

Day 4 Arrived Justin time 8:58

34 people behind the gate.

In receipt of Mr. Jamar's letter.

Observations and his res.

Reminded of 3 blind men and elephant. Each touches and sees it in a

wants to breach agreements with 3rd parties and now wants to breach court to help. Seal court completely.

Understand the logic in this. Properly relying on them as most important evidence.

1. Believe from lot doesn't come up today.
2. Accept proposal of new produced exhibits to Court of course.
3. Want briefing hasn't read Cryptology case cited. Continue using procedure of not being on public screen parties will have access. He won't change it until further resolution.

Going to stay with belief that context of name has significance. Diff between Me on Pe SW corp with \$20 in sales vs MS, FBI, Goog, whoever. Context ess to update Royal Rates and Basis - for resolution.

can go to appeals for review before evidence goes. Avoids advisory opinion.

Feel a bit in the lines Ven here.

"I bet you didn't say in the zoo"

If it is the zoo it's all new animals.

No witnesses today,

Gallery won't have it blindingly obvious & not quote

Trying to

"This is what that Crotchety old fool wants and why it's wrong". - so you have fixed target to shoot.

Partly that info got outed needed 2 law firms to say got it wrong.
MS with This is Plan will be sought expedited consideration.

Advised by 3rd parties that they will try and see to things themselves.
take it upon ourselves

"We all recog^{wholtrial con.} that on Tues

No ras by Th, Chris, NY sometime in Spring.

270 vs 160 pages.

lots of papers generated.

Had proposed a separately seeded portion on Tuesday
allowing the possibility of withdrawing stuff vs public record.

MS Basic problem vs "are these comparable" Don't think changing
label will help. Don't see how can cross without examining how
they are comparable.

MT Even if were successful at end of the trial. Maxor would still need
to disclose, Can always withdraw info? - not clear what this
is.

Judge ^{Mr. Hovart.} made this more cogent

No closed courtroom issues today.

Timothy Simcoe - MS witness
Professor.

53- Appraisal/Econ HUD. M.A. CCA. something Business
Strategy Innovation stuff school of business.

Standards setting organization.

NSAS on IP and standards setting.

Standards setting orgs have interest in seeing stds widely implemented

J Probs to address No holdup No Royalty structures.
He claims best to compare to pools which are designed to address same issue.

Were you there when Gibson ^{was} tested how stds dev'd / essential.

Owned by engineers in technical committees. Do they typically know of patents. Not always implicate patents. Implications aren't called out in the std.

Essential is used by orgs. There's a mandatory section that is covered by a std.

Even if option section still called essential.

Are all important / economically valuable from economic point of view.

Must be used and be scarce (so not equally good alternatives).
A patent cannot be essential pre std writing as otherwise concept of essentiality can't exist.

No mandatory patent search rule.

IEEE looks, may. IEEE looks for this as soon as possible, so letters speak to the future and unknown.

Patent orgs don't make judgments.

Declared essential patent - one with a law, but no one checked.

Pool process - Generally require at least 1 ^{doc.} essential patent
Hire 3rd party to check that they are essential.

All 1500 MPEG-LA pool were reviewed.

→ vs MPEG-LA.

MPEG is Motion Pic R.P. Group

MPEG-LA is the patent pool, first was a pool for MPEG ^{and tech.}

1575 - Copy of imp ^{guidelines} IIV common patent policy.

adm page 9 - 2815 stamp.

"sole objective of policy to ensure accessible to everybody to ensure"

1568 - IEEE IP policy

1440
(or 1414)

Fed register notice from FTC seeking notice on stds patents. wanted info on license structure / hold up.

"The most common mech of SSOs to prevent holdups is the RAND hold-up"
to attempt & left out what MT pointed out.

1031

MT submission to ETSI. pg 2 of Doc. 3rd para.

"Their tend for multi func multi..."

Cumulative royalties too high and often prohibitive.

Section 6: MT proposed to address ambiguity to clarify

- 2 core principles - 1. Aggregated reasonable terms means ess Patent to take ones into account ones that are commercially reasonable given all other patents (not just std) for domain
- 2. Put Holders portion of Patent importance.

Commonly understood goods ^{identifications.} vs redefinition / change.

1130

IEEE OP manual. P. 3. Foreword. To be used in tandem with the bylaws. Collectively with bylaws form IEEE policy.

