

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ASUSTEK COMPUTER, INC. and ASUS COMPUTER INTERNATIONAL,

Petitioners

v.

AVAGO TECHNOLOGIES GENERAL IP (SINGAPORE) PTE. LTD.,

Patent Owner

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Case: IPR2016-00646

U.S. Patent No. 5,870,087

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**PATENT OWNER'S EXHIBIT NO. 2003**

**DECLARATION OF SCOTT ACTON, PH.D. UNDER 37 C.F.R. § 1.68**

Avago Exhibit 2003 – Page 1

*ASUS v. Avago*

**TABLE OF CONTENTS**

I. SCOPE OF THE DECLARATION .....4

II. EXPERT QUALIFICATIONS AND BACKGROUND.....5

III. MATERIALS REVIEWED .....9

IV. SUMMARY OF OPINIONS.....10

V. UNDERSTANDING OF LEGAL PRINCIPLES .....10

    A. Anticipation .....11

    B. Obviousness.....11

    C. Claim Construction.....13

VI. PERSON OF ORDINARY SKILL IN THE ART .....13

VII. OVERVIEW OF THE '087 PATENT .....15

VIII. CLAIM CONSTRUCTION .....18

IX. ANTICIPATION ANALYSIS .....21

    A. Count 2 .....21

        1. Independent Claims 1, 10, and 16.....21

        2. Dependent Claim 7 .....28

        3. Dependent Claim 11 .....30

        4. Conclusion on Count 2.....31

X. OBVIOUSNESS ANALYSIS.....32

    A. Motivation to Combine .....32

    B. Count 3 .....33

        1. Independent Claims 1, 10, and 16.....33

2.	Dependent Claim 7 .....	39
3.	Dependent Claim 8 .....	40
4.	Dependent Claim 11 .....	43
5.	Conclusion on Count 3.....	45
C.	Count 5 .....	46
1.	Dependent Claim 7 .....	47
2.	Dependent Claim 8 .....	48
3.	Conclusion on Count 5.....	50
D.	Count 6 .....	51
1.	Dependent Claim 7 .....	52
2.	Dependent Claim 8 .....	53
3.	Conclusion on Count 6.....	55
E.	Conclusion on Obviousness .....	56
XI.	CONCLUSION.....	56

I, Scott Acton, being over the age of 18 and competent to make the statements herein, hereby declare the following:

## **I. SCOPE OF THE DECLARATION**

1. I have been retained on behalf of Patent Owner Avago Technologies General IP (Singapore) Pte. Ltd. (“Patent Owner”) as an expert consultant to analyze and provide my opinions on the validity of U.S. Patent No. 5,870,087 (the “’087 Patent”), and such other topics as addressed in this report.

2. As part of this work, I have been requested by counsel for Patent Owner to study the challenged claims of the ’087 Patent and compare them with the grounds identified by Petitioners ASUSTeK Computer, Inc. and ASUS Computer International (collectively, “Petitioners”) and instituted by the Patent Trial and Appeal Board.

3. I have prepared this declaration summarizing certain of my opinions regarding this subject matter and its relevance to the validity of the ’087 Patent.

4. If called upon to do so, I am prepared to testify as an expert witness in this regard.

5. This declaration is based on information currently available to me. To the extent that additional information becomes available, I reserve the right to continue my investigation and study, which may include a review of documents

and information that may be produced, as well as testimony from depositions that have not yet been taken.

## II. EXPERT QUALIFICATIONS AND BACKGROUND

6. I am qualified by education and experience to testify as an expert in the field of signal processing, including signal, image, and video processing. Attached as Attachment A is a copy of my curriculum vitae detailing my experience and educational background. Additionally, I provide the following overview of my background as it pertains to my qualifications for providing expert testimony in this matter.

7. I am a Professor at the University of Virginia in the Electrical and Computer Engineering Department. I have been at the University of Virginia since 2000. I am currently the Director of the Virginia Image and Video Analysis (VIVA) laboratory. My area of expertise is signal, image, and video processing. I have taught signal processing and image and video processing at the graduate level for over twenty years. My experience in the signal processing research area dates back to 1988, when I joined the Laboratory for Vision Systems (now called the Laboratory for Image and Video Engineering) at the University of Texas at Austin. I hold M.S. and Ph.D. degrees from the University of Texas at Austin in Electrical and Computer Engineering. The concentration area of my graduate work was image and video processing. I hold a B.S. degree from Virginia Tech in Electrical

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