UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Unified Patents Inc.

Petitioner

v.

Bradium Technologies, LLC

Patent Owner

IPR2018-00952
U.S. Patent 9,253,239

SECOND 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." The opinions set forth in this declaration relate to Unified's Reply to Patent Owner's Response ("Unified's Reply") and Unified's Opposition to Patent Owner's Motion to Amend ("Unified's Opposition") I previously opined on issues related to Unified's Petition for *Inter Partes* Review of the 239 Patent ("Unified's IPR Petition") (Ex. 1005).

2. This declaration is based on the information currently available to me. To the extent that additional information becomes available, I reserve the right to continue my investigation and study, which may include a review of documents and information that may be produced, as well as testimony from depositions that may not yet be taken.

3. In forming my opinions, I have relied on information and evidence identified in this declaration, including the 239 Patent, the prosecution history of the 239 Patent, and prior art references listed as Exhibits to this IPR, including a number of

references known to those in the art to describe technical concepts relevant to the subject matter of the 239 Patent, and include (for example) patents, technical publications, and industry standards. In my opinion, an expert or a person of ordinary skill in the art in the subject matter relevant to the 239 Patent would have considered each of the references relevant to the subject matter of this declaration and would reasonably rely on such materials to form an opinion as to the state of the art prior to December 27, 2000, the interpretation of the prior art references relied upon, and the obviousness of the substitute claims proposed in Patent Owner's Contingent Motion to Amend. I have also relied on my own personal experience in the field of mapping and navigation systems, which includes the design and development of map rendering hardware, software, and display systems.

II. SUMMARY OF OPINIONS

4. Claim 20 of the 239 Patent relates to a system and method for dynamic visualization of image data transferred through a communications channel. For the reasons explained below, none of the features described in claim 20 of the 239 Patent were novel as of October 1999, nor does the 239 Patent teach a novel and non-obvious way of combining these known features.

5. Claim 20 of the 239 Patent relates to well-known technologies in the computer industry such as multi-resolution hierarchical maps, image compression, packetized data transmission, and three-dimensional (3D) graphics rendering. No element of

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