

Scott Andrews, Expert Witness
Petaluma, CA
scott.andrews@cogenia.com
650-279-0242

Summary of Litigation Experience

- **15 years of experience as technical expert and expert witness for patent litigation**
- **Supported over eighty U.S. patent cases**
- **U.S. District Court cases (21 depositions, 6 trials, 1 hearing)**
- **Arbitration Hearings (1 deposition, 1 trial)**
- **International Trade Commission cases (2 depositions, 2 trials, 1 tutorial)**
- **IPRs and Re-exams (35+ declarations, 10+ depositions)**
- **Targeted prior art searching**
- **Extensive personal library of key references in navigation, telematics and intelligent transportation systems (ITS)**
- **Invalidity and non-infringement analysis and reports**
- **Validity, and infringement analysis and reports**
- **IPR declarations**
- **Support for claim construction, and motions for summary judgment**

Key Practice Areas

- **Location Based Services and Systems**
- **Personal Computing and Mobile Electronics**
- **Collision Warning and Avoidance Systems**
- **Connected Vehicle Systems**
- **Automated Vehicle Technology**
- **Navigation and Digital Maps**
- **GPS Technology**
- **Automotive Control Systems and User Interface Technologies**
- **Integration of Mobile Electronics and/or Personal Computing in Automobiles**
- **Automotive Electronics**
- **Automotive Control Systems and User Interface Technologies**
- **Integration of Mobile Electronics and/or Personal Computing in Automobiles**
- **Traffic Information Systems**
- **Communications Systems (802.11, DSRC, Satellite)**
- **Streaming Audio Technologies (e.g. SDARS)**
- **Hybrid Vehicle Technology**
- **Intelligent Transportation Systems (ITS)**
- **Connected Vehicles**
- **Electronic Toll Collection**
- **Safety Systems**

Summary of Cases by Practice Area

Location Based Systems/Services	
<p>Client: Andrews Kurth Kenyon (Rep. VW/Audi) Case: West View Research v. VWGOA Case No. 16-cv-2643 JLS-AGS (SCADC) Topic: Mobile information systems Role: Invalidity and non-infringement expert</p>	<p>Client: Renaissance (Rep. Unified Patents) Case: IPR2017-00845 Patent Owner: Virtual Fleet Management Topic: Location based alerts Role: Invalidity expert, IPR declaration</p>
<p>Client: Kenyon and Kenyon (Rep. VW/Audi) Case: Rothschild Location Tech. v. VW/Audi Case No. 1:14-cv-01129 (DEDC) Topic: Vehicle navigation systems Role: Prior art search; Invalidity and non-infringement analysis; Re-exam declaration</p>	<p>Client: Finnegan (Rep. Unified Patents) Case: IPR 2017-00361 Patent Owner; Shipping and Transit Topic: Vehicle Tracking and Telematics Role: Invalidity expert; IPR declaration</p>
<p>Client: Hogan Lovells (Rep. Mercedes Benz) Case: Manitto Technologies v. Mercedes-Benz Topic: Vehicle Telematics/Location Systems Case No. 2:14-cv-1106 (TXEDC) Role: Invalidity Expert</p>	<p>Client: Hogan Lovells (Rep. Mercedes Benz) Case: Proximity Monitoring Innovations v. Mercedes Benz Case No. 14-cv-576-SLR-SRF (DEDC) Topic: Location based alert systems Role: Invalidity Expert; IPR declaration</p>
<p>Client: Kenyon and Kenyon (Rep. VW/Audi) Case: West View Research v. VWGOA Case No. 3:14-cv-02668-BAS-JLB (CASDC) Topic: Mobile information systems Role: Invalidity and non-infringement expert, IPR declarations</p>	<p>Client: Perkins Coie (Rep. M/A COM) Case: M/A COM Tech Holdings v. Laird Tech. Case No. 14-181-LPS (DEDC) Topic: Vehicle Telematics Systems Role: Validity and infringement expert, Depositions (2), Dist. Court hearing testimony</p>
<p>Client: Girardi and Keese (Rep. Zoltar) Case: Zoltar v. Samsung et al Case No. 5:06-CV-00044 JW (CANDC) Topic: Emergency Response Systems Role: Validity expert</p>	<p>Client: Desmarais (Rep. Cisco Systems) Case: TracBeam, LLC v. Cisco Systems, Inc. Case No. 6:17-cv-525-RWS Topic: Location and Positioning Systems Role: Invalidity and non-infringement expert Ongoing</p>
<p>Paul Hastings (Rep. SNAP) Blackberry vs. SNAP et al. Case No. Case 2:18-cv-02693-GW-KS (CCADC) Topic: Display of multiple terminal locations on navigation screen Role: Patentability analysis and supporting declaration, invalidity Deposition</p>	<p>Morrison and Foerster (Rep. Uber) XOne Technologies vs. Uber Case No. Case 5:16-cv-06050-LHK (CA NDC) Topic: Display of locations of multiple terminals on mobile devices Role: Invalidity Expert Deposition</p>

