

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. 8,805,001

**DECLARATION OF DR. JOHN C. HART
IN SUPPORT OF PETITION FOR INTER PARTES REVIEW
OF U.S. PATENT NO. 8,805,001**

TABLE OF CONTENTS

Contents

I.	INTRODUCTION	1
II.	BACKGROUND AND EXPERIENCE.....	1
	A. Qualifications	1
	B. Previous Testimony.....	4
III.	TECHNOLOGICAL BACKGROUND.....	5
IV.	THE '001 PATENT.....	12
V.	SUMMARY OF OPINIONS.....	22
VI.	LEVEL OF ORDINARY SKILL IN THE ART	23
VII.	CLAIM CONSTRUCTION	24
VIII.	THE PRIOR ART TEACHES OR SUGGESTS EVERY STEP AND FEATURE OF THE CHALLENGED CLAIMS OF THE '001 PATENT	24
	A. Overview Of The Prior Art References	24
	1. U.S. Patent No. 5,481,622 (“Gerhardt”) (Ex. 1013).....	24
	2. U.S. Patent No. 6,044,166 (“Bassman”) (Ex. 1014).....	31
	3. Alton L. Gilbert et al., A Real-Time Video Tracking System, PAMI-2 No. 1 IEEE Transactions on Pattern Analysis and Machine Intelligence 47 (Jan. 1980) (“Gilbert”) (Ex. 1005).....	34
	4. U.S. Patent No. 5,150,432 (“Ueno”) (Ex. 1007)	46
	B. Gerhardt In View Of Bassman Renders Obvious Claims 5-13	49
	1. Reasons To Combine Gerhardt And Bassman	49

2.	Elements Incorporated Into Claims 5-7 As Claims Dependent From An Independent Claim	52
3.	Claim 5	59
4.	Claim 6	63
5.	Claim 7	64
6.	Claim 8	64
7.	Claim 9	66
8.	Claim 10	66
9.	Claim 11	67
10.	Claim 12	68
11.	Claim 13	68
12.	Gerhardt and Bassman Are Not Cumulative	69
13.	Detailed Application Of Gerhardt And Bassman To The Challenged Claims	69
C.	Ground 2: Gerhardt In View Of Gilbert And Ueno Renders Obvious Claims 5-13	113
1.	Reasons To Combine Gilbert, Gerhardt, And Ueno	113
2.	Elements Incorporated Into Claims 5-7 As Claims Dependent From An Independent Claim	116
3.	Claim 5	124
4.	Claim 6	129
5.	Claim 7	130
6.	Claim 8	131
7.	Claim 9	132

Declaration of Dr. John C. Hart
Patent No. 8,805,001

8.	Claim 10	133
9.	Claim 11	134
10.	Claim 12	138
11.	Claim 13	139
12.	Gilbert, Gerhardt, And Ueno Are Not Cumulative.....	139
13.	Detailed Application Of Gilbert, Gerhardt, And Ueno To The Challenged Claims	141
IX.	CONCLUSION.....	206

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 5-13 (the “Challenged Claims”) of U.S. Patent No. 8,805,001 (“the ’001 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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