DOCKET NO.: 2211726-00179US1
Filed on behalf of Unified Patents, LLC
By: David L. Cavanaugh, Reg. No. 36,476
Scott Bertulli, Reg. No. 75,886
Trishan Esram, Reg. No. 74,075
Wilmer Cutler Pickering Hale and Dorr LLP
1875 Pennsylvania Ave., NW
Washington, DC 20006
Tel: (202) 663-6000
Email: david.cavanaugh@wilmerhale.com

Ashraf Fawzy, Reg. No. 67,914
Roshan Mansinghani, Reg. No. 62,429
Unified Patents, LLC
1875 Connecticut Ave. NW, Floor 10
Washington, DC, 20009
Tel: (202) 871-0110
Email: afawzy@unifiedpatents.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS, LLC
Petitioner

v.

INTERDIGITAL VC HOLDINGS, INC.
Patent Owner

Case No. IPR2021-00102

DECLARATION OF DIDIER J. LEGALL
U.S. PATENT NO. 8,363,724
CHALLENGING CLAIMS 1–4, 7–12, 15, 19–23, 26–31, 34, 38–42, 45–50, 53, 56–60, 63–68, 71, AND 74

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF CONTENTS

I. INTRODUCTION 1

II. MATERIALS CONSIDERED 5

A. Prosecution History 5
B. Prior Art Patents and Printed Publications 5

III. LEGAL PRINCIPALS 7

IV. SUMMARY OF OPINIONS 10

V. BRIEF DESCRIPTION OF THE TECHNOLOGY 10

A. Non-Virtual Reference Pictures 10
B. Virtual Reference Pictures 12

VI. OVERVIEW OF THE '724 PATENT 14

A. Alleged Invention 14
B. Level of Ordinary Skill in the Art 18
C. Prosecution History 20

VII. CLAIM CONSTRUCTION 21

VIII. SPECIFIC GROUNDS FOR PETITION 21

A. Grounds I and II: Claims 1–3, 7, 9, 12, 15, 19–22, 26, 28, 31, 34, 38–41, 45, 47, 50, 53, 56–59, 63, 65, 68, 71, and 74 are anticipated or rendered obvious by *Xin* 22

1. Overview of *Xin* 22
2. Claim 1 is anticipated or rendered obvious by *Xin* 29
3. Claim 2 is anticipated or rendered obvious by *Xin* 35
4. Claim 3 is anticipated or rendered obvious by *Xin* 37
5. Claim 7 is rendered obvious by *Xin* 39
6. Claim 9 is anticipated or rendered obvious by *Xin* 41
7. Claim 12 is rendered obvious by *Xin* 42
8. Claim 15 is anticipated or rendered obvious by *Xin* 45

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

9. Claim 19 is anticipated or rendered obvious by *Xin* 46
10. Claim 20 is anticipated or rendered obvious by *Xin* 48
11. Claim 21 is anticipated or rendered obvious by *Xin* 49
12. Claim 22 is anticipated or rendered obvious by *Xin* 50
13. Claim 26 is rendered obvious by *Xin* 50
14. Claim 28 is anticipated or rendered obvious by *Xin* 51
15. Claim 31 is rendered obvious by *Xin* 51
16. Claim 34 is anticipated or rendered obvious by *Xin* 52
17. Claim 38 is anticipated or rendered obvious by *Xin* 52
18. Claim 39 is anticipated or rendered obvious by *Xin* 53
19. Claim 40 is anticipated or rendered obvious by *Xin* 58
20. Claim 41 is anticipated or rendered obvious by *Xin* 59
21. Claim 45 is rendered obvious by *Xin* 60
22. Claim 47 is anticipated or rendered obvious by *Xin* 61
23. Claim 50 is rendered obvious by *Xin* 61
24. Claim 53 is anticipated or rendered obvious by *Xin* 64
25. Claim 56 is anticipated or rendered obvious by *Xin* 65
26. Claim 57 is anticipated or rendered obvious by *Xin* 66
27. Claim 58 is anticipated or rendered obvious by *Xin* 68
28. Claim 59 is anticipated or rendered obvious by *Xin* 68
29. Claim 63 is rendered obvious by *Xin* 69
30. Claim 65 is anticipated or rendered obvious by *Xin* 69
31. Claim 68 is rendered obvious by *Xin* 70
32. Claim 71 is anticipated or rendered obvious by *Xin* 70
33. Claim 74 is anticipated or rendered obvious by *Xin* 71

B. Ground III: Claims 4, 8, 10, 11, 23, 27, 29 30, 42, 46, 48, 49, 60, 64, 66, and 67 are obvious over *Xin* in view of *LeGall* 71

1. Overview of *LeGall* 72
2. Claim 4 is obvious over *Xin* in view of *LeGall* 73
3. Claim 8 is obvious over *Xin* in view of *LeGall* 79
4. Claim 10 is obvious over *Xin* in view of *LeGall* 81
5. Claim 11 is obvious over *Xin* in view of *LeGall* 82
6. Claim 23 is obvious over *Xin* in view of *LeGall* 83
7. Claim 27 is obvious over *Xin* in view of *LeGall* 84
8. Claim 29 is obvious over *Xin* in view of *LeGall* 84
9. Claim 30 is obvious over *Xin* in view of *LeGall* 85
10. Claim 42 is obvious over *Xin* in view of *LeGall* 85

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

11. Claim 46 is obvious over *Xin* in view of *LeGall* 86
12. Claim 48 is obvious over *Xin* in view of *LeGall* 86
13. Claim 49 is obvious over *Xin* in view of *LeGall* 86
14. Claim 60 is obvious over *Xin* in view of *LeGall* 87
15. Claim 64 is obvious over *Xin* in view of *LeGall* 87
16. Claim 66 is obvious over *Xin* in view of *LeGall* 88
17. Claim 67 is obvious over *Xin* in view of *LeGall* 88

IX. AVAILABILITY FOR CROSS EXAMINATION.....89

X. RIGHT TO SUPPLEMENT.....89

XI. JURAT.....90

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

I, Didier J. LeGall, declare as follows:

I. INTRODUCTION

1. My name is Didier J. LeGall. I received a Master of Science and Ph.D. in Electrical Engineering from the University of California, Los Angeles in 1977 and 1981, respectively. A copy of my curriculum vitae, which includes a more detailed summary of my background, experience, patents, and publications, is attached as Appendix A.

2. I have been retained by Unified Patents, LLC as an independent expert consultant in the field of video processing and transmission.

3. I am currently Executive Vice President of Ambarella (2004 to Present), a semiconductor design company that I founded and that focuses on low-power, high-definition (HD) and Ultra HD video compression, image processing, and computer vision processors. Prior to Ambarella, I co-founded and was Chief Technology Officer of C-Cube Microsystems, Inc. ("C-Cube") from 1990 until its acquisition by LSI Logic in 2001. C-Cube was an early pioneer of the Moving Picture Experts Group ("MPEG") digital video standard who provided enabling silicon technology for image compression of digital video and audio. In 1995, the company received an Emmy award for technical achievement in digital audio-visual. At LSI Logic, I served as Vice President and General Manager of the Digital Video

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.