Patent holders submit at nominal competitive cost
sample license offering

1407

Symbol Technologies Blanket letter for 802.11 Nov 1995 received by MT where some pts came from in case.

1409?
2838

pg something blanket letter of assurance from MT. Was prov of a manual req lic at "nominal commercial cost" in place? yes.

2838

Copies of letters of A from MT published to ITU.

Patent Pools / collective lic agreements CLA.

Not sug Pools and should be made. Pat pools are comparable and often best avail comp.

1033

MT sub to ETSI in rel to min charge opt impact. Saw oth companies had put forward stuff rel y. CLAs. MT comments on these proposals.

- eval by ind exp.
- lic term by mem
- most mem are licensees => RAND
- lic term public
- one stop shop / all features of Pools.

These kinds of vol coll lic Ag all compat with and comp the min change opt Imp app.

Motorola didn't say pools were disc swaps in this doc.

Dual roll of members \rightarrow RAND

MT's assertion that pools were not a good benchmark does NOT agree with what MT told ETSI.

Believes MT told ETSI pools were good comps.

1032 - Antitrust Guid for lic of IP from DOJ from 90s.
p. 208 Crosslic and pooling may prov pro comp benefits by avoiding various plans

⁻²
MPEG ~~LA~~ pool app by DOJ. & misspoke.

Features - 3rd party analysis is joint licensing of comp inputs.

And can also license them separately.

2 letters, only MPEG and DVD pool.

Antitrust rules do not req low rates

For cons prod. Struc of Roy. is fixed price/unit also with caps or other things.

Running % royalty - CruiseShip or Jetliner a % captures more than std value of patents.

Pools often have field of use price variations.

MPEG-LA has cons. product and then per video title.

How does it hold benefit from std agent from Royalty?

Most imp exam is profits in comp markets, i.e. Gorp company makes profit selling comps from larger markets.

Lower costs incl own tech or faster time to market.

May have large install base and as such your install base might intrup w/ std.

This explains why companies might do Roy free lic.

If comp doesn't join pool doesn't imply higher value still subject to RAND commitment.

MT cross exam → Judge blows his nose at MIT.
Hug 24th Dep trans at back of binder.

Here as EXP on econ and std settings.

Here as econ, answered above again.

Never emp of std st 0

Warneg RAND

Neu

Never part in RAND lic.

Never testified ever → Cannot reas Royal

Never test on Georgia Pacific be applied.

Opinion is that RAND comm are 4. No Holdup and No stacking
and as long as GP are cons then it doesn't matter GP.

OP relating to principles reg what proposed lic are RAND.

Based on expand res on SSOs, but not exp on SSO or part in lic negs.

Understand Lots were MIT → IEEE admit → ITU, and submitted to these.

Don't think his views are based on ^{not} ITU/IEEE ^{views of people.} people, but are his
opinions are based on exp including interaction with ITU/IEEE people.

Dep page 124 line 7 → answers say can't point to specific writings.

No specific views on IP pol of ITU/IEEE is limited to what RAND
commitments mean. → Do opine that they want stds widely adopt and
is based on the writings.

No opinion on how IEEE define RAND / def of RAND.

Have opinion on prop interp of RAND in the event of disp. not def of RAND
in

Refers to Dep on Sim question, → Answering how account might define RAND.

Hasn't been asked about via pool and it's an appropriate. Hasn't done work
on via specifically, but ~~RAND~~ pools often best comparable.

Can ^{not} opine on H264 MPEG LA spec appropriate benchmark, ie general thing.

No detailed view of prior MT licenses, so can't say they include holdup.

Economists assume licenses have hold up value in them if done often the fact.

No specific rec to court

However one does No Hold up / No Snatching are needed.

Testifying about widely held views.

Can't offer legal opinions on

Don't actually know what Fair and Reasonable Mean? FRAND and RAND are
syn. Opinion is that there is a consensus that RAND is meant to prevent
hold up value /

3125 Sep 2nd 2009 paper - blog post of Talk to Stds by Guy Simcoe.
And a comment by Simcoe really mean:
No one knows what the FR ~~helps~~ ^{really mean} ~~to solve~~

His comment is about as long as the post.
RAND commitment often abused.

