

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SONY CORPORATION  
Petitioner

Patent No. 6,665,003

Issue Date: Dec. 16, 2003

Title: SYSTEM AND METHOD FOR GENERATING AND DISPLAYING  
PANORMAIC IMAGES AND MOVIES

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*Inter Partes* Review No. IPR2013-00326

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DECLARATION OF KOUICHI MATSUDA



I, Kouichi Matsuda, do hereby make the following declaration:

1. The statements contained in this declaration are based on my personal knowledge.
2. I am a Chief Distinguished Researcher at Sony Corporation and have been employed by Sony since 1995. I have a Master's degree in artificial intelligence and a Doctorate in distributed virtual environment technology. In November 1997, I was a Researcher at the Architecture Laboratory and my job responsibilities included research relating to virtual reality.
3. From June 1997 until approximately 2001, I served as an operating director of SIG-CyberSpace ("SIG-CS") – a special interest group of an academic society named the Virtual Reality Society of Japan ("VRS").
4. In the November 1997 time frame, VRS was an academic society for individuals (mostly engineers, scientists and students) interested in virtual reality and related technologies, including 3D technology. SIG-CS organized symposiums and meetings, and its objective was to offer a forum for discussing academic research regarding virtual reality applications such as networked communities.
5. As a matter of general practice during my tenure as an operating director, the symposiums and meetings that were organized by SIG-CS were open to members, students, and the general public, and information and materials

distributed at such events were publicly available and not subject to any confidentiality restrictions. Both members and non-members also had access to printed materials related to SIG-CS symposiums and meetings. VRS had a website that could be viewed by any interested member of the general public, and information and announcements about SIG-CS symposiums and meetings were posted on this website.

6. I was operating director of SIG-CS on November 27, 1997, when SIG-CS held a meeting at the Landmark Tower in Yokohama City, Kanagawa Prefecture. The preparations for this meeting included the following: planning the subjects to be presented, handling registration of applications, choosing and organizing the papers that would be presented and the order of such presentations, collecting papers that corresponded with the planned presentations prior to the meeting, organizing the papers into a booklet that would be distributed to meeting participants, and ordering copies of the booklet for distribution.
7. For the November 27, 1997 meeting, a program was created that included information about the date, time, and location of the meeting. It also included additional information about the meeting, such as the authors and titles of the five papers that would be presented, as well as registration

information and participation fees for members, students, and the general public.

8. Attached as Exhibit 1M is a copy of an email that I received on November 17, 1997 containing the program for the November 27, 1997 meeting. As indicated, applications for participation were accepted at the venue on the day of the event. The participant fees were 2,000 yen for the general public and 1,000 yen for students. SIG-CS members were admitted free.
9. At the November 27, 1997 meeting, copies of a booklet containing the five papers presented at the meeting were made available to participants. The participants included SIG-CS members as well as other individuals who were interested in the subjects of the papers being presented. The booklet was entitled "Virtual Reality Society of Japan Research Report" and was dated November 27, 1997. The booklet included a table of contents at the beginning, which identified the five papers presented at the November 27, 1997 meeting. The booklet was not marked or treated as confidential. Attached as Exhibit 2M is a copy of that booklet. To enable non-Japanese speaking members of the public to understand the contents of these five papers, and to facilitate searches by non-Japanese speakers for the papers, SIG-CS requested that the authors of each of the five papers provide English

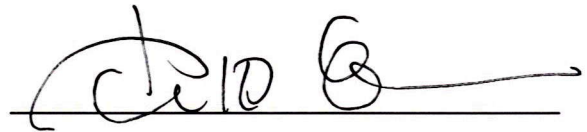
titles and abstracts for their papers, and those English titles and abstracts were included in the booklet.

10. It was general practice for SIG-CS to print copies of conference materials for distribution at the conference, and to send any remaining copies after the conference to universities. For the November 27, 1997 meeting, 100 copies of the booklet were printed for distribution, 30 were distributed at the meeting, and the remaining copies were given to Professor Okada of Keio University for further distribution.
11. Attached as Exhibit 3M is a copy of an email to the SIG-CS expert committee (of which I was a member), dated October 30, 1997, which includes meeting minutes from an October 30, 1997 committee meeting. As the minutes indicate, copies of the booklet for the November 27, 1997 meeting were printed by Sankyo Printing in units of 100 copies.
12. Attached as Exhibit 4M is a copy of an email sent to the SIG-CS expert committee, dated February 12, 1998, containing minutes from a February 11, 1998 committee meeting. As the minutes indicate, 70 copies of the booklet from the November 27, 1997 meeting were sent to Keio University.
13. Symposium and meeting materials were generally available and could be obtained after a symposium or a meeting by contacting VRS. Any requests

for copies of the booklet from the November 27, 1997 meeting were directed to Professor Okada, and the booklet could be purchased from him directly.

I declare under penalties of perjury set out in 18 U.S.C. § 1001 that the foregoing statements are true and correct to the best of my knowledge.

Executed on March 26, 2013.

A handwritten signature in black ink, appearing to read "David G. [unclear]", is written over a horizontal line.