UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LG ELECTRONICS INC.,
Petitioner,

v.

IMMERVISION, INC.,
Patent Owner.

_____

U.S. Patent No. 6,844,990

_____

DECLARATION OF RUSSELL CHIPMAN, PH.D.

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2. Claims 5 and 21: "[The method according to claim 1 / The panoramic objective lens according to claim 17], wherein the [objective] lens compresses the center of the image and the edges of the image[,] and expands an intermediate zone of the image located between the center and the edges of the image." 42

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I, Russell Chipman, hereby declare the following:

I. BACKGROUND AND QUALIFICATIONS

1. My name is Russell Chipman and I am over 21 years of age and otherwise competent to make this Declaration. I make this Declaration based on facts and matters within my own knowledge and on information provided to me by others, and, if called as a witness, I could and would competently testify to the matters set forth herein.

2. I have been retained as a technical expert witness in this matter by Counsel for Petitioner LG Electronics Inc. to provide my independent opinions on certain issues requested by Counsel for Petitioner relating to the accompanying petition for Inter Partes Review of U.S. Patent No. 6,844,990 ("the '990 Patent"). My compensation in this matter is not based on the substance of my opinions or the outcome of this matter. I have no financial interest in Petitioner. I have been informed that ImmerVision, Inc. ("ImmerVision") is the purported owner of the '990 Patent, and I note that I have no financial interest in ImmerVision.

3. I have summarized in this section my educational background, career history, and other qualifications relevant to this matter. I have also included a current version of my curriculum vitae as Appendix A (Ex. 1009).

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4. I received a B.S. in Physics from the Massachusetts Institute of Technology in 1976, an M.S. in Optical Science from the University of Arizona in 1984, and a Ph.D. in Optical Science from the University of Arizona in 1987.

5. I have extensive professional experience in the fields of optics and engineering. I worked for Perkin Elmer Corporation from 1977-1978 where I was an Optical Engineer responsible for the construction and operation of interferometers and optical test setups as well as for testing of telescope mirrors for space-based telescopes.

6. In 1978, as a Physicist for Beckman Instruments, Inc., I performed optical design for spectrophotometer products and developed one of the first commercial concave holographic grating spectrometers.

7. From 1982-1986, I developed polarization aberration theory for calculating polarization effects in optical systems. I also wrote the first polarization ray tracing program.

8. I was Director of Optics R & D at Innotech, Johnson & Johnson, Inc. from 1997 to 1998 where I managed an Optics Department leading research and development in the optical design and metrology of ophthalmic optics.

9. From 2000-2002, I was a Senior Manager in the Network Appliances Department of JDS Uniphase, where I managed and developed the Polarization

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