UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

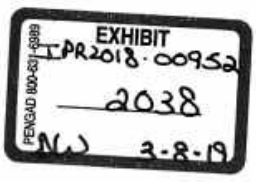
Unified Patents Inc.
Petitioner

v.

Location Based Services, LLC
Patent Owner

IPR2017-01965
U.S. Patent 7,860,648

DECLARATION OF CHRISTOPHER K. WILSON



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A. "Map" (Claims 1 and 9). 15

B. "Location Interaction Rules" (Claims 1 and 9). 16

C. "Monitoring Device" (Claims 1 and 9). 16

VIII. EACH ELEMENT OF CLAIMS 1-4, 6, 7, 9, 10, 13, AND 14 IS TAUGHT OR RENDERED OBVIOUS BY THE PRIOR ART 17

A. Grounds 1 and 2: *Gellberg* anticipates or render obvious claims 1-4, 6, 9, 10, and 13 17

1. Overview of *Gellberg* 17

Bradium Exhibit 2045

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2. *Gellberg* Discloses or Suggests the Elements of Independent Claim 1. 23

3. *Gellberg* Discloses or Suggests the Elements of Claim 2. 43

4. *Gellberg* Discloses or Suggests the Element of Claim 3. 44

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6. *Gellberg* Discloses or Suggests the Features of Claim 6. 49

7. *Gellberg* Discloses or Suggests the Elements of Claims 9, 10, and 13. 54

B. Ground 3: *Gellberg* and *Schroeder* render obvious claims 7 and 14. 57

C. Ground 4: *DeKock* Renders Obvious Claims 1-4, 6, 7, 9, 10, 13, and 14. 60

1. Overview of *DeKock*. 60

2. *DeKock* Discloses or Suggests the Elements of Claim 1. 64

3. *DeKock* Discloses or Suggests the Elements of Claim 2. 82

4. *DeKock* Discloses or Suggests the Elements of Claim 3. 83

5. *DeKock* Discloses or Suggests the Elements of Claim 4. 83

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7. *DeKock* Discloses or Suggests the Element of Claims 9, 10, 13, and 14. 87

IX. CONCLUSION. 90

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I, Christopher K. Wilson, declare as follows:

I. INTRODUCTION

I have been retained by Unified Patents Inc. ("Unified" or "Petitioner") as an independent expert consultant in this proceeding before the United States Patent and Trademark Office. Although I am being compensated at my usual rate of $350 per hour for the time I spend on this matter, no part of my compensation depends on the outcome of this proceeding, and I have no other interest in this proceeding.

II. QUALIFICATIONS

1. I have a bachelor's degree in Physics from Princeton University and one year of graduate school in Physics at the University of California, San Diego. My qualifications and professional experienced are described in my curriculum vitae, attached to my declaration as Appendix A.

2. I am currently an independent consultant to the transportation industry focused on the use of vehicle data and analytics to provide cloud services in support of safety systems in automated and semi-automated vehicles.

3. I have 23 years of experience in the automotive safety technology field working for tier 1 suppliers (TRW and TomTom) and vehicle manufacturers (Mercedes Benz), as well as working with other vehicle manufacturers and government in consortia developing pre-competitive technologies and performance metrics for vehicle safety systems, and consulting.

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4. I worked on the development of traffic management systems in San Francisco, Atlanta and Houston where I advocated the use of vehicle data for managing the system.

5. In the early 2000s, I was a nationally recognized advocate for connected vehicle technology within transportation businesses, and have been working with transportation departments on deployment models as recently as 2014. I worked closely with traffic engineers throughout this period, specifically identifying vehicle data that could be shared with traffic engineers to improve a transportation system.

6. As related to this case, I developed one of the first telematics systems intended for a production vehicle ca. 1993. This system used a paging network to send the vehicle's location to emergency responders in the event of an airbag deployment, as well as supporting text based navigation customers. The system was very similar to GM's OnStar. As part of this effort I worked with standards organizations to develop standards for vehicle location to support both emergency response and navigation, and the dissemination of vehicle location and speed to traffic providers. Our system, and others at the time, were developed to both provide information to drivers and to collect information on traffic that could improve the information sent to drivers. My work on traffic management systems was attempting to deploy such feedback systems in various metropolitan systems.

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