UNITED STATES PATENT AND TRADEMARK OFFICE _____

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ASUSTEK COMPUTER, INC. and ASUS COMPUTER INTERNATIONAL,

Petitioners

v.

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

Patent Owner

Case: IPR2016-00646

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

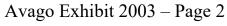
PATENT OWNER'S EXHIBIT NO. 2003

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



TABLE OF CONTENTS

I.	SCOI	COPE OF THE DECLARATION4					
II.	EXPERT QUALIFICATIONS AND BACKGROUND5						
III.	MATERIALS REVIEWED9						
IV.	SUM	UMMARY OF OPINIONS10					
V.	UNDERSTANDING OF LEGAL PRINCIPLES						
	A.	Anticipation11					
	B.	Obviousness11					
	C.	Clain	n Construction	13			
VI.	PERS	SON O	F ORDINARY SKILL IN THE ART	13			
VII.	OVE	ERVIEW OF THE '087 PATENT15					
VIII.	CLA	AIM CONSTRUCTION18					
IX.	ANTICIPATION ANALYSIS						
	A.	Count 2					
		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						
	A.	Motivation to Combine					
	B. Count 3						
		1.	Independent Claims 1, 10, and 16	33			



ASIIS v Avago



		2.	Dependent Claim 7	39		
		3.	Dependent Claim 8	40		
		4.	Dependent Claim 11	43		
		5.	Conclusion on Count 3	45		
	C.	Cour	nt 5	46		
		1.	Dependent Claim 7	47		
		2.	Dependent Claim 8	48		
		3.	Conclusion on Count 5	50		
	D.	Cour	nt 6	51		
		1.	Dependent Claim 7	52		
		2.	Dependent Claim 8	53		
		3.	Conclusion on Count 6	55		
	E.	Conc	clusion on Obviousness	56		
XI.	CON	CONCLUSION5				



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 Avago Exhibit 2003 Page 5



ASIIS v Avago

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