UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,

Petitioner,

v.

TRAXCELL TECHNOLOGIES, LLC,

Patent Owner.

U.S. Patent No. 10,820,147
Filing Date: February 12, 2020
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Case No. IPR2022-00442

DECLARATION OF WILLIAM MICHALSON, PH.D.

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VII. CLAIM CONSTRUCTION 25

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IX. GROUND 1: CLAIMS 1, 5-8, 11-12, AND 17-19 ARE UNPATENTABLE OVER *MYR* IN VIEW OF *YIU* 27

A. *Myr* 27

B. *Yiu* 28

C. Independent Claims 30

1. Claim 1 30

a. Element [1pre]: "A wireless communications system including:" 30

b. Element [1a]: "a first radio-frequency transceiver within a wireless mobile communications device and an associated first antenna to which the first radio-frequency transceiver is coupled" 30

c. Element [1b]: "wherein the first radio-frequency transceiver is configured for radio-frequency

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communication with a wireless communications network;” 33

d. Element [1c]: “a first processor within the wireless mobile communications device coupled to the at least one first radio-frequency transceiver programmed to receive information indicative of a location of the wireless mobile communications device and generate an indication of a location of the wireless mobile communications device with respect to geographic features according to mapping information stored within the wireless mobile communications device, and”.....37

e. Element [1d]: “wherein the first processor determines user navigation information and displays to the user navigation information according to the location of the wireless mobile communications device with respect to the geographic features and a destination specified by the user at the wireless mobile communications device, and” 42

f. Element [1e]: “wherein the first processor further sends the user navigation information to the network as a number of segments, wherein at least one other processor outside the network updates the user navigation information in conformity with traffic congestion information accessible to the at least one other processor outside the network by computing a numerical value for the segments corresponding to the expected time to travel through all the segments, updates the user navigation information in conformity with the numerical values for the segments, and sends the

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updated user navigation information to the wireless mobile communications device;” 43

g. Element [1f]: “at least one second radio-frequency transceiver and an associated at least one second antenna of the wireless communications network to which the second radio-frequency transceiver is coupled; and” 48

h. Element [1g]: “a second processor coupled to the at least one second radio-frequency transceiver programmed to acquire the information indicative of a location of the wireless mobile communications device, wherein the second processor selectively acquires the information indicative of a location of the wireless mobile communications device dependent on the setting of preference flags,” 49

i. Element [1h]: “wherein the second processor acquires the information indicative of a location of the wireless mobile communications device if the preference flags are set to a state that permits tracking of the user of the wireless mobile communications device, and” 58

j. Element [1i]: “wherein the second processor does acquire the information indicative of the location of the wireless mobile communications device if the preference flags are set to a state that prohibits tracking of the wireless mobile communications device.” 60

2. Claim 11 63

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a. Element [11pre]: "A method of providing navigation information within a wireless communications network:"....63

b. Elements [11a]-[11j]] 64

D. Dependent Claims 67

1. Claim 5 and 17: "wherein the first processor further requests from the wireless communications network, traffic congestion information, wherein the first processor receives the requested traffic congestion information and determines the user navigation information in conformity with the received traffic congestion information." 67

2. Claim 7 and 18: "wherein the first processor further sends the indication of a location of the wireless mobile communications device with respect to the geographic features to the network, wherein at least one other processor outside the network receives the indication of a location of the wireless mobile communications device, determines the user navigation information in conformity with the location of the wireless mobile communications device and transmits the user navigation information to the wireless mobile communications device."....70

3. Claims 8 and 19: "wherein the preference flags are specified by a user associated with the wireless mobile communications device, and wherein the method further comprises transmitting the preference flags to the at least one second radio-frequency transceiver."....71

4. Claim 12: "The method of claim 11, further comprising within the wireless mobile communications device, determining the user navigation information."....72

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