

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
PATENT TRIAL & APPEAL BOARD**

In re Patent of: Rosenlund et al.
U.S. Patent No.: 6,738,155
Issue Date: May 18, 2004
Appl. No.: 09/364,935
Filing Date: July 30, 1999
Title: System and Method of Providing Publishing
And Printing Services Via a Communication
Network

DECLARATION OF JOHAN SUETENS
REGARDING REFERENCE PUBLICATION DATE

I, Johan Suetens, declare as follows:

(1.) All statements herein made of my own knowledge are true, and all statements herein made based on information and belief are believed to be true. I am over 21 years of age and otherwise competent to make this declaration. I am not being compensated for my time in preparing this declaration, the opinions herein are my own, and I have no personal stake in the outcome of the petitions for *inter partes* review (“IPR”) filed against U.S. Patent Nos. 6,611,349 and 6,738,155 or any related litigation or administrative proceeding.

(2.) I note that although Dutch is my first language, I understand and read English fluently and I am competent to give this declaration.

(3.) I have worked for Agfa Graphics from March 1985 to the present time.

(4.) In 1998 I was responsible for marketing-communications of commercial printing in the marketing-communication department within Agfa Graphics. At the present time I am responsible for Agfa Graphics' Corporate Identity in the marketing-communication department of Agfa Graphics.

(5.) As part of my current position at Agfa, I am familiar with the archives of marketing-communication department as one of the managers of the marketing-communication department of Agfa Graphics.

(6.) I have been asked by Eastman Kodak Company ("Kodak"), Agfa Corporation ("Agfa"), Esko Software BVBA ("Esko"), and Heidelberg USA ("Heidelberg") (collectively, the "IPR Petitioners") to determine when the document attached hereto as Attachment A, "*Agfa Apogee, The PDF-based Production System* ("Apogee")," was disseminated by Agfa and publicly available.

(7.) Apogee, a PDF production system of Agfa, was announced in 1997 at Seybold NYC 97 in New-York. After a world-wide tour with focus groups, seminars, educational books, progress previews at shows, "Apogee" was distributed short after the press briefing Agfa Delivers PDF-based workflow with Apogee Production system - World's First True PDF-Based Workflow System Soon Fully Available on 17 March 1998 (Attachment B) with the formal introduction of Apogee PrintDrive output manager and Apogee Viper. In the press briefing World's First True PDF-based workflow system ships in June – Apogee

Pilot to complete workflow system on 1998 May 28 (Attachment C), the releasing Apogee Pilot as final component of Apogee, the PDF production system, was announced.

(8.) “Apogee” is an 8-pages A4 folder which was created to promote Agfa Apogee, including the internal products: Apogee Pilot, Apogee PDF RIPs and Apogee PrintDrive. “Apogee” was short after the press briefing on 17 March 1998 available in printed form and electronic form. The printed form and electronic form were world-wide distributed via the Agfa sales departments.

(9.) The printed form was also available on several seminars, exhibitions and demos of Apogee to the public. On the last page of the promotion folders the year and month were printed when the promotion folder was printed including a code for the language of the promotion folder. For example the language code GB stands for Great Britain to indicate that the language of the folder is (British) English.

(10.) The Attachment A is a printed “Apogee” on April 1998 with as internal purchasing code NEFDU (printed on page 8). Attachment D is the user interface of the database entry in the current Agfa’s Enterprise Management System including the ordering, delivery, invoicing of 76030 printed “Apogee” with as internal purchasing code NEFDU. The Attachment A was found in the archives of the marketing-communication department of Agfa Graphics.


(11.) Marketing-communication department of Agfa made also “Apogee” available to the public no later than the press briefing of 28 May 1998, and possible as early as on the press briefing of 17 March 1997, as electronic PDF-file for downloading to the public at the website www.agfahome.com.

(12.) Based upon the foregoing, and the accompanying excerpt from the user interface of the database entry in the current Agfa’s Enterprise Management System (attached hereto as Attachment D), “Apogee” was available to the public no later than the press briefing of 28 May 1998, and possible as early as on the press briefing of 17 March 1997.

(13.) These statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the results of these proceedings.

(14.) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

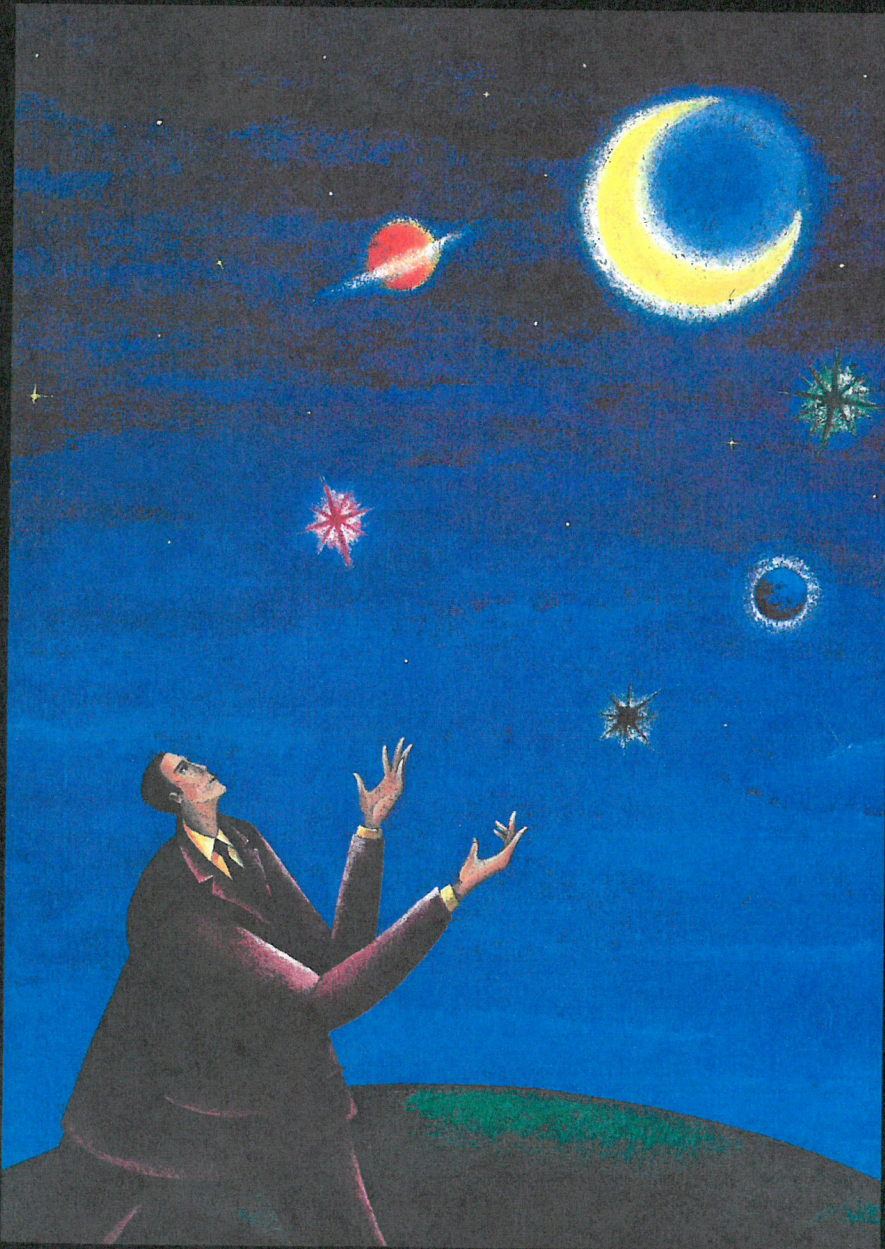
Executed on the twentieth day of May 2014.

