

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Valeo, Inc.; Valeo S.A.; Valeo GmbH; Valeo Schalter und Sensor GmbH;
Connaught Electronics Ltd.
Petitioners,

v.

Magna Electronics Inc.
Patent Owner

Patent No. 7,877,175
Issued: January 25 2011
Filed: April 21, 2010
Inventor: Michael J. Higgins-Luthman
Title: IMAGING SYSTEM FOR VEHICLE

Inter Partes Review No. _____

Declaration of Dr.-Ing. Jan-Michael Frahm Regarding

U.S. Patent No. 7,877,175

Declaration of Dr.-Ing. Jan-Michael Frahm

Patent No. 7,877,175

Filed: 11/17/10

I, Dr.-Ing. Jan-Michael Frahm, do hereby declare and state, that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: December 3, 2013

A handwritten signature in blue ink, appearing to read "Jan-Michael Frahm", is written over a horizontal line.

Declaration of Dr.-Ing. Jan-Michael Frahm

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I. INTRODUCTION

A. ENGAGEMENT

1. I have been retained by counsel for Valeo, Inc., Valeo S.A., Valeo GmbH, Valeo Schalter und Sensor GmbH and Connaught Electronics Ltd., as an expert witness in the above-captioned proceeding. I have been asked to render an opinion regarding the validity of claims 1-12, 15-19, and 21 of U.S. Patent No. 7,877,175 (“the ’175 patent”), which is submitted herewith as Petition Exhibit 1001¹. The following is my written report on that topic.

A. BACKGROUND AND QUALIFICATIONS

2. I am currently an Assistant Professor of Computer Science at the University of North Carolina at Chapel Hill in the Department of Computer Science. I am also the head of the 3D Computer Vision Group in the Department of Computer Science.

3. Since the mid 1990s, I have studied and worked in the field of computer science and engineering. My experience includes research and teaching, with research interests in 3D camera vision technology, including issues arising out of camera motion, camera self-calibration, and multi-camera systems.

¹In this declaration, citations to “Pet. Ex. [No.]” refer to exhibits to Valeo's Petition for *Inter Partes* Review of U.S. Patent No. 7,877,175. Citations to “Att. [A, B, C, etc.]” refer to documents attached to this declaration that are not cited as exhibits in Valeo’s *Inter Partes* Review Petition of U.S. Patent No. 7,877,175.

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