

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.

Petitioner,

v.

TRAXCELL TECHNOLOGIES, LLC

Patent Owner

IPR2022-00073

U.S. Patent No. 10,820,147

**DECLARATION OF MICHAEL BRAASCH, PH.D.,
UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION
FOR *INTER PARTES* REVIEW**

Table of Contents

I. Qualifications and Professional Experience.....	6
II. Relevant Legal Standards.....	9
III. Level of Ordinary Skill in the Art.....	11
IV. Claim Construction.....	12
V. Background.....	14
VI. Overview of the '147 Patent.....	15
VII. Ground I: Claims 1-3, 5-7, 11-14, and 16-17 are obvious over Moles, Sakarya, and Khavakh.....	17
A. Summary of Moles.....	17
B. Summary of Sakarya.....	20
C. Summary of Khavakh.....	23
D. Reasons to Combine Moles and Sakarya.....	24
1. Generate and display a location of a mobile device on a map.....	24
2. Provide directions to a destination.....	26
E. Reasons to Combine Moles, Sakarya, and Khavakh.....	27
1. Efficiently determine direction information.....	28
2. Access resources available in a network external to the wireless network.....	29
F. Detailed Analysis of Claims.....	32
Claim 1.....	32
Claim 2.....	56
Claim 3.....	63
Claim 5.....	65
Claim 6.....	67
Claim 7.....	70

Claim 11.....	74
Claim 12.....	76
Claim 13.....	76
Claim 14.....	77
Claim 16.....	78
Claim 17.....	78
Claim 18.....	79
VIII. Ground II: Claims 8-9, 19-20, 22-24 are obvious over Moles, Sakarya, Khavakh, and Zellner.....	80
A. Summary of Zellner.....	80
B. Reasons to Combine Moles, Sakarya, Khavakh, and Zellner	81
1. Controlling distribution of user and device information in a wireless network.	81
2. Provide a flexible approach to distributing location and user information available on the mobile device.	83
3. Distribute information to third parties.....	85
C. Detailed Invalidity Analysis.....	86
Claim 8.....	86
Claim 9.....	88
Claim 19.....	95
Claim 20.....	96
Claim 22.....	97
Claim 23.....	100
Claim 24.....	101
IX. Ground III: Claims 5 and 15 are obvious over Moles, Sakarya, Khavakh and Tanibayashi	102
A. Summary of Tanibayashi.....	102
B. Reasons to Combine Moles, Sakarya, Khavakh, and Tanibayashi	102

C. Detailed Invalidity Analysis104
 Claim 4.....104
 Claim 15.....105
Conclusion106

I, Michael Braasch, do hereby declare:

1. I am making this Declaration at the request of Apple Inc., in the matter of the *Inter Partes* Review (“IPR”) of U.S. Patent No. 10,820,147 (“the ’147 patent”).

2. I am being compensated for my work in this matter at my standard hourly rate. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this proceeding. My compensation is not contingent on the outcome of this proceeding or the specifics of my testimony.

3. I have been asked by Apple’s counsel to provide my opinions regarding whether the subject matter of claims 1-9, 11-20, and 22-24 (“the Challenged Claims”) of the ’147 patent would have been obvious to a person having ordinary skill in the art (“POSITA”) at the time of the alleged invention, in light of the prior art. It is my opinion that the Challenged Claims would have been obvious to a POSITA.

4. In the preparation of this declaration, I have studied:

- a) the ’147 patent, Ex. 1001,
- b) the prosecution history of the ’147 patent, Ex. 1002,
- c) U.S. Patent 6,505,048 to Moles et al. (“Moles”), Ex. 1005;
- d) WO2001/28270 to Sakarya (“Sakarya”), Ex. 1006;
- e) U.S. Patent 6,716,101 to Meadows et al. (“Meadows”), Ex. 1007;

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.