UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C. 20436

Before The Honorable Cameron Elliot
Administrative Law Judge

In the Matter of **CERTAIN VIDEO CAPABLE ELECTRONIC DEVICES, INCLUDING COMPUTERS, STREAMING DEVICES, TELEVISIONS, AND COMPONENTS AND MODULES THEREOF**	**Inv. No. 337-TA-1380**

RESPONDENTS' CORRECTED IDENTIFICATION OF EXPERT WITNESSES

Pursuant to the Procedural Schedule (Order No 13), Respondents Amazon.com, Inc. and Amazon.com Services LLC, and HP Inc. (collectively "Respondents"), by and through their counsel, hereby provide identification of expert witnesses who may offer testimony at the hearing in this matter. Respondents reserve their right to rely upon the testimony from any of the experts identified herein.

I. SCOTT ACTON

Dr. Scott Acton earned his Ph.D. in Electrical & Computer Engineering from the University of Texas, Austin, in 1999. He is the current Chair of the Electrical & Computer Engineering department at the University of Virginia and oversees the Virginia Image and Video Analysis laboratory. He has published many journal articles and books. He was the Acting Deputy Division Director and Program Director at the Directorate for Computer and Information Science and Engineering with the National Science Foundation from 2019-2022 and the Editor-in-Chief of IEEE Transactions on Image Processing from 2014-2018. Dr. Acton was honored as an IEEE Fellow in 2013 and served as the Editor-in-Chief of IEEE Transactions on Image Processing from 2014-2018. A copy of Dr. Acton's curriculum vitae is attached as Exhibit A.

Dr. Acton may provide expert testimony regarding the technical background of the asserted patents, the construction claims and claim terms of the asserted patents, the knowledge of a person of ordinary skill in the art, the scope and content of the prior art, the invalidity or unenforceability of the asserted patents; the design, structure, function, and operation of the accused products and the purported domestic industry products, the noninfringement and failure of the accused products to practice the asserted patent claims, the failure of the purported domestic industry products to practice the asserted patents, and other issues in connection with invalidity, noninfringement, other defenses, and any other technical issues that may arise. Dr. Acton may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

II. CHARLES CREUSERE

Professor Creusere holds a Doctor of Philosophy and Master of Science Degree in Electrical and Computer Engineering from the University of California at Santa Barbara, as well as a Bachelor of Science Degree in Electrical and Computer Engineering from the University of California at Davis. Professor Creusere is presently the holder of the Frank Carden Endowed Chair in Telemetering & Telecommunications and a full professor at the New Mexico State University. Professor Creusere was also a Senior Area Editor for IEEE Transactions on Image Processing.

Dr. Creusere may provide expert testimony regarding the technical background of the asserted patents, the construction claims and claim terms of the asserted patents, the knowledge of a person of ordinary skill in the art, the scope and content of the prior art, the invalidity or unenforceability of the asserted patents; the design, structure, function, and operation of the accused products and the purported domestic industry products, the noninfringement and failure of the accused products to practice the asserted patent claims, the failure of the purported domestic industry products to practice the asserted patents, and other issues in connection with invalidity, noninfringement, other defenses, and any other technical issues that may arise. Dr. Creusere may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other

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issues asserted by Complainants. A copy of Dr. Creusere's curriculum vitae is attached as Exhibit B.

III. FELIX DASSER

Dr. Dasser earned his juris doctorate summa cum laude from the University of Zurich and an L.L.M. from Harvard Law School in 1989 and 1990, respectively. He is a Partner at Homberger and a visiting professor at the China University of Political Science and Law. Dr. Dasser lectures and publishes regularly in the fields of international commercial dispute resolution and international business law and recently taught at the Hague Academy of International Law. A copy of Dr. Dasser's curriculum vitae is attached as Exhibit C.

