). I also developed a computer system for supporting civil engineering, especially earthmoving, that included a digital three-

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