# UNITED STATES PATENT AND TRADEMARK OFFICE

## BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE, INC. Petitioner

V.

BLACKBERRY, LTD.
Patent Owner

IPR No. IPR2017-00914 U.S. Patent 8,713,466

DECLARATION OF DR. GEORGE T. LIGLER



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A B	<ol> <li>CADIZ'S PERSON-CENTRIC INTERFACE DOES NOT DISCLOSE OR RENDER OBVIOUS ANY CLAIM OF THE '466 PATENT</li> <li>Cadiz's Person-Centric Interface Does Not Disclose or Suggest the "Software Application" of Claims 1, 14, and 22</li></ol>	.26 .27 s
VI.	CADIZ IN VIEW OF SIEDLIKOWSKI DOES NOT RENDER OBVIOUS CLAIMS 7, 8, 9, 18, 19, OR 25	40
	CADIZ IN VIEW OF SIEDLIKOWSKI DOES NOT RENDER OBVIOUS CLAIMS 7-9, 18-19, OR 25	
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A.	OVERVIEW OF YAMADERA
В.	A POSA WOULD NOT HAVE BEEN MOTIVATED TO COMBINE CADIZ AND
	YAMADERA, AS DR. OLSEN SUGGESTS, BECAUSE THE COMBINATION WOULD
	PROVIDE NO ADDED BENEFIT TO THE USER47

## PETITIONER'S EXHIBITS CONSIDERED

No.	Exhibit Description
1001	U.S. Patent No. 8,713,466
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. 8,713,466
1005	Prosecution History of U.S. Patent No. 8,402,384
1006	U.S. Patent Application Publication No. 2002/0186257 ("Cadiz")
1007	U.S. Patent No. 7,007,239 ("Hawkins")
1008	U.S. Patent No. 6,741,232 ("Siedlikowski")
1009	U.S. Patent Publication No. 2002/0123368 ("Yamadera")
1010	U.S. Patent No. 7,454,714 ("Totman")
1011	European Patent Application No. EP1265157 ("Cadiz-EP")
1012	Caroline Rose et al., "Inside Macintosh Volume 1" (1985)
1013	"Macintosh Human Interface Guidelines," Apple Computer, Inc. (1995)
1014	Prosecution History of European Patent Application No. 06125884.4

## 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	U.S. Patent No. 8,402,384 B2 to Scott
2004	[RESERVED]
2005	The American Heritage College Dictionary (4th Ed. 2004) (Excerpt)
2009	Deposition Transcript of Dr. Daniel R. Olsen, Jr. (Nov. 21, 2017)



### 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. 8,713,466 (Exhibit 1001, "the '466 patent"), which is entitled "Dynamic Bar Oriented User Interface." I understand that Petitioner Google LLC ("Petitioner") has challenged claims 1-26 of the '466 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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