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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Mail Stop Patent Board
Patent Trial and Appeal Board
P.O. Box 1450
Alexandria, VA 22313-1450

**DECLARATION OF JAMILA
WILLIAMS.**

Inter-partes Review Trials:

IPR2017-00136
IPR2017-00137

1 I, Jamila Williams, hereby declare as follows:
2

3 1. I have personal knowledge of the facts stated in this Declaration, and
4 am competent to testify thereto.

5 2. I am a skilled prior art searching professional, with sixteen years of
6 professional experience in patent searching, presently employed by CPA Global
7 (Landon IP) Inc. as Director of Mechanical Engineering – IP Search. Before my
8 employment with CPA Global (Landon IP) Inc., I was employed as a prior art
9 searching professional for CPA Global (Landon IP) Inc.’s predecessor, Landon IP,
10 Inc., starting in 2011. Previously, I was a Patent Examiner at the United States
11 Patent and Trademark Office, from 2001 to 2009. During that entire fourteen-year
12 time period, I have been conducting and supervising professional prior art searches.

13 3. Landon IP, Inc. was purchased by CPA Global in August 2014 and was
14 rebranded as CPA Global (Landon IP) Inc. in April 2016. Before, throughout, and
15 after the acquisition of Landon IP by CPA Global, I was continuously employed by
16 the acquired or acquiring entity as a prior art searching professional.

17 4. The law firm of Barceló, Harrison & Walker, LLP (hereinafter “the
18 Client”) hired Landon IP on various occasions to conduct patent validity searches,
19 including a particular group of prior art searches in March 2014 on an allegedly
20 inventive controller for a video game console, as described and claimed in US
21 Patent 8,641,525 (and in US Patent 9,089,770, which has a common specification
22 and the same priority date). The Client paid Landon IP \$6,880 for that particular
23 group of prior art searches (hereinafter “the Subject Searches”), of which \$4,300
24 was incurred because the Client authorized the searching that Landon IP
25 recommended, and an additional \$2,580 was incurred because the Client also
26 authorized supplemental Japanese prior art searching.

27 5. Landon IP dedicated a four-person team to the Subject Searches,
28 directed by Mr. Adam West, with me acting as the Technical Lead, and including a

1 US prior art analyst and a Japanese prior art analyst. All four members of that team
2 were well-trained search professionals at the time of the Subject Searches, each with
3 several years of experience in applying the best practices in prior art searching, and
4 each spending approximately five days of labor on the Subject Searches.

5 6. At the time of the Subject Searches, Landon IP had been offering
6 professional patent search services for more than 16 years, and was an industry
7 leader in patent searching methods, founded in 1998.

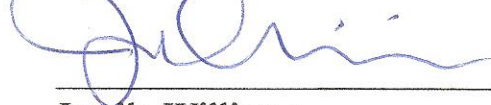
8 7. In 2007, three executives of Landon IP, Inc., wrote a book on the tools
9 and techniques of patent searching, which book then became well regarded as an
10 authority on professional patent searching methods. The co-authors of the book
11 were David Hunt, the CEO and owner of Landon IP, Long Nguyen, the director of
12 patent search quality for Landon IP, and Matthew Rogers, the vice president of the
13 patent search group of Landon IP. The book was published as: “Patent Searching:
14 Tools and Techniques,” David Hunt, ISBN: 978-0-471-78379-4, John Wiley &
15 Sons, 2007. Naturally, Landon IP’s prior art searches, including the Subject
16 Searches, were conducted in general accordance with methods outlined in that book,
17 which had been written by Landon IP’s own leadership. I am familiar with that
18 book, which is considered to be a learned and trusted treatise in the field of prior art
19 searching, and a true and correct copy of an excerpt of it appears at Appendix 1 of
20 this declaration.

21 8. The first step of the Subject Searches was to collaborate with the Client
22 to identify target claims and specific limitations of interest, the critical dates, and
23 any prior art references already known to the Client. Initial citation searching was
24 then performed, to review the prior art of record and prior art already known to the
25 Client, to help identify most pertinent search classes & sub-classes, and keywords.
26 The initial searching of the Subject Searches also included ten internet searches on
27 products that were potentially pertinent to the subject controller for a video game
28 console.

1 9. Once the most pertinent search classes & sub-classes, and keywords
2 were initially identified, numerous searches of the Subject Searches were performed
3 using that information. For example, the Subject Searches included approximately
4 eleven searches by the most pertinent classification & sub-classifications that had
5 been identified, and approximately 45 searches by the most pertinent keywords and
6 combinations of keywords that had been identified. Several manual searches, and
7 several searches by assignee, were also performed as part of the Subject Searches.
8 Once prior art references of particular interest were identified, forward and
9 backwards citation searches on those prior art references were also conducted as part
10 of the Subject Searches. A true and correct copy of the search strings that were used
11 for searching U.S. patent documents and on the Internet during the Subject Searches
12 appears at Appendix 2 of this declaration. A true and correct copy of the search
13 strings that were used for searching Japanese documents during the Subject
14 Searches (and an English translation of the same) appear at Appendix 3 of this
15 declaration. The search string records that appear at Appendices 2 and 3 of this
16 declaration were made and generated by my team (including myself) as part of
17 Landon IP's regular prior art searching processes and practices, and were included
18 with the prior art search results that were transmitted to my team (including myself)
19 and to Mr. Reynaldo C. Barceló, an attorney for the Client, on March 27, 2014.
20 These search strings are records that are kept and were transmitted in the course of
21 Landon IP's regularly conducted activity.

22 10. CPA Global (Landon IP) Inc. is being paid \$200 per hour for my work
23 associated with preparing this declaration and the related required analysis. My
24 compensation for work on this declaration is not contingent on any outcome in this
25 case. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the
26 foregoing is true and correct.
27
28

1 Executed on: November 1, 2017



2 Jamila Williams
3 Director of Mechanical Engineering –
4 IP Search,
5 CPA Global (Landon IP) Inc.

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