

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IRON DOME LLC

Petitioner

v.

E-Watch, INC.

Patent Owner

Case: IPR2014-00439

Patent No. 7,365,871

**Title: Apparatus For Capturing, Converting And Transmitting A Visual Image
Signal Via A Digital Transmission System**

**DECLARATION OF DAVID A. MONROE
PURSUANT TO 28 U.S.C. §1746 AND 37 C.F.R. §1.131**

E-Watch, Inc.
Exhibit 2014
Petitioner - Iron Dome LLC
Patent Owner - E-Watch, Inc.
IPR2014-00439

I, David A. Monroe, pursuant to the provisions of 28 U.S.C. §1746 and 37 C.F.R. §1.131, declare:

1. My name is David A. Monroe.
2. I am over 21 years of age and am competent to make this declaration.
3. I am the named inventor on United States Patent Application No. 09/006,073 (“’073 patent application”).
4. The ‘073 patent application was filed on January 12, 1998 and is the patent application to which United States Patent No. 7,365,871 (“’871 patent”), the patent that is the subject of the above-captioned *inter partes* review proceeding (“these pending IPR proceedings”), claims priority.
5. I originally conceived of the invention claimed in claims 1-15 of the ‘871 patent no later than March 18, 1993. I conceived of the invention claimed in claims 1-15 of the ‘871 patent during a timeframe between about 1989 to about 1993 (“the period of conception”) during which I initiated and led several product development projects for apparatuses directed to various aspects of a handheld self-contained cellular telephone and integrated image processing system for both sending and receiving telephonic audio signals and for capturing a visual image and transmitting it to a compatible remote receiving station of a wireless telephone network. Examples of internal designations for these projects included, but were not limited to, FAX-CAM, Mini-RIT, CAM-RIT, ICE, Micro-ICE, HCT, Micro-RIT, Military Micro-RIT, L-RIT, and PICS. For example, apparatuses within the scope of the FAX-CAM, CAM-RIT, Micro-RIT, and Mini-RIT product development projects were various configurations of hand-held

electronic devices capable of capturing visual images and wirelessly transmitting them to a remote receiving station.

6. Winston Ninh, who worked under my direction with respect to at least one product development project relating to the invention claimed in claims 1-15 of the '871 patent, can independently corroborate that I fully conceived of the invention claimed in claims 1-15 of the '871 patent no later than March 18, 1993. To this end, Winston Ninh has executed a declaration pursuant to the provisions of 28 U.S.C. §1746 and 37 C.F.R. §1.131 ("the Ninh declaration," which is submitted in these pending IPR proceedings as exhibit EXH 2015) to corroborate facts supporting my conception of the invention claimed in claims 1-15 of the '871 patent.
7. The evidentiary documentation included in the Ninh Declaration shows schematics and associated technical documents that were contemporaneously generated during my conception of the invention claimed in claims 1-15 of the '871 patent and that corroborate my conception of the invention claimed in claims 1-15 of the '871 patent at least as early as March of 1992 and not later than March 18, 1993.
8. On or prior to the date indicated during the period of conception, I created various sketches and other conception materials in relation to at least the FAX-CAM product development project. These sketches and other conception materials include the following:
 - a. As shown in page 27 of this declaration (FAX-CAM apparatus conceptual schematic; date of disclosure at least by 11/04/1989), a hand-held, self-

contained apparatus conceived in relation to the FAX-CAM product development project included a processor and power supply having memory coupled thereto, an image card coupled thereto, video signal input circuitry coupled thereto through an analog-to-digital conversion device, a display coupled thereto, telephonic system coupled thereto and including a cellular interface, and a button interface coupled thereto with keypad buttons coupled thereto. The power supply supplies power to electronic components of the apparatus. The processor digitally processes signals generated by electronic components of the apparatus. The memory and/or the image card enable visual images to be stored thereon. The video signal input circuitry (e.g., including video sensor and electronic camera) generates a visual image signal and the analog-to-digital conversion device outputs the visual image signal in a digital format. The display enables information generated by the electronic components of the apparatus to be viewed. The button interface with keypad buttons coupled thereto enables alphanumeric signals to be manually inputted. The telephonic system (e.g., via the cellular interface) enables signals generated by electronic components of the apparatus to be transmitted to a remote receiving station of a wireless telephone network and enables at least telephonic audio signals to be received from the remote receiving station.

- b. As shown in pages 28-33 of this declaration (FAX-CAM apparatus conceptual sketches and artistic rendering; date of disclosure at least by

03/03/1990), a hand-held, self-contained apparatus conceived in relation to the FAX-CAM product development project included a housing having a wireless communication device (e.g., including a speaker, microphone and antenna) therein, a display supported thereon, a telephone keyboard supported thereon, a memory card removably insertable therein, a camera therein, a user interface (e.g., button) thereon for enabling sending of a visual image signal corresponding to an image captured by the camera, a user interface (e.g., button) thereon for enabling viewing of a image captured by the camera, a user interface (e.g., knob) thereon for enabling adjustment of a sharpness of a displayed image, and power supply supported thereon. Although not specifically shown, functionalities that affected sharpness or other visual attributes of a displayed and/or viewed image and that were well known in the art of electronic (i.e., digital) cameras to be controlled via digital and/or analog signaling included, for example, gain, pedestal, setup, white clip, lens focus, white balance, lens iris, lens zoom and other functions of the camera from a local input device, a remote device or as automatic or programmed functions.

- c. As shown in page 34 of this declaration (FAX-CAM apparatus conceptual schematic; date of disclosure at least by 03/05/1990), a hand-held, self-contained apparatus conceived in relation to the FAX-CAM product development project included a processor having memory coupled thereto, an electronic camera (e.g., CCD chip) coupled thereto through an analog-to-digital conversion device, a display coupled thereto with a user

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