# Cliff Reader, Ph.D.

# **Expertise**

- Real-time Processing and Display
- Video compression (MPEG-HEVC)
- Imaging/Video Systems Architecture
- Imaging/Video Chip Architecture
- Video Compression Algorithms
- Consumer audio/video
- Reconnaissance Imaging
- Medical Imaging

## **Professional Summary**

Dr. Reader has over forty years of work experience in digital imaging and digital video and audio. In the 1970's and early 1980's, he was one of the leaders in the digital imaging field, performing extensive work in areas of compression, real-time processing, real-time display, image enhancement, and others. Applications included reconnaissance imaging, medical imaging, earth resources management and videoconferencing. This work anticipated much of the technology being used in contemporary consumer digital video systems. He has in-depth experience of the commercial history and when key parts of technology were first developed and published.

Dr. Reader's career includes technical work in areas of algorithm design, system design, and semiconductor chip design and business development, marketing and sales work in areas of market analysis, product roadmap development and direct sales.

Dr. Reader has held many leadership roles in standards development: US Head of Delegation to MPEG (1991-1993); chief editor of the MPEG1 standard (1991-1993); instigator of the successful effort to make MPEG2 the market standard for digital TV over proprietary competitors in the US and national competitors in Europe and Japan (1992); MPEG4 Subcommittee Chairman (1993-1996); AVS (China) Subgroup Chairman (2003-Present). He is an expert in all major audio-video standards. MPEG audio (Layer I, II, mp3, AAC), Dolby AC3, MPEG video (1, 2, 4), H.264, Windows Media 9 (VC-1), H.265 (HEVC), AVS and AV1. He is also an expert in DVD standards, including formatting, navigation and authoring.

Dr. Reader has extensive experience in patent licensing and patent pools. He was the technical expert for developing the initial list of potentially essential patents for the first MPEGLA patent pool. He is the Co-Director leading the pool formation and license negotiations for the AVS patent pool. Dr. Reader has experience in the valuation of patents and the acquisition and sale of patent portfolios.

Dr. Reader has authored over twenty technical papers, two book chapters and two patents in digital video processing, display, and compression. He is an Adjunct Professor at Peking University, Beijing, China.

Resume of Cliff Reader, Ph.D.

## **Employment History**

From: 2001 **Independent Consultant** 

To: Present Escondido, CA

Provide technical and marketing consulting services in the areas of digital imaging and digital video including:

- consumer video
- real-time processing and display
- image and video and audio compression (specializing in MPEG)
- imaging/video systems architecture
- imaging/video chip architecture
- audio/video transmission, including optical & wireless networks Over 80 clients including Apple, AT&T, Adobe, Broadcom, China Central TV, Chinese Academy of Sciences, Cisco, Comcast, DirecTV, EchoStar, Fujifilm, Gateway, GE, Haier, Hisense, HP, IBM, Johnson Controls, KAIST, Lenovo, LG, Matsushita, MediaTek, Microsoft, Motorola, Nikon, Nokia, ON2, Philips, Quanta, Riverbed, Samsung, Sharp, Siemens, Sony, Sun Microsystems, Toshiba, TPV, Tyco, US Department of Justice, Verizon, Vizio, Wistron, Yahoo, Zoran and ZTE.

### Personal database of patent analysis:

- -Evaluation of all the US patents in the MPEG2, H.264 and H.265 patent pools.
- -Evaluation of the US patents and published applications underlying the H.264 and H.265 standards.
- -Personal archive of over 2000 audiovisual patents.

#### Personal database of audio and video prior art.

- -Virtually complete collection of all contributions to the H.26x and MPEGx families of standards from 1985 to today.
- -Many hundreds of technical journal and conference articles documenting the first invention of key technologies.
- -Work-in-progress book on the history of video compression.
- -Historical collection of technical data from the earliest digital video, image processing and real-time image display systems in the 1970s and 1980s.

From: 1999 **nDSP Corporation** 

To: 2001 Campbell, CA

Title: *Vice President of Marketing and Acting Vice President of Sales* 

Responsible for marketing and sales in a startup company providing

high-quality video signal processors to TV manufacturers.

Developed product specifications and roadmap. Built and managed sales and marketing team of 6 direct and contractor staff in the US

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and Japan to provide technical sales, sales support, application engineering, Marcomm and PR. Established distribution in China, Japan and throughout the Far East. Secured first sales as company moved into production phase with design wins in China, Japan and Europe. Initiated and secured major design wins in emerging Progressive DVD business, with production volumes beginning in 4Q00 at an annualized rate of \$3.5M. Established strategic partnership with Pixelworks in LCD chip business. Pixelworks acquired nDSP in 2001.

From: 1997 CagEnt Technologies, Inc. (wholly owned by Samsung)

To: 1998 Santa Clara, CA

Position: Vice President of Sales, Digital Video Products

Responsible for a line of PC-based real-time MPEG2 and Dolby Digital encoders. Established distribution agreements for third-party DVD authoring software. Secured OEM contracts for the products. Built the sales channel worldwide. Built sales to break-even point in

9 months leading to sale of the product line.

