UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROKU, INC.,

Petitioner,

v.

VIDEOLABS, INC.,

Patent Owner.

Case No. IPR2025-00071

Patent No. 7,440,559

DECLARATION OF BRUCE MCNAIR IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,440,559

Roku Exhibit 1003

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EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 7,440,559 ("'559")
1002	File History of U.S. Patent Application No. 10/690,692 ("'559FH")
1003	Declaration of Bruce McNair
1004	CV of Bruce McNair
1005	U.S. Patent No. 6,341,316 ("Kloba")
1006	U.S. Patent Application Publication No. 2003/0079038 ("Robbin")
1007	*Starz Entm't, LLC v. VL Collective IP, LLC*, 1:21-cv-01448, Dkt. 88, pages 1-4 (Claim Construction Order) (D. Del. Jan. 10, 2023)
1008	*Netflix, Inc. v. VideoLabs, Inc*, IPR2023-00630, Paper 2 (Petition) (P.T.A.B. Feb. 23, 2023)
1009	*Netflix, Inc. v. VideoLabs, Inc*, IPR2023-00630, Paper 10 (Institution Decision) (P.T.A.B. Oct. 3, 2023)
1010	Federal Judicial Caseload Statistics (Dec. 31, 2023)
1011	U.S. Patent Application Publication No. 2003/0163431 ("Ginter")
1012	U.S. Patent No. 5,943,422 ("Van Wie")
1013	*Netflix, Inc. v. VideoLabs, Inc*, IPR2023-00630, Paper 31 (Final Written Decision) (P.T.A.B. Oct. 2, 2024)

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I. INTRODUCTION AND SUMMARY OF TESTIMONY

1. My name is Bruce McNair. I am currently a professor in the Electrical and Computer Engineering Department at Stevens Institute of Technology.

2. I have been engaged by Roku, Inc. ("Roku") as a consultant in connection with Roku's Petition for *Inter Partes* Review ("IPR") of U.S. Patent No. 7,440,559 (the "'559 patent").

3. I understand that the '559 patent is assigned to VideoLabs, Inc. ("Patent Owner" or "VideoLabs").

4. This Declaration is based on the information currently available to me. To the extent that additional information becomes available, I reserve the right to continue my investigation and analysis, which may include a review of documents and information that have not yet been produced, as well as testimony from depositions that have not yet been taken.

5. All of the opinions set forth in this Declaration are based on my own personal knowledge, professional experience, education and judgment, in consideration of the documents, materials and information that I reference.

6. In connection with my work as an expert in this matter, I am being compensated at $650 per hour for consulting services, including time spent testifying at any hearing that may be held. I am also being reimbursed for reasonable and customary expenses associated with my work in this case. I receive no other forms

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