IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EASTMAN KODAK COMPANY, AGFA CORPORATION, ESKO SOFTWARE BVBA, and HEIDELBERG, USA, Petitioners

V.

CTP INNOVATIONS, LLC Patent Owner

Case IPR2014-00788 Patent 6,738,155

REQUEST TO FILE CORRECTED EXHIBIT

Patent Owner CTP Innovations, LLC respectfully requests leave to file the attached corrected Exhibit 2014. Exhibit 2014 is the Declaration of Robert L. Stevenson, and was filed on April 2, 2015. The declaration itself is complete, but it was filed without including his curriculum vitae with litigation experience, despite indicating that it was attached. The proposed corrected Exhibit 2014 is attached hereto. A copy of the exhibit with attachment has been provided to Petitioners on April 3, 2015, as soon as the error was discovered. It is obvious from the declaration that the curriculum vitae with litigation experience was intended to be submitted. *See Safeway, Inc., et a. v. Kroy IP Holdings, LLC*,



IPR2014-00685 (Paper 9) (granting leave to file declaration originally filed without curriculum vitae). Accordingly, Patent Owner respectfully requests that the Board grant this request.

Dated: April 3, 2015

Respectfully submitted,

BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, P.C.

/W. Edward Ramage/

W. Edward Ramage, Reg. No. 50,810 Samuel F. Miller (pending pro hac vice admission)

BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, P.C. Baker Donelson Center 211 Commerce Street, Suite 800

Nashville, Tennessee 37201 Tel: (615) 726-5771

Fax: (615) 744-5771

Email: eramage@bakerdonelson.com smiller@bakerdonelson.com

Counsel for Patent Owner CTP Innovations, LLC



CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on April 3, 2015, the foregoing Request (including attachments) was served in its entirety via U.S. Express Mail, postage prepaid, and electronic mail upon the following:

Scot A. McKeown OBLON, SPIVAK, MCCLELLAND, MAIER & NEUSTADT, LLP 1940 Duke Street Alexandria, VA 22314 Tel: (703) 412-6297

Fax: (703) 413-2220

Email: cpdocketmckeown@oblon.com cpdocketkiklis@oblon.com

/W. Edward Ramage/

W. Edward Ramage, Reg. No. 50,810



1IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EASTMAN KODAK COMPANY, AGFA CORPORATION, ESKO SOFTWARE BVBA, and HEIDELBERG, USA Petitioners

v.

CTP INNOVATIONS, LLC
Patent Owner

Case IPR2014-00788 Patent 6,738,155

DECLARATION OF ROBERT L. STEVENSON IN SUPPORT OF VALIDITY OF U.S. PATENT NO. 6,738,155

> CTP Exhibit 2014 Eastman Kodak v. CTP Innovations IPR 2014-00788



Page 1



TABLE OF CONTENTS

1.	QUALIFICATIONS		3
II.	MATERIALS CONSIDERED		5
III.	SUMMARY OF OPINIONS		6
IV.	OPINIONS AND BASES FOR THOSE OPINIONS		11
	A.	One of Ordinary Skill in the Art.	11
	B.	Claims 10-13 and 15-20 Are Not Obvious from Jebens and Apogee	11
	C.	Claim 14 Is Not Obvious from Jebens, Apogee and Andersson	25
	D.	Claims 10-13 Are Not Obvious from Dorfman and Apogee	26
	E.	Claims 14-15 Are Not Obvious from Dorfman, Apogee and Andersson	36
	F.	Claims 16-20 Are Not Obvious from Dorfman, Apogee, and OPI White Paper	38
V.	CONCLUSIONS		41

CTP Exhibit 2014 Eastman Kodak v. CTP Innovations IPR 2014-00788





DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