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right. The signature is enclosed within a hand-drawn blue oval.

AGFA APOGEE

The PDF-based Production System

- Apogee Pilot
- Apogee PDF RIPs
- Apogee PrintDrive



The Open Digital Workflow

Agfa Apogee is the first PDF-based production system. Unlike anything before, Apogee uses Adobe's industry standard PDF format as the native file format of the system. This one format can be used for both production and imaging, and eliminates the need to convert to intermediate file formats.

Apogee adheres to the new NORM-approach: you Normalize the file Once, and Render it Many times for different output processes or devices.

In Apogee, PDF becomes the "digital master", a single file format that can be used to produce the same content in print, on a digital press, on the Web or CD-ROM.

AGFA 
The complete picture.

AGFA APOGEE PRODUCTION SYSTEM

Using the PDF Digital Master

PDF and the Digital Master

Agfa Apogee is a production system solution that utilizes the PDF data format as a truly reliable Digital Master. This also fits the new, open NORM-approach: Normalize a file Once to become the Digital Master, and Render it Many times for specific devices.

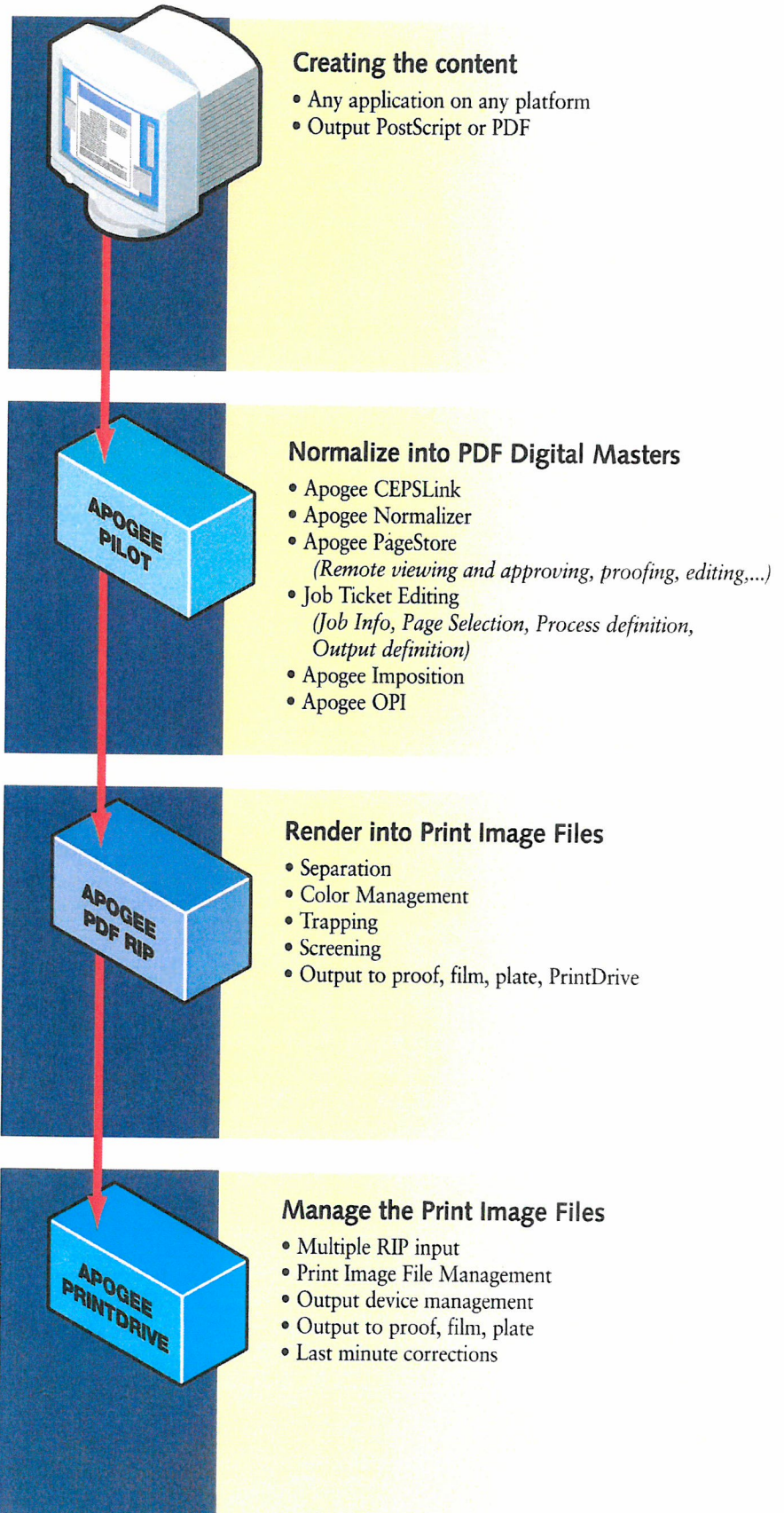
With the Job Ticket implementation based on Adobe Portable Job Ticket technology, important job and printing information is carried along with the PDF file. By keeping formatting information separate from PDF content, it is easy to make late production changes, and publish the PDF file in other print or electronic forms. Designers, service bureaus, and printers can easily prepare and process production jobs for various output types. Using the PDF, flexibility for last minute content editing and easy remote revisions is always maintained.

On top of this, the compact, streamlined PDF format travels with ease throughout the production flow, reducing transfer and processing loads on the network and the hardware platform.

Apogee System Components:

- Agfa's Apogee Publishing Production System ideally includes
- the APOGEE PILOT, a PDF production manager;
 - one or more APOGEE PDF RIPS, and
 - the APOGEE PRINTDRIVE, an engine output manager.

Handling both PDF and PostScript files, the Apogee Production System easily adapts to any open platform environment.



APOGEE PILOT

Normalize into PDF Digital Masters

The Apogee Pilot is the operational center in the production process. It uses a three step approach to organize the workflow: normalize the files into PDF Digital Masters; edit the Job Tickets; and process the PDF file as instructed in the Job Ticket.

