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

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



Apple Inc. Exhibit 1003

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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 Filing	18
A. the 19	Systems for Locating Wireless Devices, such as E911 systems, arrived in 190s	
B. for Er	Expanding Wireless Device Locators to the Creation of Ad-Hoc Network mergency Responders was Known	
C. and A	Utilizing Interactive Maps within the Context of Location-Based Service d-Hoc Networks was known	
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6.	Motivation to Combine Fumarolo-782, Fumarolo-844, Muramatsu, and Liu	38
7.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, and Liu discloses or suggests each feature of claims 13-19 and 21	19
B. Liu, a	Ground 1: The combination of Fumarolo-782, Fumarolo-844, Muramats and Spaargaren teaches or suggests each feature of claims 13-19 and 21	-



1.	Overview of Spaargaren85
2.	Motivation to combine Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren
3.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 1390
4.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 1496
5.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 15
6.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 16104
7.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 17
8.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 18
9.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 19108
10.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 21109
C.	Dependent Claims 13-19 and 21 Recite Nothing More Than Obvious
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VIII.	Conclusion110



EXHIBIT LIST

Exhibit	Description
No.	
1001	U.S. Patent No. 9,445,251 B2 to Beyer, Jr. et al. ("'251 patent")
1002	Prosecution History of U.S. Patent No. 9,445,251 B2 (Application No. 14/633,804)
1003	Declaration of David Hilliard Williams ("Williams Dec.")
1004	Curriculum Vitae of David Hilliard Williams
1005	U.S. Patent No. 6,366,782 B1 to Fumarolo <i>et al.</i> ("Fumarolo-782")
1006	U.S. Patent No. 6,204,844 B1 to Fumarolo <i>et al.</i> ("Fumarolo-844")
1007	U.S. Publication No. 2002/0173906 A1 to Muramatsu ("Muramatsu")
1008	U.S. Publication No. 2002/0027901 to Liu et al. ("Liu")
1009	Intl. Publication No. WO 02/17567 A2 to Spaargaren ("Spaargaren")
1010	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")
1011	U.S. Patent No. 7,031,728 to Beyer, Jr., issued April 18, 2006 ("'728 Patent")
1012	U.S. Patent No. 7,630,724 to Beyer, Jr., <i>et al.</i> , issued December 8, 2009 ("'724 Patent")
1013	911 and E911 Services, Federal Communications Commission, www.fcc.gov/e911 (last visited May 7, 2018)
1014	Fact Sheet, FCC Wireless 911 Requirements (January 2001), available at https://transition.fcc.gov/pshs/services/911-services/enhanced911/archives/factsheet_requirements_012001.pdf



Exhibit	Description
No.	
1015	Jock Christie, et al., Development and Deployment of GPS Wireless Devices for E911 and Location Based Services (Position, Location, and Navigation Symposium, 2002) ("Christie")
1016	Dale N. Hatfield, A Report on Technical and Operational Issues Impacting The Provision of Wireless Enhanced 911 Services, Federal Communications Commission (2002) ("Hatfield")
1017	Charles E. Perkins, "Ad Hoc Networking." Nokia Research Center (November 28, 2000) ("Perkins")
1018	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) ("Duncan")
1019	Madhavi W. Subbarao, <i>Mobile Ad Hoc Data Networks for Emergency Preparedness Telecommunications - Dynamic Power-Conscious Routing Concepts</i> (Submitted as an interim project for Contract Number DNCR086200 to the National Communications Systems, February 1, 2000) ("Subbarao")
1020	Intentionally Left Blank
1021	McKinsey & Company, The McKinsey Report: FDNY 9/11 Response (2002) ("The McKinsey Report")
1022	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
1023	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
1024	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
1025	U.S. Patent Publication No. 2003/0100326 to Grube <i>et al.</i> , published May 29, 2003 ("Grube")



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