From: 1993 **Samsung Semiconductor, Inc.** 

To: 1997 San Jose, CA

Position: Director of Marketing, Digital Media Products;

Acting Director of Software Engineering

Developed business plans for digital audiovisual semiconductor chips. Managed team of over 50 software engineers in US and Korea

for development of a media processor. Established strategic partnerships with Microsoft and IBM for media processor

From: 1990 **Cypress Semiconductor, Inc.** 

To: 1993 San Jose, CA

Position: Business Development Manager

Founding member of new business unit chartered to develop a "video DSP". Jointly developed a complete business plan, and personally initiated and developed relationships with Philips, Sun Microsystems, Apple Computers and IBM. Chief architect for this early media DSP design, capable of complete MPEG1

decode in real time. (Fully validated by cycle-accurate

simulation). Managed R&D team of 10 hardware and software

engineers.

Head of US Delegation to MPEG, 1991 to 1992. Chief Editor of the MPEG1 standard. Technical Expert for establishing the

MPEGLA Patent Licensing Pool.

From: 1988 **Sun Microsystems, Inc.** 

To: 1990 Mountain View, CA

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Position: Program Manager

Developed requirements and specifications for real-time imaging system. Managed a team of 20 engineers to develop the architecture and high-level design. Interfaced with two key customers – Philips Medical Systems and Lockheed. Developed design for single-board

real-time medical and reconnaissance image display.

From: 1981 International Imaging Systems, Zoran, Virtual Imaging

To: 1988 Design and development of real-time image processing and display

systems. Details available on request.

From: 1975 Ford Aerospace & ESL (A Division of TRW)

To: 1981 Details available on request.

# **Consulting History**

Date 2019 MediaTek

To: Present

Duties: Consulting Expert in American Patents matter

Date 2019 **AT&T** 

To: Present

Duties: Consulting Expert in Uniloc matter

Date 2019 KAIST/KBS

To: Present

Duties: Consulting Expert for Inter Partes Review proceedings. (Unified Patents

matter)

Date 2019 Vimeo

To: Present

Duties: Preparation of declarations for Inter Partes Review proceedings. (BT

matter)

Date 2019 Apple

To: Present

Duties: Preparation of declarations for Inter Partes Review proceedings.

(Red.com matter)

Date 2019 Adobe

To: Present

Duties: Preparation of declarations for Inter Partes Review proceedings.

(Realtime matter)

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Date 2018 Toshiba

To: Present

Duties: Testifying expert concerning essential patents for ATSC standards

Date 2018 Hisense

Duties: Analysis of essential patents for AAC standards

Date 2018 Leading smartphone company

To: Present

Duties: Analysis of essential patents for the H.265 standard

Date 2018 Cisco

Duties: Consulting expert in Realtime matter

Date 2017 **HEVC Advance** 

To: Present

Duties: Consulting expert for HEVC essential patent analysis

Date 2017 **Dish Network** 

To: Present

Duties: Consulting expert in ClearPlay matter

Date 2017 Apple

Duties: Preparation of declarations for Inter Partes Review proceedings. (Uniloc

matter)

Date 2017 **Dish Network** 

To: Present

Duties: Testifying expert in Realtime matter

Date 2017 CustomPlay

To: Present

Duties: Preparation of declarations for summary judgment and claim

construction in Amazon case.

Date 2017 Vizio, Funai, LG, MediaTek, MStar

Duties: Testifying expert in Broadcom case.

Date 2017 Apple

Duties: Preparation of declarations for Inter Partes Review proceedings. (Nokia

matter)

Date 2017 Vizio

Duties: Preparation of declarations for Inter Partes Review proceeding.

(Lightside Technologies matter)

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Date 2016 Dell, Riverbed, EchoStar, Dish Network To: 2019 Duties: Testifying expert in Realtime matter Date 2016 Sharp, Vizio, ON To: 2019 Duties: Testifying expert in WiLan matter 2016 Date Avid To: 2017 Duties: Testifying expert in Harmonic matter. Date 2016 **Apple** Duties: Testifying expert in PUMA matter. Date 2016 Vizio Duties: Testifying expert in PMC matter. Date 2016 US Dept. of Justice, Dept. of Homeland Security, DoD, FBI, NSA, & **Others** To: Present Consulting expert in Discovery Patents (3<sup>rd</sup> Eye Surveillance) matter. Duties: Declarations in support of six Inter Partes Reviews. Technology tutorial for Judge. Date 2015 ST Micro To: 2016 Duties: Consulting expert in Avago matter. AT&T 2015 Date Duties: Consulting expert in Raniere matter. Date 2015 Motorola To: 2016 **Duties:** Consulting expert in PUMA matter. 2015 **TPV** Date To: 2016 **Duties:** Consulting expert in Thomson licensing matter. Date 2015 Tyco (Exacq, Johnson Controls) To: 2018 **Duties:** Consulting expert in JDS Technologies matter.

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Tyco

2015

Date

Duties: Declaration in support of Inter Partes Review petition in Hawk

Technology matter.

