

~~UNITED STATES PATENT AND TRADEMARK OFFICE~~
IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re *Inter Partes* 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

~~BEFORE THE PATENT TRIAL AND APPEAL BOARD~~

~~GOOGLE LLC~~
~~Petitioner~~

~~v.~~

~~AGIS SOFTWARE DEVELOPMENT, LLC~~
~~Patent Owner~~

~~Case IPR2018-01084~~
~~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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4.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 14	96
5.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 15	101
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7.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 17	106
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EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 9,445,251 B2 to Beyer, Jr. <i>et al.</i> (“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	<i>Curriculum Vitae</i> 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 <i>et al.</i> (“Liu”)
1009	Intl. Publication No. WO 02/17567 A2 to Spaargaren (“Spaargaren”)
1010	Plaintiff’s Original Complaint for Patent Infringement, <i>AGIS Software Development LLC v. Huawei Device USA Inc., et al.</i> , 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
1015	Jock Christie, <i>et al.</i> , <i>Development and Deployment of GPS Wireless Devices for E911 and Location Based Services</i> (Position,

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