

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY CORPORATION, SONY MOBILE COMMUNICATIONS (USA) INC.,
SONY MOBILE COMMUNICATIONS AB & SONY MOBILE
COMMUNICATIONS INC.
Petitioners

v.

CREATIVE TECHNOLOGY LIMITED
Patent Owner

U.S. Patent No. 6,928,433

Inter Partes Review Case No. 2016-01407

**DECLARATION OF ERIC J. GOULD BEAR
IN SUPPORT OF PATENT OWNER RESPONSE
PURSUANT TO 37 C.F.R. §42.120**

Sony Corp., et al., v. Creative
Technology Ltd., IPR2016-01407

EXHIBIT

Creative-2014

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I, Eric Justin Gould Bear, hereby declare as follows:

I. INTRODUCTION

1. I have been retained by Creative Technology Limited (“Creative” or “Patent Owner”), in this action. My credentials are described in my CV, which is Exhibit 2030. I offer this report on the technology at issue in U.S. Patent No. 6,928,433 (the “’433 patent” or “Creative Patent”) in response to the Petition for *Inter Partes* Review, Case No. 2016-01407, filed by Sony Corporation et al. (“Sony” or “Petitioners”).

2. I have been asked by Creative’s counsel to offer technical opinions relating to U.S. Patent No. 6,928,433 and the alleged prior art and arguments presented by the Petitioners and their expert. I am being compensated at the rate of \$480 per hour. My compensation is not related to the outcome of this case.

II. SUMMARY OF CONCLUSIONS

3. As a result of performing the analysis described herein, and applying the standards outlined below in Section IV, I have determined that, in my opinion, Petitioners’ evidence is insufficient to conclude that any of the claims of the ’433 patent should be found invalid. My opinion is supported by the evidence in the patent specification, figures and claims, as well as the disclosures of the alleged prior art and the other documents cited below.

III. BACKGROUND AND QUALIFICATIONS

4. I am the first named inventor on at least 90 United States patent applications. These are cataloged in my CV. To date, at least 75 of those applications have issued as U.S. patents. I am also the first named inventor on a number of international patents and patent applications.¹

5. Inventions of mine for which patents have been issued include virtual force-feedback user interfaces, methods of navigating poly-hierarchical information, management of playlists that include both owned and un-owned songs, real-time communications architectures, auxiliary visual displays for personal computers, auxiliary processing by sleeping computing devices, methods for reducing parallax in computer camera systems, methods for using telephony controls on personal computers, methods for navigating content using media transport controls, and methods for unifying audio control on personal computers. More recent applications claim inventions relating to symbolic and schematic displays of protocol-specific information, user interfaces for visualizing data backup and recovery, and handheld multi-channel interactive environments.

6. By the time I was 12, I was programming computers in BASIC using Tandy TRS-80 and Apple personal computers. In 1984, I formed Element Systems

¹ Some of my patents and applications identify me as “Gould” while others identify me as “Bear” because I legally changed my name from Eric Justin Gould to Eric Justin Gould Bear after adopting my first child from China in 1999.

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