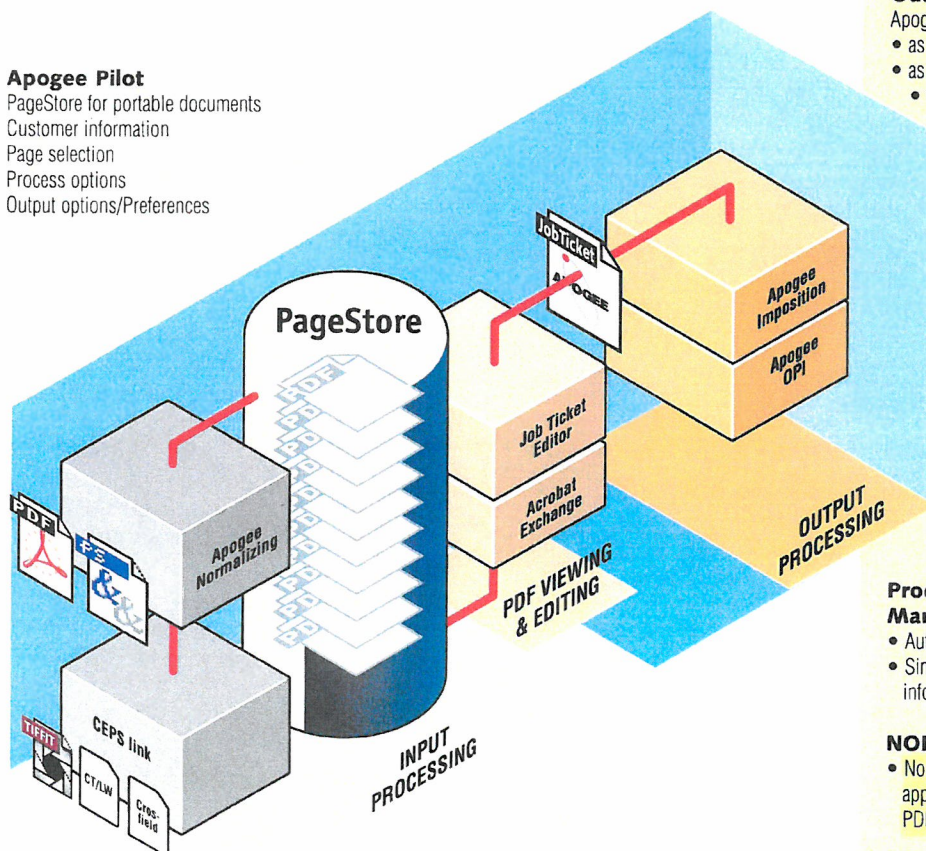
All incoming files are normalized into Digital Masters in PDF format. This happens only once and is similar to the interpretation phase of a RIP. It makes the resulting Digital Master highly efficient, regularly structured and compact.

Job information, workflow routing, page and formatting settings for the production processes are specified with the Job Ticket Editor and stored separately in Adobe's Portable Job Tickets Format (PJTF).

To output films or plates, the Job Ticket instructions are processed, pages are retrieved from the PageStore and imposed. If needed, high resolution images are exchanged with OPI. Using Acrobat Exchange or any other PDF editing tool, changes can be implemented on an object, page or flat level until the last minute prior to rasterizing.

Apogee Pilot

PageStore for portable documents
Customer information
Page selection
Process options
Output options/Preferences



FEATURES & BENEFITS

Unique PDF-based workflow

- The Apogee Pilot takes advantage of all PDF benefits.
- Agfa's unique normalizer generates fully predictable PDF files, using them as Digital Masters.
 - Agfa's normalizer includes specific solutions to handle bleeds, in-RIP trapping, Duotone and Tritone settings, etc.
 - The PDF format guarantees compact, fully viewable, editable, searchable and portable documents.

Job Ticket controlled workflow

- Job Tickets automatically instruct the system components to perform specific actions.
- Apogee's Job Tickets are compatible with Adobe's Portable Job Ticket Format specification standard.

Completely integrated workflow

- Integrated imposition, OPI, trapping, screening, and proofing guarantee seamless production and a short learning curve.
- Every step uses PDF-based, non-proprietary tools.

Input Compatibility

- The Apogee Pilot directly processes PDF and PostScript jobs, for flexibility when working with customers.
- As an option, CEPS data formats can be converted into PDF files to support input from proprietary systems.

Output Flexibility

- Apogee Pilot outputs jobs:
- as PDF or PostScript Level 2 files, for RIP flexibility
 - as imposed "flats" or a continuous stream of pages,
 - with extra compression or downsampling for proofing or CD-ROM/ Internet/ Intranet publishing.

Easy integration

- As a Windows NT based product running on Intel platforms, Apogee Pilot can easily be integrated into existing workflows and systems.

Productivity

- With PDF Digital Masters you receive:
- Predictable results to avoid costly remakes.
 - Short and easy correction cycles for higher productivity.
 - Changes made at the last minute are done in PDF, so your digital master remains up-to-date for repurposing.

Process and Information Management

- Automatic extracting and cataloging of job data.
- Simple queries allow for extensive process and information management.

NORM

- Normalize Once, Render Many: Flexible, reliable approach based on the use of the open standard PDF Digital Master files.

APOGEE PILOT

Processing steps

Normalizing the files

All incoming files are normalized into PDF to guarantee complete predictability and compatibility. Agfa's normalizer, based on Adobe technology, includes specific solutions to handle bleeds, in-RIP trapping, Duotone and Tritone settings, etc. A check verifies if all resources needed for output are available.

If some source pages are in CEPS formats, the optional Apogee CEPSPlink component handles the conversion of TIFF/IT-P1, CT/LW or Crosfield Textran formats prior to normalizing into PDF.

Once normalized, the PDF files are moved to the central PageStore as individual PDF pages and become the Digital Masters to create all production versions.

PDF Editing

One of the major advantages of Apogee Pilot is that anytime during the process prior to final rendering, changes or corrections can be made.

Commercially available PDF applications or Adobe Acrobat Exchange plug-ins offer a variety of tools to conveniently edit layout, text, images or graphic objects of most any kind. And as a Digital Master, changes made in the PDF file at any stage of production are retained for reuse in additional print or electronic versions. Being PDFs, the Digital Masters can easily be used for remote viewing, proofing, approval and editing.

Job Ticket Creation

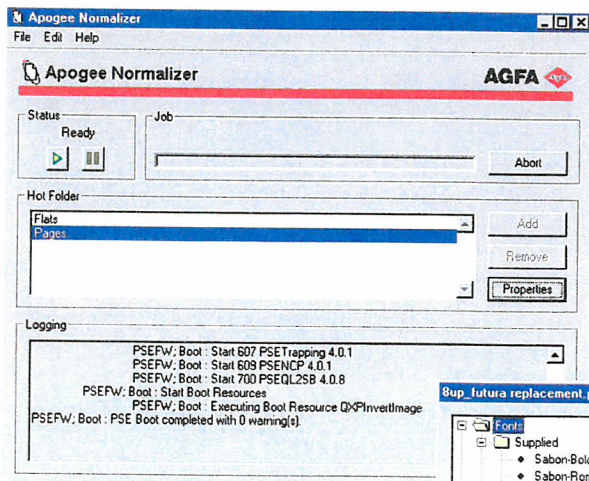
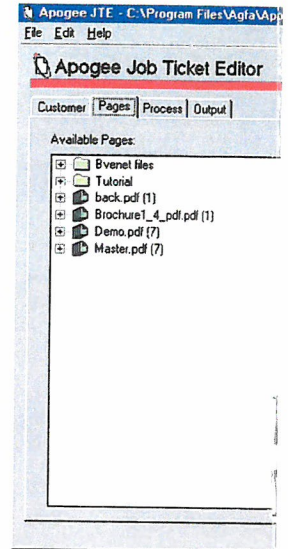
In the Apogee Pilot, Job Tickets provide detailed production instructions. The Job Ticket is independent of the PDF Digital Master file and can be created, edited and saved separately. It can be re-used with other jobs, just as each job could be processed on several different Job Tickets. Additionally, if changes need to be made late in the production process, a simple click on a button allows you to edit the Job Ticket.

Creating the Job Ticket is very simple. First you enter general job information, such as the job name, client and invoicing information. A special section is available to add production notes.

The second step is page selection from the PageStore. PDF Digital Master pages can be easily exchanged, moved, added or deleted. Using a PDF preview function like Adobe Acrobat, jobs can be checked visually for content. Additionally, one click of the information button provides a comprehensive list of all elements, such as fonts, spot colors and embedded file formats.

