

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Shenzhen Zhiyi Technology Co. Ltd., d/b/a iLife,
Petitioner,

v.

iRobot Corp.,
Patent Owner

Case IPR2017-02061
6,809,490

DECLARATION OF KENNETH SALISBURY, Ph.D.

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I, Kenneth Salisbury, of Palo Alto, California, declare the following.

I. INTRODUCTION AND SCOPE OF WORK

1. I have been retained by Fish & Richardson P.C. as an expert witness on behalf of iRobot Corp. (“iRobot” or “Patent Owner”). I understand that Shenzhen Zhiyi Technology Co. Ltd., d/b/a iLife (“iLife” or “Petitioner”) filed for *inter partes* review (“IPR”) of claims 1-3, 7, 12, and 42 of U.S. Patent No. 6,809,490 (“’490 patent”), and that the Patent Trial and Appeal Board (“PTAB” or “Board”) instituted IPR on each of these claims.

2. I have been asked to provide my independent analysis of the ’490 patent in light of the materials cited below and my knowledge and experience in the field of the ’490 patent. I have been asked to consider what a person of ordinary skill in the art as of the Critical Date of the ’490 patent (described below in paragraph 12) would have understood from the patent, including scientific and technical knowledge related to the ’490 patent. I have also been asked to consider whether the references relied on by iLife disclose or render obvious the inventions claimed by the ’490 patent.

3. I am not, and never have been, an employee of iRobot. I received no compensation for this declaration beyond my normal hourly compensation based on my time actually spent analyzing the ’490 patent, the materials cited below, and the

issues related thereto, and I will not receive any added compensation based on the outcome of any IPR or other proceeding involving the '490 patent.

II. QUALIFICATIONS

4. I am currently a Professor Emeritus (Research) at Stanford University, with joint appointments in Computer Science and Surgery, as well as a courtesy appointment in Mechanical Engineering. My academic focus has been in the fields of robotic hands and arms, haptics, robotically assisted surgery, and personal robotics.

5. My full Curriculum Vitae, including a list of publications, is attached as Appendix A to this declaration. A summary of some pertinent aspects of my background and qualifications are described in the following paragraphs.

6. After receiving my Ph.D. from Stanford in 1982 in Mechanical Engineering (Design Division), I spent approximately 15 years as a researcher at the Massachusetts Institute of Technology in the Artificial Intelligence Laboratory and in MIT's Mechanical Engineering Department, ultimately in the position of Principal Research Scientist. In 1997, I moved to California where I served for four years as Fellow and Scientific Advisor at Intuitive Surgical, Inc. In 1999, I moved to Stanford University, where I have held a number of faculty positions.

7. I have worked in the field of robotics for over 30 years. My work has focused on the mechanical design of dexterous robots, sensors, task control systems,

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