UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

American Honda Motor Co., Inc.
Petitioner

v.

Blitzsafe Texas, LLC
Patent Owner

Patent No. 7,489,786
Filing Date: December 11, 2002
Issue Date: February 10, 2009
Title: AUDIO DEVICE INTEGRATION SYSTEM

Inter Partes Review No. <u>IPR2016-01472</u>

**DECLARATION OF JAMES T. GEIER
IN SUPPORT OF PETITION FOR INTER PARTES REVIEW OF U.S.
PATENT NO. 7,489,786**

I, James T. Geier, hereby declare and state as follows:

I. BACKGROUND AND QUALIFICATIONS

1. A copy of my curriculum vitae is attached.

2. I have 30 years' experience in the communications industry designing, analyzing and implementing communications systems, wireless networks, and mobile devices.

3. I received a Bachelor's Degree in Electrical Engineering from California State University in 1985. I received a Masters Degree in Electrical Engineering from the Air Force Institute of Technology in 1990. I also received an M.B.A. from the University of Phoenix in 2001.

4. From 1986 to 1989, while in the Air Force and assigned to the 1815th Operational Test and Evaluation Squadron, I tested and evaluated wired and wireless communications systems supporting the transport of military data, voice and video information worldwide. For example, this included running tests to validate performance and compatibility of different communications devices, such as secure telephones. During this time, I was also an instructor at the 1815th System Evaluation School, where I developed and taught courses on communications technologies and test methods.

5. From 1990 to 1992, while in the Air Force and assigned to the Information Systems Center, I designed and implemented computer networks for

Wright-Patterson Air Force Base. This involved testing some of the first-available routers, switches and controllers in a laboratory environment and then later designing and overseeing the installation of corresponding networks throughout Wright-Patterson Air Force Base for supporting thousands of users.

6. From 1992 to 1994, while employed at Adroit Systems, Inc., I analyzed and evaluated communications technologies for use in Airborne communications platforms, such as aircraft and satellites, to support secure transport of data, voice and video information.

7. From 1994 to 1996, while employed at TASC, Inc., I designed and implemented communication networks for civilian and military applications. For example, I analyzed and designed for the U.S. Department of Defense an audio / video conferencing system for use by soldiers in battlefields. I also designed a highly secure communications network supporting data, voice and video applications for a U.S. Navy attack submarine.

8. From 1996 to 2000, while employed at Monarch Marking Systems, I designed and developed wireless printers and corresponding networks for customers. This included designing wireless bar code scanners having voice command recognition capabilities. In addition, I designed and implemented wireless middleware that provided an interoperable interface between incompatibility bar code scanners and servers.

9.   Since 2000, I have been an independent consultant working under the business name Wireless-Nets, Ltd., where I have been analyzing and designing wireless devices, communications systems and applications. As examples, I have designed and tested voice-over-Wi-Fi user devices and networks, designed and implemented drivers for Bluetooth transceivers, and implemented microcontroller-based audio encoding for operation over ZigBee wireless networks.

II.   ASSIGNMENT AND MATERIALS REVIEWED

10.   I submit this declaration in support of the Petition for *Inter Partes* Review of U.S. Patent No. 7,489,786 ("the '786 patent").

11.   I am not currently, and have not previously been, an employee of Honda Motor Co., Ltd. or any of its affiliates or subsidiaries, including American Honda Motor Co., Inc. ("Honda") and Honda of America Mfg., Inc.

12.   I am being compensated for my time at a rate of $300 per hour. My compensation is in no way dependent upon the substance of the opinions I offer below, or upon the outcome of Honda's petition for *inter partes* review (or the outcome of such an *inter partes* review, if a trial is initiated).

13.   I have been asked to provide certain opinions relating to the patentability of the '786 patent. Specifically, I have been asked to provide my opinion regarding (i) the level of ordinary skill in the art to which the '786 patent

pertains and (ii) the patentability of claims 1, 5, 6, 7, 8, 10, 14, 57, 60, 61, 62, 64, and 65.

14.   The opinions expressed in this declaration are not exhaustive of my opinions on the patentability of claims 1, 5, 6, 7, 8, 10, 14, 57, 60, 61, 62, 64, and 65. Therefore, the fact that I do not address a particular point should not be understood to indicate any agreement on my part that any claim otherwise complies with the patentability requirements.

15.   I have reviewed the '786 patent and its prosecution history in forming my opinions in this declaration.

16.   I have reviewed the following prior art to the '788 patent:

a)   U.S. Patent No. 6,629,197 to Bhogal et al. ("Bhogal") (Ex. 1004);

b)   U.S. Patent No. 6,559,773 to Berry ("Berry") (Ex. 1005);

c)   Japanese Unexamined Patent Application Publication No. JP 2001-128280A to Onishi et al. ("Onishi") (Exs. 1006 & 1007 (English translation));

d)   U.S. Patent Application Publication No. 2001/0028717 A1 to Ohmura et al. ("Ohmura") (Ex. 1008);

e)   European Patent Application No. EP 0 953 486 A2 to Okagaki et al. ("Okagaki") (Ex. 1009);

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