IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re <i>Inter Partes</i> Review of:)
U.S. Patent No. 9,445,251)
Issued: September 13, 2016)
Application No.: 14/633,804)

For: Method to Provide Ad Hoc and Password Protected Digital and Voice

Networks

FILED VIA E2E

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 9,445,251



TABLE OF CONTENTS

LXHIB	311 LIS1	3
I.	Mandatory Notices (37 C.F.R. § 42.8(a)(1))	2
II.	Grounds for Standing (37 C.F.R. § 42.104(a))	6
III.	Identification of Challenge (37 C.F.R. § 42.104(b))	7
A.	Statutory Grounds for the Challenge	7
B.	Citation of Prior Art	7
IV.	The '251 Patent	8
A.	Background of the '251 Patent	8
B.	Level of Ordinary Skill in the Art	11
C.	Claim Construction	11
1.	"second georeferenced map"	12
V.	Ground of Rejection	14
A. Obvid	Ground 1: Claims 1, 2, 4-6, 8, 10, 12, 22-24, 27, 29, 31, 32, and 35 arous Over Fumarolo-782 in View of Fumarolo-844, Muramatsu, and Liu	
1.	Overview	14
2.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, and L renders independent claims 1 and 24 obvious.	
3.	Claim 2 is obvious.	51
4.	Claims 4 and 27 are obvious.	52
5.	Claim 5 is obvious.	53
6.	Claims 6 and 29 are obvious.	54
7.	Claims 8 and 31 are obvious.	55
8.	Claim 10 is obvious.	59
9.	Claims 12 and 35 are obvious.	60
10.	Claim 22 is obvious.	61
11.	Claim 23 are obvious	61
12.	Claim 32 is obvious.	62
B.	The Dependent Claims Merely Recite Obvious Design Choices	62
VI.	The Instant Petition Should be Instituted Under § 325(d)	63



Inter Partes Review of U.S. Patent No. 9,445,251

1	VII.	Conclusion68
		The Circumstances of this Joinder Petition Do Not Justify Denial Under or 325(d)67
		The Instant Petition is Not Cumulative with the Petition filed in IPR2018- and Both Petitions Should be Instituted
		The Instant Petition is Not Cumulative with the Concurrently-Filed n Based on Haney and Both Petitions Should be Instituted64
		The References in the Instant Petition Were Either Not Cited or Not lered by the Office During Examination of the '251 Patent63



EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 9,445,251 to Beyer, Jr. <i>et al.</i> , issued September 13,
1001	2016 ("'251 Patent")
1002	File History of U.S. Patent No. 9,445,251 ("'251 Patent File
1002	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
	al., 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
1011	("'728 Patent")
1011	U.S. Patent No. 7,630,724 to Beyer, Jr., et al., issued December 8,
1010	2009 ("'724 Patent")
1012	911 and E911 Services, Federal Communications Commission,
1012	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
1014	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,
	Federal Communications Commission (2002) ("Hatfield")
1016	Charles E. Perkins, "Ad Hoc Networking." Nokia Research Center
	(November 28, 2000) ("Perkins")



Exhibit No.	Description
1017	Duncan Scott Sharp, Adapting Ad Hoc Network Concepts to Land Mobile Radio Systems (1972 Ph.D. dissertation, University of
	Alberta) (on file with Simon Fraser University, December 2002)
1010	("Duncan")
1018	Madhavi W. Subbarao, Mobile Ad Hoc Data Networks for
	Emergency Preparedness Telecommunications - Dynamic Power- Conscious Routing Concepts (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 Response</i> (2002) ("The McKinsey Report")
1021	William K. Rashbaum, Report on 9/11 Finds Flaws In Response of
	Police Dept., N.Y. Times (July 27, 2002), available at
	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., A Decade of Difference, NFPA Journal (Sept. 1,
	2011), available at http://www.nfpa.org/news-and-
	research/publications/nfpa-journal/2011/september-october- 2011/features/a-decade-of-difference
1000	
1023	Rick Rotondo, "Locate-Track-Extract; Wireless Mesh Networking
	Allows Commanders to Keep Track of Firefighters at an Incident Scene," <i>Mission Critical Communications</i> , March 2004
1024	
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
1025	("Jin")
1026	U.S. Patent No. 6,119,017 to Cassidy <i>et al.</i> , issued September 12,
1020	2000 ("Cassidy")
1027	U.S. Patent No. 5,563,931 to Bishop et al., 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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