

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CSC SERVICEWORKS, INC.,
Petitioner,

v.

PAYRANGE, INC.,
Patent Owner.

IPR2023-01449
U.S. Patent No. 11,481,772

**DECLARATION OF DR. B. CLIFFORD NEUMAN
UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION FOR
INTER PARTES REVIEW**

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I, Dr. B. Clifford Neuman, do hereby declare as follows:

I. INTRODUCTION

1. I am making this declaration at the request of CSC Serviceworks, Inc. in the matter of the *Inter Partes* Review of U.S. Patent No. 11,481,772 (“the ‘772 patent”) to Patel.

2. I am being compensated for my work on this matter and for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the outcome of this matter or the specifics of my testimony, and I have no other interest in this case or the parties thereto.

3. I have been asked to provide my opinions regarding whether claims 1-6 and 8-20 (“the challenged claims”) of the ‘772 patent are unpatentable insofar as they would have been obvious to a person having ordinary skill in the art (“POSITA”) at the time of the alleged invention, in light of the prior art.

4. It is my opinion that all of the challenged claims would have been obvious to a POSITA.

5. In the preparation of this declaration, I have studied:

- The ‘772 patent, Ex.1001;
- The prosecution history of the ‘772 patent (“‘772 file history”), Ex.1002;

- U.S. Patent No. 7,458,510 to Zhou, Ex.1004;
- U.S. Patent App. Pub. No. 2003/0130902 to Athwal, Ex.1005;
- U.S. Patent No. 10,210,501 to Low *et al.*, Ex.1006;
- U.S. Patent No. 9,898,884 to Arora *et al.*, Ex.1007;
- U.S. Patent No. 8,255,323 to Casey *et al.*, Ex.1008;
- U.S. Patent No. 8,958,846 to Freeny, Ex.1009; and
- U.S. Patent App. Pub. No. 2010/0082485 to Lin *et al.*, Ex. 1010.

6. In forming the opinions expressed below, I have considered: the documents listed above, the relevant legal standards, including the standards for anticipation and obviousness; any additional authoritative documents as cited in the body of this declaration; and my own knowledge and experience based upon my work in the field of electronic payments and distributed networks as described below.

7. Unless otherwise noted, all emphasis in any quoted material has been added.

II. QUALIFICATIONS AND PROFESSIONAL EXPERIENCE

8. My complete qualifications and professional experience are described in my *Curriculum Vitae*, a copy of which can be found in Exhibit 1011. The

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