

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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LG ELECTRONICS INC. and LG ELECTRONICS USA, INC.,  
Petitioners

v.

IMAGE PROCESSING TECHNOLOGIES, LLC,  
Patent Owner.

**DECLARATION OF DR. JEFFREY J. RODRIGUEZ IN SUPPORT OF  
PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,959,293**

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1. I, Jeffrey J. Rodriguez, declare as follows.

## **I. INTRODUCTION**

2. I have been retained by LG Electronics Inc. and LG Electronics USA, Inc. (“Petitioner”) as an independent expert consultant in this *inter partes* review (“IPR”) proceeding before the United States Patent and Trademark Office (“PTO”).

3. I have been asked by LG’s counsel (“Counsel”) to consider whether certain references disclose, teach, and/or suggest the features recited in Claim 1 of U.S. Patent No. 6,959,293 (the “’293 Patent”) (Ex-1001), assigned to Image Processing Technologies, Inc. (“Patent Owner”). My opinions and the bases for my opinions are set forth below.

4. I am being compensated at my ordinary and customary consulting rate for my work, which is \$575 per hour. My compensation is in no way contingent on the nature of my findings, the presentation of my findings in testimony, or the outcome of this or any other proceeding. I have no other financial interest in this proceeding.

## **II. BACKGROUND AND QUALIFICATIONS**

5. I am a professor at The University of Arizona in the Department of Electrical and Computer Engineering, where I hold or have held the following positions: (a) Associate Professor of Electrical and Computer Engineering, with

tenure (1997–present), (b) Associate Professor of Biomedical Engineering, with tenure (2017–present), (c) Director of the Signal and Image Laboratory (1990–present), (d) Director of Image Analysis, Cancer Imaging Shared Services, Arizona Cancer Center (2009–2014), (e) Co-Director of Connection One, a National Science Foundation industry/university cooperative research center for wired and wireless communication circuits and systems, (f) Director of Graduate Studies for the Department of Electrical and Computer Engineering (2000–2003, 2005–2016).

6. My formal education includes a Bachelor of Science degree in Electrical Engineering from the University of Texas at Austin in May 1984, a Master of Science degree in Electrical Engineering from the Massachusetts Institute of Technology in June 1986, and a Ph.D. Degree in Electrical Engineering from the University of Texas at Austin in May 1990.

7. I teach courses at both the graduate and undergraduate level through the Dept. of Electrical and Computer Engineering and the College of Optical Sciences. The courses I have taught include Digital Image Processing, Digital Image Analysis, Digital Signal Processing, Advanced Digital Signal Processing, Signals and Systems, and Circuit Analysis. I have been awarded the Outstanding Teaching Award by the IEEE and Eta Kappa Nu (IEEE-HKN), given by students at The University of Arizona to one outstanding professor each year.

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