UNITED STATES PATENT AND TRADEMARK OFFICE

———————————————

BEFORE THE PATENT TRIAL AND APPEAL BOARD

———————————————

LENOVO HOLDING COMPANY, INC.,
LENOVO (UNITED STATES) INC., and
MOTOROLA MOBILITY LLC,
Petitioners,

v.

DODOTS LICENSING SOLUTIONS LLC,
Patent Owner.

———————————————

CASE IPR2019-00988
Patent No. 9,369,545

———————————————

<u>DECLARATION OF RAKESH RAMDE</u>

I declare as follows:

1. I was the sole in-house counsel of DoDots, Inc. for approximately nine months in the 2000-2001 timeframe after having served as DoDots' outside counsel while at a law firm. I am submitting this declaration to provide information about the commercial success of the invention described in U.S. Patent No. 9,369,545 (the "'545 Patent").

2. Led by twin brothers John and George Kembel, the team of scientists who invented the groundbreaking technology described in the '545 patent were true internet pioneers. In 1999, more than nine years before the Apple app store opened, these inventors conceived of a novel approach for creating an ecosystem of apps (which they called "Dots") that enabled the delivery of custom-tailored content from the internet without using a web browser and without the need for each Dot to be a standalone application.

3. DoDots, Inc. was able raise investment and venture funding to build a company around the then-patent-pending technology that at its peak was valued at $275 million. DoDots, Inc. built Dots for dozens of companies, including ABC, Edmunds, CNET and many others. Attached as Exhibit A is a copy of the company's customer listing from its website in 2000.

4. The success the company had was directly related to its technology, as the

primary product/service of the company was the Dots described in the specification of the '545 Patent.

5. Unfortunately, the industry-wide dot com crash sank the company, allowing later entrants to eclipse the trailblazing work done by DoDots, Inc. DoDots, Inc. was forced to wind down operations, and sold its patent portfolio, which remained dormant for various reasons until the '545 patent finally issued in June 2016 (claiming priority back to 1999).

6. I was one of the owners of a company that owned the patent portfolio after DoDots, Inc., and I continue to have a stake under certain circumstances in any eventual recovery.

7. Stanford Business School put together a case study of DoDots, Inc. in July 2000. A copy of that case study is attached as Exhibit B. The case study includes various attachments, including the summary of a Proposed Private Placement dated March 10, 2000 in which DoDots, Inc. was valued at $275 million.

8. I have a Bachelor of Science degree in Electrical Engineering from UCLA, a Master of Science Degree in Engineering from USC, a JD degree from the University of Pittsburgh and an MBA from Carnegie Mellon University.

9. Currently, I manage business development, venture investment, software advisory, strategic alliances joint ventures from start-ups to established

companies. I also develop and manage corporate and business development

activities and initiatives, technology evaluation and diligence, product

development/program management, go-to-market and other matters in a wide

range of technology and commercial areas for tech clients and law firms.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 23, 2019 in Los Altos, California.

Rakesh Ramde
_____
Rakesh Ramde

EXHIBIT A

DOCKET ALARM

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.

fastcase®
Smarter legal research.