Next you select process options such as imposition, trapping, and separation, including special settings for spot colors and screening techniques, all according to specific device requirements.

Finally you define device-specific output options such as media type or plate size, and output options. After that the job is submitted for automatic processing.

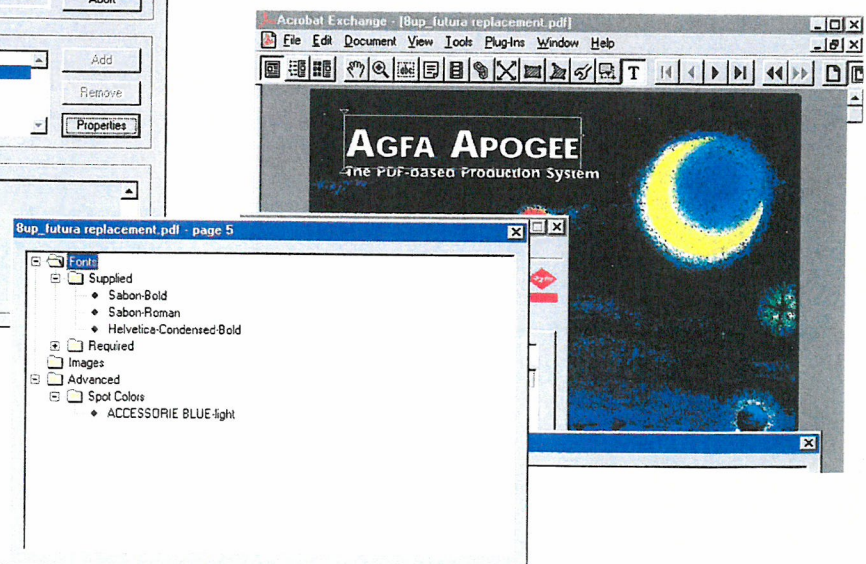


Normalizing the files

All incoming files are normalized into PDF to guarantee complete predictability and compatibility.

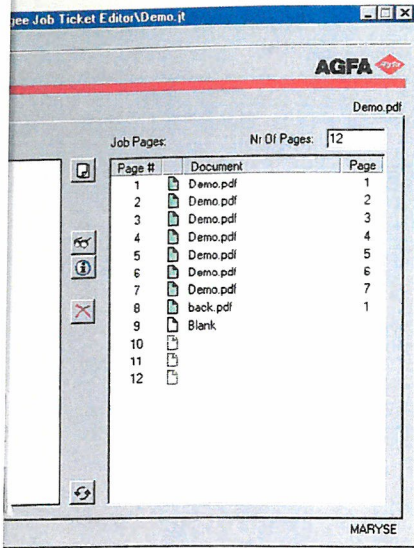
Content information

Page object info is just a click away.



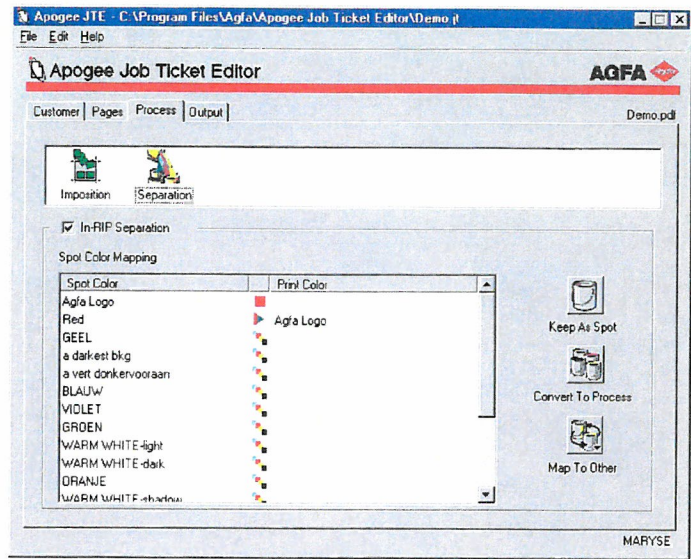
Edit your PDF at all times

Edit, skew, rotate, color your text.
Change clipping paths.



The PageStore
 Drag documents or pages from the PageStore on the left and drop them onto the outline of your document on the right side.

Spot color mapping
 You can conveniently specify spot color handling



Job Ticket Processing

Based on the Job Ticket settings, Apogee Pilot routes the digital masters to the appropriate output process.

Apogee Imposition

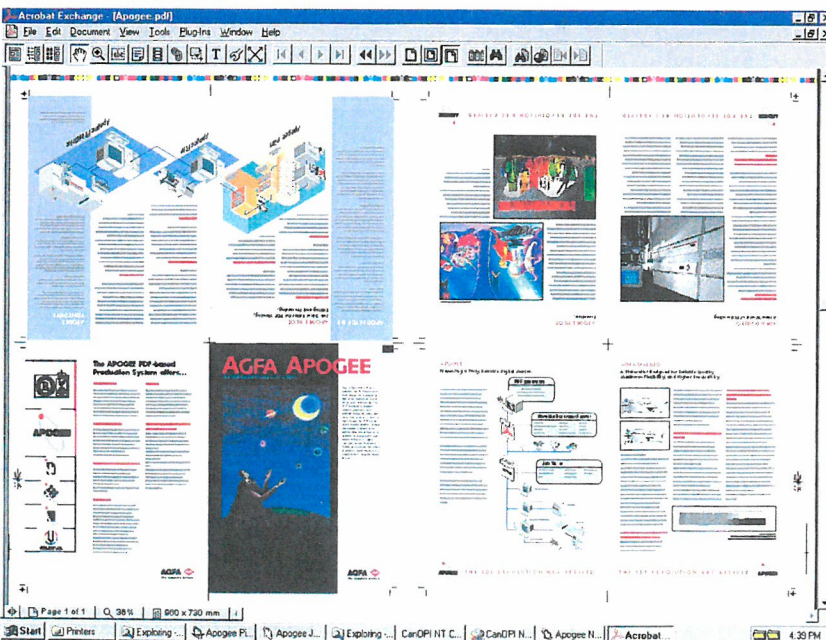
Imposition is handled automatically by selecting one of the many pre-designed imposition templates accessible from the Job Ticket Editor. As required, interactive imposition adjustment is also possible prior to output.

Apogee OPI

Apogee offers an optional NT-based OPI package. The component is completely integrated in the workflow and provides additional features such as high resolution image checking. For users with existing OPI solutions, Apogee Pilot can automatically direct files to an outside server queue. In either case, low-resolution images are replaced prior to routing to the Apogee PDF RIP. Alternatively, users can retain EPSF or PS files with, or without, high resolution images for archiving or other applications.

Output Options

Early in the development process, Agfa realized that any new workflow could create legacy equipment challenges for customers. The Apogee Pilot can output PDF or "Normalized" PostScript files to maintain compatibility with almost any PostScript-compatible system from Agfa – and even other vendors. Pilot can output files of imposed flats or a continuous stream of pages. And Digital Masters can be specially created for proofing, with high or low resolution images, or for publishing on the Web or CD-ROM.



Preview of imposed files

This preview shows how Apogee Pilot delivers an 8-up imposed PDF file ready for

- remote approval
- imposition proofing
- native PDF RIPPING in Apogee PDF RIPs.