Page 2 "I would argue that the FR part of FRAND is no diff from
lect of commitment" ^{is a} more critical take is that the purpose "to address
SSO of antitrust concerns."

missed # Nov 5 2007 "Competing on Stds? Extraneous " Reg paper.
"In practice RAND/FRAND is unclear".

He keeps saying "I think RAND can be abused by saying it's nothing
more than a com to reg" vs no hold up.

314 - June 2007 - "peer reviewed Journal on the Internet".
↳ Not really peer reviewed as normal no feedback
other than

"RAND is common are not a workable solution to SSOs".

Direct test is that there's a broad testimony.

MT → trying to do "existing contract" vs what it might well concern

relevant. Problem with RAND is not a standard? Is it com not vs each (in).
com → percentage vs aggregated percentage.

→ "Sometimes pt holders make ^{com} better in belief it's so vacuous" that it's meaningless.
p/row/road is

3010 - Comments for ETC

! adm. pg 8. Not clear that RAND can place any rest on prosp prices or lic terms aside from ban on exclus.

Says SSOs basically fear anti-trust concerns among members and as such avoid spec definitions.

Recently recent discussions from Anti-Trust over to encourage SSOs.

Are conversations where anti-trust conc are reason for

3118 pg 6. NVM not might exhibit

any price

Rand avoids holdup and most actions is RAND.

No particular price.

Nether ITC no IEEE specify incremental value.

Patent pools don't do inc value.

Judge: "What dist bet Prof Posner and Judge Posner?"
"My inclinations betray me"

10:45 - No Bowyer today.

Do you agree it's left entirely ^{to the parties} by the means they deem appropriate?

Yes. subject to existence of commitment which can be enforced.

Evidence of Royalty stacking problem is MT's ^{sub}ject to ETSI.

No evidence of holdup in prior cases.

No evidence that this is holdup.

Can't show any evidence of any holdup.

in IEEE meetings no discussion of lic terms. Typ engineers anyway.
Most SSOs don't let ex ante neg take place under their auspices.
ex ante unilateral discussions feared.

1031 - was a proposal to ETSI not ITU or IEEE not EC211, H264 as ETSI doesn't do this.

Clarification - means something needs to be clarification.

Revise
Clarify
clarify
in common parlance.

MT thought clarifications would be good, as would other parts.

"They were rejected?" I don't know, I voted but not part of policy.
Aiming at too unclear to be contract.

All else equal pools with

can't assess MPEG on Via as benchmarks.

RAND can't have holdup, stacking, switching cost, and prices can be higher/lower than pool.

"Not done enough work to determine overall reliability of patent covering"
Pools use counting as a practical matter, don't know any outside of

Organizations stay out of license negotiations/feasible

→ for "So assume if a license granted it is reasonable"

3116 - 2008 paper EU Book Chapter p. 30

In practice RAND is vague. Let's them grant

admitted
other reminder
note.

"But rather presume criteria has been met as long as lic granted."

Redirect MS

1031 - p83.

Believe clarifications and so forth reflect community held views.

MT words. → Objective - Judges can and should look at aggregate vs patents
in vacuo

q MT cross. ETSI didn't adopt that bit

6.1 Clarification.

2 proposed changes would introduced the concept of Aggress and Reasonableness and introduce means not already there.

MS Dr. Matthew ~~Lynde~~ Lynde

ex 54 copy of CV.
admitted
new MT person

Phd Berkeley.
undergrad Berkeley

EE and French
academically! ^{academic!}

Cornerstone Research → Ex Professor, PWC IP practice.
expert on IP and damages.

Worked with clients on how to value things.
Adv board for LST board.

4073 Destructive of conclusions.

H.264 .2 cents per unit based on MPEG LA (best available ^{comparable})

802.11 no higher than 5-6 cents/unit no higher, based on Via 802.11
\$5-\$4 / chip of marvell. and ARM holdings. → but limited

Why cents/unit vs %. C.E. products pods usually use cents/unit.
Prob with % basis is that it's on value that is completely separate.

Exacerbated by downstream licensing that MT does where price is highest.

1151 - List of MT's H.264 patent 63 listed/disclosed. 16 in U.S.
numbers in his analysis. MS has some U.S. patents for H.264

1150 - MS H.264 essential patents. 3x on worldwide 42. 40 US patents.
For MS they were in MPEG and as such evaluated.

economic problem of coordination.

