

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RUIZ FOOD PRODUCTS, INC.,

Petitioner,

v.

MACROPOINT LLC,

Patent Owner.

Case IPR2017-02016
U.S. Patent No. 8,275,358 B1

DECLARATION OF DAVID HILLIARD WILLIAMS

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LIST OF EXHIBITS

<u>Exhibit Number</u>	<u>Description</u>
2001	Expert Declaration of David Hilliard Williams
2002	David Hilliard Williams CV
2003	Ruiz Food Products, Inc.'s Initial Invalidation Contentions, Civil Action 6:16-cv-1133
2004	Expert Report of Dr. Stephen B. Heppe dated January 25, 2017, Civil Action 6:16-cv-1133
2005	Ruiz Food Products, Inc.'s Final Election of Asserted Prior Art, Civil Action 6:16-cv-1133

I, David Hilliard Williams, declare as follows:

I. INTRODUCTION AND SCOPE OF WORK

1. I have been retained on behalf of the Patent Owner for the above-captioned *inter partes* review proceeding. I am being compensated for my time in connection with this IPR at my standard hourly consulting rate. I understand that this proceeding involves U.S. Patent No. 8,275,358 (“the ’358 patent”) titled “Providing Notice And Receiving Consent To Obtain Location Information Of A Mobile Device” by Bennett H. Adelson, and that the ’358 patent is currently assigned to Macropoint LLP.

2. I have reviewed and am familiar with the specification of the ’358 patent filed on March 1, 2012. I understand that the ’358 patent has been provided as Exhibit 1001. I will cite to the specification using the following format: (1:1-10). This example citation points to the ’659 patent specification at column 1, lines 1-10.

3. I have reviewed and am familiar with the file history of the ’358 patent. I understand that the file history has been provided as Exhibit 1004.

4. In preparing this Declaration, I have also reviewed and considered the materials of record in IPR2017–02016 as of the time of signing this Declaration, including but not limited to the Petition (Paper 1) and Exhibits thereto, including the Declaration of Mr. Denning (Ex. 1002); U.S. Patent Publication No. 2002/0115453 to Poulin et al. (Ex. 1005; “Poulin”); U.S. Patent No. 6,591,242 to Karp et al. (Ex.

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