If called upon to testify, Dr. Dasser may provide expert testimony regarding the regarding the remedy, public interest, as well as the enforceability of the Patents-in-Suit, including ITU, JVT, and VCEG IPR policies, licensing negotiations, RAND, and Swiss law. Dr. Dasser may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

IV. BARBARA A. FREDERIKSEN-CROSS

Ms. Frederiksen-Cross earned her Associate degree in Applied Science in Computer Programming in 1974 and has over 50 years of experience in the computer industry. Ms. Frederiksen-Cross is the Director of Litigation Services at JurisLogic and has provided her expertise in 35 patent cases involving software, source code, and prior art. Her experience extends to software development, negotiations, and licensing. A copy of Ms. Frederiksen-Cross's curriculum vitae is attached as Exhibit D.

Ms. Frederiksen-Cross may provide expert testimony regarding the technical background of the asserted patents, the construction claims and claim terms of the asserted patents, the knowledge of a person of ordinary skill in the art, the scope and content of the prior art, the invalidity or unenforceability of the asserted patents; the design, structure, function, and operation of the accused products and the purported domestic industry products, the noninfringement and failure of the accused products to practice the asserted patent claims, the failure of the purported

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domestic industry products to practice the asserted patents, and other issues in connection with invalidity, noninfringement, other defenses, and any other technical issues that may arise. Ms. Frederiksen-Cross may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

V. STEVEN GOLSON

Mr. Golson holds a Bachelor of Science Degree in Earth, Atmospheric and Planetary Sciences from the Massachusetts Institute of Technology. He has extensive experience in the design and analysis of circuits, including VLSI design, computer architecture and memory systems, digital hardware design, developing synthesis, static timing, and physical design methodologies (flows) for integrated circuits using a variety of design tools. A copy of Mr. Golson's curriculum vitae is attached as Exhibit E.

Mr. Golson may provide expert testimony regarding the technical background of the asserted patents, the construction claims and claim terms of the asserted patents, the knowledge of a person of ordinary skill in the art, the scope and content of the prior art, the invalidity or unenforceability of the asserted patents; the design, structure, function, and operation of the accused products and the purported domestic industry products, the noninfringement and failure of the accused products to practice the asserted patent claims, the failure of the purported domestic industry products to practice the asserted patents, and other issues in connection with invalidity, noninfringement, other defenses, and any other technical issues that may arise. Mr. Golson may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

VI. JOSEPH HAVLICEK

Dr. Joseph P. Havlicek earned his Ph.D. in Electrical Engineering from The University of Texas in 1996. Dr. Kavlicek joined the University of Oklahoma in 1997 and serves as the Gerald Tuma Presidential Professor & Williams Companies Foundation Presidential Professor at the University of Oklahoma, School of Electrical and Computer Engineering, and the Director at the OU Center for Intelligent Transportation Systems. He received the Outstanding Reviewer

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Recognition Award at the 2022 IEEE International Conference on Acoustics, Speech, and Signal Processing. Dr. Havlicek is a Senior Member of the IEEE and actively contributes to the IEEE Signal Processing Society, the IEEE Intelligent Transportations System Society, and the IEEE Computer society. A copy of Dr. Havlicek's curriculum vitae is attached as Exhibit F.

Dr. Havlicek may provide expert testimony regarding the technical background of the asserted patents, the construction claims and claim terms of the asserted patents, the knowledge of a person of ordinary skill in the art, the scope and content of the prior art, the invalidity or unenforceability of the asserted patents; the design, structure, function, and operation of the accused products and the purported domestic industry products, the noninfringement and failure of the accused products to practice the asserted patent claims, the failure of the purported domestic industry products to practice the asserted patents, and other issues in connection with invalidity, noninfringement, other defenses, and any other technical issues that may arise. Dr. Havlicek may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

VII. LINA KARAM

Dr. Karam earned her Ph.D. in Electrical Engineering from the Georgia Institute of Technology in 1995 and is a leading figure in the field of image and video processing. She is an Emerita Professor at Arizona State University, the President of PICARIS, and the Chief Technical Advisor of AIAEC. Dr. Karam is an expert delegate of the ISO/IEC JTC1/SC29 Committee for the coding of audio, picture, multimedia and hypermedia information and participates in JPEG/MPEG standardization activities. She was honored as an IEEE Fellow for her contributions to image and video processing, visual media coding and transmission, and digital filtering, and served as the Editor-In-Chief of the IEEE Journal on Selected Topics in Signal Processing from 2019-2021. A copy of Dr. Karam's curriculum vitae is attached as Exhibit G.

