UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Google LLC

Petitioner

v.

Ikorongo Technology LLC,

Patent Owner

U.S. Patent No. RE45,543
Filing Date: May 14, 2013
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Case No. IPR2021-00127

DECLARATION OF DAVID HILLIARD WILLIAMS IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW

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B. A wide variety of location determination methods and technologies were well known at the time of the '543 patent's earliest priority date, as was the automatic and passive collection and use of such data for tracking purposes. 41

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A. Claim 76 (Core Elements A-B-C-D-E-F) 103

1. [76p] "A system for collecting and sharing visited geographic location data, comprising:" 103

2. [76a] "a location-aware device adapted to:" (Core Element A) 104

3. [76b] "record geographic location data while visiting geographic locations using a satellite-based location fixing protocol" (Core Element D) 104

4. [76c] "enable access to one or more lists of other users to identify one or more other users with whom the geographic location data may be shared;" (Core Element B) 105

5. [76d] "enable definition of rights of the one or more other users to access the geographic location data, and" (Core Element C) 105

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6. [76e] "send at least a portion of the geographic location data to a tracking server; and" (Core Element E) 105

7. [76f] "the tracking server adapted to:" (Core Element E) 105

8. [76g] "receive the at least a portion of the geographic location data from the location-aware device; and" (Core Element E) 106

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2. [45-49a, 51a] "enable access to one or more lists of other users to identify one or more other users with whom visited geographic location data is capable of being shared;" (Core Element B) 114

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3. [45-49b, 51b] "enable definition of access rights for the one or more other users to enable access to the visited geographic location data;" (Core Element C) 114

4. [45-49c, 51c] "collect the visited geographic location data for geographic locations visited by the location-aware device using a client-side application; and" (Core Element D) 114

5. [45-49d, 51d] "report information indicating at least a portion of the visited geographic location data to a tracking server." (Core Element E) 115

6. [45e] "wherein…receive, via a user interface of the location-aware device, input that defines at least one user of the one or more other users from the one or more lists of other users that is to have access to the visited geographic location data." 115

7. [46e] "wherein…receive, via a user interface of the location-aware device, input that defines categories of the visited geographic location data that can be shared with the other user." 119

8. [47e] "wherein the one or more lists of other users comprises an Instant Messaging buddy list of the user…" 122

9. [48e] "wherein the one or more lists of other users comprises a contact list…" 123

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