UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KIOSOFT TECHNOLOGIES LLC

and

TECHTREX, INC.

Petitioners

v.

PAYRANGE, INC.
Patent Owner

Patent 11,074,580

DECLARATION OF GERALD SMITH IN SUPPORT OF PETITION FOR POST-GRANT REVIEW OF U.S. PATENT NO. 11,074,580

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Kiosoft LLC EX1003
U.S. Patent No. 11,074,580

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A. The Limitation "Validating The Request, Wherein Validation Of The Request Indicates That The Mobile Device Is Authorized, By A Remote Server, To Access The Signals Generated By The First Peripheral Device" Is Indefinite (Claims 1-17).....167
B. The Limitations "Registering The Electronic Device As A Slave To The Machine Controller" And "Registering The First Peripheral Device As A Slave To The Electronic Device" Are Indefinite (Claims 1-17).....173

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I, GERALD SMITH, declare as follows:

I. Introduction

1. I have been asked by KioSoft Technologies LLC and TechTrex, Inc. ("Petitioners" and, collectively, "KioSoft") to provide my opinions in the above-captioned post-grant review proceeding involving U.S. Patent No. 11,074,580 ("the '580 patent," EX1001), which is titled "Device And Method For Providing External Access To Multi-Drop Bus Peripheral Devices."

2. I am being compensated at the rate of $450 per hour for the time I spend in connection with the proceeding. My compensation is not dependent in any way on the substance of my opinions or on the outcome of this proceeding.

II. Summary of My Opinions

3. To assist and orient the reader in reviewing this declaration, I have provided a summary of my main opinion below. Claims 1 to 17 (the "challenged claims") are anticipated by the prior art. Also, a person of ordinary skill in the art ("POSITA") at the time of the alleged invention would have found the subject matter of claims 1 to 17 obvious in view of the prior art. Additionally, a POSITA would not have found certain elements of the claims to be enabled by the written description of the '580 patent as of its filing date. A POSITA would have found other elements of the claims to have been indefinite as of the '580 patent's filing date.

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4. The specific grounds of unpatentability that I refer to are identified below:

Ground	Statute(s)	Challenge	Challenged Claim(s)
1	§102(a)(1)	**Anticipation** by WO 2014093857 ("Anderson," EX1005)	1-17
2	§103	**Obviousness** by Anderson in view of U.S. 8,596,529 ("Kolls," EX1016) and U.S. 2017/0193508 ("'508 publication," EX1007)	1-17
3	§101	Non-statutory subject matter	1-17
4	§112(b)	Indefiniteness	1-17

III. Qualifications and Experience

5. A copy of my *curriculum vitae* is provided as Exhibit 1004.

6. I obtained a Bachelor of Science in Electrical Engineering from Rose-Hulman Institute of Technology in 1978 and continued post graduate studies at Rutgers University from 1978 to 1983 in Electronics Engineering and Computer Science.

7. I am the founder of Generic Smart Cards LLC. I founded this company in 2012. I have worked extensively with smart cards, terminals, and transaction solutions since 1983. I have worked in a wide range of technologies relating to smart cards, including, but not limited to, silicon, operating systems, card applications, packaging, printing technologies, edge interfaces, terminals, and host system applications.

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