

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. 8,155,342  
Filing Date: June 27, 2006  
Issue Date: April 10, 2012  
Title: MULTIMEDIA DEVICE INTEGRATION SYSTEM

---

*Inter Partes* Review No. IPR2016-01473

---

**DECLARATION OF JAMES T. GEIER  
IN SUPPORT OF PETITION FOR INTER PARTES REVIEW OF U.S.  
PATENT NO. 8,155,342**

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. 8,155,342 (“the ‘342 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. 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 proceeding, if a trial is initiated).

13. I have been asked to provide certain opinions relating to the patentability of the ’342 patent. Specifically, I have been asked to provide my opinion regarding (i) the level of ordinary skill in the art to which the ’342 patent pertains

and (ii) the patentability of claims 49, 53, 54, 56, 57, 62, 66, 70, 73, 77, and 78 of the '342 patent.

14. The opinions expressed in this declaration are not exhaustive of my opinions on the patentability of claims 49, 53, 54, 56, 57, 62, 66, 70, 73, 77, and 78. 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 '342 patent, its prosecution history, and the papers in Case IPR2016-00418 and Case IPR2016-00118 in forming my opinions in this declaration.

16. I have reviewed prior art to the '342 patent, including the following:

- a) U.S. Patent Application Publication No. 2003/0215102 ("Marlowe") (Ex. 1009);
- b) US 2003/007649 A1 ("Riggs") (Ex. 1012);
- c) DE 10101702 A1 ("Plagge") (Ex. 1011);
- d) U.S. Patent No. 6,629,197 ("Bhogal") (Ex. 1013);
- e) U.S. Patent Application Publication No. US 2003/0171834 A1 ("Silvester") (Ex. 1014);
- f) U.S. Patent Application Publication No. US 2005/0281414 A1 ("Simon") (Ex. 1015);

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.