4074 - H.264 pod is best comparable b/c it represents best approx of
ex ante req.

26 licensors, 2400+ patents, 1100 licensors.

Allowed success adoption of std.

for things.

Judge → Define ex ante - before something ex post - after something.

For economics - it is before ~~implementers~~ ^{implementers} have sunk costs, by impl std.

1152 - MPEG LA pool

Not a good comp bc people getting revenue from products vs licensing.
But there were some.

Adobe Labs - ICLERP gets all/most lic.

Elec Telecom R Inst - all lic

German ← HHI - major licensor / major contributor
stuff known in English as → subst will/covers.

Trustees of Columbia - receive royalties

Disagree with "pools set rates low to enc adop vs comp holders.

bc wants lic revenue, and also get licensees.

If would no revenue, and get it widely adopted so everyone can benefit.

Since #s of patents is basis only attract low value patents.

Not what we observe. And point is that everybody just agree on the std.

Are these leading tech firms

AT&T (perhaps the leading "Innovation if my client would agree").

MT was involved in creation of MPEG LA pool, was in until last press release.

Naer suggested theirs were more value

MPEG-4 pool - participated in it

similar to LA H264 pool's terms.

Erico

LG

Fabitsu

Sony

Ericson, Toshiba

One patent overlaps into that pool.

Fl. - internal MT doc by STAMP group spe in licensing. Relates to MPEG 4 visual pool. Joining the pool helps with reasonable rates.

25 cents/unit.
but overall.

0-10-20 cents/unit for pool not per company

Is Google H264 LA licensor? yes.

103 - Has ^{ATK} ~~ATK~~ pool sometimes called H264 pool
 Google agreement with MPEG LA, std agreement.
 Conrobates

economist understands there's a H264 grant back and believes it extends to affiliates, including those purchased later.

Terms that terms/cond are fair and reasonable for the Grant Backs.
 Says rates provide further consideration for sublicense.
 Arms length transaction.

No pool has all relevant patents, and not possible to find them all.

1153 - Declaration 5 outside of MPEG-LA pool. - 84 outside.
 1154 - Companies with Blanket letters - 19 not in MPEG-LA.
 AT&T, Bcom, Lucent, Qcom, Thompsons who?
 NEC,

#s MS would pay MT under	Annual	per unit.		
as if all those were in pool 4077 as if all those were in pool as if all those were in pool as if all those were in pool	certified pool	502k	0.197	
MTs and other id'd patents rates + 10%	174k	0.185		→ allowed in pool agreement if pool decides. But haven't even done so yet.
Rates based on grantbacks	521k	0.204		
	67k	0.065		

MPEG-4 vis pool. Structure a bit diff. first 6 acc'd side (00¢/unit)
 Roy free up to 100k units. then 20¢/unit then 10¢/unit.

Payable from MS to Google → does that include MT's patent.
 Assuming Google hits one of the cases, and if it does about .2 cent.

Judge says definitively
 lawyer's work was getting
 Grantback provision!
 OBJ that he's not lawyer interpreting contracts.

1160 → Detailed calcs for summary figures
1161
1163

~~4074~~ → This is by share and accounts for expiration.
4077

Testimony relating to interlaced. Has not reduced due to interlaced's irrelevance.

802.11

1156 - MT patents has said are essential.
adm. 263 WW - 54 US.

MT has claimed $\frac{1}{4}$ in XBOX. (might be expired).

1125 Via licensing pool - much smaller. 5 licensors.
ETRT, Japan Radio, Philips, . . . , Nippon Telegraph

1164 - 11 licensees - including 5 above.

Formed 2t3-2t5. Timing matters & not as ideal b/c smaller and 802.11 was already widely adopted not ex ante. Tend to push the rates up, as investments already made.

1158 802.11 Patents dec essential.
Blantets - probably in 1000s acknowledged widely & domestic

1159 - Blantet companies. → 59 of them 80 Royal

4078 - Static graph of declared essential US. patent.
Via has 14. MT has 54 at least.

What's the face Marvell said 100s of declared US patents

Individual Patent weight → Via does count but does by region of world.

Filed 12:00 Noon on Sunday. Home work.

MT has definitely run out of TI water on the bench,
Another guy taking notes on an iPad has arrived no jacket on certain of
where to sit.

