

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC.,
Petitioner,
v.

VEDANTI SYSTEMS LIMITED¹,
Patent Owner.

Case IPR2016-00212²
Patent 7,974,339 B2

**MOTION FOR OBSERVATION OF CROSS-EXAMINATION OF DR.
JOHN R. GRINDON**

¹ Vedanti Systems Limited has assigned the patent to the current patent owner, Vedanti Licensing Limited.

² Case IPR2016-00215 has been consolidated with this proceeding.

Patent Owner Vedanti Licensing Limited files this motion for observation of the testimony of Dr. John R. Grindon obtained on December 29, 2016 (filed herewith as Exhibit 2025), during the cross-examination of his Supplemental Declaration (Exhibit 1030).

Observation No. 1

In Exhibit 2025, on page 14, line 14 to page 15, line 7, Dr. Grindon testified that he does not recall having taken any coursework in discrete cosine transform image compression. This testimony is relevant to the credibility of Dr. Grindon's position as to how a POSA would have interpreted and used the teachings of the patent by Thyagarajan entitled Contrast Sensitive Variance Based Adaptive Block Size DCT ["Discrete Cosine Transform"] Image Compression.

Observation No. 2

In Exhibit 2025, on page 15, line 8 to page 16, line 14 and page 9, lines 9-21, Dr. Grindon could not identify any specific experience with discrete cosine transform image compression and instead referred to his general knowledge of mathematical methods and his position that a person of ordinary skill in his view did not require knowledge or experience in compression. This testimony is relevant to the credibility of Dr. Grindon's position as to how a POSA would have interpreted and

used the teachings of the patent by Thyagarajan directed to Contrast Sensitive Variance Based Adaptive Block Size DCT [“Discrete Cosine Transform”] Image Compression.

Observation No. 3

In Exhibit 2025, on page 42, line 4 to page 43, line 5, Dr. Grindon testified that his coursework extended to compression generally, “not specifically image compression in the formal college work.” This testimony is relevant to the credibility of Dr. Grindon’s testimony using a POSA standard that specifically included coursework or experience in compression.

Observation No. 4

In Exhibit 2025, on page 35, line 15 to page 40, line 10, Dr. Grindon testified that we should not consider the criteria used by Thyagarajan in making a subdivision decision and rather should follow a criteria for subdivision he says comes from Belfor based upon similarity of spatial frequency in the image. This argument is relevant to Dr. Grindon’s opinion that the asserted ground relies upon a simple substitution into Belfor of the quadtree method having pixel variation as a test suggested by Thyagarajan, which would be replaced by the pixel variation edge detector of Golin.

Observation No. 5

In Exhibit 2025, on page 44, line 10-page 45, line 5, Dr. Grindon confirmed that blocks would be subdivided to cover regions of similar spatial frequency. This argument is relevant to Dr. Grindon's opinion that the asserted ground relies upon a simple substitution into Belfor of the quadtree method having pixel variation as a test suggested by Thyagarajan, which would be replaced by the pixel variation edge detector of Golin.

Dated: January 10, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing MOTION FOR OBSERVATION OF CROSS-EXAMINATION OF DR. JOHN R. GRINDON, was served on January 10, 2017, by filing this document through the PTAB E2E System as well as delivering a copy via electronic mail directed to the attorneys of record for the Patent Owner at the following address:

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