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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 Filing	18		
A. the 19	Systems for Locating Wireless Devices, such as E911 systems, arrived 190s	in 20		
B. for Er	Expanding Wireless Device Locators to the Creation of Ad-Hoc Netwonergency Responders was Known	rks 23		
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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	49		



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 Spaargaren 8	35
2.	Motivation to combine Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren	36
3.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 13	90
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 1510_)1
6.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 1610)4
7.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 171010)6
8.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 1810)7
9.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 1910)8
10.	The combination of Fumarolo-782, Fumarolo-844, Muramatsu, Liu, and Spaargaren discloses or suggests each feature of claim 2110)9
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VIII.	Conclusion 11	10



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, <i>AGIS</i> 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
1015	Jock Christie, et al., Development and Deployment of GPS Wireless Devices for E911 and Location Based Services (Position,



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