UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
APPLE INC.,
Petitioner
v.
UNILOC LUXEMBOURG S.A.,
Patent Owner
Patent No. 9,414,199

DECLARATION OF DR. GABRIEL ROBINS IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 9,414,199



### TABLE OF CONTENTS

I.	INTRODUCTION						
II.	BACKGROUND AND QUALIFICATIONS						
III.	INFORMATION CONSIDERED						
IV.	RELEVANT LEGAL STANDARDS						
	A.	Claim	Interpretation	7			
	B.	Perspe	ctive of One of Ordinary Skill in the Art	7			
	C.	Obvio	usness	8			
V.	LEVI	EL OF ORDINARY SKILL IN THE ART1					
VI.	SUM	MMARY OF MY OPINIONS12					
VII.	TECH	TECHNOLOGICAL BACKGROUND12					
VIII.	THE	E '199 PATENT21					
IX.	PROS	DSECUTION HISTORY2					
X.	BLEGEN AND MONTEVERDE						
	A.	Overvi	iew of Blegen (Ex. 1004)	25			
	B.	Overview of Monteverde (Ex. 1005)					
	C.	Claim	1	28			
			Preamble: "A method for delivering information to two or more user devices, the method comprising:	28			
		] ] ]	Element [1a]: retrieving the information from one or more data records that associate the information with [1a.i] one or more predetermined locations, [1a.ii] a predetermined maximum amount of time, [1a.iii] a predetermined likelihood, and [1a.iv] one or more predetermined actions; and	30			



		3.	Element [1b]: "for each of the two or more user devices:"	45
		4.	Element [1c]: "predicting whether the user device will be at any of the one or more predetermined locations within the predetermined maximum amount of time with at least the predetermined likelihood; and"	45
		5.	Element [1d]: "in response to the predicting that the user device will be at any of the one or more predetermined locations within the predetermined maximum amount of time with at least the predetermined likelihood, performing the one or more predetermined actions;"	47
		6.	Element [1e]: "wherein at least one of the actions includes delivering the information to the user device."	49
	D.		n 2: "The method of claim 1 wherein predicting comprises: zing a location history of the user device."	51
XI.	BLEGEN, MONTEVERDE AND SCHMIDT			
	A.	Over	view of Schmidt (Ex. 1006)	53
	В.	Claim 3: "The method of claim 1 wherein predicting comprises: analyzing a location history of the user device for day- and time-based patterns related to a current time and a current day."5		
	C.	Claim 4: "The method of claim 1 wherein predicting comprises: analyzing a location history of the user device for movement patterns related to a current location of the user device."		
	D.	Claim 5: "The method of claim 1 further comprising: analyzing a location history of the user device for patterns that involve day- and time-based and movement related to a current time, a current day, and a current location of the user device."		
XII.	СНА	RLEB	OIS AND GILLIES	66
	A.	Over	view of Charlebois (Ex. 1007)	66
	B.	Over	view of Gillies (Ex. 1008)	68
	C	Clain	n 1	69



1.	Preamble: "A method for delivering information to two or more user devices, the method comprising:"69
2.	Element [1a]: "retrieving the information from one or more data records that associate the information with [1a.i] one or more predetermined locations, [1a.ii] a predetermined maximum amount of time, [1a.iii] a predetermined likelihood, and [1a.iv] one or more predetermined actions; and"
3.	Element [1b]: "for each of the two or more user devices:"87
4.	Element [1c]: "predicting whether the user device will be at any of the one or more predetermined locations within the predetermined maximum amount of time with at least the predetermined likelihood; and"
5.	Element [1d]: "in response to the predicting that the user device will be at any of the one or more predetermined locations within the predetermined maximum amount of time with at least the predetermined likelihood, performing the one or more predetermined actions;"89
6.	Element [1e]: "wherein at least one of the actions includes delivering the information to the user device."90
	m 2: "The method of claim 1 wherein predicting comprises: yzing a location history of the user device."91
anal	m 3: "The method of claim 1 wherein predicting comprises: yzing a location history of the user device for day- and based patterns related to a current time and a current day."91
anal	m 4: "The method of claim 1 wherein predicting comprises: yzing a location history of the user device for movement erns related to a current location of the user device."94
a loc day-	m 5: "The method of claim 1 further comprising: analyzing ration history of the user device for patterns that involve and time-based and movement related to a current time, a rent day, and a current location of the user device."95



D.

E.

F.

G.

## Declaration of Dr. Gabriel Robins U.S. Patent No. 9,414,199

XIII.	CHARLEBOIS, GILLIES, AND FROLOFF		
	A.	Overview of Froloff (Ex. 1009)	98
	B.	Claims 1-5	99
XIV	CON	CLUSION	102



# DOCKET A L A R M

# 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.