There's a copy of "Mobile Communications" text book sitting on
the MS table.

Dr. Lynde

52 - Shows rate structure of Via Pool.
Geographically weighted patent counts.

4074 - To account for low Via size, assumed rather essential patents got added.
MT assumed 26% were Motorola, though doesn't own anything approaching
26%. This is a highly favorable assumption.

	Annual	Per unit	
Current Rate	\$ 736 K	\$ 0.0516	→ Current Via licensing cost? Max in pool agreement 26% [but for 1/4 of projected units ^{patents} curr price is RAND]
Current +25%	\$ 920 K	\$ 0.6645	

1155 → Mark of Summary.

1165 / 1167 → At that time France Telecom was part of it.

Via pool not as ideal since it's done before. Doesn't have large participation.
Perhaps b/c it's too high a rate. Thinks this should be a ceiling.
Other benchmarks.

Smallest salable unit → Law is taken cognizance of the difficulty
so looking to smallest salable unit, as opposed to the thing as a whole.
\$3-\$4/chip marvell, (implication this is SSU).

Don't agree 2.25% to XBOX is RAND
would be 7-9 cents per Marvell chip.

ARM stuff → 1%, sets ceiling. <sup>OS J lect of foundation. overruled (but prob fair since
he was wrong
you need more
formal in ASIC
see Intel foundation).</sup>

1190 - Arm 2011 Annual Report. Arm was charging \$0.01/unit.
\$0.05 to licensing.

3-4 \$ per Marvell chip

Dem for RAND Roy of MT 802.11

9060

Not more than 5-6 \$/data Comb Arm 8-9 \$/unit

Marvell.
↑
MT 2.25% for SSU
7 to 9 \$/unit

6 MT's internal STAMPboard presentation (signed off on Royalties) set 18th 2003. Wifi beginning to take off.

PC segment / OEM numbers.

MT: hoping for 0.1% of laptop selling price.

Indiecap consulting; specialized in patent portfolios. Generally retained to max royalty.

65,66 & indiecap

MT needs to consider strategy and the risk of selecting in Indiecap. $\$300 \times 0.1\% = 30¢$

Typical PC has many standards or

67 - Architecture such as this was discussed internally. Proposed 802.11 final royalty 0.1% for Gateway.

Indiecap applied a 1/4 of entire standard's value.

This exaggerated the value. Do this in form and level.

This was not put forward with any expectation of RAND commitments.

MT expert

Too low b/c 802.11 is now more widespread. Increases danger of holdup.

ex post facto negotiations after wide spread. Even less essential patent becomes like a bullet, and it only takes one to kill.

MT's shared head lawyer (should just pretend to be captain Phard).

"Good thing the Dr. Seuss character who is the defensor of the law isn't here, he'd be annoyed at you" "I apologize to the 300k in the room."

Not an expert in SSO. Testified in trials a couple dozen times.

Never dealt with SSOs except this litigation.

Never did anything specifically on patent pools before.

Never negotiated any std (or non std) ess patents.

Did advised

about 67 licenses but no std essential

2970 - Letter on std setting read issues June 2011. David Kleiner and Gary Monasco.

Didn't speak to any of them, nor existence of that letter at option creation time.

June 2011 7 months after lawsuit filed.

"There's little evidence that patent holdup is a real problem." Do you have any evidence/basis for saying holdup is very serious, but economic

go to Dep Nobasis to agree/disagree

"Concerns about patent holdups should not extend to bilateral business-- which may include other issues".

No basis to agree or disagree if typically bilateral negotiations vs multilateral pools.
"True in my experience"

A Rand commitment can result from Bilateral negotiations.

No investigation of other MT licenses where holdup was involved. Was analyzing proposed.

Expert on Royalty Stacking. 802.11 roy stacking. Some debate in profit on whether 802.11 has a Royalty stacking issue. Suit about presently no assertion of many patents, so not a problem YET.

H264 industry, no literature of stacking problem, Not aware of any very successful pool, most outside have forbore.

3013 - "Complements problem within Std Setting: Assessing Roy stack prob"
Quote about members getting "discounted cross licenses" → no reason to disagree but no evidence of any discounted cross license.

"This whole dispute shows the problem with deciding individual values" - transaction costs.

He's relying on Patent pools as comparable not MT.

