

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NEARMAP US, INC.,
Petitioner

v.

EAGLE VIEW TECHNOLOGIES, INC.,
Patent Owner

Case IPR2024-00729
Patent 9,182,657

DECLARATION OF SAYEM OSMAN

I, Sayem Osman, make the following Declaration pursuant to 28 U.S.C. § 1746:

1. I am a paralegal at the law firm of Groombridge, Wu, Baughman & Stone LLP.
2. I provide this Declaration in connection with the Petition for *Inter Partes* Review of U.S. Patent No. 9,182,657 in the above-captioned *Inter Partes* Review proceeding that is being requested at the U.S. Patent and Trademark Office by Petitioners under 35 U.S.C. §§ 311-319, 37 C.F.R. § 42. Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.
3. EX1001 hereto is a true and correct copy of United States Patent No. 9,182,657, which I retrieved on March 15, 2024, from the United States Patent & Trademark Office's Patent Public Search Basic (PPUBS Basic) website (<https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/9182657>). An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1001 but no other alterations have been made.
4. EX1002 hereto is a true and correct copy of the File History for United States Patent No. 9,182,657 which I retrieved on March 20, 2024, from the United States Patent & Trademark Office's Patent Center website (<https://patentcenter.uspto.gov/applications/13791032/ifw/docs?application=>). An

exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1002 but no other alterations have been made.

5. EX1004 hereto is a true and correct copy of United States Patent No. 7,184,072, which I retrieved on March 15, 2024, from the United States Patent & Trademark Office's Patent Center website (<https://image-pubs.uspto.gov/dirsearch-public/print/downloadPdf/7184072>). An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1004 but no other alterations have been made.

6. EX1005 hereto is a true and correct copy of European Patent Application EP0053640, which I retrieved on March 14, 2024, from <https://patentimages.storage.googleapis.com/a9/6f/0d/8b90b559a2a554/EP0053640A1.pdf>. An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1005, and paragraph numbers have been added.

7. EX1006 hereto is a true and correct copy of United States Patent No. 5,878,356, which I retrieved on March 14, 2024, from the United States Patent & Trademark Office's Patent Center website (<https://image-pubs.uspto.gov/dirsearch-public/print/downloadPdf/5878356>). An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1006 but no other alterations have been made.

8. EX1007 hereto is a true and correct copy of M.M.R. Mostafa, et al.'s article titled, "Digital image georeferencing from a multiple camera system by GPS/INS," ISPRS Journal of Photogrammetry & Remote Sensing, Vol.56, 1-12 (2001), which I retrieved on March 26, 2024 from

https://www.academia.edu/4604164/Digital_image_georeferencing_from_a_multiple_camera_system_by_GPS_INS. An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1007 but no other alterations have been made.

9. EX1008 hereto is a true and correct copy of WO 97/35166, which I retrieved on March 15, 2024, from

https://patentscope.wipo.int/search/en/detail.jsf?docId=WO1997035166&_cid=P22-LTWD6-87502-1. An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1008 but no other alterations have been made.

10. EX1009 hereto is a true and correct copy of United States Patent Pub. No. 2003/0048357, which I retrieved on March 15, 2024, from the United States Patent & Trademark Office's Patent Center website (<https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/20030048357>). An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1009 but no other alterations have been made.

11. EX1010 hereto is a true and correct copy of United States Patent No. 7,893,957, which I retrieved on March 15, 2024, from the United States Patent & Trademark Office's Patent Center website (<https://imageppubs.uspto.gov/dirsearch-public/print/downloadPdf/7893957>). An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1010 but no other alterations have been made.

12. EX1011 hereto is a true and correct copy of R.J. Hall, et al.'s article titled, "A Microcomputer-Based Camera Control System," Photogrammetric Engineering and Remote Sensing, Vol.56 No.5, 443-446 (April 1990), which I retrieved on March 15, 2024 from https://www.asprs.org/wp-content/uploads/pers/1990journal/apr/1990_apr_443-446.pdf. An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1011 but no other alterations have been made.

13. EX1012 hereto is a true and correct copy of K.J. Held, et al.'s article titled, "TIER II Plus Airborne EO Sensor LOS Control and Image Geolocation," 1997 IEEE Aerospace Conference, Vol.2, 377-405 (1997), which I retrieved on March 26, 2024 from <https://ieeexplore.ieee.org/document/577989>. An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1012 but no other alterations have been made.

14. EX1013 hereto is a true and correct copy of *U.S. District Courts—National Judicial Caseload Profile*, available at

https://www.uscourts.gov/sites/default/files/data_tables/fcms_na_distprofile1231.2023.pdf (Dec. 31, 2023), which I retrieved on March 15, 2024. An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1013 but no other alterations have been made.

15. EX1014 hereto is a true and correct copy of Fourth Amended Patent Case Scheduling Order, Dkt. 372, *Eagle View Technologies Inc., and Pictometry International Corp v. Nearmap US, Inc., Nearmap Australia Pty Ltd, and Nearmap Ltd*, C.A. No. 2:21-cv-00283-TS-DAO (D. Utah Dec. 27, 2023), which I retrieved on March 15, 2024 from <https://ecf.utd.uscourts.gov/doc1/18316336511>. An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1014 but no other alterations have been made.

16. EX1015 hereto is a true and correct copy of WO 97/35166, which I retrieved on March 15, 2024, from https://patentscope.wipo.int/search/en/detail.jsf?docId=WO1999018732&_cid=P22-LTSX2T-01027-1. An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1015 but no other alterations have been made.

17. EX1016 hereto is a true and correct copy of United States Patent Pub. No. 2003/0164962, which I retrieved on March 15, 2024, from the United States Patent & Trademark Office's Patent Center website (<https://imageppubs.uspto.gov/dirsearch-public/print/downloadPdf/20030164962>). An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1016 but no other alterations have been made.

18. EX1017 hereto is a true and correct copy of "ISPRS Journal of Photogrammetry and Remote Sensing," web page, which I retrieved on March 26, 2024 from <https://www.sciencedirect.com/journal/isprs-journal-of-photogrammetry-and-remote-sensing/vol/56/issue/1>. An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1017 but no other alterations have been made.

19. EX1018 hereto is a true and correct copy of the definition of "Nadir," which I retrieved on March 26, 2024 from the Merriam-Webster.com Dictionary (<https://www.merriam-webster.com/dictionary/nadir>). An exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1018 but no other alterations have been made.

20. EX1021 hereto is a true and correct copy of Oblique Aerials Browser, "A collection of historical aerial photographs of the City of Tampa," which I retrieved on March 27, 2024 from

<https://storymaps.arcgis.com/stories/f26b7c047dde45d6ae2224208d46071a>. An

exhibit label on the first page and page numbers on all pages have been added to the bottom of EX1021 but no other alterations have been made.

21. I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both. I make this declaration of my own personal knowledge, and all statements are true. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

22. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28th day of March, 2024, at Washington, D.C.

/Sayem Osman/
Sayem Osman