

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners,

- vs. -

BILLJCO, LLC,

Patent Owner.

Case IPR2022-00427

U.S. Patent No. 10,292,011

EXPERT DECLARATION OF WILLIAM R. MICHALSON
IN SUPPORT OF PETITION FOR *INTER PARTES*
REVIEW OF U.S. PATENT NO. 10,292,011

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I, William R. Michalson, hereby declare as follows:

I. INTRODUCTION AND QUALIFICATIONS

1. I have been retained on behalf of 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. 10,292,011 (EX1001; “the ’011 Patent”) entitled “System and method for location based exchange network.” The patent is assigned to BillJCo LLC. (“BillJCo”).

2. I am a professor in the Department of Robotics Engineering at the Worcester Polytechnic Institute, where I currently hold the position of Professor of Robotics Engineering. I was a founding member of the faculty of the Robotics Program. I have held an appointment as a Professor of Electrical and Computer Engineering since 1991 and currently hold appointments as a Professor in the Departments of Electrical and Computer Engineering, Computer Science and Mechanical Engineering, in addition to my appointment to Robotics Engineering. I have been a faculty member at Worcester Polytechnic Institute since 1990.

3. My emphasis at Worcester Polytechnic Institute is on teaching and conducting research on navigation, communications and computer system design. I have taught classes related to the fundamentals of navigation systems, robotics,

computer architecture, embedded system designs, advanced system architectures, and real-time system designs.

4. Prior to joining Worcester Polytechnic Institute, I was employed as an engineer at Raytheon Company from 1981 until 1991. During that time, I worked on various projects involving hardware and software design, including those relating to satellite, airborne and ground-based systems for navigation and communications. I have worked extensively in software programming, including during my employment at Raytheon and in a variety of projects relating to navigation, communications, and computation systems at Worcester Polytechnic Institute.

5. I received a Ph.D. in electrical engineering from Worcester Polytechnic Institute in 1989. Before that, I received a M.S. degree in electrical engineering from the Worcester Polytechnic Institute in 1985, and a B.S. degree in electrical engineering from Syracuse University in 1981.

6. I have been issued multiple patents in the fields of geolocation devices and handheld Global Positioning System (“GPS”) devices. I have authored or co-authored over 100 original articles in the fields of communication networks, precision location systems, and GPS, including more than 15 journal papers and 90 conference papers. I am a Senior Member of the Institute of Electrical and Electronics Engineers (IEEE).

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