

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

GAMBA GROUP HOLDINGS LLC,
Patent Owner.

Case IPR2026-00156
Patent 9,772,193

DECLARATION OF EHUD MENDELSON

I, Ehud Mendelson, declare as follows:

1. I am the sole named inventor of U.S. Patent No. 9,772,193 (the “’193 Patent”).

2. I provided Google with information about the patent family of the ’193 Patent (“Patent Portfolio”) more than a decade ago and at other times since.

3. In December, 2013, I sent messages via LinkedIn to the following Google employees about my Patent Portfolio: (1) Laura Sheridan, Senior Patent Counsel, and (2) Joshua McGuire, Senior Patent Counsel. True and correct copies of those LinkedIn messages (screen captures from the LinkedIn messaging window) are provided as Ex. 2031 and Ex. 2032.

4. On September 22, 2014, I sent a follow-up e-mail to Mr. McGuire, providing him with updates about my Patent Portfolio. A true and correct copy of that e-mail is provided as Ex. 2033.

5. In October 2015, I sent messages about my Patent Portfolio to multiple Google employees via LinkedIn, including to Noam Bardin, Chief of Waze and Vice President, Products. A true and correct copy of my LinkedIn message is provided as Ex. 2034. My message to Mr. Bardin included a link to a presentation, a PDF file named ‘shortblue.pdf’. Ex. 2034. A true and correct copy of that presentation is provided as Ex. 2035. The PDF file identified 7 issued U.S. patents and 8 pending U.S. patent applications in my Patent Portfolio. Ex. 2035, at 8-12.

6. In September 2022, I sent messages about my Patent Portfolio to several Google employees via LinkedIn, including the following: (1) David McClusky, Director, Customer Experience, Solutions & Support for Google Maps; (2) Christopher Phillips, VP & General Manager, Geo; (3) Jen Fitzpatrick, Senior Vice President, Core Systems & Experiences; (4) Miriam Daniel, Vice President & General Manager for Google Maps; (5) Amanda Leicht Moore, Director of Product Management; and (6) Kirk Mitchell, Director, Geo Partnerships (Google Maps, Local Search & Google Earth). True and correct copies of my LinkedIn messages to Mr. McClusky are provided as Ex. 2036.

7. With those 2022 LinkedIn messages, I attached a PDF file named ‘indoor navigation and mapping info.pdf’, which was a presentation that highlighted various technologies in my Patent Portfolio and specifically identified the ’193 Patent. A true and correct copy of that presentation is provided as Ex. 2037.

8. In September 2024, I sent LinkedIn messages about my Patent Portfolio to at least the following Google employees: (1) Tim Kowalski, Senior Counsel, Head of Patent Transactions; (2) Ola Adekunle, Sr. Patent Counsel, Head of Engagement Readiness; (3) Laura Sheridan, Head of Patent Policy; and (4) Arun Di Castro, Director, Global Geo Partnerships. True and correct copies of the LinkedIn messages with Mr. Kowalski and Mr. Di Castro are provided as Ex. 2038-2039.

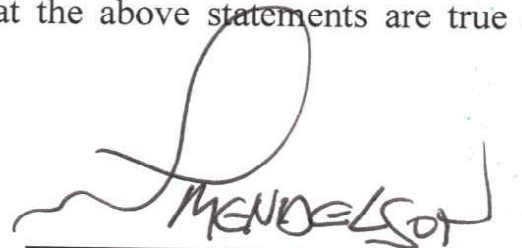
9. With my September 2024 LinkedIn messages, I attached a file named ‘patent list1 (1).pdf’ – a list of patents and patent applications in my Patent Portfolio that included the ’193 Patent as the fourth listed patent. A true and correct copy of that patent list is provided as Ex. 2040.

10. On September 14, 2024, Mr. Di Castro responded to one of my LinkedIn messages, stating: “Hi Ehud, sorry I can’t help with a connection but if you want to send me an email at arond@google.com w[i]th relevant intro/ materials I can share it fw with people who may be interested.” Ex. 2039, at 2. I responded later that day: “I will , thanks”. Ex. 2039, at 2.

11. On October 28, 2024, I sent two e-mails to Mr. Di Castro at the e-mail address he had provided me and attached to the second e-mail a PDF file having the filename ‘indoor mapping navigation and indoor view3.pdf’. The PDF file was a presentation highlighting various technologies in my Patent Portfolio and specifically identified the ’193 Patent. True and correct copies of my October 28, 2024 e-mails to Mr. DiCastro and of the attachment are provided as Exs. 2041-2043.

I declare under penalty of perjury that the above statements are true and correct.

Dated: April 13, 2026



Ehud Mendelson