No analysis of patent value.

Patent pools sometimes

LOG 6

"To Join or not to Join, Patent pool Particip and Rent sharing"
p. 207. Firms with higher value patents are less likely to join.

Empirically not the case. Theoretically, this is true everything else equal.

Bilateral negotiations are very expensive.

Pools can have lower rates b/c lower transaction costs.

pg 166 Dep.

Cell phone
mic's
feedback.

The

Biasing Patent Pool transaction cost

"I thought I answered it!" "It's max profit contrary to RAND" NO ← DEP "and there's what I just said"

↑ and he didn't
a more qualified.

Dep 8/58 5-10 "Mot, IBM, Nokia didn't join". each

No one ~~not~~ forced to join pool.

Nothing wrong as long as

Don't know about Nokia/IBM ~~licensing~~.

3/24

Via Pool MS didn't join. Don't recall asking why MS didn't join.

No reason not to? wasn't necessary.

Dep MS then reads in next question about how it wasn't necessary.

MT not being nice w/ Dep. →

Email - Lynda can't really see it.

About Via Pool.

"MS prefers to enter with Bilateral discussions individually".

Not many people in the pool. No reason to dispute.

4080

→ struck

Smallest - Saleable Unit → was referring to SSU. → Can't give Legal Def of SSU - as other elements may be

Economic portion of appropriation. Doesn't know if XBOX provides stuff. To an economist obvious that chip is obvious the SSU.

Regardless of technical or legal things chip is only reasonable

ARM was corroborative not comparable to ex ante.

Don't think he's seen ARM License. "Doesn't manufacture ASI" expanded.

Calced stuff from what restrictions Arms license poses on ^{uses of} ARM's Patents? NO

Didn't determine if it covered making your own chip, if it was restricted

to Dep to deal with restricted vs unrestricted. ← MT needs to ask more precise questions.

Arm license is proprietary stc.

Indiecap studied only 5 SEPs, MT how many more.

only 2 was considered by Indiecap. Didn't look into it.

17

Did nothing to assess relative value of patents in litigations.

Didn't look for how Indiecaps

2 Symbol Patents found fees and infringed 8% NSP agreed neither in

Range of rates compliant with RAND is a

The RAND arrangement for ^{USP} royalty is same range of the point estimate.
0.2 I at few tenths of cents. few cents \pm the 5-6 cents 802.11.

Assessment of RAND not aware of being in damages case law, total market value is ^{typical}

In real world expensive to audit ^{roy} rates.
USP/unit pricing can be chosen as its easy.

^{per watt}
Reasonable to use a per unit calc even if

"Do you take into account the extent to which MS

Lucent v. Gateway.

Big lot of things trying to get him to say can calc ^{estimate} as % NSP, and doing it as % NSP is reasonable.

Participated in Fujitsu. Testified RAND rate was higher than via rate.

MS cross.

Indiecap didn't consider 2 symbol patents.

Oct 20th believe the 2 symbol patents had expired. 25% indiecap greatly exaggerates even with a few extra things.

If a company ran up trans costs by imposing if everyone wanted 2.25% then stacking issue
Do you believe MT has stacking problem with offer? yes

MT has 12 remaining witnesses
are they really going to call 12 witnesses and which ones.
Sun 4:00pm is deadline. advise by 4:30 pm tomorrow list for Mond.

If you know someone is out comm without games.

MT OPENING.

1/2 way through processing

MS wants patent pool rates vs Bilateral rates.

No multilateral ex ante negotiation.

Pools ~~are~~ don't show

Patent pools ^{voluntary} ~~optional~~, Patent co-ownership. Every patent found on well known Buzz tweets.

The pools used for all SEP discourage strong contrib to ~~standards~~.

Important tech rejected H264 rejected MPEG LA
Rejected via pools (see MS)

and would call old licensing #s.

MT wants bilateral #s and this is how the real world works.

MT wants 2010 negotiation simulation. like that of Georgia Pacific.

All applicable ~~things~~. MT provides basis for this GA process.

ITIE = gox stuff about RAND. Leave to parties.

econ guy proper frame for RAND ~~neg~~

Ross Smith IBM explain why pools aren't good tool

Luthra H264 MT guy testify regarding contrib.

Patent experts discuss value of

Williams Breadth of 80%!! etc.