Date 2015 Sceptre

Duties: Expert reports in licensing matter concerning MPEGLA MPEG2 pool

patents.

Date 2015 Samsung

Duties: Consultant and fact witness in case asserting Samsung patents of which I

am a named inventor, against NVidia.

Date 2015 **Nissim** 

To: 2016
Duties: Consultant expert for patent holder in 20<sup>th</sup> Century Fox, MGM, and

Paramount cases concerning patents related to DVD navigation.

Testified at Markman hearings.

Date 2015 Nikon

To: Present

Duties: Consultant.

Date 2015 Humax

Duties: Search and analysis of prior art.

Date 2015 Apple

Duties: Analysis of patent portfolio potentially essential for the H.264 standard.

Date 2014 Haier

To: 2018

Duties: Analysis of patent portfolios for smart consumer devices.

Date 2014 Cisco

To: 2018

Duties: Consultant.

Date 2014 ZTE, Sony, LG, Samsung, Nokia, GoPro

To: 2015

Duties: Consulting expert.

Date 2014 Tyco

To: 2015

Duties: Expert reports; declaration in support of Inter Partes Review in Trover

matter.

Date 2013 Humax

Duties: Consultant.

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Date 2014 **GE Licensing** To: 2015 Duties: Consultant. Date 2014 **HikVision & Axis** To: 2015 Duties: Declaration in support of Inter Partes Review. Expert reports in Trover matter. Date 2014 Sharp To: 2016 **Duties:** Declaration in support of Inter Partes Review in Wi-Lan matter. Date 2013 **InterDigital** To: 2015 Duties: Consulting expert in support of licensing a patent portfolio. Date 2013 Apple Duties: Consulting expert in National Cheng Kung University matter. Date 2013 Acer, ASUS, TPV To: 2014 Duties: Testifying expert in Florida Atlantic University matter. Date 2013 **Toshiba** To: 2014 Duties: Testifying expert in WiLAN matter. 2013 Date **Grass Valley Group** Consulting expert for defense in FastVDO matter. Duties: Date 2013 TI To: Present Duties: Consulting expert. Date 2012 Vizio Duties: Consulting expert in Innovus Prime matter. 2012 Date

# **Haier & Shandong Provincial Government**

To: 2014

> **Duties:** Foreign expert advisor for developing and acquiring patent portfolios for

innovative consumer products. Development of a patent pool for patents

essential to standards for wireless power.

Date 2012 Vizio

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To: 2014

Duties: Consulting expert in MIT matter.

Date 2012

To: 2013

Duties: Consulting expert.

**Nokia** 

Date 2012 TPV & Vizio

To: 2013

Duties: Testifying expert for defense in Hitachi matter.

Date 2012 Samsung

Duties: Consulting expert in Myport matter.

Date 2012 Verizon Wireless (Cellco) & T-Mobile

To: 2013

Duties: Testifying expert for defense in Realtime Data matter.

Date 2011 Apple

Duties: Consulting expert in Technicolor matter.

Date 2012 Microsoft

To: 2014

Duties: Consulting expert for plaintiff in Motorola matter.

Date 2012 Apple & LG

To: 2014

Duties: Testifying expert for defense in MPT matter.

Date 2011 Sanyo & Olympus

Duties: Consulting expert for defense in FastVDO matter.

Date 2011 Apple

Duties: Consulting expert for defense in FastVDO matter.

Date 2011 Sonv

Duties: Consulting expert for defense in FastVDO matter.

Date 2011 Philips

To: 2014

Duties: Consulting expert for licensing essential patents.

Date 2011 Apple

Duties: Consulting expert for defense in MobileMediaIdeas matter.

Date 2011 Video264Innovations

Duties: Consulting expert.

Date 2011 Nikon, Fujifilm & Panasonic

Duties: Consulting expert for defense in FastVDO matter.

Date 2011 Haier

To: 2014

Duties: Consultant for standards, patent pools and patent licensing.

Date 2011 Susman Godfrey

Duties: Consultant for patent analysis.

Date 2011 Vizio

Duties: Testifying expert for defense in MPT matter.

Date 2011 Tivo

Duties: Consulting expert.

Date 2011 Nikon

To: 2013

Duties: Consulting expert for defense in MPT matter.

Date 2011 **Broadcom** 

Duties: Consulting expert.

Date 2010 Lionsgate Entertainment

Duties: Consulting expert in MPEG licensing matter.

Date 2010 Verizon

To: 2012

Duties: Testifying expert for defense in ActiveVideo Networks matter.

Date 2010 Lenovo

To: 2011

Duties: Consulting expert for defense in licensor matter.

Date 2010 Sonic, Cyberlink & Joint Defense Team

Duties: Consulting expert for defense in Mediostream licensor matter.

Date 2010 Wistron

To: 2011

Duties: Consulting expert for defense in Toshiba licensor matter.

Date 2010 Panasonic, Pioneer

To: 2011

Duties: Consulting expert for defense in VES licensor matter.

