

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.
Petitioner

v.

IMAGE PROCESSING TECHNOLOGIES LLC,
Patent Owner

CASE IPR2017-00336
Patent No. 6,989,293

**DECLARATION OF DR. PEGGY
AGOURIS IN SUPPORT OF PATENT
OWNER RESPONSE**

Exhibit 2009
IPR2017-00336

Petitioner - Samsung Elecs. Co., Ltd., et al.

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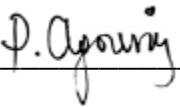
APPENDIX A Dr. Peggy Agouris Curriculum Vitae

I hereby declare that all the statements made in this Declaration are of my own knowledge and true; that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001 and that such willful false statements may jeopardize the validity of the application or any patent issue thereupon.

I declare under penalty of perjury under the laws of the United States of America that the following is true and correct.

Dated: August 28, 2017

Respectfully Submitted



Peggy Agouris

I. INTRODUCTION

1. I have been retained by counsel for Image Processing Technologies LLC (“Image Processing” or “Patent Owner”) as an expert consultant in regards to *inter partes* review proceeding IPR2017-00336 for U.S. Patent No. 6,989,293.

2. In IPR2017-00336, I understand that Petitioner, Samsung Electronics Corporation (“Samsung” or “Petitioner”) is challenging the validity of Claims 1, 18, 19, 22, and 29 of the ’293 Patent.

3. I understand that the Board instituted an *inter partes* review on the following Grounds: Claim 22 as obvious under 35 U.S.C. § 103(a) over International Patent Publication WO 99/36893 (“Pirim PCT” or “Pirim”) (Ex. 1005). Paper No. 15 (Institution Decision) at 53.

4. I was asked to consider whether the sole instituted claim of the U.S. Patent No. 6,989,293 (“the ’293 Patent”) (Ex. 1001), which is claim 22, would have been obvious to a person of ordinary skill in the art (“POSA”) as of the date of the invention over the Pirim PCT reference, which I understand is the only ground instituted by the Board.

5. Based on my analysis of the ’293 Patent and Pirim, the specific reference relied upon by the Petitioner for the ground that was instituted by the Board, it is my opinion that the challenged claims would not have been obvious to a POSA as of the date of the invention over Pirim. To summarize my reasoning,

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