UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PERFECT CORP.,

Petitioner,

v.

LENNON IMAGE TECHNOLOGIES, LLC,

Patent Owner.

PTAB Case No. IPR2021-00124

Patent No. 6,624,843

DECLARATION OF ELI SABER, PH.D. IN SUPPORT OF PETITION FOR

INTER PARTES REVIEW OF U.S. PATENT NO. 6,624,843



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		1. Bechara (WO 97/29441)16		
		2. Goldberg (WO 98/10358)18		
		3. Motivation to Combine22		

	4.	Independent Claim 1 and Associated Dependent Claims
	5.	Independent Claim 14 and Associated Dependent Claims
C.		and 1A: Bechara, Goldberg, and Lin Render Obvious ms 18, 20, 24, 27, and 2959
	1.	Lin (US 6,108,437)59
	2.	Motivation to Combine60
	3.	Claim 18: "The method of claim 17, wherein the step of determining further comprises comparing biometric information of the person with the customer image."
	4.	Claim 20: "The method of claim 14, wherein the step of displaying further comprises: detecting a presence of a person near a display; determining that the person does not correspond of the customer image; and informing the person about a subsequent ac[t]ion in response to the step of determining."
	5.	Claim 24: "The apparatus of claim 1, wherein the image capture system repeatedly captures images until the controller determines that a valid image has been obtained for use with a composite image."64
	6.	Claim 27: "The method of claim 14, wherein the step of capturing the customer image comprises: detecting presence of the customer; capturing the customer image in response to detecting presence of the customer, wherein the step of detecting presence of a customer further comprises detecting proximity of a customer."
	7.	Claim 29: "The method of claim 14, wherein the step of capturing the customer image comprises repeatedly capturing customer images until determining that a

		valid image has been obtained for use with a composite image."66
	D.	Ground 1B: Bechara and Nobuyoshi Render Obvious Claims 21 and 2666
		1. Nobuyoshi (JPH07282227A)66
		2. Claim 21: "The apparatus of claim 1, further comprising: a trigger device, coupled to the controller, that detects a presence of the customer and activates the image capture system in response to detecting presence of the customer, wherein the trigger device detects the presence of the customer by identifying one or more facial features."
		3. Claim 26: "The method of claim 14, wherein the step of capturing the customer image comprises: detecting presence of the customer; capturing the customer image in response to detecting presence of the customer, wherein the step of detecting presence of the customer further comprises identifying one or more customer facial features."
	E.	Ground 2: MasqueArray Renders Obvious Claims 8, 18, 21- 23, 26-28
		1. MasqueArray70
		2. MasqueArray is Prior Art70
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I. INTRODUCTION AND SUMMARY OF TESTIMONY

I, Eli Saber, have been retained by Petitioner Perfect Corp.
 ("Petitioner") to investigate and opine on certain issues relating to United States
 Patent No. 6,624,843 ("the '843 patent") in Perfect's Petition for *Inter Partes*

5 Review of that patent. The Petition requests that the Patent Trial and Appeal
Board ("PTAB" or "Board") review and cancel claims 5, 6, 8, 9, 12, 18, and 20-30
of the '843 patent.

2. I am being compensated for my work on this matter by Petitioner for consulting services including time spent testifying at any hearing that may be held.

- I am also reimbursed for reasonable and customary expenses associated with my work in this case. I receive no other forms of compensation related to this case.
 My compensation does not depend on the outcome of this *inter partes* review and I have no other financial interest in this *inter partes* review.
- 3. This declaration is based on the information currently available to me.
 15 To the extent that additional information becomes available, I reserve the right to continue my investigation and study, which may include a review of documents and information that may be produced, as well as testimony from depositions that have not yet been taken.

A. Qualifications

20 4. I have summarized in this section my educational background, career

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