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

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DECLARATION OF WINSTON NINH
PURSUANT TO 28 U.S.C. §1746 AND 37 C.F.R. §1.131

E-Watch, Inc.
Exhibit 2015
Petitioner - Iron Dome LLC
Patent Owner - E-Watch, Inc.
IPR2014-00439

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

1. My name is Winston Ninh.

2. I am over the age of 21 years of age and am competent to make this declaration.

3. During the timeframe from about 1990 to about 1993, I worked under the direction of David Monroe with respect to several product development projects, which included: 1.) a product development project referred to as facsimile camera ("FAX-CAM") and sometimes also as "PhaxxCam" and FaxMan (hereinafter referred to as FAX-CAM), 2.) a product development project referred to as camera remote image transceiver ("CAM-RIT"); and 3) a product development project referred to as mini remote image transceiver ("Mini-RIT").

4. The professional services that I performed for the project consisted of formalizing content of block diagrams ~~created by David Monroe and articulated to me verbally and/or~~ in writing by David Monroe, designing circuit schematics for same, building breadboards for same, and testing such breadboards.

5. Apparatuses within the scope of the FAX-CAM, CAM-RIT, and Mini-RIT product development projects related to various configurations of hand-held electronic devices capable of capturing visual images and transmitting them to a remote receiving station.

6. Although I am not an inventor of the subject matter claimed in U.S. patent no. 7,365,871 ("the '871 patent"), based on my direct knowledge of the FAX-CAM, CAM-RIT, and Mini-RIT product development projects and my interactions with David

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Monroe during the timeframe indicated above, it is my testimony that David Monroe disclosed to me the following subject matter on or prior to the date indicated.

a. As shown in page 11 of this declaration (FAX-CAM apparatus conceptual schematic; date of disclosure at least by 03/05/1990), an 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 interface for affecting content presented on the display, and a fax modem chip coupled thereto. The fax modem chip is coupled between the processor and communications interfaces (e.g., RJ-11 jack) such that signaling between the processor and the communications interfaces is in a digital format. The processor digitally processes signals generated by electronic components of the apparatus. The memory enables visual images to be stored thereon. The 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 communications interfaces enable signals generated by electronic components of the apparatus to be transmitted to a remote receiving station.

b. As shown in pages 12-15 of this declaration (FAX-CAM apparatus conceptual schematic; date of disclosure at least by 03/30/1990), an apparatus conceived in relation to the FAX-CAM product development

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project included a processor, various types of memory, an electronic camera (e.g., CCD chip), image processing circuitry, a display, a keyboard for enabling input of alphanumeric information, a user interface for enabling image capture and transmission, a modem, a modem driver, a data access arrangement, a digital-to-analog converter, and analog-to-digital converter, and various communication interfaces for enabling 2-way communication with a remote receiving station (e.g., RJ-11, RS-232).

c. As shown in page 16 of this declaration (CCD Camera Module; date of disclosure at least by July 20, 1990), an apparatus conceived in relation to the FAX-CAM product development project included a camera module having a physical size allowing it to be integrated into a hand-held housing. The CCD camera module was the smallest size camera module that was identified by David Monroe in or shortly before July of 1990.

d. As shown in pages 17-18 of this declaration (FAX-CAM apparatus processor board schematic; date of disclosure at least by 12/03/1990), an apparatus conceived in relation to the FAX-CAM product development project included processor configured (e.g., with the use of software) for providing the following functionality: control the electronics to allow viewing of a live image to be framed, control the keypad/keyboard electronics to allow input of commands, control the keypad/keyboard electronics to allow input of alpha or numeric data, run the operating system software, run the applications software, control the internal RAM memory, control the external memory, control the display of video and

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images, control the display of text, control the backlight of the display, control the electronics to capture an image, provide one or more image compression algorithms, perform gray scale to bit map conversion for FAX machine compatibility, store the captured image in fixed RAM memory, store the capture image in removable memory, recall a captured image from RAM, recall a captured image from removable memory, monitor the status of the memory card door (open/closed), control memory based on memory card door, control the electronics to display a captured image, select the means of transmission of the image, control the modem, control dialing functions of the telephone and the cellular telephone, control the telephone line communications, control the cellular telephone communications, control the serial channel communications, control communications encryption/decryption functions, provide one or more protocols for the telephone line, provide one or more protocols for the cellular telephone, provide one or more protocols for the serial channel, control sending of an image over the telephone line, control sending of an image over the cellular telephone, control sending of an image over the serial channel, control receiving of an image over the telephone line, control receiving of an image over the cellular telephone, control receiving of an image over the serial channel, provide one or more image decompression algorithms, control the power supply system, control the video parameters of the electronic camera, control the video parameters of the A/D conversion, control the video parameters of the D/A conversion,

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