

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

VALTRUS INNOVATIONS LIMITED,
Patent Owner.

Case No. IPR2026-00262
Patent No. 7,057,509

DECLARATION OF ANGELA QUINLAN

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-145

I, Angela Quinlan, declare as follows:

1. I have been the Managing Director of Valtrus Innovations, Ltd. (“Valtrus”) since October 23, 2020. I am also Managing Director of Key Patent Innovations, Ltd. (“Key Patent”), which is Valtrus’ parent entity. I reside in Wicklow, Ireland.
2. In November 2021, Valtrus acquired a portfolio of patents, including U.S. Patent No. 7,057,509 (“the ’509 patent”), which were originally assigned to Hewlett Packard. *See* patent assignments recorded at Reel/Frame 58897/0262 and 055269/0001.
3. Since then, more than fifty entities have licensed Valtrus’ patent portfolio, which includes the ’509 patent. The ’509 patent was specifically called out in notice letters to nearly a dozen of these licensees.
4. Valtrus has also filed and settled patent infringement lawsuits against TierPoint, LLC, Lenovo and Motorola. These litigations involved the ’509 patent. As part of these settlements, the defendants and/or their affiliates received rights under Valtrus’ portfolio, including to the ’509 patent.
5. In the litigation against Lenovo and Motorola, Valtrus accused Lenovo and Motorola of infringing the ’509 patent “through the use of Google Maps.” EX20xx [Lenovo Complaint], ¶ 48. Google Maps is provided by Google.

6. In November 2021, Valtrus sent Google a letter, putting it on notice of, among other things, its infringement of the '509 patent by offering "products and services featuring location sharing, including but not limited to Google Maps and Pixel phones." EX200x at 3 (excerpted below).

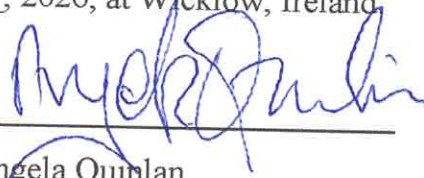
US7057509	Monitoring An Object With Identification Data And Tracking Data	17 & 18	Google products and services featuring location sharing, including but not limited to Google Maps and Pixel phones
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7. Google received the letter, as it followed up with a question regarding another patent in the letter, but Google did not correspond with Valtrus regarding the '509 patent.

8. Until it filed the IPR petition in February 2026 (IPR2026-00262), Google never contested that the '509 patent was valid; not for over four years after it received the November 2021 notice letter and not during the pendency of the Lenovo/Motorola lawsuit which involved Google-provided Google Maps.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. I further declare that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Executed on April 24, 2026, at Wicklow, Ireland



Angela Quinlan