

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

RED.COM, LLC,
Patent Owner.

Case No. IPR2019-01065
Patent No. 9,245,314

**DECLARATION OF PETER JARRED LAND IN SUPPORT OF
PATENT OWNER RED.COM, LLC'S PRELIMINARY RESPONSE**

RED.COM Ex. 2017
Apple v. RED.COM

I, Peter Jarred Land, declare and state as follows:

1. I am President of RED.COM (“RED”), the assignee of U.S. Patent Nos. 9,230,299 (“the ’299 patent”) and 9,245,314 (the ’314 patent). I am submitting this declaration in connection with Patent Owner Preliminary Responses to IPR2019-01064 and IPR2019-01065, filed by Petitioner Apple Inc., relating to the ’299 and ’314 patents, respectively.

2. I joined RED in 2005, and was involved in the development of the RED ONE camera from its earliest stages. My title on the RED ONE project was Fire Chief, which characterized my responsibility for addressing any immediate issues that arose day-to-day to keep the RED ONE project moving forward.

3. I had personal involvement with the testing of the RED ONE camera, nicknamed Boris, that took place at RED headquarters in March 2007. Specifically, members of the RED team, including myself, tested the visual output of Boris in preparation for the 2007 National Association of Broadcasters show (“NAB 2007”) to be held in Las Vegas in April. Members of the RED Team who were also present for that event included Jim Jannard, Graeme Nattress, Ted Schilowitz, David Macintosh and Stuart English. I recall Graeme Nattress taking pictures during that testing. I have reviewed **Exhibits 2002-2008** that I understand are attached to Mr. Nattress’s declaration that is also being submitted with these Patent Owner Preliminary Responses to IPR2019-01064 and IPR2019-01065. I

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can confirm that **Exhibits 2002-2008** depict RED's testing of the Boris RED ONE camera at RED's headquarters in March 2007.

4. I appear in **Exhibits 2003 and 2005**. In **Exhibit 2003**, reproduced below, I am shown on the right wearing a brown shirt and gray hat.



In **Exhibit 2005**, reproduced below, I am adjusting Boris's focus as it sits atop a tripod.



5. With regard to the photos reflected in **Exhibits 2006, 2007 and 2008**, reproduced below, respectively, I recall Messrs. Schilowitz and Macintosh sitting for the test shots reflected in those photos. I also recall viewing the output of that test video and confirming upon visual inspection that the raw compressed video shot by Boris displayed as visually lossless when decompressed and demosaiced. I also recall that the program used to display Boris's test video reported that Boris's video achieved 4K resolution at 24 frames per second, which can be seen in the annotation and enlargement of **Exhibit 2008** below.

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Ex. 2006.



Ex. 2007.

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