FEATURES & BENEFITS

PostScript 3 RIP architecture

- Apogee PDF RIPs include an Adobe PostScript 3 interpreter to process native PDF and PostScript files and to render them for specific devices.
- Each comes with extended font sets, and can drive most any Agfa engine.

Performance

- Apogee PDF RIPs are multithreaded to take full advantage of modern NT multiprocessor architecture.
- Performance can be further increased by adding more RAM, a second CPU or using advanced storage technologies.

Remote User Interface

- Convenient client/server technology
- From any MAC or PC system on the network, the user can control the RIP, check logs, preview Print Image Files and approve them for production.

Unique Buffer and Preview

- Print Image Files can be stored to disk for preview and approval.
- Users can preview single and multi-page or imposed jobs or multiple views of a single page at different resolutions.
- Tools are available to zoom in to the dot level of color planes. What you look at are the real dots as they will appear on proof, film or plate. One more feature to reduce errors and cost.

Full Compatibility

- Apogee PDF RIPs support Accuset, SelectSet, Avantara imagesetters and Galileo, Antares and Polaris platesetters.
- Included are the professional Agfa PS Companion tools.
- Screening choices include the standard Agfa Balanced Screening and Adobe Accurate screens or the optional CristalRaster, Flexo and Gravure screens.

Flexibility

- Apogee RIPs are offered bundled with platforms, or packed to run on your own Macintosh or PC platform.

APOGEE PDF RIP

Render Digital Masters into Print Image Files

Apogee Pilot normalizes the incoming files into PDF, collects the pages, imposes, does OPI image exchange and sends this imposed "digital flat" to an Apogee PDF RIP.

In the context of Apogee, the PDF RIP takes the device and format independent PDF digital master, and renders (rasterizes) it exactly for the selected output device. The result is a "Print Image File" (PIF), that contains all the dots that will appear on the film or plate.

It also contains necessary engine control information. With PDF or PS interpretation of the file done upfront in the Apogee Pilot normalizing step, rendering is quick (NORM).

While rendering, the PDF RIP performs many tasks that were once stand alone graphic arts crafts. As instructed, the PDF RIP may perform screening, trapping and color separations. Specifications for each of these steps are controlled by Apogee Job Tickets.

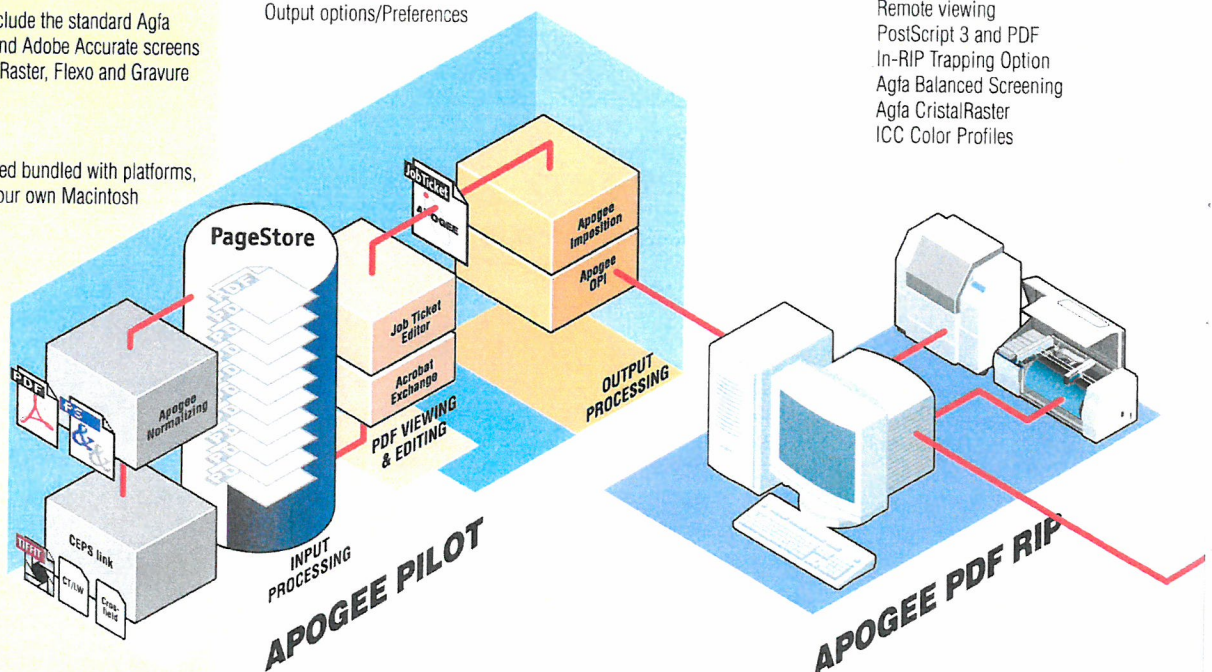
For color management, Apogee PDF RIPs are fully compatible with the use of ICC profiles. Based on Agfa ColorTune technology, professional profiles can be created and used in the RIP to tune the output to the color characteristics of the chosen output process and device. A decisive asset in an all digital workflow.

Apogee Pilot

PageStore for portable documents
Client information
Page selection
Process options
Output options/Preferences

Apogee PDF RIP

Remote viewing
PostScript 3 and PDF
In-RIP Trapping Option
Agfa Balanced Screening
Agfa CristalRaster
ICC Color Profiles



APOGEE PRINTDRIVE

Manage the Print Image Files

For "direct-to" production, Agfa developed an output manager that is almost a system by itself: the Apogee PrintDrive.

Apogee PrintDrive manages the Print Image Files (PIF) output by one or more RIPs, and controls output flow to a variety of output devices including Agfa imagesetters, proofers, and platesetters.

These PIF files amount to "digital film" because, like film, they contain every dot that will appear on the plate, and are 100% final and ready to image. They are the equivalent of the final films you used in a conventional workflow to expose printing plates.

Apogee PrintDrive allows you to do the things you used to do with film... in a completely digital way! You can preview the jobs on-screen, view the actual dots to check angles and traps, proof on a wide-format printer and quickly remake plates.

Apogee PrintDrive

Multiple RIP input
Compression/Decompression
Buffering and Back-up
Print Image File management
Imagesetter or platesetter output
Fast remakes
Double burn
QuickFix
Remote viewing
Page and imposition proofing

The optional QuickFix/DoubleBurn features allow for last minute patch corrections, and plate-image assembly.

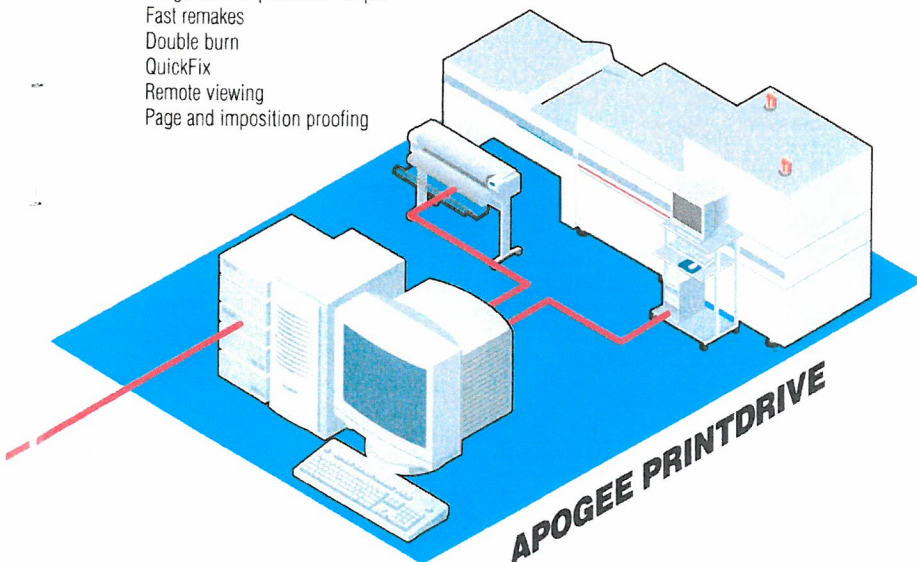
Jobs can be automatically queued and organized by priority and media. Print Image Files are stored in a compressed format, speeding network transmission times and reducing disk storage requirements.

