

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CISCO SYSTEMS, INC.,  
APPLE INC.,  
HEWLETT PACKARD ENTERPRISE CO.,  
ARUBA NETWORKS, LLC

Petitioners,

- vs. -

BILLJCO, LLC,

Patent Owner.

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Case IPR2022-00426

U.S. Patent No. 8,761,804

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EXPERT DECLARATION OF DARRELL D.E. LONG  
IN SUPPORT OF PETITION FOR *INTER PARTES*  
REVIEW OF U.S. PATENT NO. 8,761,804

## TABLE OF CONTENTS

I.	INTRODUCTION AND QUALIFICATIONS.....	1
II.	UNDERSTANDING OF THE GOVERNING LAW .....	5
	A. Invalidity by Obviousness.....	5
	B. Interpreting Claims Before the Patent Office .....	8
	C. Materials Relied on in Forming My Opinions .....	9
III.	OVERVIEW OF THE '804 PATENT .....	10
	A. Specification of the '804 Patent .....	10
	B. The Claims of the '804 Patent.....	13
	C. The Prosecution History of the '804 Patent.....	18
	D. The Priority Date of the '804 Patent .....	19
IV.	STATE OF THE ART PRIOR TO THE '804 PATENT .....	19
	A. The Person of Ordinary Skill in the Art.....	19
	B. A POSA Would Have Known of Multiple Ways to Track and Locate Mobile Devices. ....	20
	C. Himmelstein .....	23
	D. Myr .....	27
	E. Evans .....	29
V.	CLAIM CONSTRUCTION .....	31
VI.	FOUNDATIONS OF INVALIDITY .....	31
	A. GROUND 1: Claims 1 and 10-12 of the '804 Patent are obvious in light of the combination of Himmelstein and Myr.....	31

1. Motivation to Combine.....	32
2. Invalidity Analysis.....	34
B. GROUND 2: Claims 1 and 10-12 of the '804 Patent are obvious in light of the combination of Himmelstein, Myr and Evans.....	71
VII. OBJECTIVE INDICIA OF NON-OBVIOUSNESS.....	75

I, Darrell D.E. Long, hereby declare as follows:

## **I. INTRODUCTION AND QUALIFICATIONS**

1. I have been retained by Cisco Systems, Inc. (“Cisco”), Apple Inc. (“Apple”), Hewlett Packard Enterprise Co. (“Hewlett Packard”) and Aruba Networks, LLC (“Aruba”) (collectively, “Petitioners”) to provide my technical review, analysis, insights, and opinions concerning the validity of the claims of U.S. Patent No. 8,761,804 (EX1001; “the ’804 Patent”) entitled “System and Method for Location Based Exchange of Data Facilitating Distributed Locational Applications.” The patent is assigned to BillJCo LLC. (“BillJCo”).

2. I am currently a Distinguished Professor of Engineering in the Jack Baskin School of Engineering at the University of California, Santa Cruz. I am also the Director of the Storage System Research Center at the University of California, Santa Cruz. Before that time, I was a research assistant at the University of California, San Diego, and a lecturer at San Diego State University. I was also a Visiting Scientist at IBM Research from 1995 until 2011. All of this experience is covered in my curriculum vitae (EX1003), which provides a more detailed recitation of my employment history and experience.

3. I have held numerous positions at the University of California and for various governmental agencies. For example, I have served as the Vice Chair and later Chair of the University of California Committee on Research Policy. I have

served on the University of California President's Council on the National Laboratories, and on the Science & Technology, National Security and Intelligence Committees for these laboratories. I also serve on the University of California Academic Council Special Committee on Laboratory Issues (ASCOLI). I served for a number of years on the National Research Council's Standing Committee on Technology Insight-Gauge, Evaluate and Review (TIGER), on the Committee on Defense Intelligence Agency Technology Forecasts and Reviews, and on the National Research Council's Committee on Science and Technology for Defense Warning. I currently serve on the Intelligence Science and Technology Experts Group (ISTEG) for the National Academies of Science, Engineering, and Medicine.

4. I have also held visiting faculty positions at the Université Paris-Dauphine (Paris IX), the Conservatoire National des Arts et Métiers, the Université Paris – Descartes (Paris V), Sorbonne Université, the University of Technology, Sydney, the Center for Communications Research, the U.S. Naval Postgraduate School. Further, I am a Professor *ad Honorem* at the de la Universidad Católica del Uruguay. I am also an Associate Member of the European Organization for Nuclear Research (CERN).

5. I graduated from San Diego State University with a Bachelor of Science in Computer Science in 1984. I earned a Master of Science in Computer Science

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