UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.; and
SAMSUNG ELECTRONICS AMERICA, INC.
Petitioners

v.

IMAGE PROCESSING TECHNOLOGIES, LLC
Patent Owner

Patent No. 8,989,445

DECLARATION OF DR. JOHN C. HART
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,989,445

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4. Berthold K.P. Horn and Brian G. Schunck, Determining Optical Flow, SPIE Techniques and Applications of Image Understanding 281, 1981, at 319 ("Horn") (Ex. 1016) 39

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1. I, John C. Hart, declare as follows:

I. INTRODUCTION

2. I have been retained by Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Petitioner") as an independent expert consultant in this proceeding before the United States Patent and Trademark Office ("PTO").

3. I have been asked to consider whether certain references teach or suggest the features recited in Claims 2, 3, 5, 7, 8, 10-17, 19-23, 26, and 28-30 (the "Challenged Claims") of U.S. Patent No. 8,989,445 ("the '445 Patent") (Ex. 1001), which I understand is allegedly owned by Image Processing Technologies, LLC ("Patent Owner"). My opinions and the bases for my opinions are set forth below.

4. I am being compensated at my ordinary and customary consulting rate for my work.

5. My compensation is in no way contingent on the nature of my findings, the presentation of my findings in testimony, or the outcome of this or any other proceeding. I have no other interest in this proceeding.

II. BACKGROUND AND EXPERIENCE

A. Qualifications

6. I have more than 25 years of experience in computer graphics and image processing technologies. In particular, I have devoted much of my career to

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