

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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Robert Bosch LLC,  
Petitioner

v.

Monument Peak Ventures, LLC,  
Patent Owner

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Case IPR2019-01473  
U.S. Patent No. 6,654,507

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**DECLARATION OF DR. JOHN R. GRINDON, D.SC.**

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        3. Claim 8.....38

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    g. “A computer storage product having at least one  
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## **I. Introduction**

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

1. I have been asked to submit this declaration on behalf of Robert Bosch LLC (“Petitioner”) in connection with a petition for *inter partes* review of U.S. Patent No. 6,654,507 (“the ’507 patent,” Ex. 1001). Specifically, I have been retained as an independent expert consultant by Petitioner to provide my opinions on the technology claimed in, and the patentability or unpatentability of certain claims of the ’507 patent (“the challenged claims”). Although I am being compensated at my usual rate of \$500 per hour for the time I spend on this matter, no part of my compensation depends on the outcome of this proceeding, I have no financial interest in any of the parties, and I have no other interest in this proceeding.

## **II. Qualifications**

2. My qualifications for forming the opinions set forth in this report are summarized below and described in more detail in my curriculum vitae (attached as Ex. 1003). I am currently an independent consultant and provide services related to digital image processing and software algorithm development. For more than forty years, I have studied, researched, and worked in the analysis, design, and development of electronic systems, devices, and software related to acquiring, processing and analyzing signals and images. I hold various US and foreign patents in these areas.

3. I received a Bachelor of Science in Electrical Engineering from the University of Missouri at Rolla (now Missouri University of Science and Technology), in Rolla, Missouri in 1961. I then received a Master of Science in Electrical Engineering from MIT in Cambridge, Massachusetts in 1962. In 1960, I designed RF electronics for military radar systems for Westinghouse Electric Corporation, and in 1961, I designed microwave electronics for Hughes Aircraft Corporation. I began working at McDonnell Aircraft Corp., which became McDonnell Douglas Corporation and now Boeing, in 1962, and I received my Doctor of Science in Electrical Engineering from Washington University in St. Louis in 1970 while employed at McDonnell Douglas.

4. I held various positions during my 25-year tenure at McDonnell Douglas, including Branch Chief of Electronics. I led various research and development teams, including projects related to (1) tracking and guidance for the Tomahawk Cruise Missile; (2) developing scene analysis algorithms for 3D-imagery for autonomous Cruise Missile guidance; and (3) developing image-based automatic target classification and recognition algorithms for anti-ship missiles.

5. In 1987, I became Executive Vice President and Director of Research for Cencit, Inc., a start-up company engaged in the research and development of 3D electronic imaging systems based on digital video image processing electronics and software algorithms. While at Cencit, I developed the concept and led the analysis,

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