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 No. IPR2019-00314

U.S. Patent No. 7,932,923

_____

DECLARATION OF JENNIFER A. BABBITT

I, JENNIFER A. BABBITT, declare under penalty of perjury as follows:

1.   I am an Electronic Services Librarian of the law firm Kirkland & Ellis, LLP.

2.   I obtained a Masters in Library and Information Science from San Jose State University in 2013. In connection with that degree, I took multiple courses relating to library operations and catalog management.

3.   From 2012 to 2014, I worked as an Archive Consultant at the Golden Gate National Recreation Area. I assisted in archival of Golden Gate National Recreation Area documents and maintenance of active division records. I also created finding aids for discrete collections, as well as preserving and arranging active records for multiple divisions within the Golden Gate National Recreation Area, including the superintendent's office.

4.   From 2014 to present, I have been working as a Research Assistant at Kirkland & Ellis LLP. My primary responsibilities include the following: (1) maintain library catalog, including coordination of cataloging new material and routing of serial publications, (2) work with outside vendors to maintain/update standing orders and facilitate new orders, (3) coordinate interlibrary loans, (4) catalog and maintain technical book collection, and (5) research and document retrieval.

5.   I make this Declaration in support of the petition for *inter partes* review of U.S. Patent No. 7,932,923 before the United States Patent and Trademark Office. I make this Declaration of my own personal knowledge.

6.   Exhibit 2005 is a true and correct copy of Thomas Olson & Frank Brill, *Moving Object Detection & Event Recognition Algorithms for Smart Cameras*, 1 PROC. 1997 IMAGE UNDERSTANDING WORKSHOP 159-175 (1997), that I obtained from U.S. Patent No. 7,868,912 Reexamination Request No. 90/012,878 located at https://portal.uspto.gov/pair/PublicPair on April 9, 2019.

7.   Exhibit 2006 is a true and correct copy of Jonathan D. Courtney, *Automatic Video Indexing Via Object Motion Analysis*, 30(4) PATTERN RECOGNITION 607-625 (1997), that I obtained from https://www.sciencedirect.com on April 9, 2019.

8.   Exhibit 2008 is a true and correct copy of Young Francis Day, et al, *Spatio-Temporal Modeling of Video Data for On-Line Object-Oriented Query Processing*, Proceedings of the International Conference on Multimedia Computing and Systems 98-105 (1995), that I obtained from U.S. Patent No. 7,932,923 Reexamination Request No. 90/012,876 located at https://portal.uspto.gov/pair/PublicPair on April 9, 2019.

9.   Exhibit 2009 is a true and correct copy of the Forouzan Golshani & Nevenka Dimitrova, *A Language for Content-Based Video Retrieval*, 6

MULTIMEDIA TOOLS AND APPLICATIONS, 289-312 (1998), that I obtained from https://link.springer.com on April 5, 2019.

10.   Exhibit 2012 is a true and correct copy of the SearchWorks Catalog entry for the Image Understanding Workshop Proceedings series at the Stanford University   Library   website   that   I   obtained   from https://searchworks.stanford.edu/view/1267489 on March 5, 2019.

11.   Exhibit 2013 is a copy of the scanned cover and front matter from PATTERN RECOGNITION, Vol. 30, No. 4, dated April 1997 obtained on March 5, 2019.

12.   I declare under penalty of perjury under the laws of the United States of America that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further 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 the Title 18 of the United States Code.

Executed on April 9, 2019, in San Francisco, California.

_____
Jennifer A. Babbitt