

*Covered Business Method Review of USPN 6,771,970  
Declaration of Oded Gottesman, Ph.D. (Exhibit 1026)*

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE INC.  
Petitioner

v.

LOCATIONNET SYSTEMS LTD.  
Patent Owner

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Covered Business Method Review No. Unassigned  
Patent No. 6,771,970

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**DECLARATION OF ODED GOTTESMAN, PH.D.**

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Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

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I, Oded Gottesman, hereby declare as follows:

**I. INTRODUCTION**

**A. Background**

1. My name is Oded Gottesman. I am a researcher and consultant working in areas related to digital signal processing, telecommunications, networks, and location and positioning systems.

2. I have been retained to act as an expert witness on behalf of Google Inc. (“Petitioner”) in connection with the above captioned Petition for Covered Business Method Review of U.S. Patent No. 6,771,970 (“Petition”). I understand that this proceeding involves U.S. Patent No. 6,771,970 (“the ’970 Patent”), titled “Location Determination System.” The ’970 Patent is provided as Exhibit 1001.

3. I understand that Petitioner challenges the validity of Claims 14–17 and 19 of the ’970 Patent (the “challenged claims”).

4. I have reviewed and am familiar with the ’970 Patent as well as its prosecution history. The ’970 prosecution history is provided as Exhibit 1003. Additionally, I have reviewed materials identified in Section III.

5. As set forth below, I am familiar with the technology at issue as of the October 4, 1999 filing of Provisional Patent Application No. 60/157,643, Exhibit 1002. I have been asked to provide my technical review, analysis, insights, and opinions regarding the prior art references that form the basis for the Petition. In

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forming my opinions, I have relied on my own experience and knowledge, my review of the '970 Patent and its file history, and of the prior art references cited in the Petition.

6. My opinions expressed in this Declaration rely to a great extent on my own personal knowledge and recollection. However, to the extent I considered specific documents or data in formulating the opinions expressed in this Declaration, such items are expressly referred to in this Declaration.

7. I am being compensated for my time in connection with this covered business method review at my standard consulting rate, which is \$475 per hour. My compensation is not contingent upon and in no way affects the substance of my testimony.

**B. Qualifications**

8. In this section, I have summarized my education, knowledge, skill, experience and training. My *curriculum vitae* contains further details on my education, experience, publications and other qualifications. A copy is provided as Exhibit 1027.

**1. Summary of Education**

9. I earned a Ph.D. in Electrical and Computer Engineering from the University of California of Santa Barbara in 2000 and have subsequently performed post-doctoral research at the University of Santa Barbara as well. In

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