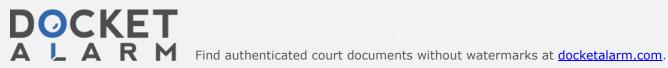
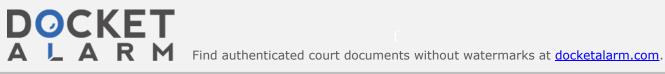
DECLARATION OF PATRICK McDANIEL, PH.D.

TABLE OF CONTENTS

I.	INTRODUCTION AND SCOPE OF WORK5						
II.	QUALIFICATIONS6						
III.	МАТ	MATERIALS CONSIDERED					
IV.	PERSON OF ORDINARY SKILL IN THE ART11						
V.	BACKGROUND OF THE '327 PATENT12						
	A.	'327	Patent Overview (Ex. 1001)	12			
	B.Th	e Pros	ecution History of the '327 Patent	15			
VI.	INTERPRETATION OF THE '327 PATENT CLAIMS AT ISSUE18						
	A.	"actio	on spot"	19			
	B. "determine/determining at least one action spot within a predetermined distance from the current location of the mobile device"20						
VII.	ANALYSIS OF GROUND 1: ALLEGED OBVIOUSNESS IN VIEW OF WINKLER AND ALTMAN						
	A.	Over	view Of Prior Art	23			
		i.	Winkler	23			
		ii.	Altman	27			
	B.Ground 1 Deficiencies						
		iii.	The Petition Presents Inconsistent Mappings For "The At I One Action Spot" Of Independent Claims 1, 10, and 13				
		iv.	The Petition Has Not Shown That Winkler's Map Element Correspond To Activity That "Is Occurring" Under The '32 Patent's Definition of "Action Spot"	27			
			Takin s Definition of Action Spot	∠∠			



		v.	Correspond To A Location Where At Least One Other Mobile Device Has Engaged In Documenting Action	
		vi.	The Petition Has Not Shown That The Alleged Winkler-Altm Combination Would Have Set A "Predetermined Distance" Before Determining "The At Least One Action Spot"	
		vii.	The Petition Conflates The Distance From A Tagged Location Map Element With A Distance From Current Location Of A First Mobile Device	
		viii.	Winkler's Color-Changing Map Element Is Not A "Graphical Item Identifying A Direction, Relative To The Current Location [Of The Mobile Device], In Which To Travel In Order To Arrive At The Determined At Least One Action Spot" As Recited In Claim 10	on
VIII.	I. ANALYSIS OF GROUNDS 2-4: ALLEGED OBVIOUSNESS IN V OF LEMMELA AND CROWLEY (GROUND 2) / IN VIEW OF LEMMELA, CROWLEY, AND WINKLER (GROUND 3) / IN VIE LEMMELA, CROWLEY, AND WALDMAN (GROUND 4)			
	A.	Over	view Of Prior Art	50
		ix.	Lemmela	50
		х.	Crowley	52
	B.Gr	ounds	2-4 Deficiencies	52
		xi.	The Petition Has Not Shown That Lemmela's Groups Of Virtual Location-Based Posts Correspond To Activity That "I Occurring" Under The '327 Patent's Definition of "Action Spot"	
		xii.	Lemmela Does Not Provide An "Activity Level" As Recited Independent Claims 1 and 13	
		xiii.	Winkler's Color-Changing Map Element Is Not A "Graphical Item Identifying A Direction, Relative To The Current Location [Of A First Mobile Device], In Which To Travel In Order To	



		Arrive At The Determined At Least One Action Spot" As Recited In Claim 10	62
IX.	LEGAL STANDARDS		
	A.	Obviousness	64
ΧI	ADΓ	OITIONAL REMARKS	69



I, Patrick D. McDaniel, of State College, Pennsylvania, declare that:

I. <u>INTRODUCTION AND SCOPE OF WORK</u>

- 1. I have been retained by Fish & Richardson P.C. as an expert witness on behalf of BlackBerry Limited ("Blackberry" or "Patent Owner"). I understand that Snap, Inc. ("Snap" or "Petitioner") filed a petition for *inter partes* review ("IPR") of claims 1-3, 8-11, 13-15, and 20 of U.S. Patent No. 8,326,327 ("the '327 patent"), and the case was assigned case no. IPR2019-00715.
- I have been asked to provide my independent analysis of the '327 2. patent in light of the materials cited below and my knowledge and experience in this field during the relevant period. I have been asked to consider what a person of ordinary skill in the art at the time of the invention of the '327 patent (a "POSITA"; refer to ¶¶16-17) would have understood from the teachings of the '327 patent, including scientific and technical knowledge related to the '327 patent. I have also been asked to consider whether the references cited in the Petition anticipate or render obvious the inventions described by claims 1, 10, and 13 of the '327 patent. I have been told that this is only a preliminary stage of this proceeding, and accordingly, I address at this stage only certain aspects of the Petition and only some of my analysis of the cited grounds. I reserve the opportunity to address other issues and provide further analysis at a later date should it become necessary.



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