

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS, LLC  
Petitioner

v.

MEMORYWEB, LLC  
Patent Owner

IPR2021-01413  
U.S. PATENT 10,621,228

**REPLY DECLARATION OF BENJAMIN B. BEDERSON, PH.D.**

UNIFIED PATENTS EXHIBIT 1038

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I, Benjamin B. Bederson, declare as follows:

## **I. INTRODUCTION**

1. As I stated previously, I have been retained as an independent expert witness on behalf of Unified Patents, LLC (“Unified”) for the above-captioned Petition for Inter Partes Review (“IPR”) of U.S. Patent 10,621,228 (“the ’228 Patent”). I am being compensated at my usual and customary rate for the time I spent in connection with this IPR. My compensation is not affected by the outcome of this IPR.

2. I previously submitted a Declaration as Exhibit 1002, setting forth my background, credentials, and curriculum vitae, which provides further details (referred to herein as my “first Declaration”). I submit this second Declaration in response to the Declaration of Dr. Glenn Reinman, filed as Exhibit 2038.

3. In addition to the materials I reviewed in preparing my first Declaration, in preparing this second Declaration, I have also reviewed: a) EX2038, Declaration of Dr. Glenn Reinman; b) EX1030, the redacted version of the Patent Owner’s Response filed as Paper 23, which I refer to as the POR in this declaration; and c) any other document or reference cited in the analysis of this declaration.

4. In forming the opinions expressed in this Declaration, I relied upon my education and experience in the relevant field of art, and have considered the

viewpoint of a person of ordinary skill in the art (“POSITA”), as of June 9, 2011. I have also considered: a) the documents listed above, b) any additional documents and references cited in the analysis below, c) the relevant legal standards, including the standard for obviousness, and d) my knowledge and experience based upon my work in this area as described below.

## II. UNDERSTANDING OF PATENT LAW

5. I am not an attorney. For the purposes of this declaration, I have been informed about certain aspects of the law that are relevant to my opinions. My understanding of the law was provided to me by Petitioner’s attorneys and was set forth in my first Declaration.

## III. THE ’228 PATENT CLAIMS

6. For ease of reference, I have reproduced claims 1-7, the “Challenged Claims” in this proceeding, along with the reference numerals used to refer to specific limitations in the Petition and POR.

### Claim 1

[1a-preamble] “A method comprising:”

[1b] “responsive to a first input, causing a map view to be displayed on an interface,”

[1c] “the map view including: (i) an interactive map;”

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