Typical configurations hold several shifts of work on-line, more with extra disks or network storage.

For volume applications, Apogee PrintDrive can be fed by multiple PDF RIPs over a TCP/IP network. This unique feature allows you to physically separate the rendering from the actual plate production, so your PDF RIP can be in the desktop department and the PrintDrive can sit next to the output device, even in another town.

It also ensures that your platesetter is running at full capacity.

Apogee PrintDrive also supports input from existing Agfa PostScript Level 2 RIPs, and even some 3rd party systems.



FEATURES & BENEFITS

Performance and Productivity

Apogee PrintDrive offers:

- Input by multiple RIPs over the TCP network for volume RIPping
- A "RIP-ahead" workflow to productively create finished jobs that can be grouped by media or priority and imaged later, even unattended.
- The storage of Print Image Files for engines or media that are not physically connected or immediately available.
- Absolute reduction of idle time: RIPs are never waiting for the engine to free, nor is the engine waiting for the RIP. Everything runs at full capacity.
- Immediate plate remakes to prevent press downtime.

Remote User Interface

- Modern and convenient client/server technology for ease of use
- From any PC system on the network, the user can control the PrintDrive, check logs, preview Print Image Files and approve them for production. There is no requirement for a PrintDrive "operator".

Preview and "see the dots"

- Users can preview single and multi-page or imposed jobs or multiple views of a single page at different resolutions.
- Tools are available to zoom in to the dot level of color planes. What you look at are the real dots as they will appear on proof, film or plate. One more feature to reduce errors and wasted material.

Print Image Files are like Film

- Print Image Files are compressed to ease network traffic and save disk space.
- You can archive on disk cartridge, CD or any server on the network.

Digital Imposition Proofing

- Print Image Files can be proofed on wide-format proofers for imposition proofs or "blue-lines". Once approved, the same file can be sent for output without re-rasterizing.

Last minute corrections

- The optional QuickFix/DoubleBurn lets you digitally combine plate images and "cut in" last minute changes without re-rendering the whole plate.



APOGEE

APOGEE



APOGEE PILOT



APOGEE RIP



APOGEE PRINTDRIVE



ISO 9001 LABEL

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NEFDU GB 1998 04

Apogee PDF-based Production System

Full Scope of Industry Know-how and Technology

Agfa developed Apogee by working closely with key suppliers in the graphics industry for imposition, OPI, and file conversion.

Leading technologies includes:

- Adobe Acrobat, PDF, and CPSI technology.
- Apogee PDF RIPs
- Agfa ColorTune to create and use ICC profiles,
- Agfa CristalRaster, Agfa Balanced Screening
- Agfa software and hardware output technology.

Agfa Apogee - Working with You...

Agfa backs-up this new technology with full service and support. Agfa consultants will explain the various options and suggest the best possible bundles for your prepress environment. Your Apogee system will be installed and customized to your specific prepress environment by Agfa. Additionally, Agfa Apogee experts are available on-line on the Agfa Website. Have a question? Wondering what Apogee can do for your particular situation? Just check us out on Apogee on-line at www.agfa.com.

Argentina, Agfa-Gevaert, Argentina S.A., Tel.: 54-1-958-5767/5770, Fax: 54-1-983-5052
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Austria, Agfa-Gevaert G.m.b.H., Tel.: 43-222-850-2232, Fax: 43-222-850-2385
Belgium, Agfa-Gevaert N.V., Tel.: 32-3-450-9872, Fax: 32-3-450-9888
Belgium, Agfa-Gevaert N.V., Direct Export, Tel.: 32-3-444-7120, Fax: 32-3-444-7119
Brazil, Agfa-Gevaert do Brasil Ltda, Tel.: 55-11-5188-6430, Fax: 55-11 5188 6469
Canada, Agfa Division, Bayer, Inc., Tel.: 1-416-241-1110, ext 4032, Fax: 1-416-241-5409
Caribbean and Central America, Agfa, Division Bayer, Tel.: 305-592-6522, Fax: 305-593-8521
Chile, Agfa-Gevaert Ltda., Tel.: 56-2-360-7600, Fax: 56-2-360-7642
China, Hong Kong, Agfa Hong Kong Ltd., Tel.: 852-2555-9421, Fax: 852-2555-2480
Columbia, Hoechst Colombiana S.A., Tel.: 57-1-410-1077, Fax: 57-1-295-4197
Czech Republic, Agfa Division, Bayer S.R.O., Tel.: +42-2-66101-623, Fax: +42-2-66101-699
Denmark, Agfa-Gevaert A/S, Grafiske Systemer, Tel.: +45 4326 6766, Fax: +45 4326 6701
Finland, Oy Agfa-Gevaert AB, Graafiset järjestelmät, Tel.: 358-9-88781, Fax: 358-9-8878-278
France, Agfa-Gevaert S.A., Tel.: 33 1 47 32 71 77, Fax: 33 1 47 32 73 64
Germany, Agfa Deutschland, Vertriebsgesellschaft mbH & Cie., Tel.: 49-221-5717-0, Fax: 49-221-5717-248
Greece, Agfa-Gevaert A.E.B.E., Tel.: 30-1-576-3200, Fax: 30-1-574-4900
Hungary, Agfa Division, Bayer Hungaria Kft, Tel.: 361 212 1540, Fax: 361 212 1574
Ireland, Agfa Ltd., Tel.: 353-1-4506733, Fax: 353 -1-4565267
Italy, Agfa-Gevaert S.p.A., Tel.: 39-2-3074-1, Fax: 39-2-3074-429
Japan, Agfa-Gevaert Ltd., Tel.: 81-3-5704-3140, Fax: 81-3-5704-3089
Korea, Agfa Korea Ltd., Tel.: 82-2-262-4200, Fax: 82-2-274-9764
Luxembourg, Agfa-Gevaert S.A., Tel.: 352-44-20-44-1, Fax: 352-45-04-37
Malaysia, Agfa Film (Malaysia) Sdn. Bhd. Tel.: 60-3-7574200, 60 3 757 4700
Mexico, Agfa Division, Tel.: (525) 728 32 13, Fax: (525) 728 32 10
Netherlands, Agfa-Gevaert B.V., Tel.: (31) 70 4131211, Fax: (31) 70 4131585
New Zealand, Agfa Division, Bayer Ltd., Tel.: 649-443-5500, Fax: 649-443-8855
Norway, Agfa-Gevaert A.S., Grafiske Systemer, Tel.: 47 67 06 88 00, Fax: 47 67 06 07 53
Poland, Agfa Sp., Tel.: 48-22-636-7576, Fax: 48-22-38-9114
Portugal, Agfa-Gevaert Ltd, Tel.: 351 1 414 6700 Fax: 351 1 414 6780
Singapore, Agfa Division, Bayer Pte. Ltd., Tel.: 65-261-3389, Fax: 65-265-6559
South Africa, Agfa Division, Bayer Pty. Ltd., Tel.: 27-11-921-5562, Fax: 27-11-921-5419
Spain, Agfa-Gevaert, S.A., Tel.: 34.3.476-7600, Fax: 34.3.476-7856
Sweden, Agfa-Gevaert AB, Tel.: 46-8-793 01 00, Fax: 46-8-793 01 71
Switzerland, Agfa-Gevaert AG, Tel.: 41-1-823-71-11, Fax: 41-1-823-73-76
Taiwan, Agfa Division, Tel.: 886-2-503-9123, Fax: 886-2-504-4819
UK, Agfa Gevaert Ltd., Tel.: 44-181-231-4200, Fax: 44-181-231-4957
USA, Agfa Division, Bayer Corporation, Tel.: 1-800-227-2780, Fax: 908-534-5151
Venezuela, Agfa-Gevaert S.A., Tel.: 58-2-203-9000, Fax: 58-2-239-0477

