UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

RED.COM,
Patent Owner

Declaration of Cliff Reader, Ph.D.
under 37 C.F.R. § 1.68

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I. INTRODUCTION

1. I am making this declaration at the request of Apple Inc. in the matter of the *inter partes* review of U.S. Patent No. 9,245,314 ("the '314 Patent") to Jannard, *et al*.

2. I am being compensated for my work in this matter at the rate of $600/hour. 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 1-30 of the '314 Patent are unpatentable, either because they are anticipated or 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. After careful analysis it is my opinion that all of the limitations of claims 1-30 would have been obvious to a POSITA.

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

- The '314 Patent, Ex. 1001;
- The prosecution history of the '314 Patent, Ex. 1002;
- U.S. Patent No. 9,565,419 to Presler ("Presler"), Ex. 1005;
- U.S. Patent No. 7.656,561 to Molgaard et al. ("Molgaard"), Ex. 1006;

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- Ning Zhang et al., "Lossless Compression of Color Mosaic Images," IEEE Transactions in Image Processing, vol. 16, no. 6 (June 2006) ("Zhang"), Ex. 1007;
- Ben Long, REAL WORLD APERTURE, 1st ed. (July 21, 2006) ("Long"), Ex. 1008;
- "Serial ATA Revision 2.6" ("ATA"), Ex. 1009;
- U.S. Provisional Application No. 60/911,196 ("The '196 Application"), Ex. 1010;
- U.S. Provisional Application No. 61/017,406 ("The '406 Application"), Ex. 1011;
- U.S. Provisional Application No. 60/923,339 ("The '339 Application"), Ex. 1012;
- U.S. Patent No. 7,349,574 to Sodini et al. ("Sodini"), Ex. 1013;
- U.S. Patent No. 8,170,402 to Frost-Ruebling et al. ("Frost"), Ex. 1014; and
- U.S. Patent No. 3,971,065 to Bayer ("Bayer"), Ex. 1016.

5. In forming the opinions expressed below, I have considered:

a) The documents listed above;

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