

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC., AMAZON.COM SERVICES, LLC,
Petitioner

v.

NOKIA TECHNOLOGIES OY,
Patent Owner

Case: IPR2024-00626
U.S. Patent No. 11,805,267

DECLARATION OF DR. IAIN RICHARDSON

I, Dr. Iain Richardson, declare as follows:

1. I have been a professional in the field of video coding for over 35 years.
2. I received a Master of Engineering (M.Eng.) degree in Electronic and Electrical Engineering from Heriot-Watt University in Edinburgh, Scotland in 1990. I received a Doctor of Philosophy (Ph.D.) degree in Video Compression from Robert Gordon University in Aberdeen, Scotland in 1999. I worked as a Digital Signal Processing (“DSP”) Hardware Designer with GEC Avionics Ltd. from 1990 to 1993.
3. After receiving my doctorate, I obtained a full professorship in the field of image and video compression in the School of Engineering at Robert Gordon University. While there, I founded and ran an image communication technology research laboratory which carried out original research in the field of data, image, and video compression. I am the author of five books and over 70 journal and conference papers on video and image coding and communication, including two widely cited books on the H.264 / MPEG-4 industry standards for video compression, a book that covers the H.265 / HEVC industry standard and papers published in peer-reviewed journals including IEEE Transactions on Circuits and Systems for Video Technology.
4. I have been closely involved with the field of data, image and video compression for many years and have founded and operated several companies in the space. In 2007, I founded Vcodex Ltd., which provides technical and strategic

advice to technology companies in the space. I currently serve as the CEO of Vcodex Ltd. I also founded and served as CEO of Onecodec Ltd. until its eventual merger with Vcodex Ltd. in 2015.

5. I am the named inventor on 11 patents or patent applications. I have received patent grants from the United States Patent and Trademark Office (“USPTO”), the European Patent Organization (“EPO”), and the World Patent Organization.

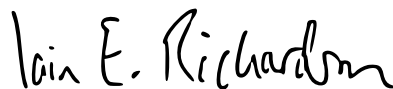
6. From experience, I am familiar with the EPO’s website, <https://www.epo.org>. The EPO’s website provides official information regarding patents as well as news and information related to the EPO and to prominent figures related to European intellectual property. Based on my experience, I understand information on the EPO’s website to be reliable. I am also aware that the USPTO includes a description of the EPO and a link to the same www.epo.org website on its own webpage. Ex-2020.

7. I have reviewed Ex-2017, a webpage from the EPO’s website titled “Marta Karczewicz.” Ex-2017 is a short discussion of the achievements of Marta Karczewicz which the EPO published as part of a series on the “50 Leading Tech Voices.” This series was published during the EPO’s celebration of the 50th anniversary of the European Patent Convention which formed the EPO.

8. I am familiar with Dr. Karczewicz and her work in video coding. Based on my experience of Dr. Karczewicz's work and achievements, Ex-2017's characterization of Dr. Karczewicz's achievements is accurate. I was familiar with the achievements of Dr Karczewicz listed in Ex-2017 prior to my involvement in this IPR proceeding. For example, these achievements are consistent with biographies of Dr Karczewicz that I have read in peer-reviewed journal articles such as articles published in the IEEE Transactions on Circuits and Systems for Video Technology.

9. I declare that all statements made herein of my knowledge are true, and that all statements made on information and belief are believed to be true, and that these statements are made with the knowledge that willful false statements and the like so made are punishable by fine, imprisonment, or both, under 18 U.S.C. § 1001.

Dated: January 7, 2024



Dr. Iain Richardson