

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTERNATIONAL BUSINESS MACHINES CORPORATION,
Petitioner,

v.

DIGITALDOORS, INC.
Patent Owner

Case IPR2023-00973
U.S. Patent 8,468,244

**DECLARATION OF KRISTINA MARTIN
IN SUPPORT OF PATENT OWNER'S RESPONSE**

This declaration is given in support of DigitalDoors, Inc.’s Patent Owner Response.

1. I am a paralegal at the law firm of Global IP Law Group, LLC. I have personal knowledge of the facts set forth in this declaration and, if called to testify, could and would testify competently thereto.

2. In my role I am generally familiar with Clarivate’s Derwent Innovations patent technology system, and I work frequently with their “Patent Search” database tool.

3. In order to determine the number of forward citations of the ’244 patent family members, I used Derwent Innovations “Patent Search” database tool to generate a list of the total number of forward cited patents, the forward cited patent numbers, and the forward cited patent assignee. *See* Table 1.

4. I was then able to do an assignee search under the forward cited patent assignee column for “IBM” or “International Business Machines” to determine the number of forward cites to IBM. *See* Table 2.

5. Exhibit 2009 is a true and correct copy of the excel spreadsheet I used for these tables that was generated from Derwent Innovation’s patent system.

In compliance with 28 U.S.C. §1746 and 37 C.F.R. §42.2, I declare under penalty of perjury that the foregoing is true and correct.

-and-

In compliance with 35 U.S.C. §25, I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both (18 U.S.C. §1001).

-and-

In compliance with 37 C.F.R. §1.68, I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both (18 U.S.C. §1001) and may jeopardize the validity of the application or any patent issuing thereon. All statements made of my own knowledge are true and that all statements made on information and belief are believed to be true.

Executed on March 11, 2024



Kristina Martin