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Date 2010 Zoran To: 2011 Duties: Technical analysis of patents potentially related to video coding standards. Date 2010 **Intravisual** To: 2015 Consulting expert for patent licensing. Duties: Date 2010 Motorola To: 2010 **Duties:** Consulting expert for PMC matter. Date 2009 Apple Duties: Technical analysis of patents potentially related to video coding standards. 2009 SanDisk Date Duties: Consulting expert re Audio and Video coding patents 2009 Date Lenovo To: 2011 Consulting expert for defense in MPEGLA licensor matter. Duties: Date 2009 **Polycom** To: 2010 Consulting expert for defense in MPT matter. Duties: 2009 **DirecTV** Date To: 2011 Duties: Consulting expert for defense in MPT matter. 2009 EchoStar Date To: 2010 **Duties:** Consulting expert for defense in MPT matter. 2009 Date Vizio Duties: Consulting expert for defense in Sony matter. 2009 Date Vizio To: 2010 Duties: Consulting expert for defense in LG matter. Date 2009 Vizio, TPV, Amtran

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2010

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To:

Duties: Technical report & video presentation to US Customs on design issues

related to Funai matter.

Testified in ITC hearing, March 2010.

Date 2008 Humax (Korea)

To: 2009

Duties: Audio patent and prior art review.

Date 2008 IC Media (Canada)

To: 2009

Duties: Design of digital signage.

Date 2008 AVS Patent Pool Administration (China)

To: Present
Duties: Co-Director, leading license negotiations among domestic and

multinational licensors.

Date 2008 **DirecTV** 

Duties: Prior art search for DirecTV's appeal against Finisar.

Date 2008 Pure Digital

Duties: Prior art research and analysis.

Date 2008 Wragge (UK)

Duties: Prior art review for two video coding patents.

Date 2008 Microsoft

Duties: Extensive non-infringement analysis for patents asserted by Multimedia

Patent Trust (MPT).

Date 2008 iPotential

To: 2010

Duties: Technical analysis of patents potentially related to video coding

standards.

Date 2008 Alba (UK) aka Harvard Research

To: 2009

Duties: General education on essential patents, licensing, prior art related to the

MPEG2 video standard.

Date 2008 Philips (Holland)

Duties: Review of patents for essentiality.

Date 2008 Proview

Duties: Prior art search for TV display features.

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Date 2008 **Nissim** To: Present

To: Present

Duties: Consultant expert for plaintiff in Time-Warner case concerning patents

related to DVD navigation.

Date 2008 Comcast

Duties: Technical analysis of MPEG2 systems, DSM-CC, and carousel operation

in the cable TV network environment. Contribution to expert's report in

Comcast's successful litigation against Finisar.

Date 2007 **Sun Microsystems** To: 2009

Duties: Chief architect of royalty-free video codec: OMS Video. Extensive

supporting patent analysis and technical publication analysis for prior art

review.

Date 2008 SanDisk

Duties: Technical analysis of patents and prior art searching for audio coding.

Date 2008 **Stammberger (Munich)** 

Duties: Technical analysis of patents potentially related to video coding

standards.

Date 2008 Trigem America Liquidating Trust

Duties: Preparation of expert reports concerning litigation between Toshiba and

Trigem.

Date 2007 Susman-Godfrey

Duties: Technical analysis of patents potentially related to video coding

standards.

Date: 2007 Wong-Cabello

Duties: Technical analysis of patents potentially related to video coding

standards.

Date: 2007 Sisvel

Duties: Technical assistance in licensing audio patents to a third party.

Date: 2007 **Quanta** 

Duties: Technical assistance in litigation related to DVD.

Date: 2006 CCTV (China Central TV)

Duties: Technical analysis of patents potentially related to MPEG2, H.264, AVS

and VC-1 video coding standards and MPEG-AAC and Dolby audio

coding standards.

Date: 2006 MediaTek

Duties: Technical analysis of MediaTek patents potentially related to video

coding standards.

Date: 2006 Alcatel

Duties: Technical analysis of Alcatel patents potentially related to video coding

standards.

Date: 2006 Motorola

Duties: Analysis of technologies contributed to the H.264 standard.

Date: 2005 Nokia

Duties: Analysis of technologies contributed to the H.264 standard.

Date: 2005 Avid

Duties: Technical analysis of patents potentially related to coding standards.

Date: 2005 IBM

Duties: Analysis of technologies contributed to the H.264 standard.

Date: 2005 **HP** 

Duties: Analysis of selected audio coding patents.

Date: 2005 ComVentures

Duties: Due diligence review of a start-up company in the video semiconductor

business.

Date: 2005 nVidia

Duties: Prior art search for a set of third-party patents.

Date: 2004 Microsoft

Duties: • Working with a major financial services company, developed a

procurement model for managing licensing costs.

• Assisting development of non-infringement positions for a set of

patents. (Not in suit).

From: 2004 **SAGEM (France)** 

To: 2005

Duties: Technical analysis of potential infringement by SAGEM of a set of third-

party patents.

From: 2004 **Polycom Inc.** 

To: 2005

Duties: Technical analysis of Polycom patents potentially related to video coding

standards.

