

UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD

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KYOCERA INTERNATIONAL, INC.  
Petitioners

v.

E-WATCH, INC.  
Patent Owner

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*INTER PARTES* REVIEW OF U.S. PATENT NO. 7,365,871

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**DECLARATION OF ROBERT MICHAEL GUIDASH IN SUPPORT OF  
INSTITUTION OF *INTER PARTES* REVIEW OF U.S. PATENT NO.  
7,365,871**

**Declaration**

I declare that all statements made herein on my own knowledge are true and that all statements made on information and belief are believed to be true, and further, that 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.

By: 

Robert Michael Guidash – 12/10/2014

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I, R. Michael Guidash, do hereby declare:

1. I am making this declaration at the request of Kyocera Communications, Inc. in the matter of the *Inter Partes* Review of U.S. Patent No. 7,365,871 (“the ’871 patent.”)

2. I am being compensated for my work in this matter at my standard hourly rate of \$400 for consulting services. My compensation in no way depends on the outcome of this proceeding.

3. In preparing this Declaration, I considered the following materials:

(a) U.S. Patent No. 7,365,871 to Monroe (Exhibit 1001);

(b) The ’871 patent file history, including the selected portions identified in Exhibit 1004;

(c) Japanese Application Publication No. JP H06-133081A (“Kyocera ’081”) (Exhibit 1003);

(d) Japanese Application Publication No. JP H8-65647A (“Toshiba”) (Exhibit 1005);

(e) Japanese Patent No. Hei8(1996)-315106 (“Hitachi”) (Exhibit 1006);

(f) U.S. Patent No. 6,414,714 (“Kurashige”) (Exhibit 1007).

## **I. Professional Background**

4. Information concerning my professional qualifications, experience, publications and presentations in the field of digital imaging in which I have served as an expert are set forth in my current Curriculum Vitae, attached as Exhibit A.

5. I started my career with Eastman Kodak as a product engineer for Photometer ASIC's for Kodak film cameras after graduating with a Bachelor of Science in Electrical Engineering from the University of Delaware in 1981. In 1986, I transferred to the Kodak Research Laboratories and CCD wafer fabrication facility. During my time with the Kodak Research Laboratories and CCD wafer fabrication facility, I developed 2um and 1um CMOS processes, and a 30V 4um BiCMOS process. These processes were used for gate arrays for many Kodak products and output driver ASICs for all of Kodak's copiers. During this time, I was also awarded entrance into the Special Opportunity Graduate Program that allowed me to obtain a Master's of Science in Electrical Engineering from the Rochester Institute of Technology.

6. In 1989, I transferred to the Smart Sensor Group which developed BiCMOS-CCD processes to provide fully integrated CCD systems on a chip. I also served as product engineer and yield enhancement engineer for Kodak's high volume CCD's that were used in digital cameras. During this time, I led product delivery and technology development of all ASIC and smart sensor products. I

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