
UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

iVenture Card, Inc.
Petitioner

v.

Smart Destinations, Inc.
Patent Owner

Patent No. 7,765,128

DECLARATION OF KENNETH COX
IN SUPPORT OF PETITION FOR COVERED BUSINESS METHOD
REVIEW OF U.S. PATENT NO. 7,765,128

I, Kenneth Cox, declare as follows:

1. I make this declaration based upon my own personal knowledge and, if called upon to testify, can and will testify competently to the matters stated herein.

2. I am over 18 years of age. I am fully competent to make this declaration, and I have personal knowledge of the facts stated in this declaration. To the best of my knowledge, all of the facts stated in this declaration are true and correct.

3. I make this declaration in support of iVenture Card, Inc. (“iVenture”) petition for Covered Business Method Review of U.S. PATENT NO. 7,765,128.

4. I am the proprietor of Kenneth Cox Technical Translations, located in Wassenaar, The Netherlands.

5. I am fluent in both German and English and routinely translate documents from German to English. I also commonly proof read documents translated from German to English as part of my practice.

6. I have an undergraduate degree from Stanford University, specializing in physics.

7. I have been a professional translator from 1995 to present. For more information on my translations and related experience, please see my *curriculum vitae*, which is attached hereto as Exhibit A and incorporated herein by reference.

8. I understand that iVenture is relying on statements in the 3rd English Edition of the Smart Card Handbook. I have been asked whether that English-language publication was previously published in German, and if so, when.

9. The 3rd English Edition of the Smart Card Handbook is the result of the translation that I personally performed of the 4th German Edition of The Smart Card Handbook (*Handbuch der Chipkarten*). When I translated the 4th German Edition of the Smart Card Handbook into the 3rd English Edition of the Smart Card Handbook, I endeavored as best as possible to do a straight translation from German into English. I did not add any new substantive material into the 3rd English Edition of the Smart Card Handbook beyond what was already present in the 4th German Edition of the Smart Card Handbook. Indeed, it would be beyond my technical expertise to add new substantive material to this text.

10. I have received no communications that any part of the 3rd English Edition of the Smart Card Handbook is inconsistent with, or improperly translated from, the 4th German Edition of The Smart Card Handbook.

11. The 4th German Edition of the Smart Card Handbook (*Handbuch der Chipkarten*), was published by Carl Hanser Verlag of Munich/FRG, ISBN 3-446-22036-4, no later than September, 2002.

12. About that time I was contracted to translate the 4th German Edition of The Smart Card Handbook into English. I completed the translation from German to English in mid-2003. The translation was published as the 3rd English Edition of the Smart Card Handbook no later than December 2003, ISBN 0-470-85668-8

13. I translated the 4th German Edition of The Smart Card Handbook based on my knowledge, skill, experience, training, and education. My opinions in this declaration are also based on my knowledge, skill, experience, training, and education.

Jurat

I declare 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.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kenneth Cox", written in a cursive style.

Kenneth Cox

Dated: June 9, 2016

Exhibit A

Kenneth Cox
Technical Translations

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Curriculum Vitae

Translation services and experience

As a native English speaker, I translate from German and Dutch into English. I have been active as a freelance translator since 1995, following a previous career as an electronics technician and system engineer for computer-based systems. I specialise in technical translation, especially material related to electronics, IT, computers and engineering, but I also have translation experience in other scientific and technical fields, including mechanical engineering, and in general commercial documents and promotional material. As a full-time freelance translator, I regularly supply over 500,000 words per year to a variety of clients.

Personal

Although born and educated in the United States, I spent most of the first phase of my working life in Canada. I have been living and working in the Netherlands with my family since 1992.

I learned Dutch after arriving in the Netherlands, while my knowledge of German is based on both my education and the experience of living with a German wife.

Education

- BSc in physics, Stanford University (USA)
- Technical diploma in electronics (telecommunication), BCIT (Vancouver, Canada)
- Training courses in technical writing and system engineering

Technical experience

- Specification, design and testing of electronics hardware
- Specification, design, integration, testing and installation of computer-based systems for satellite image data reception and processing
- Preparing and conducting customer training courses
- Writing and reviewing technical documents (requirements, design, operation and maintenance)

Employment

- 1972 – 1978: Electronics technician, Gestalt International, Vancouver, Canada
- 1979 – 1992: Hardware and system engineer, MacDonald Dettwiler and Associates, Vancouver, Canada
- 1995 – present: Freelance translation and related activities