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From: 2004 Sony Corp. To: 2006

2004

Date:

Technical analysis of potential infringement by Sony of a set of Duties: third-party patents. The parties settled without litigation.

Analysis of a third-party patent per Sony's direction.

Date: 2004 On2 Inc Duties: Delivery of the comprehensive set of reports on IPR potentially related

to the emerging H.264 standard.

Date: 2004 **Matsushita Avionics** 

Duties: Technical analysis of potential infringement of Matsushita patents by a

third party.

Date: 2004 Connex Inc. Duties: Teaching the details of key complex algorithms in the H.264 standard.

Delivery of the comprehensive set of reports on IPR potentially related Duties:

to the emerging H.264 standard.

From: 2004 DivX Inc.

DoCoMo (Japan)

To: 2006 Duties: Analysis of technologies contributed to the H.264 standard

Date: 2004 Cues, Inc

> Duties: Assisted evaluation of infringement by Cues' products of a patent

asserted by a third party. The parties settled without litigation.

From: 2003 **GE Licensing** To: 2004

> **Duties:** Working with a major financial services company, developed a business,

> > market and financial model for valuation of a portfolio of patents

through their expiration.

From: 2003 **Institute of Computing Technology, Chinese Academy of Sciences** To: Present

> Preparation of IPR Report for IPR potentially related to the AVS Video standard. This effort involved review of over 2500 abstracts and over 450 patents.

IPR Subgroup Chairman of AVS. Formed an IPR Experts group to establish a legal foundation for AVS IPR. This group comprised approximately 20 attorneys and business development managers from eight multinational companies representing the PC, consumer, semiconductor and communication industries. (Broadcom, IBM, Intel, Matsushita, Microsoft, Nokia, Sony, Sun

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**Duties:** 

Microsystems). The group drafted a member agreement, bylaws and a formal IPR policy governing licensing commitments, disclosure obligations, and protection of license holder rights. AVS Members approved these documents in September 2004.

- Co-Director of AVS Patent Pool. Leading the drafting and negotiation of patent pool management and licensing agreements.
- Adjunct Professor, supervising a graduate student project on deinterlacing algorithm development.

2003 Date: Yahoo

> Duties: Prior art search to provide background information per Yahoo's request.

Date: 2002 Gateway, Inc.

To: 2007 Duties: Extensive prior art search and assistance with claim construction in a

litigation matter with Lucent Technologies.

From: 2002 **Apple Computer** To: 2007

> Duties: Technical analysis of Apple patents potentially related to H.264.

> > Prior art search for various patents per Apple's request.

Date: 2002 Siemens (Germany)

**Duties:** Technical analysis of Siemens patents potentially related to H.264.

Delivery of the comprehensive set of reports on IPR potentially

related to the emerging H.264 standard.

Date: 2002 JVT Committee (Apple, Cisco, Nokia, Polycom, Sun Microsystems,

Tandberg, Teles, Texas Instruments, UBVideo, VideoLocus)

Developed a comprehensive set of reports on IPR potentially related to Duties:

> the emerging H.264 standard. The reports included a technical review of legacy and new patents for video coding, and analysis of the patent

> statements provided by all companies whose contributions were adopted

into H.264.

Date 2002 Intervideo

> Duties: Advised on market opportunities in the emerging MPEG4 marketplace.

2001 Date: Proskauer Rose LLP

> Provided background support in MPEGLA's (successful) effort to Duties:

> > license MPEG2 to the major PC manufacturers.

2001 Date **Pixonics** 

> Duties: Developed marketing plan and marketing support materials for this

> > incubator-stage company.

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Date 2001 Eltron, (Taiwan)

Duties: Provided overview of the digital video semiconductor market.

Date 1999 **nDSP Corporation** 

Duties: Drafted the sales and marketing plan for this early-stage company.

Joined nDSP full-time.

Date: 1998 IBM Corp.

Duties: Assisted with participation in the ATSC DASE (datacasting) standard.

Date 1998 Spruce Technologies

Duties: Assisted with transition of Cagent MPEG encoder product after it was

sold to Spruce.

From: 1997 Samsung Advanced Institute of Technology

To: 1999

Duties: Supported Samsung researchers in MPEG4 standard development. Led

effort to provide error-resilient 3D-mesh coding.

Date 1997 MPEGLA LLC

Duties: Review of opportunity for an MPEG4 patent pool

From: 1993 CableLabs

To: 1994

Duties: Teamed with a patent attorney to develop the initial essential patent list

for MPEG2. Reviewed approximately 10,000 abstracts and 1,000 patents for the MPEG2 Video and MPEG2 Systems standards. This effort led to

the MPEGLA patent pool.

# **Litigation Support Experience**

Finnegan, Henderson, Farabow, Garrett & Dunner, LLP,

**Washington DC** 

Case MPEGLA vs. Toshiba, NY State Court, Index No. 162716/2015

Project: Expert report on essentiality and technical value of ATSC Standards

patents.

Status: Ongoing.

