

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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**FORESIGHT DIAGNOSTICS INC.**  
Petitioner

vs.

**PERSONALIS, INC.**  
Patent Owner

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**DECLARATION OF INGRID HSIEH-YEE, PH.D.**

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## **I. Introduction**

I, Ingrid Hsieh-Yee, Ph.D., do hereby declare as follows:

1. I have personal knowledge of all of the matters about which I discuss in this declaration.

2. I have been retained as an independent expert witness on behalf of Foresight Diagnostics, Inc. (“FORESIGHT”) for proceedings before the United States Patent and Trademark Office (“PTO”) regarding the authenticity and public availability of certain prior art references in relation to US Patent No. 11,408,033.

3. I am being compensated for my work in this matter at my customary hourly rate. I am also being reimbursed for any reasonable expenses associated with my work and testimony in this investigation. My compensation is not contingent on the results of my study, the substance of my opinions, or the outcome of this matter.

### **A. Qualifications and Professional Experience**

4. My complete qualifications and professional experience are described in my academic curriculum vitae (**Appendix A**). The following is a brief summary of my relevant qualifications and professional experience.

5. I was a professor in the Department of Library and Information Science at the Catholic University of America for 32 years and retired at the end of August 2022. I have experience working in an academic library, a medical library, and a legislative library. I hold a Ph.D. in Library and Information Studies from the

University of Wisconsin-Madison and a Masters in Library and Information Studies from the University of Wisconsin-Madison.

6. I am an expert on library cataloging and classification and have published two editions on this subject, *Organizing Audiovisual and Electronic Resources for Access: A Cataloging Guide* (2000 and 2006). I taught a variety of courses, including Cataloging and Classification, Advanced Cataloging and Classification, Organization of Internet Resources, Organization of Information, Digital Content Creation and Management, Internet Searches and Web Design, Information Literacy Instruction, Advanced Information Retrieval and Analysis Strategies, and The Information Professions in Society. I am familiar with metadata schema design and implementation. In my teaching I covered the design and implementation of metadata in databases, search engines, digital repositories, digital libraries, and digital archives. I also covered database design and how information organization affects the discovery and access to digital resources on the Internet. My research interests cover cataloging and classification, information organization, metadata, information retrieval, information architecture, digital collections, scholarly communication, user interaction with information systems, and others.

7. I am personally familiar with many online catalogs, databases, search engines, digital libraries and digital archives. In preparing for this declaration, I used the following authoritative information systems to search for records:

- Google Scholar (<https://scholar.google.com/>)
- Public catalog of the U.S. Copyright Office  
(<https://cocatalog.loc.gov/>)
- PubMed (<https://pubmed.ncbi.nlm.nih.gov/>)
- PubMed Central (<https://www.ncbi.nlm.nih.gov/pmc/>)

**B. Scope of This Declaration**

8. I have been asked to offer an opinion on the authenticity and public availability date of the following documents:

- Chan, K. A., Jiang, P., Zheng, Y. W., Liao, G. J., Sun, H., Wong, J., ... & Lo, Y. M. D., (2013, January 1), Cancer genome scanning in plasma: detection of tumor-associated copy number aberrations, single-nucleotide variants, and tumoral heterogeneity by massively parallel sequencing, *Clinical Chemistry*, vol. 59, no. 1, pp. 211-224, **Ex.1008** (“Chan”).

**C. Evidence Considered in Forming My Opinions**

9. In the preparation of this declaration, I have reviewed the documents referenced below and any other documents I reference herein, and each of these is a type of material that experts in my field would reasonably rely upon when forming their opinions:

- (1) The documents referenced above in Section I.B;

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