UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS INC.
Petitioner

v.

GEOGRAPHIC LOCATION INNOVATIONS, LLC
Patent Owner

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Case No. IPR2017-02022
Patent No. 7,917,285

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DECLARATION OF SCOTT ANDREWS

I, Scott Andrews, hereby declare the following:

I. INTRODUCTION

1.   I, Scott Andrews, have been retained by counsel for Petitioner Unified Patents, Inc. ("Petitioner") as a technical expert in the above-captioned case. Specifically, I have been asked by counsel for Petitioner to render certain opinions in regards to the accompanying IPR petition with respect to U.S. Patent No. 7,917,285 ("the '285 Patent"). I understand that the Challenged Claims are claims 1, 2, 5-7, 9, and 13-18. My opinions are limited to those Challenged Claims.

2.   My compensation in this matter is not based on the substance of my opinions or the outcome of this matter. I have no financial interest in Petitioner. I have been informed that Geographic Location Innovations, LLC ("Geographic") is the current assignee of the '285 Patent. I have no financial interest in Petitioner or Geographic, and I have no other interest in the outcome of this matter.

3.   In reaching my opinions in this matter, I have reviewed the following materials:

- U.S. Patent No. 7,917,285 to Rothschild (Ex. 1001);

- U.S. Patent No. 5,987,381 to Oshizawa (Ex. 1004, *Oshizawa*);

- U.S. Patent Application Publication No. 2002/0174360 to Ikeda (Ex. 1005, *Ikeda*);

- U.S. Patent Application Publication No. 2005/0221876 to Van Bosch et al. (Ex. 1006, *Van Bosch*);

- U.S. Patent No. 6,175,803 to Chowanic et al. (Ex. 1007, *Chowanic*);

- U.S. Patent Application Publication No. US 2006/0058953 to Cooper et al. (Ex. 1008, *Cooper*);

- U.S. Patent No. 4,502,123 to Minami et.al. (Ex. 1011, *Minami*);

- Robert L. French, *Automobile Navigation: Where is it Going?*, IEEE Aerospace and Electronic Systems Magazine (Volume: 2, Issue: 5, May 1987) (Ex. 1012, *French 1987*);

- Robert L. French, *Historical overview of automobile navigation technology*, 36th IEEE Vehicular Technology Conference (1986) (Ex. 1013, *French 1986*);

- V.W. Imnan and J.I. Peters, *TravTek Global Evaluation and Executive Summary*, U.S. Department of Transportation Federal Highway Administration, Pub. No. FHWA-RD-96-031 (March 1996) (Ex. 1014, *Imnan*);

- C. Blumentritt, K. Balke, E. Symour, R. Sanchez, *TravTek System Architecture Evaluation*, U.S. Department of Transportation Federal Highway Administration, Pub. No. FHWA-RD-94-141 (July 1995) (Ex. 1015, *Blumentritt*);

- R. Lind, R. Schumacher, R. Reger, R. Olney, H. Yen, and R. Freeman, *The network vehicle-a glimpse into the future of mobile multi-media,* The AIAA/IEEE/SAE Digital Avionics Systems Conference Proceedings, 17th DASC. (1998) (Ex. 1016, *Lind*);

- Network Vehicle Screenshots (Ex. 1017, *Network Vehicle Screenshots*);

- Yilin Zhao, *Telematics: Safe and Fun Driving*, IEEE Intelligent Systems, 10-14 (2002) (Ex. 1009, *Zhao*);

- K.Y. Cho, C.H. Bae, Y. Chu, and M. W. Suh, *Overview of Telematics: A System Architecture Approach*, International Journal of Automotive Technology, Vol. 7, No. 4, 509-517 (2006) (Ex. 1010, *Cho*); and

- Takao Kamai, Hayami Encho, Ichiro Kugo, Katsuharu Yokoyama, and Masato Maruoka, MONET – Compatible Car-mounted Information Terminal, Fujitsu Ten Tech. J., No. 11 (1998) (Ex. 1019, *Kamai*).

A.   **Qualifications**

4.   I have over 25 years of experience in fields relevant to the '285 Patent, including vehicle navigation systems and telematics-aided vehicle navigation systems. In various positions at, among others, TRW and Toyota, I have been responsible for research and development projects relating to, among others, numerous vehicle navigation systems, information systems, and user interface systems.

5.   I received an undergraduate Bachelor of Science degree in Electrical Engineering from the University of California, Irvine in 1977. I received a Master's of Science degree in Electronic Engineering from Stanford University in 1982.

6.   From 1977 to 1983, I held engineering positions at Ford Aerospace and Teledyne Microwave where I worked on, among other things, transmitter-receiver systems for guided missiles and other related military electronics.

7.   From 1983 to 1993, I worked at TRW, Inc. ("TRW") in the Space & Electronics Group, where I served as a project manager, a department manager, and an assistant program manager on a variety of spacecraft communications systems projects. My last position at TRW in the Space & Electronics Group was as the manager of the Monolithic Microwave Integrated Circuits ("MMIC") Products Organization. In that role, I developed TRW's commercial gallium arsenide (GaAs) MMIC business. During my time in the MMIC Products Organization, I helped produce one of the first cellular phone related RF integrated circuits. I also developed the first single chip 94 GHz radar, intended for use in automotive adaptive cruise control systems. While I was at TRW in the Space & Electronics Group, I received several awards for outstanding performance on independent research and development projects.

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