IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

Valtrus Innovations Ltd. and Key Patent Innovations Ltd.,	§	
Plaintiffs	§	
v.	§	**CIVIL ACTION NO. 2:24-CV-00021-JRG (LEAD CASE)**
SAP America, Inc. and SAP, SE.	§	
Defendants.	§	**JURY TRIAL DEMANDED**

Valtrus Innovations Ltd. and Key Patent Innovations Ltd.,	§	
Plaintiffs	§	
v.	§	**CIVIL ACTION NO. 2:24-CV-00021-JRG (MEMBER CASE)**
SAP America, Inc. and SAP, SE.	§	**JURY TRIAL DEMANDED**
Defendants.	§	

OPENING EXPERT REPORT OF MARTIN FARACH-COLTON, M.D., PH.D. REGARDING U.S. PATENT NOS. 6,889,244; 7,152,182; 7,313,575; AND 7,936,738

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Martin Farach-Colton, M.D., Ph.D.
New York, New York
May 12, 2025

I. INTRODUCTION AND REPORT SCOPE

1. My name is Dr. Martin Farach-Colton. I have been retained by counsel for Plaintiffs Valtrus Innovations Ltd. and Key Patent Innovations Ltd., Inc. (collectively, "Valtrus") to serve as an expert in *Valtrus Innovations Ltd. v. SAP America, Inc.*, Case No. 2:24-cv-00021-JRG and *Valtrus Innovations Ltd. v. SAP America, Inc.*, Case No. 2:24-cv-00533-JRG in the United States District Court for the Eastern District of Texas. I expect to testify at trial regarding the matters set forth in this expert report, if asked about those matters by the Court or the parties' attorneys.

A. Scope and Summary of Analysis

2. The scope of this report is to determine whether certain products and services of Defendants SAP America, Inc. and SAP, SE (the "Accused Products") infringe certain claims (the "Asserted Claims") of U.S. Patent Nos. 6,889,244; 7,152,182; 7,313,575; and 7,936,738 (collectively, the "Asserted Patents"), as identified in **Table A** below.

Table A – Identification of Asserted Patents and Asserted Claims

Asserted Patents	**Asserted Claims**
U.S. Patent No. 6,889,244 ("the '244 patent")	1
U.S. Patent No. 7,152,182 ("the '182 patent")	1, 6, 10, 16, 17, 18
U.S. Patent No. 7,313,575 ("the '575 patent")	1, 31, 36
U.S. Patent No. 7,936,738 ("the '738 patent")	1, 3, 33

3. Specifically, I have been asked to provide my opinions concerning (i) the technology disclosed and claimed in the Asserted Patents; (ii) the advantages or disadvantages with the technology disclosed and claimed in the Asserted Patents; (iii) whether and to what extent the Accused Products infringe the Asserted Claims; (iv) to the extent there is infringement, the

SAP - Exhibit 1130
SAP v. Valtrus et al. - IPR2025-00416
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