Internet address:
www.AgfaHome.com

AGFA 
The complete picture.

Attachment B

Press Briefing

May 28, 1998 – Mortsels, Belgium

Agfa Delivers PDF-Based Workflow With Apogee Production System.

World's First True PDF-Based Workflow System Soon Fully Available.

Mortsels, Belgium – 17 March 1998 – Agfa announced that it is nearing full completion of its award-winning Apogee PDF-based Workflow Production System with the formal introduction of *Apogee PrintDrive* output manager, and *Apogee Viper* — the newest member of Agfa's line of PDF RIPS . Agfa also announced that *Apogee Pilot* production manager, the final component of the complete Apogee System, has entered Beta testing.

Demonstrating the company's commitment to bringing the power of PDF-based workflows to the high volume environment of computer-to-plate, Agfa showed the full Apogee System driving Agfa's Galileo advanced platesetting system for the first time in the U.S. at Seybold in New York City.

Apogee To Bring True PDF-based workflow to the Industry

The Industry Apogee comprises the Apogee Pilot production manager, the PDF RIP and the PrintDrive output manager — is the world's first completely integrated PDF-based workflow system that maintains Adobe System's reliable, editable and open PDF file format throughout the entire production process. Unlike systems that convert PDF into proprietary formats at input, the Apogee System was specifically designed to maintain the PDF file format throughout, thus fully maximising all of the production enhancing capabilities inherent to PDF, which include late-stage editability, predictability, and device and page independence. Apogee's true PDF-based workflow also allows for incoming files to be "normalised" into a PDF file. This file becomes a Digital Master which is

Apogee Pilot ready to ship.

Agfa's *Apogee Pilot* production manager, the operational center of the production process, is ready to ship in June. It "normalizes" incoming files into PDF digital masters, edits the Job Tickets and processes the PDF digital masters as specified in the Job Ticket.

Apogee Pilot makes extensive use of Adobe Portable Job Tickets. Job Tickets allow users to both store and manage information about how a job will be processed, such as instructions for normalizing, imposition, trapping, OPI, color management, rendering and final output. All changes and alterations made to content are retained in the PDF digital master and will not effect processing instructions on the Job Ticket.

The Apogee Normalizer turns incoming PDF, PostScript, EPSF or CEPS converted files into PDF digital masters. Apogee Pilot already presents solutions to handle bleed information in QuarkXPress and Pagemaker, duotones and tritones. It also retains trapping settings throughout the normalizing process to take full benefit of the convenient and powerful In-RIP Trapping feature inside PostScript 3.

With the Job Ticket Editor the user inputs client, job name and invoicing information, selects the pages that are part of the final job, specifies process options such as imposition, trapping, separation, and screening, and defines the device specific output options such as media type or plate size.

Trapzones and Trapsettings can be set with either Agfa's Xpress Trapping Extension, Agfa's Exchange Trapping Plug-in, Agfa's Job Ticket Editor on a job-by job basis, or as a general setting inside the Apogee RIP.

Jobs can be output as PDF files, to still allow easy transfer, remote proofing, or last minute corrections, while providing multilevel security settings and password protection. While PDF is more and more being accepted as the ideal file format, Agfa realized that any new workflow could create legacy equipment challenges for customers. Therefore, the Apogee Pilot can also output "Normalized PostScript" files to maintain compatibility with older Agfa systems.

New Version of Apogee PrintDrive 1.2

Apogee PrintDrive, a powerful digital output manager, optimizes output devices by automatically storing, managing and queuing Print Image Files or PIFs for imagesetters, platesetters and proofers. The newest version 1.2 offers full output support for the Antares series of platesetters. It comes in either the current hardware/software bundle, as a specially integrated hardware/software bundle running together with an Apogee Taipan RIP on an Intel-based platform, or as an unbundled, software-only version. Product release is July.

PrintDrive manages the output of one or more networked RIPs and dramatically increases throughput by eliminating RIP and engine idle time. In addition to job queuing

PrintDrive offers RIP maximization features such as remote rendering, and “RIP-ahead” – a productivity enhancing ability that outputs film and plates during off-peak hours automatically, without support from the prepress department.

For Galileo and Antares platesetters, Apogee PrintDrive offers maximum efficiency for buffering, back up, PIF management and digital imposition proofing.

PrintDrive includes advanced correction, control and proofing capabilities such as QuickFix, DoubleBurn, Preview and Digital Imposition Proofing.

QuickFix and DoubleBurn are both new digital tools to replace traditional manual stripping – a tremendous timesaving feature essential for computer-to-plate workflows.

QuickFix allows for last minute corrections to page elements or entire pages.

DoubleBurn is ideal for multiple versions of the same job where languages and data vary. To increase productivity in both features, only the corrected elements or pages are re-rendered, which saves valuable time as opposed to re-rendering the full job as required with traditional PostScript workflows.

Preview displays dots on screen, as they would be rendered on plates or film, which is critical for checking content, screening and trapping.

The Digital Imposition Proofing feature, from the same PIF meant to be output on film or plates, creates a descreened and subsampled version to generate highly accurate and predictable full-size proofs on a Hewlett Packard large format plotter.

CIP 3 product announcement at IPEX.

As a founding member of the CIP 3 committee, Agfa is closely working with MAN Roland, Heidelberg and Komori to implement CIP 3 software products that conform with the latest CIP 3 specifications. Revision 3 of the CIP3 standard includes more post-press information and added Adobe’s Portable Job Ticket Format—PJTF— as the second encoding format next to PostScript. A future option for Apogee PrintDrive will generate CIP3 compliant files (PPF files) that press manufacturers can use for ink key presetting. The option will replace the plate scanner machinery and the processing time/manpower in current operations. A full product announcement will be made at IPEX.

Availability.

With Apogee Pilot production manager shipping in June, the three Apogee modules are available either separately, to augment an existing workflow, or together as an integrated Apogee System, to reap the full benefits of a PDF-based workflow.

About Agfa.

The Agfa-Gevaert Group is a worldwide manufacturer of imaging products and systems, with annual worldwide sales of \$4.5 billion. Agfa-Gevaert manufactures and markets

products and systems for the electronic and photographic prepress, medical, and technical diagnostic and amateur and professional photographic markets. Headquartered in Europe, Agfa-Gevaert is wholly owned by Bayer AG. In the United States, Agfa operates as a division of Bayer Corporation, with headquarters in Ridgefield Park, New Jersey. Bayer, headquartered in Pittsburgh, has major businesses in chemicals, health care and imaging technologies. Agfa is on the World Wide Web at <http://www.agfahome.com>.

