# UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

Unified Patents Inc.

Petitioner

v.

Bradium Technologies, LLC

Patent Owner

IPR2018-00095 U.S. Patent 9,253,239

#### DECLARATION OF CHRISTOPHER WILSON



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I, Christopher Wilson, declare as follows:

#### I. INTRODUCTION

- 1. My name is Christopher Wilson. I am a consultant in the fields of mapping, navigation systems, and telematics. I have been engaged by Unified Patents Inc. ("Unified") to investigate and opine on certain issues relating to U.S. Patent No. 9,253,239 B2 (the "239 Patent") entitled "System and methods for network image delivery with dynamic viewing frustum optimized for limited bandwidth communication channels" in Unified's petition for *Inter Partes* Review of the 239 Patent ("Unified's IPR Petition") which requests the Patent Trial and Appeal Board ("PTAB") to review and cancel all claims of the 239 Patent—claims 1-25 ("Challenged Claims").
- 2. I understand that the 239 Patent was purportedly assigned from the inventors Isaac Levanon and Yoni Lavi to Inovo Limited on April 3, 2011, and assigned from Inovo Limited to Bradium on June 17, 2013. Bradium is therefore referred to as the "Patent Owner" in this declaration.
- 3. This declaration is a modified version of the declaration of William R. Michalson for the previous IPR petition IPR2016-01897, executed on September 30, 2016. That petition resulted in a decision by the Patent Trial and Appeal Board to institute a review of most of the claims of the 239 Patent, but the review never occurred due to settlement of the case. I have fully reviewed the declaration of Mr



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