Dr. Karam may provide expert testimony regarding the technical background of the asserted patents, the construction claims and claim terms of the asserted patents, the knowledge of a person of ordinary skill in the art, the scope and content of the prior art, the invalidity or

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unenforceability of the asserted patents; the design, structure, function, and operation of the accused products and the purported domestic industry products, the noninfringement and failure of the accused products to practice the asserted patent claims, the failure of the purported domestic industry products to practice the asserted patents, and other issues in connection with invalidity, noninfringement, other defenses, and any other technical issues that may arise. Dr. Karam may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

VIII. EVAN KOVANIS

Mr. Kovanis is the Founder and President of Kovanis IP, Inc. He holds a Bachelor of Science in Computer Engineering (Honors) and a Technology Entrepreneurship Certificate, both from the University of California, Santa Barbara. Mr. Kovanis has experience with embedded firmware, GUI software, RF hardware, and database applications, as well as the creation of complex scripts and RTL for ASIC verification. A copy of Mr. Kovanis' curriculum vitae is attached as Exhibit H.

Mr. Kovanis may provide expert testimony regarding the technical background of the asserted patents, the construction claims and claim terms of the asserted patents, the knowledge of a person of ordinary skill in the art, the scope and content of the prior art, the invalidity or unenforceability of the asserted patents; the design, structure, function, and operation of the accused products and the purported domestic industry products, the noninfringement and failure of the accused products to practice the asserted patent claims, the failure of the purported domestic industry products to practice the asserted patents, and other issues in connection with invalidity, noninfringement, other defenses, and any other technical issues that may arise. Mr. Kovanis may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

IX. DIDIER LEGALL

Dr. LeGall, holds a Doctor of Philosophy and Master of Science Degree in Electrical Engineering from the University of California, Los Angeles. Dr. LeGall is the founder and

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executive Vice President of Ambarella (which provides, inter alia, ow-power, high-definition and Ultra HD video compression, image processing, and computer vision processors), and co-founder and Chief Technology Officer of C-Cube Microsystems (an early pioneer of the MPEG digital video standard, providing silicon technology for image compression of digital video and audio). Dr. LeGall was the Chair of the MPEG (ISO/IECJTC1/SC29/WG11) Video Committee and was a principal author of the MPEG-1 and MPEG-2 standards. A copy of Dr. LeGall's curriculum vitae is attached as Exhibit I.

Dr. LeGall may provide expert testimony regarding the technical background of the asserted patents, the construction claims and claim terms of the asserted patents, the knowledge of a person of ordinary skill in the art, the scope and content of the prior art, the invalidity or unenforceability of the asserted patents; the design, structure, function, and operation of the accused products and the purported domestic industry products, the noninfringement and failure of the accused products to practice the asserted patent claims, the failure of the purported domestic industry products to practice the asserted patents, and other issues in connection with invalidity, noninfringement, other defenses, and any other technical issues that may arise. Dr. LeGall may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

X. MARIO LOPEZ

Dr. Lopez earned his B.A. and Ph.D. in Economics from the University of California, Berkeley. He regularly addresses intellectual property issues in litigation matters and has been involved in several high-profile disputes involving fair, reasonable, and non-discriminatory (FRAND) cases. He has valued patent rights related to several technical standards, including cellular (2G GSM, 3G-WCDMA and CDMA, and 4G-LTE), Wi-Fi (802.11), AAC, H.264, HEVC (H.265), AMR-WB/EVS and MoCa standards, among others. A copy of Dr. Lopez's curriculum vitae is attached as Exhibit J.

