

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

IMAGE PROCESSING TECHNOLOGIES, LLC  
Patent Owner

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Patent No. 8,989,445

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**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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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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