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

Patent No. 8,983,134

DECLARATION OF DR. JOHN C. HART
IN SUPPORT OF PETITION FOR INTER PARTES REVIEW
OF U.S. PATENT NO. 8,983,134

TABLE OF CONTENTS

Contents

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 3 through 6 (the "Challenged Claims") of U.S. Patent No. 8,983,134("the '134 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

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.