UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC Petitioner

v.

AGIS SOFTWARE DEVELOPMENT, LLC Patent Owner

> Case IPR2018-01083 Patent 9,445,251

DECLARATION OF DAVID HILLIARD WILLIAMS IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 9,445,251

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A. 2006	The Priority Date of the '251 Patent Cannot Be Earlier Than April 17, 16		
VI.	Overview of the State of the Art at the Time of Filing18		
A. the 19	Systems for Locating Wireless Devices, such as E911 systems, arrived in 290s		
B. for Er	Expanding Wireless Device Locators to the Creation of Ad-Hoc Networks nergency Responders was Known		
C. and A	C. Utilizing Interactive Maps within the Context of Location-Based Services and Ad-Hoc Networks was known		
D.	Conclusion		
VII.	Ground of Unpatentability		
A. Ground 1: The combination of Fumarolo-782, Fumarolo-844, Muramatsu, and Liu teaches or suggests each feature of claims 1, 2, 4-6, 8, 10, 12, 22-24, 27, 29, 31, 32, and 35			
1.	Overview of Fumarolo-782		
2.	Overview of Fumarolo-844		
3.	Overview of Muramatsu		
4.	Overview of Liu		
5.	Overview of the Combination of Fumarolo-782, Fumarolo-844, Muramatsu, and Liu		
б.	Motivation to Combine Fumarolo-782, Fumarolo-844, Muramatsu, and Liu		
7.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, and Liu discloses or suggests each feature of claims 1, 2, 4-6, 8, 10, 12, 22-24, 27, 29, 31, 32, and 35		
B. Nothi	Dependent Claims 2, 4-6, 8, 10, 12, 22, 23, 27, 29, 31, 32, and 35 Recite ng More Than Obvious Design Choices		

VIII.	Conclusion	99
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Exhibit No.	Description
1001	U.S. Patent No. 9,445,251 to Beyer, Jr. et al., issued September 13,
	2016 ("251 Patent")
1002	File History of U.S. Patent No. 9,445,251 ("251 Patent File
	History")
1003	Declaration of David Hilliard Williams ("Williams")
1004	Curriculum Vitae of David Hilliard Williams
1005	U.S. Patent No. 6,366,782 to Fumarolo et al., issued April 2, 2002
	("Fumarolo-782")
1006	U.S. Patent No. 6,204,844 to Fumarolo et al., issued March 20,
	2001 ("Fumarolo-844")
1007	U.S. Patent Application Publication No. 2002/0173906 to
	Muramatsu, published November 21, 2002, ("Muramatsu")
1008	U.S. Patent Application Publication No. 2002/0027901 to Liu et
	<i>al.</i> , issued March 7, 2002 ("Liu")
1009	Plaintiff's Original Complaint for Patent Infringement, AGIS
	Software Development LLC v. Huawei Device USA Inc., et al.,
	Case No. 2:17-cv-00513 (TXED), filed June 21, 2017.
	("Infringement Complaint")
1010	U.S. Patent No. 7,031,728 to Beyer, Jr., issued April 18, 2006
	("'728 Patent'')
1011	U.S. Patent No. 7,630,724 to Beyer, Jr., et al., issued December 8,
	2009 ("'724 Patent'')
1012	911 and E911 Services, Federal Communications Commission,
	www.fcc.gov/e911 (last visited May 7, 2018)
1013	Fact Sheet, FCC Wireless 911 Requirements (January 2001),
	available at https://transition.fcc.gov/pshs/services/911-
	services/enhanced911/archives/factsheet_requirements_012001.pdf
1014	Jock Christie, et al., Development and Deployment of GPS Wireless
	Devices for E911 and Location Based Services (Position, Location,
	and Navigation Symposium, 2002) ("Christie")
1015	Dale N. Hatfield, A Report on Technical and Operational Issues
	Impacting The Provision of Wireless Enhanced 911 Services,
1017	Federal Communications Commission (2002) ("Hatfield")
1016	Charles E. Perkins, "Ad Hoc Networking." Nokia Research Center
	(November 28, 2000) ("Perkins")

EXHIBIT LIST

Exhibit No.	Description
1017	Duncan Scott Sharp, <i>Adapting Ad Hoc Network Concepts to Land</i> <i>Mobile Radio Systems</i> (1972 Ph.D. dissertation, University of Alberta) (on file with Simon Fraser University, December 2002) ("Duncan")
1018	Madhavi W. Subbarao, <i>Mobile Ad Hoc Data Networks for</i> <i>Emergency Preparedness Telecommunications - Dynamic Power-</i> <i>Conscious Routing Concepts</i> (Submitted as an interim project for Contract Number DNCR086200 to the National Communications Systems, February 1, 2000) ("Subbarao")
1019	Intentionally Left Blank
1020	McKinsey & Company, <i>The McKinsey Report : FDNY 9/11 Re-</i> sponse (2002) ("The McKinsey Report")
1021	William K. Rashbaum, <i>Report on 9/11 Finds Flaws In Response of Police Dept.</i> , N.Y. Times (July 27, 2002), <i>available at</i> http://www.nytimes.com/2002/07/27/nyregion/report-on-9-11-finds-flaws-in-response-of-police-dept.html?mcubz=0
1022	Fred Durso, Jr., <i>A Decade of Difference</i> , NFPA Journal (Sept. 1, 2011), <i>available at</i> http://www.nfpa.org/news-and-research/publications/nfpa-journal/2011/september-october-2011/features/a-decade-of-difference
1023	"Locate-Track-Extract; Wireless Mesh Networking Allows Com- manders to Keep Track of Firefighters at an Incident Scene," <i>Mis-</i> <i>sion Critical Communications</i> , March 2004
1024	U.S. Patent Publication No. 2003/0100326 to Grube <i>et al.</i> , published May 29, 2003 ("Grube")
1025	U.S. Patent No. 6,654,683 to Jin <i>et al.</i> , issued November 25, 2003 ("Jin")
1026	U.S. Patent No. 6,119,017 to Cassidy <i>et al.</i> , issued September 12, 2000 ("Cassidy")
1027	U.S. Patent No. 5,563,931 to Bishop <i>et al.</i> , issued October 8, 1996 ("Bishop")
1028	Ching-Chien Chen, et al., Automatically and Accurately Conflating Satellite Imagery and Maps (University of Southern California, Oc- tober 2003) ("Chen")

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