US Dept. of Justice, Washington, DC

Case 3<sup>rd</sup> Eye Surveillance vs. The United States, Civil Action 15-501

Project: Declarations and Technical Tutorial on invalidity and non-infringement

of 3<sup>rd</sup> Eye's patents.

Status: Ongoing.

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Carey Rodrigues, Miami, FL

Case CustomPlay vs. Amazon, CASE N. 9:17-cv-80884-KAM.

Project: Declarations and deposition on infringement of and claim construction

for CustomPlay's patents.

Status: Ongoing.

Kirkland, JMBM, New York, Los Angeles

Case Wi-Lan vs. Sharp Electronic Corp., Vizio, Case No. C.A. No. 15-379

(LPS) (CJB)

Project: Expert reports and depositions on non-infringement and invalidity of Wi-

Lan's patent.

Status: Defendants won on summary judgement.

Fish & Richardson, Washington, DC

Case Realtime vs. EchoStar Corp., Hughes Network Systems LLC, Civil

Action No. 6: 17·CY-00084-JDL.

Project: Expert report and deposition on invalidity of Realtime's patents.

Status: Parties settled.

Akin Gump, Fish & Richardson, Finnegan, Baker Hostetler,

Washington, DC

Case Broadcom vs. Vizio, LG, Funai, MediaTek, MStar, Investigation No.

337-TA-1047

Project: Expert report and deposition on non-infringement of Broadcom's patent.

Status: Final Determination in favor of Respondents.

Jones Day, Cleveland, OH

Case Avid Technology vs. Harmonic, Case No. C.A. No. 12-627-GMS

Project: Expert reports and deposition on infringement of Avid's patent.

Status: Parties settled before trial.

Haynes and Boone, Dallas, TX

Case Realtime vs. Riverbed, Case No. 6:1S-CV-463-RWS-JDL

Project: Expert report, deposition and trial testimony (E. District Texas) on

invalidity of Realtime patent.

Status: Jury found Realtime patent invalid at trial.

Akin Gump, LLP, Irvine, CA

Case Personalized Media Communications "PMC" vs. TPV et al, Case No.

2:15-cv-01366-JRG-RSP

Project: Declaration in support of claim construction brief.

Status: Parties settled.

Feinberg, Day, LLP, Menlo Park, CA

Case Parthenon Unified Memory Architecture "PUMA" vs. Apple, Case No.

9:12-cv-80701

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Project: Expert report and deposition concerning unified memory architecture.

Status: Trial stayed at request of PUMA. Parties settled.

Carey, Rodriguez, LLP, Miami

Case \*Twentieth Century Fox Home Entertainment, LLC, Paramount Pictures

Corp., vs. Nissim Corp., Case No. 14-81349/813450-cv-MARRA

Project: Expert witness for patent owner in counterclaims for infringement.

Declaration and expert testimony at Markman Hearings concerning DVD

standards essential patents.

Status: Parties settled before trial.

\*Nissim asserted its patents against Twentieth Century Fox and

Paramount. The latter filed a complaint seeking a declaratory judgment

of non-infringement and invalidity.

TechKnowledge Law Group, Turner Boyd LLP & O'Melveny &

Myers LLP, Los Angeles,

Case Florida Atlantic University Research Corporation vs. Acer, ASUS &

TPV, Case No. 9:12-cv-80701

Project: Expert testimony at Markman Hearings concerning scan converter

design. Expert reports and deposition testimony.

Status: Parties settled before trial.

Finnegan, Henderson, Farabow, Garrett & Dunner, LLP

Case WiLAN vs. Toshiba, Case No. 1:12-Civ-23744

Project: Expert reports & deposition testimony concerning digital television

design.

Status: Parties settled before trial.

O'Melveny & Myers LLP, Los Angeles & Akin Gump LLP, Dallas

Case Hitachi vs. TPV, Case No. 2:10-CV-260-JRG

Project: Expert reports, depositions & trial testimony (E. District Texas)

concerning digital television design.

Status: Jury found no infringement of Hitachi's patents by TPV and found

Hitachi's patents invalid. (Partially reversed by JMOL)

Fish & Richardson P.C. San Diego

Case Multimedia Patent Trust vs. Apple & LG, Case No. 10-cv-2618 H

Project: Expert report, & deposition testimony concerning development of

technology, standards and patents for video coding.

Status: Jury found no infringement of MPT's patents and found MPT's patents

invalid.

Gibson Dunn LLP, Palo Alto

Case Realtime Data vs. Verizon Wireless & T-Mobile, Case No. 6:10-cv-

00493-LED

Resume of Cliff Reader, Ph.D.

Project: Expert reports, depositions and testifying expert in jury trial (E. District

Texas) concerning infringement and validity of patents related to data

transmission.

Status: Jury found no infringement of Realtime Data's patents by T-Mobile, and

found Realtime Data's patents invalid.

O'Melveny & Myers LLP, San Francisco

Case MobileMediaIdeas vs. Apple, Case No. 10-258-SLR

Project: Expert reports and deposition, concerning infringement and validity of

patents related to MPEG Audio Layer III ("mp3") coding.

