### UNITED STATES PATENT AND TRADEMARK OFFICE

## BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE, INC. Petitioner

v.

BLACKBERRY, LTD. Patent Owner

IPR No. IPR2017-00913 U.S. Patent 8,402,384

### **DECLARATION OF DR. GEORGE T. LIGLER**

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# PETITIONER'S EXHIBITS CONSIDERED

No.	Exhibit Description
1001	U.S. Patent No. 8,402,384
1002	Declaration of Dr. Dan R. Olsen Jr.
1003	Curriculum Vitae of Dr. Dan R. Olsen Jr.
1004	Prosecution History of U.S. Patent No. 8,402,384
1005	U.S. Patent Application Publication No. 2002/0186257 ("Cadiz")
1006	U.S. Patent Publication No. 2004/0075701 ("Ng")
1007	RESERVED
1008	U.S. Patent Publication No. 2005/0198584 ("Matthews")
1009	U.S. Patent No. 6,333,973 ("Smith")
1010	European Patent Application No. EP1265157 ("Cadiz-EP")
1011	Prosecution History of European Patent Application No. 06125884.4
1012	Caroline Rose et al., "Inside Macintosh Volume 1" (1985)
1013	"Macintosh Human Interface Guidelines," Apple Computer, Inc. (1995)

# PATENT OWNER'S EXHIBITS CONSIDERED

No.	Exhibit Description
2001	U.S. Patent App. Pub. No. 2006/0020904 A1 to Aaltonen et al.
2002	U.S. Patent App. Pub. No. 2004/0155908 A1 to Wagner
2003	[RESERVED]
2004	Microsoft Computer Dictionary (5th Ed. 2002) (Excerpt)
2005	The American Heritage College Dictionary (4th Ed. 2004) (Excerpt)
2009	Deposition Transcript of Dr. Daniel R. Olsen, Jr. (Nov. 21, 2017)

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### I. INTRODUCTION

### A. Engagement

1. I have been retained on behalf of Patent Owner Blackberry, Ltd. ("Blackberry") to offer statements and opinions generally regarding the novelty and understanding of a person of ordinary skill in the art ("POSA") in the industry as it relates to U.S. Patent No. 8,402,384 (Exhibit 1001, "the '384 patent"), which is entitled "Dynamic Bar Oriented User Interface." I understand that Petitioner Google LLC ("Petitioner") has challenged claims 1-13 of the '384 patent as unpatentable over certain prior art. I have been asked to provide my opinion and analysis of the various references and opinions advanced in the Declaration of Dr. Dan R. Olsen, Jr., which I understand to be Exhibit 1002 to these proceedings ("Olsen Declaration").

2. I have personal knowledge of the facts and opinions set forth in this declaration, and believe them to be true. If called upon to do so, I would testify competently thereto. I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both.

3. I am being compensated for my time at the rate of \$600 per hour for my work in connection with this matter. I am being reimbursed for reasonable and customary expenses associated with my work in this investigation. This compensation is not dependent in any way on the contents of this Declaration, the

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substance of any further opinions or testimony that I may provide or the ultimate outcome of this matter.

### **B.** Background and Qualifications

4. I am self-employed as the sole proprietor of GTL Associates. I provide consulting services primarily related to systems engineering of computer systems, both hardware and software, and telecommunications. "Systems engineering" is the engineering that it takes to put together a computer system, starting from requirements through design, implementation and fielding. Since I began GTL Associates in 1988, I have worked with 42 clients in the United States, Europe and Asia. I have also served on a *pro bono* basis both (1) on five panels/committees formed by the National Academies of Sciences, Engineering, and Medicine to advise the Government on issues related to computer system technology, design and implementation and, (2) at the request of then-Secretary of Commerce Gutierrez, on a 2008 Expert Panel related to technology implementation for the 2010 Census.

5. I earned a Bachelor's degree in Mathematics (*summa cum laude*) from Furman University in 1971, and Master of Science (M.Sc.) and Doctorate (D.Phil.) degrees in Computer Science from Oxford University in 1973 and 1975, respectively. My studies at Oxford were supported by a Rhodes Scholarship. My doctoral dissertation was directed to the design of computer programming languages.

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