

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Axis Communications AB, Canon Inc., and Canon U.S.A., Inc.,

Petitioner

v.

Avigilon Fortress Corporation,

Patent Owner

Case: IPR2019-00235

U.S. Patent No. 7,868,912
Issue Date: January 11, 2011

Title: Video Surveillance System Employing Video Primitives

DECLARATION OF JOHN R. GRINDON, D.Sc.

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I, Dr. John R. Grindon, declare as follows:

1. I make this Declaration based upon my own personal knowledge and, if called upon to testify, would testify competently to the matters stated herein.

2. I have been asked by Axis Communications AB, Canon Inc., and Canon U.S.A., Inc. (collectively “Petitioner”) to provide technical assistance in connection with the Petition for *inter partes* review of U.S. Patent No. 7,868,912 (“the ’912 patent”). This Declaration, which I understand will be filed with the Petition, is a statement of certain opinions I have formed on issues related to the patentability of claims 1-4 and 6-36 of the ’912 patent.

3. It is my opinion that each of claims 1-4 and 6-36 of the ’912 Patent is unpatentable in view of the identified prior art. My opinions are stated in detail in this Declaration, with reference to the exhibits attached to the Petition and any additional exhibits attached to my Declaration.

4. I am being paid at my customary rate of \$500 per hour for my time spent in study, preparation, and testifying in this matter. I am also being reimbursed for reasonable and customary expenses associated with my work. No portion of my compensation is dependent or otherwise contingent upon the specifics of my testimony or the results of this matter. My compensation is not contingent upon the outcome of this *inter partes* review.

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