Status: Trial bifurcated.

Jones Day, Cleveland

Case Multimedia Patent Trust Vs. Vizio, Case No. 09-CV-0278-H (CAB)

Project: Expert report, concerning infringement of patents related to H.264 video

coding. (Slated for deposition and jury trial)

Status: Parties settled on the day before my deposition.

Kellog, Huber, et al, Washington, DC

Case Active Video Vs. Verizon, No. 2:10-cv-00248-RAJ-FBS; 2011

Project: Expert report, deposition and testifying expert in jury trial concerning

infringement of patents related to video-on-demand

Status: Jury finding of infringement with significantly reduced damages and no

finding of willful infringement.

Jones Day, Washington, DC

Case Funai Vs. Vizio, et al, ITC Investigation No. 337-TA-617; 2010

Project: Expert report, deposition and testifying expert in ITC hearing concerning

infringement of a patent related to ATSC broadcast standards

Status: Parties settled after the hearing following Initial Determination adverse

to complainant.

Wilson Sonsini, Goodrich and Rosati, Palo Alto, CA.

Case Terayon vs. RGB Networks; 2007

Project: Expert report for defendant in a contract dispute alleging violation of a

non-compete agreement.

Status: Mediation hearing resolved the dispute to the satisfaction of both parties.

Wilmer Cutler Pickering Hale and Dorr, Boston, MA

Case Qualcomm Inc. vs. Broadcom Corp. No. 05 CV 1958 B (BLM); 2007

Project: Expert report and deposition on behalf of Broadcom against assertions of

infringement of patents concerning video encoding and decoding, and on Qualcomm's compliance with the policies and procedures for IPR policy

in the H.264 standards committee (JVT of ITU-ISO/IEC).

Status: Broadcom found not guilty of infringing Qualcomm's patents. The

patents were determined to be not essential for implementing the H.264

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standard. Qualcomm found guilty of inequitable behavior in the manner of their participation in the H.264 standards committee. Qualcomm's patents held unenforceable against H.264.

Greenberg Glusker Fields Claman Machtinger & Kinsella.

Case <u>DTS vs. MediaTek; 2005</u>

Project: Expert report for defendant in a contract dispute related to hacking into

semiconductor chips to enable functionality for which a license fee was

payable.

Status: Mediation hearing resolved the dispute to the satisfaction of both parties.

The Mediator personally thanked me for the clarity of my report, which

covered technical, business and licensing issues.

Arvay Finley Barristers, Victoria, BC, Canada.

Case AVT Audio Visual Telecommunications vs. University of British

Columbia; 2005

Project: Expert report and testimony on behalf of AVT in a contract dispute

related to mobile video communication including failure to disclose

intellectual property.

Status: Arbitration hearing resulted in adverse ruling to AVT.

Thelen Reid & Priest, San Jose, CA.

Case <u>Toshiba Corp. vs. Trigem Computer Inc. & Trigem America Corp. Case</u>

No. CV-03-4558-GHK(AJWx); 2005

Project: Expert report on behalf of Trigem regarding invalidity of patents relating

to video and sub-picture data in multimedia computer systems.

Status: Suspended due to insolvency of Trigem.

Morrison & Foerster LLP, San Francisco, CA.

Case TiVo Inc. vs. EchoStar Communications Corp., EchoStar DBS Corp.,

EchoStar Technologies Corp, & EchoStar LLC, Case No. 2-04CV-01;

2005

Project: Expert report and deposition on behalf of EchoStar against assertions of

infringement of a patent concerning personal video recorders (PVR).

Status: Adverse ruling to EchoStar.

Pinsent Curtis Biddle, Leeds, UK

Case Thomson Licensing S.A. and Deutsche Thomson Brandt GmbH vs. Pace

Micro Technology PLC. Case No. HC 2000 No. 1584; 2001

Project: Expert report and slated to testify on behalf of Pace arguing invalidity of

patent and defending against assertions infringement of a patent

concerning interlaced video coding.

Status: Parties agreed to settlement on the second day of trial. Settlement terms

were very favorable to defendant, and shortly after the trial, Thomson

joined the MPEGLA patent pool.

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### **Education**

1974	University of Sussex, England	Ph.D., Applied Sciences (EE/CS) Thesis on "Orthogonal Transform Coding of Still and Moving Pictures". All research performed in residence at the Image Processing Institute, USC Los Angeles, CA.
1970	University of Liverpool, England	Bachelor of Engineering with Honours, Physical Electronics

## **Publications (Partial List)**

- C Reader, "Orthogonal Transform Coding of Still and Moving Pictures", Ph.D. thesis, U. Sussex, England, 1973.
- C. Reader, "Intraframe and Interframe Adaptive Transform Coding." SPIE Vol. 66, pp. 108-117, *Efficient Transmission of Pictorial Information* (1975).
- C. Reader, W.H. Chen, "Local Retransmission of Compressed Imagery Data", SPIE Vol. 149 pp. 196-204, *Applications of Digital Image Processing* (1978).
- L. Hubble, C. Reader, "State of the Art in Image Display Systems", SPIE Vol. 199, pp 2-8, *Advances in Display Technology* (1979).
- C. Reader, W. D. Flanagan, "Design Considerations for Real-Time Image Processing", SPIE Vol. 180, *Real-Time Signal Processing II*, (1979).
- C. Reader, L. Hubble, "Trends in Image Display Systems", Proc. IEEE, Vol. 69, No. 5, pp. 606-614, (1981).
- J. Adams, C. Patton, C. Reader, D. Zamora, "Hardware for Geometric Warping", Electronic Imaging, April 1984.

