EXHIBIT 13

Defendant's Invalidity Contentions
Exhibit B8

Invalidity of U.S. Patent No. 8,339,493
by
U.S. Patent No. 7,903,162 to Juen ("Juen")

The excerpts cited herein are exemplary. For any claim limitation, Defendant may rely on excerpts cited for any other limitation and/or additional excerpts not set forth fully herein to the extent necessary to provide a more comprehensive explanation for a reference's disclosure of a limitation. Where an excerpt refers to or discusses a figure or figure items, that figure and any additional descriptions of that figure should be understood to be incorporated by reference as if set forth fully therein.

Except where specifically noted otherwise, this chart applies the apparent constructions of claim terms as used by Plaintiff in its infringement contentions; such use, however, does not imply that Defendant adopts or agrees with Plaintiff's constructions in any way.

Defendant is investigating this prior art and have not yet completed discovery from third parties who may have information concerning it. Defendants reserve the right to modify, amend and/or supplement these contentions as information becomes available, and as discovery proceeds.

U.S. Patent No. 8,339,493 ("the '493 Patent") claims priority to Japanese Application No. 2000-006064, filed January 11, 2000. For purposes of these invalidity contentions, Defendant applies the Jan. 11, 2000, priority date for the '493 Patent. However, Defendant reserves the right to contest Plaintiff's reliance on the Jan. 11, 2000 priority date, should the priority date become an issue in this proceeding.

U.S. Patent No. 7,903,162 to Juen ("Juen") filed on March 9, 2005, as a continuation of application No. 09/951,417 that was filed on September 14, 2001, which is a continuation of application No. 08/937,805 that was filed on September 25, 1997, which claims priority to a provisional application filed March 27, 1997; and Juen issued on March 8, 2011. Based at least on the filing date of September 25, 1997 of application No. 08/937,805, Juen qualifies as prior art with regard to the '493 Patent at least under 35 U.S.C. § 102(e) (pre-AIA).

U.S. Patent No. 6,335,760 to Sato ("Sato") was filed on March 24, 1998, and issued on January 1, 2002. Sato qualifies as prior art with regard to the '493 Patent at least under 35 U.S.C. § 102(e) (pre-AIA).

U.S. Patent No. 6,661,451 to Kijima, et al. ("Kijima") was filed on October 30, 1997, and issued on December 9, 2003. Kijima qualifies as prior art with regard to the '493 Patent at least under 35 U.S.C. § 102(e) (pre-AIA).

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U.S. Patent No. 6,529,236 to Watanabe ("Watanabe") was filed on September 12, 1997, and issued on March 4, 2003. Watanabe qualifies as prior art with regard to the '493 Patent at least under 35 U.S.C. § 102(e) (pre-AIA).
U.S. Patent No. 6,563,535 to Anderson ("Anderson") was filed on May 19, 1998, and issued on May 13, 2003. Anderson qualifies as prior art with regard to the '493 Patent at least under 35 U.S.C. § 102(e) (pre-AIA).

U.S. Patent No. 5,444,482 to Misawa et al. ("Misawa") issued on August. 22, 1995. Misawa qualifies as prior art with regard to the '493 Patent at least under 35 U.S.C. § 102(b) (pre-AIA).

U.S. Patent No. 5,502,483 to Takase et al. ("Takase") issued on March 26, 1996. Takase qualifies as prior art with regard to the '493 Patent at least under 35 U.S.C. § 102(b) (pre-AIA).

U.S. Patent No. 4,612,575 to Ishman et al. ("Ishman") issued on September 16, 1986. Ishman qualifies as prior art with regard to the '493 Patent at least under 35 U.S.C. § 102(b) (pre-AIA).

Juen anticipates or renders obvious claims 1, 3, 5, and 10 under 35 U.S.C. §§ 102 and 103(a).

Alternatively, Juen in view of Sato renders obvious claims 1, 3, 5, and 10 under 35 U.S.C. § 103(a).

Alternatively, Juen in view of Kijima renders obvious claims 1, 3, 5, and 10 under 35 U.S.C. § 103(a).

Alternatively, Juen in view of Watanabe renders obvious claims 1, 3, 5, and 10 under 35 U.S.C. § 103(a).

