

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CANON INC., CANON U.S.A., INC., and
AXIS COMMUNICATIONS AB,
Petitioners,

v.

AVIGILON FORTRESS CORPORATION,
Patent Owner.

CASE: IPR2019-00311
U.S. Patent No. 7,932,923

Declaration of Guang-Yu Zhu

I, Guang-Yu Zhu, declare as follows:

1. I am an attorney at the law firm of Finnegan, Henderson, Farabow, Garrett & Dunner, LLP, counsel for Petitioner Axis Communications AB in this matter. I am licensed to practice in the District of Columbia. I have personal knowledge of the matters set forth herein.

2. Exhibit 1042 is a true and accurate copy of “Understanding MARC Bibliographic: Parts 1 to 6,” available at <https://www.loc.gov/marc/umb/um01to06.html> (last accessed August 1, 2019) obtained from the Internet.

3. Exhibit 1043 is a true and accurate copy of “Understanding MARC Bibliographic: Parts 7 to 10,” available at <https://www.loc.gov/marc/umb/um07to10.html> (last accessed August 1, 2019) obtained from the Internet.

4. Exhibit 1044 is a true and accurate copy of Nevenka Dimitrova et al., “Motion Recovery for Video Content Classification,” ACM Transactions on Information Systems, Vol. 13, No. 4, 408-439 (1995) obtained from the Massachusetts Institute of Technology (“MIT”) Libraries.

5. Exhibit 1045 is a true and accurate copy of Bruce E. Flinchbaugh et al., “Autonomous Video Surveillance,” SPIE Proceedings, 25th AIPR Workshop: Emerging Applications of Computer Vision, Vol. 2962, pp. 144-151 (1997), obtained from the Library of Congress.

6. Exhibit 1046 is a true and accurate copy of Frank Brill et al., “Event Recognition and Reliability Improvements for the Autonomous Video Surveillance System” Proceedings of the Image Understanding Workshop, Nov. 20-23, 1998, Vol. 1, pp. 267-283, obtained from the University of Virginia Library, with the title and cover pages scanned in color.

7. Exhibit 1047 is a true and accurate copy of the Declaration of Katie Zimmerman filed in *KAZ USA, Inc. v. Exergen Corp.*, Case IPR2016-01437, Exhibit 1027.

8. Exhibit 1048 is a true and accurate copy of the Declaration of Marilyn McSweeney filed in *Yahoo! Inc. v. CreateAds LLC*, Case IPR2014-00200, Exhibit 1007.

9. I declare under penalty of perjury that the foregoing is true and correct. I further declare that all statements made herein of my own knowledge are true, that all statements made on information and belief are believed to be true, and that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under section 1001 of Title 18 of the United States Code.

Dated: August 5, 2019

By: /Guang-Yu Zhu/
Guang-Yu Zhu