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 IPR2017-00353
Patent No. 8,983,134

DECLARATION OF DR. ALAN BOVIK IN SUPPORT OF PATENT OWNER RESPONSE PURSUANT TO 37 C.F.R. § 42.120

Exhibit 2007
IPR2017-01218
Petitioner- Samsung Electronics Co., Ltd., et al.
Patent Owner- Image Processing Technologies LLC

Exhibit 2007

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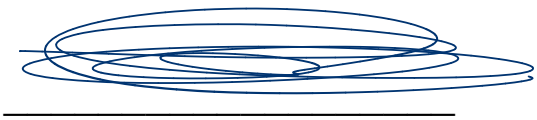
believed to be true; and further that these statements were made wit knowledge that willful false statements and the like so made are punishal fine or imprisonment, or both, under 18 U.S.C. § 1001 and that such willfu statements may jeopardize the validity of the application or any patent thereupon.

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

Dated: August 25, 2017

Respectfully Submitted



Alan Bovik

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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 IPR2017-00353 for U.S. Patent No. 8,983,134.

2. In IPR2017-00353, I understand that Petitioners, Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Samsung" or "Petitioners") challenged the validity of Claims 1 and 2 of the '134 Patent.

3. I understand that the Board instituted an *inter partes* review on the following Grounds: Claims 1 and 2 as obvious under 35 U.S.C. § 103(a) over Gilbert in view of Hashima; Claims 1 and 2 as obvious under 35 U.S.C. § 103(a) over Ueno in view of Gilbert. Paper No. 12 (Institution Decision) at 29.

4. I was asked to consider whether the instituted claims of the U.S. Patent No. 8,983,134 ("the '134 Patent") (Ex. 1001), which are claims 1 and 2, would have been obvious to a person of ordinary skill in the art ("POSA") as of the date of the invention.

5. Based on my analysis of the '134 Patent and my understanding of the state of the relevant prior art as well as the specific references 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.

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