Alternatively, Juen in view of Anderson renders obvious claims 1, 3, 5, and 10 under 35 U.S.C. § 103(a).

Alternatively, Juen in view of Sato and further in view of Kijima renders obvious claims 1, 3, 5 and 10 under 35 U.S.C. § 103(a).

Alternatively, Juen in view of Sato and further in view of Watanabe renders obvious claims 1, 3, 5, and 10 under 35 U.S.C. § 103(a).

Alternatively, any of Juen alone, Juen in view of Sato, Juen in view of Kijima, Juen in view of Anderson, Juen in view of Watanabe, Juen in view of Sato and Kijima, Juen in view of Sato and Watanabe, Juen in view of Anderson and Kijima, Juen in view of Anderson and Watanabe, and further in view of any of Misawa, Takase, or Ishman renders obvious claims 4, 6, and 11 under 35 U.S.C. § 103(a).

	A PHOSITA would have found it obvious to modify Juen's device to have an image-instability detector that detects an image-instability of the electric camera, as taught by Misawa. Like Misawa, Juen teaches a similar electronic camera that can display a reduced-resolution image on a display screen. *Juen* at Abstract. A PHOSITA would have been motivated to modify Juen's image signal reproduction device to enable a moving video mode as expressly taught by Juen and to support an image-instability detector as taught by Misawa, thereby improving similar devices in the same way. Such a combination of prior art elements according to known methods would have yielded predictable results with a reasonable expectation of success. Alternatively, Takase teaches an electric camera according to claim 3, comprising: an image-instability detector which detects an image-instability of the electric camera. *The present invention relates to a video camera apparatus using an imager and, more particularly, is directed to a video camera apparatus having a function to electronically correct an image vibration caused by a handling or the like.* *Takase* at 1:5-8. *FIG. 3 is a block diagram showing a video camera apparatus according to a first embodiment of the present invention. As shown in FIG. 1, a video camera apparatus of the present invention comprises an optical lens 1, an imager 2, a photo-sensitive pixel area 3, a scanning area 4, a scanning pulse generating circuit 6, a signal processing circuit 5, an interpolation processing circuit 7 including a 1H delay circuit, a digital interface 8, a control circuit 9, a control switch 10, an output terminal 11 and a vibration detection sensor 12.* *Takase* at 3:38-47. *The vibration detection sensor 12 detects vibrations of horizontal and vertical directions of the video camera apparatus when a handling occurs, and outputs a detected signal. When the control switch 10 is depressed, the control circuit 9 reads the detected signal d of the vibration detection sensor 12 and calculates*

	Misawa at Fig. 4B; *see also id.* at Abstract, 1:10-15, 10:37-68, Figs. 1, 3. A PHOSITA would have found it obvious to modify Juen's device to include the signal processing unit generates image signals by using the part of signal charges mixed or culled at pixel intervals of K2 pixels, the part being changed according to an amount of image-instability detected by the instability detector to correct the image-instability, during the moving video mode as taught by Misawa. Like Misawa, Juen teaches a similar electronic camera that can display a reduced-resolution image on a display screen. *Juen* at Abstract. A PHOSITA would have been motivated to modify Juen's image signal reproduction device to enable a moving video mode as expressly taught by Juen and to support an image-instability detector to correct the image-instability during the moving video mode as taught by Misawa, thereby improving similar devices in the same way. Such a combination of prior art elements according to known methods would have yielded predictable results with a reasonable expectation of success. Takase teaches wherein the signal processing unit generates image signals by using the part of signal charges mixed or culled at pixel intervals of K2 pixels, the part being changed according to an amount of image-instability detected by the instability detector to correct the image-instability, during the moving video mode. *The vibration detection sensor 12 detects vibrations of horizontal and vertical directions of the video camera apparatus when a handling occurs, and outputs a detected signal. When the control switch 10 is depressed, the control circuit 9 reads the detected signal d of the vibration detection sensor 12 and calculates a moving amount of the scanning area of the imager 2 within the photo)sensitive pixel area of the imager 2 in order to cancel the picture vibration occurred due to the handling or the like. Then, the control circuit 9 supplies data to the scanning pulse generating circuit 5 which generates a scanning pulse used to energize the imager 2 to perform the scanning in response to the calculated moving amount and the interpolation processing circuit 7.* *Takase* at 3:57-4:3.