Navigation, GPS, and Traffic Information Systems

<p>Client: Robbins Kaplan (Rep. Club Car, LLC) Case: Club Car, LLC v. Yamaha Golf Car Co. Case No. Case 1:17-cv-00034-JRH-BKE (SGDC) Topic: Golf Cart navigation systems Role: Validity IPR Delcaration</p>	<p>Client: Wiley Rein (Rep. TomTom) Case: AOT Systems GmbH, et al v. TomTom Case No. 1:12-cv-00528-TSE-IDD (VAEDC) Topic: Handheld navigation systems Role: Prior art search; Invalidity report; Non-infringement report, Deposition</p>
<p>Client: Akin Gump (Rep. ATT and Telenav) Case: Vehicle IP v. ATT and Telenav, et al Case No.09-1007-LPS (DEDC) Topic: Mobile phone location/navigation systems Role: Non- infringement expert, Non-infringement report; Deposition</p>	<p>Client: Sterne, Kessler, Goldstein & Fox (Rep. Telenav) Case: WRE v. Telenav et al. Re-examination No. 90/012,198 Topic: Navigation Systems Role: Invalidity expert for re-exam</p>
<p>Client: Sterne, Kessler, Goldstein & Fox (Rep. Google) Topic: Navigation system displays Case: Google v. Walker Digital Re-examination No. 95/002,031 Role: Invalidity expert; Re-exam declaration</p>	<p>Client: Baker-Hostetler (Rep. TomTom) Case: TomTom v. Harris Case No. 3:11-cv-02500-H-MDD (CASDC) Topic: Vehicle navigation and real time traffic systems Role: Prior art search; Invalidity expert; Re-exam declaration</p>
<p>Client: Kenyon and Kenyon (Rep. VW/Audi) Case: Beacon GmbH vs Audi, et al Case No. 1:11-cv-00928-GMS (D DE) Re-exam: 95/001,852 Topic: Vehicle navigation systems Role: Invalidity expert; Re-exam declaration</p>	<p>Client: Baker-Hostetler (Rep. TomTom) Case: Tom Tom v. Crowd Source Traffic Case No. 2:11-cv-00470 (TXEDC) Topic: Vehicle navigation and real time traffic Role: Prior art search; Invalidity expert; Re-exam declaration</p>
<p>Client: Wiley Rein (Rep. TomTom) Case: Silver State Intellectual Tech. v. TomTom Case No. 2:11-cv-01581-PMP –PAL (NVDC) Topic: Navigation Systems Role: Prior art search; Invalidity expert; Re-exam declaration</p>	<p>Clients: Kenyon and Kenyon (Rep. VW/Audi) Kramer Levin (Rep. Sirius/XM) Case: Volkswagen Group et al v. Triangle Software Case No. 1:10-cv-01457-CMH –TCB (VAEDC) Topic: Vehicle navigation and real time traffic systems Role: Invalidity and non-infringement expert, Invalidity and non-infringement reports; Deposition</p>
<p>Client: Morrison and Foerster (Rep. TomTom) Case: TomTom vs Tremontaine Case No. 1:11-cv-00918-LMB –TCB (VAEDC) Topic: Vehicle navigation and real time traffic Role: Technical Consultant Activities: Prior art search; Invalidity expert</p>	
<p>Client: Finnegan (Rep. Pioneer) Case: Pioneer v. Garmin Case No. ITC: 337-TA-694 Certain Multimedia Display and Navigation Devices and Systems, Components Thereof, And Products Containing Same Topic: Handheld navigation systems Role: Claim construction report Technical tutorial for court; Deposition; Trial testimony</p>	<p>Clients: Finnegan (Rep. Pioneer) Brinks Hofer (Rep. Alpine) Harness Dickey and Pierce (Rep. Denso) Case: Honeywell v. Alpine et al. Case No. ITC 337-TA-657 Certain Automotive Multimedia Display and Navigation Systems, Components Thereof, and Products Containing the Same) Topic: Navigation systems, mapping and GPS Role: Invalidity, non-infringement, and domestic industry practice reports; Witness statements; Deposition; Trial testimony</p>
<p>Client: Pillsbury Winthrop (Rep. ZTE) Case: Vringo v. ZTE IPR 2015-00706</p>	<p>Client: Morrison-Foerster (Rep. TomTom) Case: Mobile Traffic Systems v. TomTom Case No. 5:07-CV-00653-CLS (ALNEDC)</p>

