

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

PERDIEM CO., LLC.

Patent Owner

DECLARATION OF STEVEN G. HILL

1. My name is Steven G. Hill. I am over the age of twenty-one and competent to testify in this matter. The statements made herein as based on my own personal knowledge.

2. I am a founding partner of the law firm Hill, Kertscher & Wharton, LLP (“HKW”) and counsel to the Petitioners. HKW is counsel to the joint defense group consisting of Teletrac -Navman Wireless, Geotab, Inc. and Telular, Inc. for purposes of preparing and bringing five petitions for *inter partes* review (IPR) against patents owned by Per Diem. The patent numbers are 8,223,012, 8,493,207, 8,717,166, 9,003,499, and 9,071,931.

3. As part of my work on the IPR petitions, I was responsible for gathering the funds from the participants in the IPR petitions to be used to offset the IPR filing fees. Toward that end, I collected 1/3 of the filing fees from each of Teletrac-Navman, Geotab and Telular.

4. Attached as Exhibit A hereto is a true and correct copy of a confirmation of wire from Telular, Inc. showing that Telular wired 1/3 of the monies used for the IPR filings.

5. At the outset of the engagement by the joint defense group, the arrangement regarding payment of HKW’s legal fees was originally that each of Teletrac-Navman, Geotab and Telular would pay 1/3 of our fees relating to the

IPRs. After Teletrac-Navman settled with PerDiem and terminated its participation in the IPRs, the arrangement became that Geotab and Telular would split HKW's fees evenly.

6. At no time prior to September 2016 when PerDiem raised the question of whether SkyBitz, Inc. is an RPI was I ever aware of SkyBitz, Inc. SkyBitz has not participated in, has not funded or offered to fund any of the IPR proceedings.

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 statements and the like are punishable by fine or imprisonment, or both (18 U.S.C. § 1001).

Executed on November 1, 2016



Steven G. Hill

Exhibit A

Date: 16-MAY-2016
Time Wire Completed: 15:36 ET
Account: [REDACTED]

HILL KERTSCHER & WHARTON LLP
IOLTA
3350 RIVERWOOD PKWY SE STE 800
ATLANTA, GA 30339-3351
Attn: SAMANTHA SHUB

QB

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Transaction Ref: 2016051600341211
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2.5197

Originator: TELULAR CORPORATION [REDACTED]
OPERATING ACCOUNT
200 S. WACKER DRIVE
SUITE 1800

Sending Bank: SILICON VALLEY BANK [REDACTED]
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