

Declaration of Ulrich Neumann, Ph.D.

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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META PLATFORMS, INC.  
Petitioner

v.

THALES VISIONIX, INC.  
Patent Owner

**U.S. Patent No. 6,922,632**  
**U.S. Patent No. 7,725,253**

Cases IPR2022-01304, IPR2022-01305, IPR2022-01308

**SUPPLEMENTAL DECLARATION OF DR. ULRICH NEUMANN  
IN SUPPORT OF PETITIONER'S REPLY TO PATENT OWNER'S  
RESPONSE TO PETITION FOR *INTER PARTES* REVIEW OF U.S.  
PATENT NOS. 6,922,632 AND 7,725,253**

**TABLE OF CONTENTS**

	<b><u>Page</u></b>
<b>I. Introduction.....</b>	<b>1</b>
<b>II. Background .....</b>	<b>2</b>
A. Qualifications .....	2
B. Prior Testimony .....	3
C. Level of Ordinary Skill In The Art .....	4
<b>III. Supplemental Opinions .....</b>	<b>4</b>
A. Welch-2001 In Combination With Welch-1997 “Enumerat[es],” Or Obviously Would Have “Enumerat[ed],” The Sensing Elements Available To It.....	4
B. Horton Performs “Computations” .....	8
C. Horton “Enumerat[es],” Or Obviously Would Have “Enumerat[ed],” The Sensing Elements Available To It.....	12
<b>IV. Conclusion .....</b>	<b>14</b>

I, Dr. Ulrich Neumann, declare as follows:

## **I. INTRODUCTION**

1. My name is Ulrich Neumann. I am a Professor of Computer Science at the University of Southern California in Los Angeles, California. I was previously retained on behalf of Petitioner Meta Platforms, Inc. (“Petitioner”) to provide my opinions regarding whether claims 1-9, 11-36, 44-45, 47-55, 57-61, and 66-69 of U.S. Patent No. 6,922,632 (“the ’632 patent”) and claims 1-9 of U.S. Patent No. 7,725,253 (“the ’253 patent”) would have been obvious to one of ordinary skill in the art as of August 9, 2002. I previously provided declarations containing my opinions, which I understand from counsel were filed as EX1005 (the “Original Declarations”) in IPR2022-01304, IPR2022-01305, and IPR2022-01308 related to the ’632 patent and the ’253 patent.

2. I have been asked by Petitioner to provide my opinion about certain issues that I understand from counsel relate to arguments presented in Patent Owner’s Responses (IPR2022-01304, Paper 30; IPR2022-01305, Paper 30; IPR2022-01308, Paper 29) and the accompanying opinions in the Declaration of Yohan Baillot (filed as EX2007 in each of those proceedings). My opinion regarding those certain issues is reflected in this supplemental declaration. I was not asked by Petitioner to provide my opinion about every argument, contention, opinion, or piece of evidence in the aforementioned Patent Owner’s Responses or Declaration of

Yohan Baillot; rather, I was only asked by Petitioner to provide my opinion regarding certain limited issues, as explained in more detail below. Accordingly, I have not formed an opinion about any of the arguments, contentions, opinions, or pieces of evidence in the aforementioned Patent Owner's Responses or Declaration of Yohan Baillot except as expressly addressed below (and except to the extent a relevant opinion may be found in my Original Declarations, which I offered before Patent Owner's Responses or the Declaration of Yohan Baillot were filed).

3. In forming the opinions expressed in this declaration, I have relied on my academic and professional experience, as well as all of the evidence expressly cited herein. I considered the viewpoint of a person having ordinary skill in the art as of the time of alleged invention of the '632 and '253 patents (August 9, 2002).

4. For time spent in connection with this matter, I will be compensated at my standard billing rate of \$775 per hour. I am being separately reimbursed for any out-of-pocket expenses. My compensation does not depend on the content of my opinions or the outcome of these proceedings.

## **II. BACKGROUND**

### **A. QUALIFICATIONS**

5. I previously provided my relevant qualifications for these proceedings in Section II.A-C of my Original Declarations. I incorporate herein those sections of my Original Declarations.

6. I previously provided my curriculum vitae (“CV”) for these proceedings, which I understand was filed as EX1006 in these proceedings. I incorporate herein my previously filed CV.

**B. PRIOR TESTIMONY**

7. The cases in which I have testified as an expert at trial or by deposition within the preceding five years are as follows:

- *Science Applications International Corp. v. United States* (for defendant);
- *Meta Platforms, Inc. v. Thales Visionix, Inc.*, Case IPR2022-01294 (for petitioner);
- *Meta Platforms, Inc. v. Thales Visionix, Inc.*, Case IPR2022-01298 (for petitioner);
- *Meta Platforms, Inc. v. Thales Visionix, Inc.*, Case IPR2022-01301 (for petitioner);
- *Meta Platforms, Inc. v. Thales Visionix, Inc.*, Case IPR2022-01302 (for petitioner);
- *Meta Platforms, Inc. v. Thales Visionix, Inc.*, Case IPR2022-01303 (for petitioner);
- *Meta Platforms, Inc. v. Thales Visionix, Inc.*, Case IPR2022-01304 (for petitioner);
- *Meta Platforms, Inc. v. Thales Visionix, Inc.*, Case IPR2022-01305 (for petitioner); and
- *Meta Platforms, Inc. v. Thales Visionix, Inc.*, Case IPR2022-01308 (for petitioner).

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