

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Amazon.com, Inc. and Amazon.com Services LLC,
Petitioner

vs.

LightGuide, Inc.,
Patent Owner

IPR2024-00130
U.S. Patent No. 9,658,614

DECLARATION OF FREDERIK KJELDSSEN

I, Frederik Kjeldsen, declare as follows:

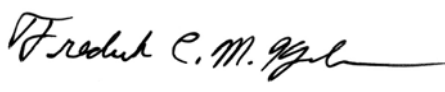
I. INTRODUCTION

1. I am an engineer who currently resides in Poughkeepsie, New York. I am retired from International Business Machines Corporation (“IBM”) after working there for 33 years. For 27 of those years I worked for the IBM Watson Research Center in Yorktown, New York. My research work focused on various applications of computer vision.
2. During my time at IBM I authored or co-authored nearly 50 academic articles, including the following:
 - Claudio S. Pinhanez, Frederik C. Kjeldsen, Anthony Levas, Gopal S. Pingali, Mark E. Podlaseck, Paul B. Chou, *Ubiquitous Interactive Graphics* (dated May 17, 2002) (Ex. 1011) (cited as “Pinhanez”)
3. I have confirmed that Exhibit 1011 is a true and correct copy of the article that my team and I published. As discussed below, I also have personal knowledge that this article was available to the community of interested researchers. Pinhanez, and most other publications produced as part of the Everywhere Display project, have been continuously available on the internet from the time of their publication to this day at various web sites of

ED-projector group members, IBM's publications web pages and sites such as CiteSeer, ResearchGate and IEEE Xplore.

4. Pinhanez (Ex. 1011) is a paper that I co-authored in connection with the Everywhere Display Projector team. This is an IBM research report titled *Ubiquitous Interactive Graphics* dated May 17, 2002. This research report was published and available to the public through the IBM Research website through some combination of Claudio Pinhanez's webpage, other team member's web pages, the ED-Projector webpage or IBM's library database, all of which were public-facing and available using a standard web browser without a password. Although I do not recall specifically when this paper was published, I know that it was available at the latest in 2003 because I recall referencing this paper to interested parties quite often. Additionally, the paper would have been available to anyone running a web search for the ED-projector project, as the ED-projector website would have been indexed by those search engines. I specifically recall individuals mentioning that they found the ED-projector project website via the web.
5. I declare under penalty of perjury that the foregoing is true and correct.

Date: October 20, 2023

By: 
Frederik Kjeldsen