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

GOOGLE INC. Petitioner

v.

VEDANTI SYSTEMS LIMITED
Patent Owner

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Case IPR No. <u>Unassigned</u> U.S. Patent 7,974,339

DECLARATION OF DR. JOHN R. GRINDON



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4.	"pixel variation data"	33
5.	"matrix"	34
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7.	"optimized matrix data"	36
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A. Thya	Claims 1, 6, 7, 9, 10, 12, and 13 are obvious over Belfor in view of garajan in further view of Golin	38
1.	Overview of Belfor	38
2.	Overview of the Combination of Belfor in view of Thyagarajan and further in view of Golin	42



3.		elfor in view of Thyagarajan in further view of Golin under 35 U.S.C. 103 renders independent claim 1 obvious51
i	a)	"A system for transmitting data transmission comprising"51
1	b)	"a analysis system receiving frame data and generating region data comprised of high detail and or low detail"53
(	c)	"a pixel selection system receiving the region data and generating one set of pixel data for each region forming a new set of data for transmission;"
(	d)	"a data receiving system receiving the region data and the pixel data for each region and generating a display;"
(	e)	"wherein the data receiving system comprises a pixel data system receiving matrix definition data and pixel data and generating pixel location data;"
1	f)	"wherein the data receiving system comprises a display generation system receiving pixel location data and generating display data that includes the pixel data placed according to the location data."64
4.		elfor in view of Thyagarajan in further view of Golin under 35 U.S.C. 103 renders dependent claim 13 obvious
5.		elfor in view of Thyagarajan in further view of Golin under 35 U.S.C. 103 renders dependent claim 6 obvious
6.		elfor in view of Thyagarajan in further view of Golin under 35 U.S.C. 103 renders independent claim 7 obvious
;	a)	"A method for transmitting data comprising:"68
1	b)	"receiving frame data; generating optimized matrix data from the frame data"69
(	c)	"selecting one of two or more sets of pixel data based on the optimized matrix data"
(	d)	"wherein receiving frame data comprises receiving an array of pixel data"
(	e)	"wherein generating the optimized matrix data from the frame data comprises setting a matrix size based on pixel selection data"
1	f)	"and transmitting the selection pixel data and the optimized matrix data by assembling the optimized matrix data and the selection pixel data into a generated display frame."



7.	§103 renders dependent claim 9 obvious.	80
8.	Belfor in view of Thyagarajan in further view of Golin under 35 U.S.C. §103 renders independent claim 10 obvious.	80
a	a) "A method for transmitting data comprising:"	81
b	o) "dividing an array of pixel data into two or more regions;"	82
c	e) "selecting a set of pixel data from each region"	82
d	l) "wherein dividing the array of pixel data comprises dividing the array pixel data into two or more matrices having a uniform size;"	
e	"wherein dividing the array of pixel data comprises dividing the array pixel data into two or more matrices having two or more different sizes;"	
f	"and transmitting the region data and the pixel selection data for each region by assembling the region data and the selection pixel data into display frame."	
9.	Belfor in view of Thyagarajan in further view of Golin under 35 U.S.C. §103 renders dependent claim 12 obvious.	91
ZIII	Conclusion	01



Inter Partes Review of USPN 7,974,339 Declaration of Dr. John R. Grindon (GOOG 1003)

I, Dr. John R. Grindon, declare as follows:

#### I. Overview

- 1. I have been retained on behalf of GOOGLE INC. (the "Petitioner") for the above-captioned *Inter Partes* Review (IPR) proceeding.
- 2. I am being compensated for my time in connection with this IPR at my standard hourly consulting rate of \$400/hour. My compensation does not depend on any outcome of this proceeding.
- 3. I understand that this proceeding involves U.S. Patent No. 7,974,339 ("the '339 patent," GOOG 1001) titled "Optimized Data Transmission System And Method "by Krichevsky et al. and that the '339 patent is currently assigned to Vedanti Systems Limited.
- 4. I have reviewed and am familiar with the specification of the '339 patent. I understand that the '339 patent resulted from U.S. Application No. 10/892,690, filed on July 16, 2002. I understand that the '339 patent has been provided as GOOG 1001. I will cite to the specification using the following format: (GOOG 1001, 1:1-10). This example citation points to the '339 patent specification at column 1, lines 1-10. Throughout this declaration, emphasis is added, unless otherwise indicated.



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