UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FLIR SYSTEMS, INC.,
FLIR MARITIME US, INC. (F/K/A RAYMARINE, INC.), and
NAVICO, INC.,

Petitioners,

v.

GARMIN SWITZERLAND GmbH,

Patent Owner.

Case IPR2017-00946

Patent 7,268,703 B1[1]

SECOND DECLARATION OF DR. MICHAEL S. BRAASCH

[1] Navico, Inc. was joined as a party to this proceeding via a Motion for Joinder in IPR2017-02051.

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I, Dr. Michael S. Braasch, make this declaration at the request of FLIR Systems, Inc. and FLIR Maritime US, Inc. (collectively, "FLIR") in connection with the petition for *inter partes* review submitted by Petitioners for U.S. Patent No. 7,268,703 ("the 703 Patent"). This declaration is provided in response to the Patent Owner Response ("POR") dated November 15, 2017 submitted by Garmin Switzerland GmbH ("Garmin"); the Motion to Amend under 37 C.F.R. § 42.121 also submitted by Garmin; and the Declaration of Captain Steven Browne ("Browne Decl."), submitted in support of Garmin's positions. All statements made herein of my own knowledge are true, and all statements made herein based on information and belief are believed to be true. Although I am being compensated for my time in preparing this declaration, the opinions articulated herein are my own, and I have no stake in the outcome of this proceeding or any related litigation or administrative proceedings.

I. INTRODUCTION

1. I previously submitted a declaration in support of FLIR's petition for *inter partes* review of the 703 Patent (which I will refer to here as my "First Decl."). In the preparation of this declaration, I again reviewed the relevant portions of the following documents:

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Ex. 1001	U.S. Patent No. 7,268,703 to Kabel et al. ("703 Patent")
Ex. 1002	Prosecution File History of U.S. Patent No. 7,268,703
Ex. 1003	Declaration of Dr. Michael S. Braasch
Ex. 1004	Curriculum Vitae of Dr. Michael S. Braasch
Ex. 1005	W.J. de Jong, *Automated Route Planning – A Network-Based Route Planning Solution for Marine Navigation*, University of Nottingham (December 2001) ("de Jong")
Ex. 1006	L. Tetley *et al.*, *Electronic Navigation Systems*, 3d Ed. (Butterworth-Heinemann 2001) ("Tetley")
Ex. 1007	B. Brogdon, *Boat Navigation for the Rest of Us*, 2d Ed., Introduction (McGraw-Hill 2001) ("Brogdon")
Ex. 1008	Fernão Vaz Dourado, Map of West Africa Waterways (1571)
Ex. 1009	National Oceanic and Atmospheric Administration, Nautical Chart 25664 (1976)
Ex. 1010	National Oceanic and Atmospheric Administration, Nautical Chart 12283-02 (1990)
Ex. 1011	International Maritime Organization, Resolution A.817(19), *Performance Standards for Electronic Chart Display and Information Systems (ECDIS)* (Dec. 15, 1996)
Ex. 1012	U.S. Patent No. 6,356,837 to Yokota et al. ("Yokota")
Ex. 1013	Wan Xiaoxia *et al.*, *Electronic chart display and information system*, Geo-spatial Information Science, 5:1, 7-11 (Mar. 5, 2002) ("Xiaoxia")
Ex. 1017	Hein Sabelis, *Voyage Planning in ECDIS*, International Hydrographic Review, Monaco, LXXVI(2) (September 1999)

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