

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS, LLC,

Petitioner,

v.

DIGIMEDIA TECH, LLC,

Patent Owner.

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U.S. Patent No. 6,473,532

Case No. IPR2022-01182

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**SUPPLEMENTAL DECLARATION OF DR. LINA J. KARAM**

I, Lina J. Karam, declare as follows:

1. On June 24, 2022, I signed the “Declaration of Dr. Lina J. Karam,” which was submitted as Ex. 1002 for this matter, IPR2022-01182.
2. On October 25, 2023, Counsel for Petitioner Unified inquired about whether a clerical error existed in the following sentence from ¶113 of Ex. 1002: “When the number of noticeable pixels in the subblock exceeds  $n_s$ , they collectively occupy a majority area of the subblock and thus are more likely to be connected; conversely, when number of noticeable pixels in the subblock **exceeds**  $n_s$ , they are scarce and are more likely to be scattered randomly in the subblock.” Ex. 1002, ¶113 (emphasis added).
3. I confirmed that a clerical error does exist and the sentence in ¶113 of Ex. 1002 should read as follows: “When the number of noticeable pixels in the subblock exceeds  $n_s$ , they collectively occupy a majority area of the subblock and thus are more likely to be connected; conversely, when the number of noticeable pixels in the subblock **does not** ~~exceeds~~  $n_s$ , they are scarce and are more likely to be scattered randomly in the subblock.” The bold and underlined text should be inserted into the sentence and the bold and strikethrough text should be deleted.
4. I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false

statements and the like so made are punishable by fine or imprisonment, or both,  
under § 1001 of Title 18 of the United States Code.

Dated: 11/07/2023

By: 

Lina J. Karam, Ph.D.