Attachment C

World's First True PDF-Based Workflow System Ships In June.

Apogee Pilot to complete Apogee workflow system.

Mortsel, Belgium – May 28, 1998 – Agfa today announced that *Apogee Pilot* production manager, the final component of its award-winning Apogee PDF-based Workflow Production System, is ready for shipment end of June. The other Apogee components, Apogee PrintDrive and an Apogee PDF RIP such as Apogee Viper or Apogee Taipan AX, are already achieving success in the market.

Apogee, true PDF-based workflow.

Apogee, which comprises the Apogee Pilot production manager, the PDF RIP and the PrintDrive output manager, is the world's first completely integrated PDF-based workflow.

Unlike systems that convert PDF into proprietary formats at input, the Apogee System was specifically designed to maintain the PDF file format throughout. This fully maximizes all of the production enhancing capabilities inherent to PDF, which include late-stage editability, predictability, compactness, and device and page independence.

PDF and the "NORM"-approach.

By "normalizing" incoming PostScript files into the open PDF file format, these files become independent "digital masters", enabling a "Normalize-Once-and-Render- Many," or NORM approach. The NORM approach—completely based on PDF— allows content to be rendered "just-in-time" for variety of output options, from imagesetters, and platesetters to proofers or for publishing to CD-ROMs, the Internet, and intranets.

Apogee and PDF combine to enable new workflows in which the same data can easily be used in both a highly productive computer-to-plate *and* new media environments. This ability to repurpose content for print and new media creates new service offerings, which will result in significant new revenue streams for designers and printers alike. That is not possible with a proprietary internal format.", said John Harrison, Agfa's marketing director of image processing systems.

device and format independent and allows a Normalise Once and Render Many–NORM–approach.

Contrary to the “Rip Once Output Many” approach, ripping to a proprietary format, NORM means you are normalising the incoming files into the format that is becoming the “norm” in publishing, the open PDF format. For production it is then efficiently rendered for a variety of output options, from imagesetters, and platesetters to proofers or for publishing to CD-ROMs, the Internet, and Intranets.

“We believe that PDF is the ideal format on which to build a truly modern, open, high production system,” stated John Harrison director of marketing for Image Processing Systems at Agfa. “The full Apogee System will soon bring all of PDF’s next generation workflow functionality, for the first time, to the market. Apogee and PDF are the enabling foundations for computer-to-plate workflows, which allowing new business opportunities to re-purpose content to new electronic media.”

“Agfa’s Apogee Production System leverages the power of the Adobe PDF standard to bring increased productivity and profitability to the printing and publishing industry,” said Eric Bean, director of product management for Adobe’s Printing and Systems Division. “Adobe has enjoyed working with Agfa to deliver this state-of-the-art PDF-based workflow solution, and together we will continue to lead the industry by providing powerful enabling technologies.”

Apogee Pilot Enters Beta Testing

Agfa’s *Apogee Pilot* production manager, which just entered Beta testing, is the operational centre of the production process. To take full advantage of the entire range of PDF functionality, Apogee Pilot automatically converts all incoming PDF or PostScript files into fully independent PDF pages. Page independence, a feature of PDF’s object-oriented nature, allows for edits to be made either to page elements (such as text or graphics) or full pages at any point during the production process, unlike traditional inflexible workflows.

Apogee Pilot makes extensive use of Adobe Portable Job Tickets, a capability that allows users to both store and manage information about how a job will processed, such as instructions for normalising, imposition, trapping, OPI, colour management, rendering and final output. All changes and alterations made to content are retained in the PDF Digital Master and will not effect processing instructions on the Job Ticket.

“Unlike proprietary workflows, Apogee and PDF combine to foster a unique and truly collaborative creative environment where a designer, or a team of designers, can make alterations to the Digital Master throughout the process without changing Job Ticket information,” explained Harrison.

New Member of the Apogee PDF RIP Line

To support the full range of platforms used in today's production environments, Agfa now offers Apogee Viper — Agfa's first Macintosh Adobe PostScript 3 RIP. The fourth generation of Agfa's Macintosh RIPs, Apogee Viper joins the Apogee PDF RIP line, which includes Apogee Taipan AX, the world's first PostScript 3 RIP for Digital Equipment Corporation's high performance DEC Alpha platform.

Apogee Viper optimises the powerful capabilities of PostScript 3, which include PDF processing, 16 bit screening, smooth shading, and idiom recognition to render the Digital Masters into device specific Print Image Files or PIFs. Print Image Files contain the exact dots you will ultimately see on your film or plate. With the RIPping done in the normalising step in Apogee Pilot, rendering the PIFs is quick. The newest member of the Apogee PDF RIP family uses a Power Macintosh processor, like the G3 running under Mac OS8, for maximum productivity. Apogee Viper also works with Apogee PrintDrive to gain access to features such as automatic queuing, job buffering, preview and proofing of the Print Image Files.

"Apogee Viper provides Macintosh users with the full power of PDF, while maintaining the ease-of-use and low support cost of the Macintosh operating system," Harrison said.

New Version of Apogee PrintDrive

Apogee PrintDrive 1.1, a powerful digital output manager, optimises output devices by automatically storing, managing and queuing Print Image Files— i.e. the rendered jobs—for imagesetters, proofers and platesetters. For the platesetter environment, Apogee PrintDrive offers maximum efficiency for buffering, back-up, PIF management and digital imposition proofing.

A highly efficient output manager, PrintDrive 1.1 manages the output of one or more networked RIPs and dramatically increases throughput by eliminating RIP and engine idle time. PrintDrive includes job queuing, remote rendering, and Render Ahead, a productivity enhancing ability that outputs film and plates during off-peak hours automatically, without support from the prepress department.

PrintDrive 1.1 includes advanced correction and proofing capabilities such as:

QuickFix — A timesaving capability that allows for last minute corrections to page elements or entire pages. To increase productivity, only the elements or pages corrected are re-Rendered, which saves valuable time re-rendering the full job as required with traditional PostScript workflows.

DoubleBurn — Another powerful timesaving feature. DoubleBurn is ideal for multiple versions of the same job where languages and data vary. Again, only the varied data is re-rendered.

QuickFix and DoubleBurn both provide new digital tools to replace traditional manual stripping—a tremendous time saving feature essential for computer-to-plate workflows.

Preview — This on-screen proofing capability displays dots on screen as they would be rendered on plates or film, which is critical for checking content, screening and trapping.

Digital Imposition Proofing — Using the same Print Image Files, PrintDrive generates highly accurate and predictable full-size proofs on a Hewlett Packard large format plotter for imposition proofing.

“Apogee is unique in combining features of PDF with the flexibility of traditional analogue techniques. Apogee’s flexible interfacing allows smooth integration with common systems and workflows,” said Harrison.

Availability

The three Apogee modules are available separately, to augment an existing workflow, and together as an integrated Apogee System, to reap the full benefits of a PDF-based workflow. Apogee Pilot production manager will be available at the end of the second quarter. Apogee PrintDrive 1.1 is now shipping. Apogee Viper will be shipping end of March. Current Viper users can receive the new Apogee Viper 3.0 as a service upgrade.

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