Topic: Cell phone location/navigation service Role: Prior art search; IPR declaration	Topic: Wireless Traffic Information Systems in Handheld Navigation Devices Role: Prior art search, and initial invalidity and non-infringement arguments
Client: Alston & Bird (Rep. Asus) Case: Maxell, Ltd. v. ASUS, et al., Case No. 2:17-cv-7528 (C.D. Cal.) Topic: Handheld Navigation Devices Role: Non infringement and invalidity expert	Client Omelveney & Myers (Rep. Google) Location Based Services LLC v. Google LLC Case No. 18-1587 (LPS) (CJB) (D. Del.) Topic: 3-Dimensional navigation display systems Role: Prior system art search, patentability analysis and declarations

Personal Computing and Mobile Electronics	
Clients: Akin Gump (Rep. Lenovo) Fish and Richardson (Rep. Samsung) Kenyon and Kenyon (Rep. Sony) King and Spaulding (Rep. Nokia) Farella (Rep. Amazon) Case: Pragmatus v. Amazon et al. Case No. ITC 337-TA-905 Certain Wireless Devices Including Mobile Phones and Tablets II Topic: Computer Location Systems Role: Invalidity expert, reports; IPR declarations (Also included IPR declaration for Amazon via Fenwick and West)	Client: Pillsbury (Rep. ZTE) Case: Hitachi Maxell v. ZTE Case No. 5:16-cv-00179-RWS (E.D. Tex.) Topic: Mobile device navigation systems Role: Invalidity and non-infringement expert Deposition, Trial Testimony
	Client: Pillsbury (Rep. ZTE) Case: CyWee v. ZTE Case No. 3:17-cv-02130-BEN-RBB Topic: Mobile device orientation Role: Invalidity and non-infringement expert Deposition
Client: Baker Botts (Rep. T-Mobile) Case: TracBeam v. T-Mobile Case No. 6:11-cv-00096-LED (TXEDC) Topic: Mobile device location systems Role: Claim construction expert; IPR declaration; Deposition	Client: Ropes & Gray (Rep. Motorola) Case: Motorola Mobility v Microsoft Case No. 1:10-cv-24063-FAM (FLSDC) Topic: Location based cellular phone browsers Role: Validity and infringement expert; Validity and infringement reports; Deposition
Client: Haynes Boone (Rep. Apple) Case: Porto Technology v. Apple Computer IPR for US6233518, and US6532413 (Associated Case No. 2:15-cv-457 (TXEDC)) Topic: mobile phone location/ navigation systems Role: Invalidity expert; IPR declaration	Client: Unified Patents Opposing Counsel: Unknown Case: Unified v. Rothschild Topic: Mobile device navigation systems Role: Invalidity expert, IPR Declaration
Client: Morgan Lewis (Rep. LG) Case: American GNC v. LG Case No. 3:17-cv-01090-BAS-BLM Topic: Mobile device sensor systems Role: Technical consultant, Deposition	Client: Hunton Andrews Kurth (Rep. PDI) Opposing Counsel: Erise IP, Morrison Foerster Case: Princeton Digital, Inc. v. Ubisoft et al. Topic: Virtual Reality Processing Systems Role: Infringement and Validity expert Reports, Deposition
Client: Arnold-Porter (Rep. LG) Case: AGIS Software Development LLC v. LG. et al. Case No. 2:17-cv-513-JRG (E.D. Tex.) Topic: Handheld Navigation Devices Role: Non infringement and invalidity expert, deposition	Client: Webb Law (Rep. Huawei) Case: AGIS Software Development LLC v. Huawei. et al. Case No. 2:17-cv-513-JRG (E.D. Tex.) Topic: Handheld Navigation Devices Role: IPR Declaration
Client: Haynes Boone (Rep. Unified) Opposing Counsel: Unknown Case: Unified v. Ride App	Client: Baker Botts (Rep. Unified) Opposing Counsel: Unknown Case: Unified v. SMTM