Digital Image Processing Techniques (Computational Techniques), Michael P. Ekstrom (Editor), Chapter describing hardware for real-time image processing and display systems, Academic Press, 1984, pp. 289-360.

C. Reader, et al, "A New Architecture for Real-Time Image Processing," SPIE Vol. 534, pp. 72-78, Architectures and Algorithms for Digital Image Processing II (1985).

B. Thacker, R. Rinaldi, C. Reader, "Multiwindow Displays of Text, Graphics and Images", SPIE Vol. 757, pp. 104-110, *Methods of Handling and Processing Imagery* (1987).

Keynote opening speech at IEEE Conference on Image Processing, 1994.

C. Reader, "MPEG4: Coding for Content, Interactivity, and Universal Accessibility," Optical Engineering, Vol. 35, No. 1 pp. 104-108 (1996).

C. Reader, P. Schirling, A. Puri, MPEG Tutorial paper at IEC – NCF/Infovision '97.

O. Avaro, P.A. Chou, A. Eleftheriadis, C. Herpel, C. Reader, J. Signes, "The MPEG4 Systems and Description Languages: a Way Ahead in Audio Visual Information Representation", Signal Processing: Image Communication, Vol. 9, No. 4, pp. 385-431 (1997).

C Reader, "What MPEG-4 means to me", Sig. Proc.: Image Comm. 9(4): 467, 1997

*MPEG Video Compression Standard*, Edited by Mitchell, Pennebaker, Fogg, Le Gall. Chapman & Hall, 1997. Chapter describing the process of establishing the MPEGLA patent pool, Chapter 16, *MPEG Patents*, pp.357-362.

W Gao, C Reader, F Wu, Y He, L Yu, H Lu, S Yang, T Huang, X Pan, "AVS - The Chinese Next-Generation Video Coding Standard", Proc. NAB Conf., 1994.

C Reader, "Origins of the performance of H.264/AVC: an account of the development of H.263 and H.264 coding tools", SPIE Vol. 5909, pp59090W-1-8 Applications of Digital Image Processing XXVIII (2005).

C Reader, "AVS Intellectual Property Rights (IPR) Policy, J. Comput. Sci. & Technol., Co. 21, No. 3 (May 2006).

Q Huang, W Gao, D Zhao, C Reader, "A Real-Time Video Deinterlacing Scheme for MPEG-2 to AVS Transcoding", Advances in Multimedia Information Processing - PCM 2006, Vol. 4261/2006, Springer Berlin / Heidelberg.

W Gao, S Ma, C Reader, "An End-to-End Application System of AVS: AVS-IPTV in China". PCM 2007: 50-57

C Reader, "Technical design & IPR analysis for royalty-free video codecs". PCS 2010: 102-105

J Chen, F Xu, Y He, J D Villasenor, Y Han, Y Xu, Y Rong, C Reader, J Wen, "Efficient Video Coding Using Legacy Algorithmic Approaches". IEEE Trans. Multimedia 14(1): 111-120 (2012)

W Gao, T Huang, C Reader, W Dou, X Chen, "IEEE Standards for Advanced Audio and Video Coding in Emerging Applications", Computer, vol.47, no. 5, pp. 81-83, May 2014.

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Ma S, Huang T, Reader C, Gao W, AVS2-Making video coding smarter [Standards in a Nutshell], IEEE Signal Processing Magazine, vol. 32, no. 2, pp. 172 - 182, 2015.

Wang R, Huang T, Park S-H, Kim J-G, Jang E S, Reader C, Gao W, The MPEG Internet Video-Coding Standard [Standards in a Nutshell], IEEE Signal Processing Magazine, Vol. 33, No. 5, pp. 164-172, Sep. 2016.

Reader C, Patent Landscape for Royalty-Free Video Coding, SPIE Vol. 9971, Sep., 2016

#### **Patents**

Patent Number	<b>Date Issued</b>	<u>Title</u>
6,192,073	2000	Methods and apparatus for processing video data
5,845,112	2000	Method for performing dead-zone quantization in a single
		processor instruction.

### **Academic Positions**

Taught "early bird" classes at Santa Clara University in Image Processing and Digital Signal Processing

Adjunct Professor of the National Engineering Laboratory for Video Technology, in the Computer Science Department at Peking University, Beijing, China.

### **Professional Associations and Achievements**

- ISO/IEC Certificate of appreciation for development of the MPEG4 standard.
- Senior Member IEEE.
- Member SPIE.
- Member ACM.
- Member AES.
- Member SMPTE.

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