

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY,
Petitioner,

v.

SAFE DRIVING TECHNOLOGIES LLC,
Patent Owner.

U.S. Patent No. 9,713,994 to Naboulsi

Case No.: IPR2021-01341

DECLARATION OF MOUHAMAD NABOULSI

I, Mouhamad Naboulsi, hereby declare as follows:

1. I am making this declaration at the request of Safe Driving Technologies LLC in the matter of *Inter Partes* review IPR2021-01341 of U.S. Patent No. 9,713,994 ("the '994 Patent") to Naboulsi in connection with its Patent Owner Preliminary Response (POPR).

2. This declaration is based on my personal knowledge as a direct participant and fact witness of the events described herein.

3. I filed U.S. Provisional Patent Application No. 60/336,293, on October 24, 2001, and U.S. Provisional Patent Application No. 60/390,877, on June 21, 2002, from which all four of the U.S. patents below claim priority to. I am the sole inventor of both applications, which includes the U.S. patents that emerged therefrom and are the subject matter of four separate challenges before the PTAB (8,301,108, 9,047,170, 9,713,994 and 10,532,709).

4. After filing these applications, I exhibited the inventions in various automotive shows and regulatory sessions throughout the U.S., which were attended by various representatives from the automotive industry including Ford. This included: Transport Canada, in Ottawa October 2003; Department of Transportation in Washington, D.C. U.S. Department of Transportation Secretary LaHood Distracted Driving Summit September 30 - October 1, 2009, and again in September of 2010; National Congress for State

Legislature in Salt Lake City July 2004 and in Louisville in July 2010; and Governors Highway Safety Association in Kansas in 2010.

5. In March 2003, I was hired to work in Petitioner Ford's Safety Office.

6. Prior to my employment with Petitioner Ford, I disclosed to Ford that I had filed the above-mentioned patent applications relating to driver safety and distraction.

7. In May 2004, I was asked by two Ford executives to give a demonstration of these inventions at the Ford Advanced Design Center in Michigan, and to give a presentation and a demonstration regarding the same to researchers at Ford's Michigan offices. This included Dev Kotchar, Luis Trajena and Jeff Rupp Senior Manager in Autonomous Vehicles, ADAS, and Crash Safety R&D.

8. On or about October of 2004, a Ford in-house IP attorney contacted me and inquired about my patent applications.

9. After providing Ford with terms for licensing my patent pending technology in 2004, Ford required me to waive my rights to my technology and patents prior to negotiating any potential license agreement. I refused.

10. I was terminated by Petitioner in December 2004 by Mazen Hammoud, a manager at Ford. The official reason for termination was "a conflict

of interest,” which, however, as I understand it, it was because I refused to assign my portfolio of pending patent applications to Ford.

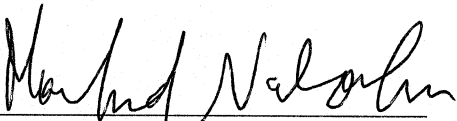
11. In January 2007, at the North American International Auto Show in Detroit, Michigan, Ford announced the adoption of its SYNC infotainment module, which implemented some of the inventions in described in my patents four of which are asserted in the Delaware patent infringement Litigation.

12. I have made many presentations about my inventions including for a group of engineers at Ford’s Advanced Features & Technology, Development & Implementation, located at 20300 Rotunda Drive, Dearborn MI 48124 in September 2008. During the meeting, the Ford engineers commented about the similarity between my presentation and many of the features in the Ford SYNC system.

13. I was awarded the prestigious MIT-SAE Innovator of the Year award in April 2010 for the inventions disclosed in my provisional patent applications.

I declare under penalty of perjury that the foregoing is true and accurate
to the best of my ability.

Executed on: 11/16/2021


Mouhamad Naboulsi