Filed on behalf of Securus Technologies, Inc.

By: Justin B. Kimble (jkimble@bcpc-law.com) Jeffrey R. Bragalone (jbragalone@bcpc-law.com) Bragalone Conroy P.C. 2200 Ross Ave. Suite 4500 – West Dallas, TX 75201 Tel: 214.785.6670 Fax: 214.786.6680

## UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBAL TEL\*LINK CORPORATION Petitioner v.

SECURUS TECHNOLOGIES, INC. Patent Owner

> Case IPR2014-00785 U.S. Patent No. 6,636,591

### **EXHIBIT 2003: DECLARATION OF DR. ROBERT AKL**

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# Petition for Inter Partes Review of U.S. Patent No. 6,636,591 Declaration of Dr. Robert Akl

I, Robert Akl, do hereby declare and state, that all statements made herein of 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 by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Executed this 23<sup>rd</sup> day of December 2014 in Denton, TX.

Robert Arce.

Dr. Robert Akl, D.Sc.

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C. Petitioner Failed as a Matter of Law to Meet its Burden of Proving Claims 1-10 Unpatentable by Failing to Show that One of Skill in the Art Would Have Reason to Combine Karacki and Gainsboro			
D. Karacki in View of Gainsboro does not Teach or Suggest Many of the Limitations of the '591 Patent			
1. The Combination of Karacki and Gainsboro Fails to Teach or Suggest the Element "reducing the telephone call charge rate for inmates that meet the measurement of conduct"			
2. The Combination of Karacki and Gainsboro Fails to Teach or Suggest the Element "establishing a discount telephone rate"			
3. The Combination of Karacki and Gainsboro Fails to Teach or Suggest the Element "a predetermined period of time"			
4. The Combination of Karacki and Gainsboro Fails to Teach or Suggest the Element "said measurement is a predetermined point total"			
5. The Combination of Karacki and Gainsboro Fails to Teach or Suggest the Element "providing an identification for each inmate"			

	6. The Combination of Karacki and Gainsboro Fails to Teach or Suggest the Element "raising the rate when an inmate no longer meets the measurem of conduct during incarceration" (element [2.1])	ent
	7. The Combination of Karacki and Gainsboro Fails to Teach or Suggest the Element "associating the reduced charge rate with at least one predetermined number" (element [9.4])	
	8. The Combination of Karacki and Gainsboro Fails to Teach or Suggest the Element "reduced charge rate for said at least one predetermined destination number" (element [10.1])	.34
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### I. INTRODUCTION

1. The facts set forth below are known to me personally and I have firsthand knowledge of them. I am a U.S. citizen over eighteen years of age. I am fully competent to testify as to the matters addressed in this Declaration. I understand that this Declaration is being submitted along with Patent Owner's response to the October 9, 2014 Decision on Institution of Inter Partes Review by the Patent Trial and Appeal Board ("PTAB") for US Patent No. 6,636,591 (hereinafter, "the '591 Patent") in IPR2014-00785.

### A. <u>Engagement</u>

2. I have been retained as a technical expert by Patent Owner to study and provide my opinions on the technology claimed in, and the patentability or nonpatentability of, Claims 1-10 of the '591 patent.

#### B. <u>Background and Qualifications</u>

3. I have summarized in this section my educational background, work experience, and other relevant qualifications. A true and accurate copy of my curriculum vitae is attached as Appendix A.

4. I earned my Bachelor of Science degrees in Electrical Engineering and Computer Science summa cum laude with a ranking of first in my undergraduate class from Washington University in Saint Louis in 1994. In 1996 I earned my Master of Science degree in Electrical Engineering from Washington University in Saint Louis. I earned my Doctorate of Science in Electrical

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