NAVMAN WIRELESS NORTH AMERICA, LTD. GEOTAB INC., AND TV MANAGEMENT INC., D/B/A GPS NORTH AMERICA Petitioners,

v.

PERDIEM CO., LLC.

Patent Owner

Case IPR2016-TBA

U.S. Patent 8,717,166

DECLARATION OF VIVEK GANTI, ESQ



Exhibit No.	Document Description
Ex. 1001	U.S. Patent No. 8,717,166 ("'166 Patent")
Ex. 1002	The file history of the '166 Patent
Ex. 1003	U.S. Patent No. 7,327,258 ("Fast")
Ex. 1004	U.S. Provisional Patent App. No. 60/542,208 ("Fast Provisional")
Ex. 1005	U.S. Patent Pub. No. US 2005/0156715 ("Zou")
Ex. 1006	Discrete Wireless's Marcus GPS Fleet Management Application Product Brochure ("Marcus")
Ex. 1007	U.S. Patent App. No. 14/629,336, Response to Non-Final Office Action (Feb. 11, 2016)
Ex. 1008	Success Stories in Fleet Tracking
Ex. 1009	U.S. Patent No. 7,949,608 ("Li")
Ex. 1010	Software as a Service Article ("SaaS Article")
Ex. 1011	Infringement Contentions in related litigation
Ex. 1012	Supporting Declaration of Dr. Heppe

3. On information and belief, the correspondence address for the attorney of record for U.S. Patent 8,717,166 is:

Robert S. Babayi Address: 3208 Q. Street, NW Washington DC 20007

 In the related district court litigations PerdiemCo, LLC. v. Omnivations II, LLC D/B/A Fleetronix, Case No. 2:15-cv-00729; PerdiemCo, LLC. v. thingtech LLC, Case No. 2:15-cv-01218; PerdiemCo, LLC. v.



LLC v. GPS Logic, LLC; Case No. 2:15-cv-01216; PerdiemCo, LLC. v.

Industrack LLC, Case No. 2:15-cv-00727, pending in the Eastern District of

Texas, Patent Owner is represented by the law firm Quinn Emanuel

Urquhart & Sullivan, LLP whose correspondence address is:

Ouinn Emanuel Urquhart & Sullivan, LLP

Quinn Emanuel Urquhart & Sullivan, LLP 777 6th Street NW 11th floor Washington, D.C. 20001-3706

- 5. On May 16, 2016, Patent Owner's litigation counsel, Alan Whitehurst of the firm Quinn Emanuel Urquhart & Sullivan, LLP, represented that Patent Owner's litigation counsel agrees to accept service on behalf of Patent Owner of all IPR petitions directed to Patent Owner's patents that are at issue in the district court litigations identified above. Mr. Whitehurst also represented that Patent Owner consents to electronic service via email.
- 6. I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that all statements made of my own knowledge are true and that all statements made on information and belief are believed to be true. I understand that willful false



Vivek Ganti