

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EXPRESS MOBILE, INC.,

Plaintiff,

v.

GODADDY.COM, LLC,

Defendant.

Civil Action No. 19-1937-RGA

**OPENING EXPERT REPORT OF PHILIP GREENSPUN, PH.D.**  
**REGARDING INVALIDITY OF THE PATENTS-IN-SUIT**

respect to Stevens for example, Stevens includes additional UI objects not discussed in Huang. Incorporating this disclosure would allow for additional web services using more complex UI objects to be used using the system and methods of Huang.

**XIX. SUMMARY OF MY OPINIONS CONCERNING INVALIDITY OF THE '755/287/044 PATENTS BASED ON ANTICIPATION AND/OR OBVIOUSNESS**

427. The Asserted Claims of the '755, '287, and '044 patents are all invalid because they are:<sup>50</sup>

- a. *Anticipated*, each independently, and/or are rendered *obvious* alone in combination with the knowledge of a POSA, by BlackBerry MDS, iWeb, Huang, Arner, and NexaWeb; and/or
- b. *Obvious* based on either:
  - 1. BlackBerry MDS in combination with Arner, Huang, or Stevens;
  - 2. iWeb in combination with Huang, Stevens, or Huang and Stevens;
  - 3. Huang in combination with Stevens;
  - 4. Arner in combination with Huang and Stevens; or
  - 5. NexaWeb in combination with Arner, Huang, or Stevens.

428. Attached as Exhibits N-AA are charts describing in detail how each of these references discloses each and every limitation of, and/or renders obvious, the asserted claims of the '755, '287, and '044 patents.

**XX. SECONDARY CONSIDERATIONS OF NON-OBVIOUSNESS RELATING TO THE '755, '287, AND '044 PATENTS**

429. As noted above, it is my understanding that there are “secondary considerations” that should be analyzed in an obviousness analysis. I am told that these considerations include (a) whether the prior art teaches away from the claimed invention, (b)

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<sup>50</sup> To the extent this list conflicts with the accompanying claim charts, the claim charts govern.

praising similar systems. I am not aware of anyone copying the Express Mobile system.

**XXI. CONCLUSION**

436. For all of the reasons set forth above and in the exhibits or attachments accompanying this report, it is my opinion that the asserted claims of the '397, '168, '755, '287, and '044 patents are invalid.

\* \* \*

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 30, 2021 in Oshkosh, Wisconsin.

A handwritten signature in cursive script that reads "Philip Greenspun".

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Philip Greenspun, Ph.D.