

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SONY CORPORATION  
Petitioner

v.

Patent of YISSUM RESEARCH DEVELOPMENT COMPANY OF THE  
HEBREW UNIVERSITY OF JERUSALEM  
Patent Owner

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Case IPR2013-00219 (SCM)<sup>1</sup>  
Patent 7,477,284

Title: SYSTEM AND METHOD FOR CAPTURING AND VIEWING  
STEREOSCOPIC PANORAMIC IMAGES

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Before SALLY C. MEDLEY, KARL D. EASTHOM, and  
JAMES B. ARPIN, *Administrative Patent Judges*.

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**DECLARATION OF WILLIAM NELSON  
SUBMITTED UNDER 37 C.F.R. §42.64(2)**

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<sup>1</sup> The IPR2013-00327 proceeding has been joined with this proceeding.

I, William Nelson, do hereby make the following declaration:

1. I am a partner of Tensegrity Law Group, LLP, located at 555 Twin Dolphin Dr., Suite 360, Redwood Shores, CA 94065. Along with my colleagues, I served as counsel of record for HumanEyes Technologies, Ltd. (“HumanEyes”), Complainant in the International Trade Commission investigation No. 337-TA-842, captioned “In the Matter of Certain Cameras and Mobile Devices, Related Software and Firmware, and Components Thereof and Products Containing the Same” (the “ITC Investigation”). HumanEyes is the exclusive licensee, with rights to enforce, of U.S. Patent Nos. 6,665,003, and 7,477,284, at issue in Case IPR2013-00218 and Case IPR2013-00219. Petitioner Sony was the Respondent in the ITC Investigation.
2. Exhibit YRD-2012 was produced by Sony in the course of discovery in the Course of the ITC Investigation. For that reason, Exhibit YRD-2012 bears “Bates” production numbers SONY842ITC\_00260537-260579. Attached as Exhibit A to this Declaration is a transmittal letter dated August 29, 2012 from Sony, transmitting the production range including YRD-2012. YRD-2012 is an English translation of the Asahi reference (Exhibit 1010).


DECLARATION OF WILLIAM NELSON  
IPR2013-00219 (Patent 7,477,284)

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3. Exhibit YRD-2013 was produced by Sony in the course of discovery in the Course of the ITC Investigation. For that reason, Exhibit YRD-2013 bears “Bates” production numbers SONY842ITC\_00260414-260422. Attached as Exhibit A to this Declaration is a transmittal letter dated August 29, 2012 from Sony, transmitting the production range including YRD-2013. YRD-2013 is a certified English translation of the Kawakita reference (Exhibit 1003).

I declare under penalty of perjury that the foregoing is true and correct.

Dated April, 25, 2014

  
\_\_\_\_\_  
William Nelson



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August 29, 2012

**VIA FEDEX**

Megan Nelson  
**Tensegrity Law Group LLP**  
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Mareesa Frederick  
**Office of Unfair Import Investigations**  
U.S. International Trade Commission  
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Washington, D.C. 20436  
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Re: In the Matter of Certain Cameras and Mobile Devices, Related Software and  
Firmware, and Components Thereof and Products Containing the Same,  
Inv. No. 337-TA-842

Dear Counsel:

Enclosed please find a disc containing Respondents Sony Corporation, Sony Corporation of America, Sony Electronics Inc., Sony Mobile Communications AB, and Sony Mobile Communications (USA) Inc.'s production documents bearing bates numbers SONY842ITC\_00260220 - SONY842ITC\_00261135.

Best regards,

A handwritten signature in black ink, appearing to read 'Ajita Shukla'.

Ajita Shukla

Enclosure  
cc: Counsel of Record (via email, without enclosure)