

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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COMCAST CABLE COMMUNICATIONS, LLC,  
Petitioner,

v.

PROMPTU SYSTEMS CORPORATION,  
Patent Owner.

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Case IPR2018-00344  
Patent 7,047,196

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**DECLARATION OF JEFFREY LAU IN SUPPORT OF PETITIONER'S  
REPLY TO PATENT OWNER'S RESPONSE**

I, Jeffrey Lau, make the following declaration in support of reply briefs filed by petitioner Comcast Cable Communications, LLC (“Comcast”) in two *inter partes* review proceedings involving U.S. Patent No. 7,047,196:

1. I am an attorney with the law firm of Farella Braun + Martel LLP, counsel for Comcast. Unless otherwise stated, the facts stated in this declaration are based on my personal knowledge.

2. The document submitted with the reply briefs and identified as Exhibit 1024 in both proceedings is a true and correct copy of excerpts from the transcript of the deposition of Paul M. Cook, which was taken over a period of three days including October 30, October 31, and November 1, 2018.

3. The document submitted with the reply briefs and identified as Exhibit 1025 is a true and correct copy of the transcript of the deposition of David Chaiken, which was taken on November 30, 2018. We prepared and attached an index at the end of Exhibit 1025 showing the correspondence between the exhibit numbers used in the Chaiken deposition with exhibit numbers in these proceedings.

4. The document submitted with the reply briefs and identified as Exhibit 1026 is a true and correct copy of the transcript of the deposition of John Tinsman, which was taken on November 29, 2018. We prepared and attached an index at the end of Exhibit 1026 showing the correspondence between the exhibit

numbers used in the Tinsman deposition with exhibit numbers in these proceedings.

5. The document submitted with the reply briefs and identified as Exhibit 1027 is a true and correct copy of paper entitled *The Inducement Standard of Patentability*, 120 Yale L.J. 1590 (2011) that appears to have been authored by Michael Abramowicz and John F. Duffy.

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.

A handwritten signature in blue ink, consisting of a stylized 'J' and 'L' followed by a long horizontal stroke.

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Jeffrey Lau