Dr. Lopez may provide expert testimony relating to the economics of issues relating to FRAND obligations, the public interest, and the appropriate remedy should the Commission find

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a violation of Section 337. Dr Lopez may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

XI. NISHA MODY

Dr. Nisha Mody earned her Ph.D. in Political Economy and Public Policy from the University of Southern California in 1999 and is now the Managing Director of Intensity. Dr. Mody has over two decades of experience in consulting and economic research. She specializes in providing economic insight for intellectual property, business valuation, antitrust, and unfair business practice cases. Dr. Mody's substantial expertise underpins her reputation for performing rigorous economic and financial analyses. A copy of Dr. Mody's curriculum vitae is attached as Exhibit K.

Dr. Mody may offer opinions and/or testimony in this Investigation relating to the economics of Complainants' purported domestic industry (or lack thereof), issues relating to FRAND obligations, the public interest, and the appropriate remedy and/or bond rate should the Commission find a violation of Section 337, including the scope of remedy, and secondary considerations of non-obviousness, including without limitation the commercial success of Complainant's alleged inventions. Dr. Mody may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

XII. BRIAN NAPPER

Mr. Napper earned a Bachelor of Science in Business Administration, Accounting and Finance from the University of California, Berkeley. He is the Senior Managing Director of Ocean Tomo. Mr. Napper has over 30 years of experience in intellectual property evaluation and economic damage quantification arising from patent, copyright and trademark infringement and trade secret misappropriation disputes. He has experience in determining FRAND/RAND rates for standard essential patents in a variety of situations and is versed in the standards for Telecom, WiFi, MPEG 2 and MPEG4, and ATSC, among others. Mr. Napper has guest lectured at law schools across the U.S. and is a member of The Sedona Conference Working Group focusing on

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SEP and FRAND licensing issues. A copy of Mr. Napper's curriculum vitae is attached as Exhibit L.

Mr. Napper may provide expert testimony relating to the economics of issues relating to FRAND obligations, the public interest, and the appropriate remedy should the Commission find a violation of Section 337. Mr. Napper may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

XIII. ELI SABER

Dr. Saber earned his Ph.D. in 1996 from the University of Rochester. He is a Professor in the Electrical and Microelectronic Engineering Department at the Rochester Institute of Technology. Dr. Saber is a senior member of the IEEE and the Imaging Science and Technology society, a former member of the Image and Multi-dimensional Digital Signal Processing Technical Committee and member and former chair of the IEEE Industry Technology Committee. He served as an Associate Editor for the IEEE Transaction on Image Processing and is currently serving as an Area Editor for the Journal of Electronic Imaging. Dr. Saber has been honored by the Rochester Institute of Technology with the Trustees Scholarship and the PI Millionaire awards. A copy of Dr. Saber's curriculum vitae is attached as Exhibit M.

Dr. Saber may provide expert testimony regarding the technical background of the asserted patents, the construction claims and claim terms of the asserted patents, the knowledge of a person of ordinary skill in the art, the scope and content of the prior art, the invalidity or unenforceability of the asserted patents; the design, structure, function, and operation of the accused products and the purported domestic industry products, the noninfringement and failure of the accused products to practice the asserted patent claims, the failure of the purported domestic industry products to practice the asserted patents, and other issues in connection with invalidity, noninfringement, other defenses, and any other technical issues that may arise. Dr. Saber may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

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XIV. DANIEL SCHONFELD

Dr. Schonfeld earned his Ph.D. in 1990 from the John Hopkins University, Baltimore, Maryland. Dr. Schonfeld is a well-known figure in electrical and computer engineering. Dr. Schonfeld joined the University of Illinois in 1990 and is currently a Professor in the Departments of Electrical and Computer Engineering, Computer Science, and Biomedical Engineering. His tenure includes co-directing the Multimedia Communications Laboratory and contributing to the Signal and Image Research Laboratory. He has also served as Director of the University-Industry Engineering Research Center, also known as the Manufacturing Research Center. He has been honored as an Institute of Electrical and Electronics Engineers (IEEE) Fellow for his contributions to image and video analysis and currently serves on the IEEE Multimedia Communications Technical Committee and IEEE Visual Signal Processing and Communications Technical Committee. A copy of Dr. Schonfeld's curriculum vitae is attached as Exhibit N.

