

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

RPX Corporation
Petitioner

v.

MD Security Solutions, LLC
Patent Owner

Case No. TBD
Patent No. 7,864,983

DECLARATION OF TAL LAVIAN, PH.D.

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I, Tal Lavian, Ph.D., declare:

1. I have been retained by Petitioner RPX Corporation (“RPX”), to assess U.S. Patent No. 7,864,983 (“the ’983 patent). I am being compensated for my time at a rate of \$400 per hour, plus actual expenses. My compensation is not dependent in any way upon the outcome of RPX’s petition.

I. PERSONAL AND PROFESSIONAL BACKGROUND

2. I have more than 27 years of professional experience. In 1987, I obtained a Bachelor of Science (“B.Sc.”) in Mathematics and Computer Science from Tel Aviv University, Israel. In 1996, I obtained a Master’s of Science (“M.Sc.”) degree in Electrical Engineering also from Tel Aviv University. In 2006, I received a Ph.D. in Computer Science from the University of California at Berkeley.

3. I am employed by the University of California at Berkeley, and was appointed as a lecturer and Industry Fellow in the Center of Entrepreneurship and Technology (“CET”) as part of UC Berkeley College of Engineering. I have been with the University of California at Berkeley since 2000 where I served as a Berkeley Industry Fellow, Lecturer, Visiting Scientist, Ph.D. Candidate, and Nortel’s Scientist Liaison.

4. As an undergraduate and a Masters student in Tel Aviv University, I worked part time as a security officer and first respondent in a national oil and

gas repository. My duties included operating a control room with multiple security alarm systems, including many security cameras, different types of sensor technologies including motion sensors.

5. My Master's thesis was in the area of image processing. From 1987 until 1990, I worked for an Israeli startup (Shalev, Inc.). At that position, I developed image processing software for analysis of camera images from multiple angles. This included finding the exact shapes, borders and contours of objects.

6. From 1990 to 1993, I worked as a software engineer and team leader at Scitex Ltd., where I developed system and network communications tools. From 1994 to 1995, I worked as a software engineer and team leader for Aptel Communications, designing and developing mobile wireless devices and network software products.

7. From 1996 to 2007, I worked for Bay Networks and Nortel Networks. Bay Networks was in the business of making and selling computer network hardware and software. Nortel Networks acquired Bay Networks in 1998, and I continued to work at Nortel after the acquisition. Throughout my tenure at Bay and Nortel, I held positions including Principal Scientist, Principal Architect, Principal Engineer, Senior Software Engineer, and led the

development and research involving a number of networking technologies. I led the efforts of Java technologies at Bay network and Nortel Networks.

8. I am named as a co-inventor on more than 80 issued patents and I have co-authored more than 25 scientific publications, journal articles, and peer-reviewed papers. Furthermore, I am a Senior Member of the Institute of Electrical and Electronics Engineers (“IEEE”).

9. I currently serve as a Co- Founder and Chief Technology Officer (CTO) of VisuMenu, Inc., where I design and develop architectures of visual IVR technologies for smartphones and wireless mobile devices in the area of network communications.

10. A detailed record of my professional qualifications, including a list of patents and academic and professional publications, is set forth in my curriculum vitae attached to this declaration as Exhibit 1011.

11. Prior to reviewing the ‘983 patent, I was well familiar with the subject matter described and claimed in the ‘983 patent. The ‘983 patent concerns a security system that includes one or more motion-activated cameras that records images in response to detecting motion and can be controlled by a handheld device, such as a cellular phone. (Ex. 1001 at 2:30-52;11:1-16) I am an expert in the field of home security systems and networking for connecting and controlling such systems.

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