UNITED STATES PATENT AND TRADEMARK OFFICE
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BEFORE THE PATENT TRIAL AND APPEAL BOARD
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VISIONSENSE CORP.
Petitioner,

v.

NOVADAQ TECHNOLOGIES INC.
Patent Owner.

Patent No. 8,892,190

_____

Inter Partes Review No. IPR2017-01426
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DECLARATION OF BRIAN WILSON

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I, Brian Wilson, Ph.D., declare as follows:

1.   I have been retained as an expert on behalf of Novadaq Technologies Inc., in the above-captioned *Inter Partes* Review of U.S. Patent No. 8,892,190 ("the '190 patent"). I have been asked to provide my opinions and views on the *Little* prior art (Ex. 1002) cited in the Petition for *Inter Partes* Review of the '190 Patent filed by Visionsense Corp.

I.   PROFESSIONAL BACKGROUND

2.   I am a medical biophysicist with more than 40 years of experience in the field.

3.   I obtained a Ph.D. in experimental physics from the University of Glasgow in 1971.

4.   My professional experience has included three years at the Institute of Cancer Research at the Royal Marsden Hospital in the United Kingdom, from 1972 to 1974, engaged in the study of radiological physics, imaging and therapeutics. I subsequently spent seven years as a medical physicist, including five years as Assistant Professor of Diagnostic Radiology at Flinders University Medical Center in Australia, from 1974 to 1981. I then became the Head of Medical Physics at the Hamilton Cancer Centre at McMaster University in Hamilton, Ontario, Canada, first as an Associate Professor and then as a Full Professor, from 1981 to 1993. In

my capacity at McMaster University, I established a research program in Biomedical Optics, including Optical Imaging and Therapeutics.

5.   I am currently a Senior Scientist at University Health Network and Professor of Medical Biophysics in the Faculty of Medicine at University of Toronto in Toronto, Canada. I have been in this position since 1993. I lead a translational research program in the application of optics-based techniques to human imaging and treatment. I also co-direct the Advanced Optical Microscopy Facility at the University Health Network, which is an association of several major teaching hospitals of the University of Toronto, along with their associated research institutes.

6.   I have published more than 370 peer-reviewed scientific papers, of which more than 300 are in the area of biomedical optics and its applications.

7.   Biomedical optics is defined as the use of light and optical technologies for applications in the life sciences and clinical medicine. This includes optical imaging, image-guided therapeutics and light-based treatments, including the use of lasers.

8.   I have extensive experience in fluorescence imaging in a wide variety of applications. Examples include the use of high-resolution fluorescence microscopy for cellular imaging and for imaging tissue vasculature and tissue function, the use of fluorescent nanoparticles and other fluorescence agents for

tissue contrast, the use of fluorescence endoscopy using autofluorescence of tissues and fluorescent dyes for cancer imaging, and the design and construction of fluorescence imaging systems for intraoperative use in guiding surgery.

9.   My professional work has involved the development of wide field of view fluorescence imaging systems for intraoperative use in guiding brain surgery.

10.   I am being compensated at an hourly rate by the Patent Owner for my assistance in connection with the above-captioned *inter partes* review proceeding, and all activities in connection with the preparation of this declaration. I am being paid regardless of the conclusions or opinions I reach. I have no personal financial stake or interest in the outcome of the present *inter partes* review.

II.   BASIS FOR OPINION

11.   My opinions and views set forth in this report are based on my education, training, and experience in the relevant field, as well as the materials I reviewed in this case, and the scientific knowledge regarding the same subject matter that existed prior to the earliest effective filing date of the '190 patent.

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