Dr. Schonfeld may provide expert testimony regarding the technical background of the asserted patents, the construction claims and claim terms of the asserted patents, the knowledge of a person of ordinary skill in the art, the scope and content of the prior art, the invalidity or unenforceability of the asserted patents; the design, structure, function, and operation of the accused products and the purported domestic industry products, the noninfringement and failure of the accused products to practice the asserted patent claims, the failure of the purported domestic industry products to practice the asserted patents, and other issues in connection with invalidity, noninfringement, other defenses, and any other technical issues that may arise. Dr. Schonfeld may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

XV. TIMOTHY SIMCOE

Dr. Timothy S. Simcoe earned his Ph.D. in Business Administration from the University of California, Berkeley, in 2004. Dr. Simcoe currently serves as Professor of Strategy & Innovation at Boston University's Question School of Business. Dr. Simcoe served as a Senior Economist to the President's Council of Economic Advisers in 2014-2015. He is a member of several prestigious

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professional organizations including the American Economics Association, Academy of Management, Strategy Research Forum, and the International Society for New Institutional Economics. A copy of Dr. Simcoe's curriculum vitae is attached as Exhibit O.

Dr. Simcoe may provide opinions and/or testimony in this Investigation relating to the economics of Complaints' purported domestic industry (or lack thereof), issues relating to FRAND obligations, the public interest, and the appropriate remedy and/or bond rate should the Commission find a violation of Section 337. Dr. Simcoe may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

XVI. JIM STOERER

Dr. Storer earned his Ph.D. in Computer Science from Princeton University in 1979 and has worked as a Professor of Computer Science at Brandeis University since 1993. Dr. Storer is an active member of the Association for Computing Machinery and IEEE Computer Society and has acted as a referee for many prestigious journals across computer science. He is the published author of numerous papers, technical reports, and books and is actively involved in various conferences related to data compression, including founding the Annual IEEE Data Compression Conference in 1991. A copy of Dr. Storer's curriculum vitae is attached as Exhibit P.

Dr. Storer may provide expert testimony regarding the technical background of the asserted patents, the construction claims and claim terms of the asserted patents, the knowledge of a person of ordinary skill in the art, the scope and content of the prior art, the invalidity or unenforceability of the asserted patents; the design, structure, function, and operation of the accused products and the purported domestic industry products, the noninfringement and failure of the accused products to practice the asserted patent claims, the failure of the purported domestic industry products to practice the asserted patents, and other issues in connection with invalidity, noninfringement, other defenses, and any other technical issues that may arise. Dr. Storer may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

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XVII. STEVE WALDBUSSER

Mr. Waldbusser is a graduate of the Computer Engineering Program at Carnegie Mellon University and joined Carnegie Mellon as a full-time employee in 1987. Mr. Waldusser developed standards, software, and systems integral to the architecture of modern inter, and contributed to the IETF networking standards. Mr. Waldbusser is the creator of Net-SNMP Open-Source Software. In 2007, Network World named him one of the "Top Network Inventors of All Time." A copy of Mr. Waldbusser's curriculum vitae is attached as Exhibit Q.

Mr. Waldbusser may provide expert testimony regarding the technical background of the asserted patents, the construction claims and claim terms of the asserted patents, the knowledge of a person of ordinary skill in the art, the scope and content of the prior art, the invalidity or unenforceability of the asserted patents; the design, structure, function, and operation of the accused products and the purported domestic industry products, the noninfringement and failure of the accused products to practice the asserted patent claims, the failure of the purported domestic industry products to practice the asserted patents, and other issues in connection with invalidity, noninfringement, other defenses, and any other technical issues that may arise. Mr. Waldbusser may further offer opinions and/or testimony in rebuttal to Complainants' expert testimony and/or other issues asserted by Complainants.

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Date: April 12, 2024

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CERTIFICATE OF SERVICE

I hereby certify that a copy of **RESPONDENTS' IDENTIFICATION OF EXPERTS WITNESSES** has been served on April 12, 2024, as indicated, on the following:

The Honorable Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E. Street, S.W., Room 112A Washington, DC 20436	☐ First Class Mail ☐ Overnight Delivery ☐ EDIS ☐ Email
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