EXHIBIT "F"

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

DATATREASURY CORPORATION,	§	
	§	
Plaintiff	§	
	§	
v.	§	Civil Action No.: 2:05-CV-294
	§	
CITIGROUP INC., CITIBANK,	§	
NATIONAL ASSOCIATION,	§	
	§	
	§	
	§	
Defendants	§	

AFFIDAVIT OF TERRY L. GEER

STATE OF OHIO	§
	§
COUNTY OF JACKSON	§

1. My name is Terry L. Geer. I am over twenty-one (21) years of age, of sound mind and competent to make this Affidavit. I have personal knowledge of the matters stated herein, which are true and correct.

2. I worked at Huntington National Bank for 37 years, most of it in Operations, Private Financial Group and Treasury Management. I retired as a Senior Vice President in 2000. I have over thirty years of experience in Check Processing and Float Management. I have participated in several professional associations, for example the American Bankers' Association and the Unisys Users Group. I led the effort to create the National Clearinghouse Association after petitioning the Federal Reserve Bank for approximately four years. I also initiated the movement within the Huntington National Bank to generate the technology and rules and regulations required to run the National Clearinghouse.

3. I am a co-inventor of U.S. Patent No. 5,265,007 ("the '007 Patent"). I am the sole inventor of U.S. Patent No. 5,583,759 ("the '759 Patent") and U.S. Patent No. 5,930,778 ("the '778 Patent"). I have recently carefully reread and analyzed each of these three patents. With my years of experience, I consider myself more than qualified as a person of ordinary skill in the art of these three patents. In my opinion, a person of ordinary skill in the art would have a minimum of 2-4 years of direct experience in the following areas of banking: bank operations, float management and basic accounting, check processing operations, and clearing

house operations and certain banking payment rules and Federal Reserve practices. In my years of experience at Huntington National Bank, I have managed many persons of ordinary skill in the art.

4. I offer the understanding of a person of ordinary skill in the art for the issues in each of the terms below as they relate to these three patents.

'007 Patent—Means within each of the pre-selected receiving institutions…for receiving from the central processing unit a calculated value (a) on a real time basis and (b) on a regular periodic settlement basis, information regarding the debits and credits owing to or payable by an institution with respect to each other of the institutions with regard to instruments sent and received

5. Every participant bank's means for accessing the CPU for send/receive and net position status was simply a PC utilizing software like PC Anywhere associated with the operating system such as the Solaris OS system and database management software such as Oracle associated with the Central Processing Unit.

6. A person skilled in the art would understand that the communication link between the CPU and the member PC provided for the ability to receive and send data regarding cash letters.

'007—Means for continuous monitoring on real time basis, as reported by each institution by the means for sending information within each institution (a)(i) the sending and receipt status of the instruments and (ii) the value of the instruments sent and received, as reported by each of the institutions, and (b) the status in transit of the instruments with respect to their having been (i) sent and (ii) received, as reported by each of the institutions, according to the reporting of an institution's sending and receiving of instruments

7. Means for continuous monitoring is simply the capability to access the data on the CPU. The bank's PC with off-the-shelf software as discussed above is connected to the CPU of The National Clearinghouse. The banks have the ability to enter and confirm cash letters and review the status of all activity online. This was the first clearinghouse to have this online capability.

'007—Means for calculating debits and credits…as monitored on a real time basis from information reported by the institutions

8. Basic programmable accounting instructions (like Lotus) associated with the CPU is used to calculate the debit and credit positions for each bank in the network. This data is updated in real time and shows the ongoing net debit or credit position for each bank. The data shows intraday risk exposure and helps a bank manage liquidity.

'007—A Cycling means interrelated with the central processing unit (a) for controlling the physical transport of the financial instruments among the

institutions and (b) for controlling the means for calculating

9. A cycling means is simply the activities that must happen on a 24 hour clock as spelled out in the rules and regulations of the clearinghouse and interrelated with the bank's PC and the central processing unit. Bank operations do the same thing in a preset routine every day. All events have a start time and a cutoff time. Deadlines are well understood in the industry.

'007—Means at each participant for (1) sending and receiving financial instruments to be cleared, (2) sending and receiving in real time, information reporting value and transit status of the financial instruments to be cleared to a programmable CPU, (3) Addressing CPU by which a participant may determine in real time, the information received by the CPU with respect to that participants real time debit and credit obligation with respect to other institutions arriving from instructions that are reported to be sent and received.

10. The aspects for physically exchanging financial instruments are air or ground transportation. Sending and receiving cash letters is a process that has been in place for years.

11. The participants would send and receive through electronic communication links to the Central Processing Unit, from a PC at the bank. The participants would address the CPU through the same electronic communication links.

'007—Means for receiving and recording a participant's reports of the value and transit status of the instruments to be cleared as having been sent and received with respect to all participants in the system

12. All a bank must do to receive a report of all items sent and received is do an inquiry on their PC. To record the reports, the bank simply printed a hard copy of the report. This is essentially a print screen function.

13. The receiving and recording functions occur as a natural extension of a PC's operating system. Purchased off-the-shelf software, as discussed above, allowed participants' PC's to link to the CPU.

'007—Means for monitoring on a real time as reported basis

14. Means for monitoring in real time is simply looking at the participant's PC monitor for updated information. This is a practice familiar to operations staff and requires no special software. PC's as a course of their operating system will display file information as presented. Again, purchased software allowed a participant's PC to link to the Clearinghouse central processing unit so data could be reviewed.

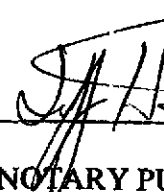**'759 Patent—"Means at the first location for preparing one or more cash letters"**

15. The common application for preparing the cash letters is well understood in the industry to be software from vendors such as CPCS (Check Processing Control Systems), SuperMICR and IPS (Item Processing Systems), IIPS (Image Item Processing Systems) operating directly or indirectly with traditional sorters made available from vendors such as Unisys (e.g., 1800), NCR (775, 7750, 7780), and IBM (e.g., 3890). This software for operating these sorters is commonly available.

'778 Patent—"Imager"

16. A person of ordinary skill in the art would understand the item capture 4 in Figure 1 and the associated components to be the "imager." The imager creates an "image" as defined in the patent specification. At around the time of writing the '778 Patent, it was well understood that hardware such as the sorters above with software from vendors such as IPS, IIPS, Unisys, and NCR were used as imagers.

TERRY GEER

SUBSCRIBED AND SWORN TO BEFORE ME this _9th_ day of _April_, 2007.

NOTARY PUBLIC, STATE OF

TEXAS   *OHIO*

My Commission Expires:
Jackson County
August 30, 2011