Topic: Mobile Ride Sharing Systems Role: Invalidity expert, IPR Declaration	Topic: Mobile Ride Sharing Systems Role: Invalidity expert, IPR Declaration
Client: Haynes Boone (Re. Apple) Opposing Counsel: Unknown Case: Alert Signal v. Apple Computer Topic: Device Tracking Systems Role: Invalidity and non-infringement expert	Client: McDermott Will & Emery (Rep. ZTE) Case: American GNC v. ZTE Topic: Mobile device sensor systems Role: Technical consultant

Automotive Infotainment Systems, Integration of Mobile Electronics and/or Personal Computing in Automobiles, Streaming Audio Technologies (e.g. SDARS)	
Client: Andrews Kurth Kenyon (Rep. VW/Audi) Case: Blitzsafe v. VWGOA Case No. 2:15-cv-01274-JRG-RSP (TXEDC) Topic: Vehicle-mobile device integration systems Role: Invalidity and non-infringement expert; Invalidity and non-infringement reports; IPR declarations	Clients: Wilmer Hale (Rep. Ford) Brooks Kushman (Rep. Ford) Case: Eagle Harbor Holdings/Medius v. Ford Motor Co. Case No. 3:11-cv-05503-BHS (WAWDC) Topic: Vehicle Infotainment systems Role: Invalidity and non-infringement expert, Invalidity and non-infringement reports; Deposition; Jury trial testimony
Client: Kenyon and Kenyon (Rep. VW/Audi) Case: Volkswagen Group et al v. Affinity Labs of Texas Case No. 9:08-cv-00164-RC (TXEDC) Topic: Automotive systems (primarily portable music player interface systems) Role: Prior art search, Invalidity and non- infringement reports; Deposition; Jury trial testimony	Client: Kenyon and Kenyon (Rep. Toyota) Case: Affinity Labs of Texas, v. Toyota Motor North America Inc., et al., Case No. 6:13-cv-365 (TXEDC) IPR 2014-01336 Topic: Vehicle-mobile device integration systems Role: Invalidity and non-infringement expert, IPR Declaration
Client: Brooks-Kushman (Rep. Ford) Steptoe (Rep. General Motors) Case: Affinity Labs of Texas v. BMW et al. 9:08-cv-00164-RC (TXEDC) Topic: Vehicle Infotainment systems/portable device integration Role: Invalidity expert (GM), Invalidity and non- infringement expert (Ford), Invalidity (Ford and GM) and non-infringement (Ford) reports; Deposition	Client: Dykema Gossett (Rep. Ford) Case: Joseph J. Berry v. Ford Motor Company and Ford Global Technologies Case No. 5:11-cv-10569 (MIEDC) Topic: Vehicle Telematics Systems Role: Analyzed documentation relative to claimed inventorship
Client: Andrews Kurth Kenyon (Rep. VW/Audi) Case: Advanced Media Networks vs VWGOA Case No. 1:15-cv-00420-GMS (DEDC) Topic: Vehicle Infotainment systems Internet Access Role: Invalidity and non-infringement expert	Client: Unified Patents Opposing Counsel: Unknown Case: Unified v. Hailo Topic: Mobile Ride Sharing Systems Role: Invalidity expert, IPR Declaration
Hunton Andrews Kurth (Rep. Toyota) Dale Progress, Ltd. vs. Toyota Case No. 2:18-cv-475 (E.D. Tex.) Topic: Vehicle information display systems Role: Technical consultant	

