IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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BEFORE THE PATENT TRIAL AND APPEAL BOARD
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EASTMAN KODAK COMPANY, AGFA CORPORATION,
ESKO SOFTWARE BVBA, and HEIDELBERG, USA
Petitioners

v.

CTP INNOVATIONS, LLC
Patent Owner

_____

Case IPR2014-00790
Patent 6,611,349

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**DECLARATION OF ROBERT L. STEVENSON
IN SUPPORT OF VALIDITY OF U.S. PATENT NO. 6,611,349**

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I, Robert L. Stevenson, have been retained to testify as an expert on behalf of CTP Innovations, LLC in this matter. I declare as follows:

I. QUALIFICATIONS

1.   I am a professor of electric of electrical engineering and computer science at the University of Notre Dame, where I have been employed for the last 24 years. I was granted tenure in 1996 as an Associate Professor and promoted to the academic rank of full Professor in 2002. I serve concurrently on the faculties of the Department of Electrical Engineering and the Department of Computer Science and Engineering. I also presently serve as the Associate Chair and Director of Undergraduate Studies in the Department of Electrical Engineering.

2.   I received my bachelor's degree from the University of Delaware in 1986 and my Ph.D. from Purdue University in 1990, both in electrical engineering. My Ph.D. research was in the area of communications and signal processing. I have been actively engaged in the field of electrical engineering for over 30 years and in the field of image processing since 1986.

3.   I am a member of the Institute of Electronics and Electrical Engineers (IEEE), the Society of Photographic Instrumentation Engineers (SPIE), and the

Society for Imaging Science and Technology (IS&T). In addition, I am a panel member and reviewer for the National Science Foundation.

4. For the past 20 years my work has focused on the design of techniques, hardware, and software for the processing of digital signals using digital computing devices, such as image processing. My academic research focuses on developing novel ideas for systems, then publishing and presenting those ideas to the technical community.

5. My early work on digital techniques for printing and image capture devices led to significant interaction with companies developing consumer products in the early 1990s as they worked to incorporate those ideas into their products.

6. Several leading computing companies, including Intel, Sun Microsystems, Apple, and Microsoft, have been involved with and supported my research at Notre Dame. I have also received significant support for my research from several U.S. Department of Defense agencies.

7. I have published over 100 technical papers related to the field of image processing and digital systems. In addition, I am an inventor of U.S. Patent No. 6,081,552, "Video Coding Using A Maximum A Posteriori Loop Filter," which issued June 27, 2000.

8.   A copy of my *curriculum vitae* is attached to this declaration as an appendix. It includes additional detail regarding my academic and professional background, and listings of various honors and awards I have received, professional activities with which I have been involved, papers and other publications I have authored or co-authored, and matters in which I have testified during the previous four (4) years.

9.   I am being compensated for my time working on this case at my customary hourly rate for all work performed on the case. My compensation is not in any way related to the outcome of the case.

II. MATERIALS CONSIDERED

10.   I base the opinions that I express in this declaration on my education and decades of experience in the fields of electrical engineering and image processing. I also base my opinions on a review of the materials provided by the parties in this trial, including a review of United States Patent Nos. 6,611,349 ("the '349 patent"), 6,738,155 ("the '155 patent"), and 6,321,231 ("Jebens"), PCT International Application Publication No. WO 98/08176 ("Dorfman"), as well as the AGFA Apogee: The PDF-based Production System paper ("Apogee"), Apple

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