

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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EVERGREEN THERAGNOSTICS, INC.

Petitioner

– vs. –

ADVANCED ACCELERATOR APPLICATIONS SA

Patent Owner

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**DECLARATION OF INGRID HSIEH-YEE, PH.D.  
IN SUPPORT OF PETITION FOR POST GRANT REVIEW  
OF U.S. PATENT NO. 10,596,278**

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

1. I have been retained as an independent expert witness on behalf of Evergreen Theragnostics, Inc. (“Evergreen”) for Post Grant Review (“PGR”) proceedings before the United States Patent and Trademark Office (“PTO”) regarding U.S. Patent Nos. 10,596,278 and 10,596,276.

2. I am being compensated for my work in this matter at my customary hourly rate of \$250/hour. 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.

## **I. INTRODUCTION**

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

3. 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.

4. I am currently a Professor in the Department of Library and Information Science at the Catholic University of America. I have experience working in an academic library, a medical library, and a legislative library and have been a professor for more than 25 years. 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.

5. 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 teach 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 have covered the design and implementation of metadata in databases, search engines, digital repositories, digital libraries, and digital archives. I have also covered how information organization affects the discovery of 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.

6. I am very familiar with a library cataloging encoding standard known as the “Machine-Readable Cataloging” standard, also known as “MARC,” which became the national standard for sharing bibliographic data in the United States by 1971 and the international standard by 1973. MARC is the primary communications

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