IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the *Inter Partes* Review of:

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

Filed: Nov. 13, 1996

Issued: Feb. 9, 1999

Inventor(s): Kwok Kit Chau

Assignee: Avago Technologies General IP (Singapore) PTE Ltd.

Title: MPEG Decoder System and Method Having a Unified Memory for Transport Decode and System Controller Functions

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DECLARATION OF DR. CHANDRAJIT BAJAJ UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 5,870,087

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I, Chandrajit Bajaj, do hereby declare as follows:

I. Introduction

1. I have been retained as an expert witness on behalf of Sony Corporation for the above-captioned Petition for *Inter Partes* Review ("IPR") of U.S. Patent No. 5,870,087 ("the '087 Patent"). I am being compensated for my time in connection with this IPR at my standard consulting rate of $550 per hour. My compensation is not affected by the outcome of this matter.

2. I have been asked to provide my opinions regarding whether claims 1-3, 5, 7, 10-13, and 16-18 ("Challenged Claims") of the '087 Patent are invalid as anticipated or would have been obvious to a person having ordinary skill in the art at the time of the alleged invention.

3. The '087 Patent issued on February 9, 1999, from U.S. Patent Appl. No. 748,269, filed on November 13, 1996. Ex. 1001 at [22], [45]. The '087 patent names a single inventor, Kwok Kit Chau.

4. In preparing this Declaration, I have reviewed the '087 Patent, the file history of the '087 Patent, prior art references, technical references and other publications from the time of the alleged invention, as well as the Petition, Preliminary Patent Owner's Response, Institution Decision, and Patent Owner's Response in IPR2016-00646.

5. I understand that claims in an IPR for an unexpired patent are given their

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broadest reasonable interpretation in view of the patent specification and the understandings of one having ordinary skill in the relevant art, while claims for an expired patent are construed under *Philips*, meaning they are given their plain and ordinary meaning as understood by a person of ordinary skill in the art in view of the specification and prosecution history, unless those sources show an intent to depart from such meaning.

6. In forming the opinions expressed in my Declaration, I relied upon my education and experience in the relevant field of the art, and I have considered the viewpoint of a person having ordinary skill in the relevant art as of the priority date of the ’087 Patent. My opinions are based, at least in part, on the following:

Reference	Date of Public Availability	Prior Art Status
Ex. 1004, U.S. Patent No. 5,898,695 (“Fujii”)	April 27, 1999 (filed on March 27, 1996; claims priority to March 29, 1995)	§ 102(e)
Ex. 1005, U.S. Patent No. 6,002,441 (“Bheda”)	December 14, 1999 (filed on October 28, 1996)	§ 102(e)
Ex. 1006, U.S. Patent No. 5,960,464 (“Lam”)	September 28, 1999 (filed on August 23, 1996)	§ 102(e)
Ex. 1007, U.S. Patent No. 5,559,999 (“Maturi”)	September 24, 1996 (filed on September 9,	§ 102(a)

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