

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC., LG ELECTRONICS U.S.A., INC.,
Petitioner

U.S. Patent No. 9,247,174

**DECLARATION OF ANDREW LIPPMAN,
UNDER 37 C.F.R. § 1.68 IN SUPPORT OF PETITION FOR
INTER PARTES REVIEW**

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I, Andrew Lippman, do hereby declare as follows:

I. INTRODUCTION

1. I am making this declaration at the request of LG Electronics, Inc. in the matter of the *Inter Partes* Review of U.S. Patent No. 9,247,174 (“the ’174 patent”) to Sirpal *et al.*

2. I am being compensated for my work in this matter at my standard hourly rate. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this investigation. My compensation is not contingent on the outcome of this matter or the specifics of my testimony.

3. I have been asked to provide my opinions regarding whether claims 1-14 (“the Challenged Claims”) of the ’174 patent are unpatentable as they would have been obvious to a person having ordinary skill in the art (“POSITA”) at the time of the alleged invention, in light of the prior art. It is my opinion that all of the elements of the Challenged Claims would have been obvious to a POSITA.

4. In the preparation of this declaration, I have studied:

- a. the ’174 patent, Ex.1001;
- b. the prosecution history of the ’174 patent (“’174 File History”),

Ex.1002;

- c. U.S. Patent Publication No. 2010/0262938 to Woods et al. (“Woods”),

Ex.1005;

- d. U.S. Patent Publication No. 2002/0060750 to Istvan et al. (“Istvan”),
Ex.1006;
 - e. “*CurioView: TV Recommendations Related to Content Being Viewed*,”
Hideki Sumiyoshi, IEEE International Symposium on Broadband Multimedia
System and Broadcasting 2010 (“CurioView”), Ex.1007;
 - f. U.S. Patent Publication No. 2007/0047920 to Machida et al.
 (“Machida”), Ex.1008;
 - g. U.S. Patent Publication No. 2011/0219395 to Moshiri et al.
 (“Moshiri”), Ex.1009;
 - h. WO2013133915 to Cherry et al. (“Cherry”), Ex.1010;
 - i. U.S. Patent Publication No. 2012/0054794 to Kim et al. (“Kim”),
Ex.1011;
5. In forming the opinions expressed below, I have considered: the documents listed above; the relevant legal standards, including the standard for obviousness; and my own knowledge and experience based upon my work in the field of televisions as described below, and any additional authoritative documents as cited in the body of this declaration.
6. Unless otherwise noted, all emphasis in any quoted material has been added.

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