

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

PATENT TRIAL AND APPEAL BOARD

Q2 SOFTWARE, INC.;
Petitioner

v.

MIRROR IMAGING LLC
Patent Owner

**COVERED BUSINESS METHOD
REVIEW OF U.S. PATENT NO. 7,836,067**

“Method of Obtaining Electronically-Stored Financial Documents”

**DECLARATION OF BARRY BENTON IN SUPPORT OF PETITION
FOR COVERED BUSINESS METHOD REVIEWS OF
U.S. PATENT NOS. 6,693,866; 7,552,118; 7,836,067; and 9,141,612**

I, Barry Benton, hereby declare as follows:

1. I am the Senior Vice President and General Counsel of Q2 Software, Inc. ("Q2").

I provide this declaration in support of the petition for covered business method review ("Petition") of U.S. Patent Nos. 6,963,866; 7,552,118; 7,386,067; and 9,141,612 (collectively "the Asserted Patents"). I have personal knowledge of the matters stated herein, and if called upon to do so, could and would testify competently thereto.

2. Hanmi Bank is a customer of Q2.

3. On or about April 17, 2014, Q2 and Hanmi Bank entered a Master Data Processing Services Agreement ("Services Agreement"). A redacted true and correct copy of the Services Agreement is attached as Exhibit A.

4. Under the Services Agreement, specifically the Platform Package as described in the Master Sales Order, Q2 supplies Q2 products and services, including the Online Banking Solution.

5. Section 6.2 of the Services Agreement obligates Q2 to defend and indemnify Hanmi Bank against claims that use of the Q2 products and services, including the Online Banking Solution, infringes a U.S. Patent.

6. Q2 and Hanmi Bank have entered an Agreement to Defend. A redacted true and correct copy of the Agreement to Defend is attached as Exhibit B.

7. Under the Agreement to Defend, Q2 assumed the defense of Hanmi Bank with respect to the Asserted Patents. The Agreement to Defend further gives Q2 sole control of that defense.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED at Austin, Texas, this 10th day of January, 2017.


Barry Benton