Automotive Electronics, User Interfaces, Safety Systems, Hybrid Vehicles, Collision Warning and Avoidance, Automated Vehicles	
<p>Client: Kenyon and Kenyon (Rep. Toyota) Case: Signal IP v. Toyota Motor Corp. IPR 2016-01382, 2016-00292 Topic: Mobile Automotive occupant sensing systems Role: Invalidity expert; IPR declarations; Deposition</p>	<p>Client: Andrews Kurth Kenyon (Rep. VW/Audi) Case: Paice v. VWGOA Case No. ITC 337-TA-998: Certain Hybrid Electric Vehicles and Components Thereof Topic: Hybrid Vehicle Systems Role: Invalidity and non-infringement expert reports; IPR declarations</p>
<p>Client: Fish and Richardson (Rep. Honda) Topic: Automotive systems (primarily user interface systems) Case: American Calcar v. Honda Case No. 06-cv-2433-DMS (CASDC) Role: Prior art search; Invalidity and non-infringement reports, rebuttal reports, consulting and review of motions, consulting and review of trial material development; Deposition; Jury trial testimony.</p>	<p>Client: Howrey Simon (Rep. BMW) Opposing Counsel: Knobbe Martens Case: American Calcar v. BMW Case No. 04-cv-0614 DMS (CASDC) Topic: Automotive systems (primarily user interface systems) Role: Prior art search; Invalidity and non-infringement reports</p>
<p>Client: Ropes & Gray (Rep. Liberty Mutual Insurance Company) Case: Progressive Insurance v. Liberty Mutual Insurance et al. CBM2012-00002, 00003, 00004, and 00009 Topic: Automotive telematics/insurance systems Role: Invalidity expert; CBM declarations, Depositions (2)</p>	<p>Client: Kenyon and Kenyon (Rep. VW/Audi) Case: Joao Control and Monitoring Systems v. VWGOA IPR2015-01645 Topic: Vehicle Telematics Systems Role: Invalidity expert; IPR declaration; Deposition</p>
<p>Client: Hogan Lovells (Rep. Mercedes Benz) Case: Entry Systems LLC v. Mercedes-Benz 2:14-CV-01090-JRG (TXEDC) Topic: Vehicle Entry Systems Role: Invalidity expert; IPR declaration</p>	<p>Client: Kenyon and Kenyon (Rep. Toyota) Case: American Vehicular Sciences v. Toyota Motor Corp. Case No. 6:12-cv-404-LED-JDL (TXEDC) Topic: Vehicle Telematics Systems Role: Prior art search, IPR declarations, Deposition</p>
<p>Client: Kenyon and Kenyon (Rep. VW/Audi) Opposing Counsel: Unknown Topic: Vehicle Telematics Systems Case: Velocity v. VWGOA Case No. 1:13-CV-8418 (ILNDC) Role: Invalidity expert, Technical consultant for re-exam</p>	<p>Client: Kacvinsky Daisak Bluni (Rep. Littelfuse) Case: FusiLamp, et al v. Littelfuse, et al. IPR for US5598138 Topic: Automotive fuse systems Role: Invalidity expert; IPR declaration Arbitration Testimony, Deposition</p>
<p>Client: Kenyon and Kenyon (Rep. VW/Audi) Opposing Counsel: Unknown Case: Cruise Control Technologies v. VW/Audi, et al Case No. 1:12-cv-01753-UNA (DEDCE) Topic: Automotive cruise control display systems Role: Prior art search; Re-exam support</p>	<p>Client: Quinn Emmanuel (Rep. Mercedes Benz) Case: Adaptive Headlamp Technologies, Inc. v. Mercedes-Benz USA IPR 2016-00501 Topic: Automotive headlamp technology Role: Invalidity expert; IPR declaration</p>
<p>Client: Dewey & Le Bouef (Rep. BMW) Case: Stragent v. BMW Case No. 6:10-CV-227 (TXEDC) Topic: Automotive adaptive cruise control systems</p>	<p>Client: Howrey Simon (Rep. Isuzu) Case: Isuzu Motors et al v. MHL TEK Case No. 2:08-cv-125 (TXEDC) Topic: Automotive tire pressure monitor Systems Role: Technical consultant; Prior art search</p>

Role: Invalidity expert	
Client: Fish and Richardson (Rep. Wasica) Case: Wasica v. Schrader and Continental IPR2014-00295 Topic: Tire Pressure Monitoring Systems Role: Validity and infringement expert; IPR declaration; Deposition	Client: Greenberg Traurig (Rep. Epsilon) Topic: Automotive Rear Seat Entertainment Case: Epsilon Electronics v. Audiovox Case No. 2:03-cv-06235 (NYEDC) Role: Validity and infringement expert
Client: Fish and Richardson (Rep Unified Patents) Opposing Counsel: Unknown Case: Unified v. Velocity Topic: Vehicle management systems Role: Invalidity expert, IPR Declaration	Client: Unified Patents Opposing Counsel: Unknown Case: Unified v. Michelotti Topic: Vehicle Safety Systems Role: Invalidity expert, IPR Declaration
Client: eRise IP (Rep. Delphi) Opposing Counsel: Unknown Case: Delphi v. IEE Sensors Topic: Vehicle Occupant Detection Systems Role: IPR Declaration, Deposition	Client: Baker McKenzie (Rep. Hyundai) Opposing Counsel: Unknown Case: Michigan Motor Technologies v. Hyundai Topic: Vehicle Control Systems Role: Invalidity expert, IPR Declarations (multiple)
Cooley (Rep. Directed Electronics) Case: Automotive Data Systems vs. Directed Electronics Case No. 2:18-cv-01560-GW (CA CDC) Role: Invalidity, trade secret and copyright non- infringement. Deposition	Client: Wilmer Have (Rep. Audi) Case: Michigan Motor Technologies v. Audi Topic: Vehicle Control Systems Role: Technical Consultant (multiple patents)

Intelligent Transportation Systems (ITS), Connected Vehicles, Electronic Toll Collection, Communications Systems (802.11, DSRC, Satellite)	
Client: McKool Smith (Rep. Los Angeles Metropolitan Transportation Commission) Case: Transport Technologies v. L.A. County Metro. Transp. Auth., IPR 2016-01077 Topic: High Occupancy Toll Lanes Role: Invalidity expert; IPR declaration; Deposition	Client: Renaissance (Rep. Unified Patents) Case: Unified Patents v. Sisvel IPR 2017-00565 Patent Owner: Sisvel Topic: Traffic Management Systems Role: Invalidity expert, IPR declaration
Client: Leffert Jay & Polglaze (Rep. Emtrac) Topic: Traffic Signal Preemption Systems Case: GTT v. Emtrac Case No. 0:10-cv-04110-ADM-JJG (MNDC) Role: Prior art search; Invalidity and non- infringement reports; Deposition; Jury trial testimony	Client: Mayer Brown (Rep, Cinterion) Case: M2M Solutions LLC v. Cinterion Case No. 1:12-cv-00031 (DEDG) Topic: M2M Communications Systems Role: Technical Consultant
Faegre (rep. Driver Reach) Tenstreet vs. Driver Reach Case No. Case 1:18-cv-03633-JRS-TAB Topic: Peer to Peer sharing of driver applicant information	Client: Shephard-Mullin (Toyota) Case: AutoBrilliance v. Toyota Topic: Vehicle communications systems Role: Technical Consultant

Role: technical consultant, claim construction, invalidity contentions	
Client: Kelley Drye & Warren Case: Innovative Global Systems v. KeepTruckin Role: Technical Consultant	