Draebick H264 aspects.

Davies - tech valuation to prod line realistic royalty

Slegumar - survey of users

Daley - VP MT former lic negs. Describe licenses

Dohoe - 20 yrs head of Samsung - explain how would have been conducted.

Witness minor real world lic agreements. Explain real world ~~not~~ accidents.

Lead negotiators languish for months.

Fair and constant with Moto's

do I, Judge here

Judge → what auth for MS cross licenses given not actual Bilat negot.

Luthra MT witness.

education BE - India MS Delhi, PhD Systems UP Phil

works MT, IT including pre app.

VP and MT follow - manage group eng in dig video comp,

MPEG2, ~~4~~, H.264. next gen → HEVC. Cochair H.264

5000 - list Patents related to H264 of MT
270, 283, 271-78, 280-282, 265-66 = might be wrong.
Krauss Wu ERTS

424 - Overview of H264 AVC Rec has trouble understanding witness.
Fig 18 - Part of ret code.

Doesn't agree with most part being there for TML-9, high res interlaced
imp for SD and HD TV.
Krauss and Wu are in groups.

Why did Moto work on interlaced? MT does distribution for TVs,
and interlaced video is used, they format

2342 MPEG submission. July 2002.
Document provided, presented that interlaced formats remain
ubiquitous in worldwide TV (MT, CBS, HBO some other people)
New stds should support interlaced for common success.

current TV, cable 1080i, 480i, 576i
Video capped in i is more efficient to encode in i

You lose some info about i converting to P. You double the pixel
count, bit rate doubled. Need 2x coding effort to get back

2007. Test verification of 50% improvements → only applied to small
res, and P.
Lots of improvements for High res interlaced.

5001 Sig improvements chart on where improvements were made.
Tried stuff and implemented, tried other stuff.
Results of tests.

General Benchmark was the currently existing std. Use current std
to show given improv is better than the current std.

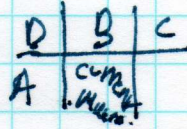
2002. VCI - Part of MPEG-4 prof used for streaming with H.26L.

423 - MT VCEG-07 submission. Coauthor of Doc.
Describes encoding tools

Figure 9. Discussion of PMV, motion vector prediction.
in the Efring patent.

268 - Fig 7 Eifrig patent.
Using these 3 blocks is advantageous
(Mention why better than other blocks)

610 p. 21. Using ABC better than ABD
(but what about underneath?)



ex 423 - testing different coding tools for inter

3382 - JBT 02D2? Gary Sullivan and Luthra + others.
What did JVT determine in VCEG ~~MB~~ vs single MB ~~AF~~ needs more work.
Improved PICAFF.
Not efficient b/c you want 16x16 and 8x16 at high res. So doing it at pair level.

3277 in Ander and a big board.

2209 - MT proposed breaking into ^{super macroblock later changed to} MB-Pair

220 Fig 11 MBpair AFF

Top and left are better.
MBpair vs PICAFF is 20%
Compared to PICAFF as it was the thing currently in the std.
Prior submission was single MB. Committee liked MBpair much more.

674 - Mot C-139 JVT sub. What

Recorder having lots of issues.

~~2224~~
2227

videotele submission. - they tested that our sim results + that frame field
1190-1890 on test sequences.

MBAFF family gave it patents

~~674~~ - GMT lawyer fault.

654 - BOTI - co author what did MT proposed PICAFF improvements
adm. Fig 3.

Fig 23 P18 - compares adaptive PICAFF-HQ frame level quality.

Perf improved. JVT adopted MTS improved stuff into std. PIAFF got
better more patents.

21

675 JVT C140 4x4 scan 8x8 scan.

MTU presented 7% improvements

676-

2281 - Samsung tested 8.64% and recommended to adopt it.
Another simulation

Page 135 - Mot 4x4 scan is in the std. 8x8 scan in std in phase 2 a year later. One patent for each.

Any alt scans proposed? Sony did.

653 - Sony sub. pg 3. alt 4x4 scan. It looks more complicated.

226 JVT output document. discussion of Sony BTJ submission.
p. 28 Small gain need to submit again / acceptance.

MT ~~was~~

Trial Mon 9-12 1-4

8:45 am M will hear argument / 3rd parties.

MS: 2:00 - 4:40
MT: 3:30 5:35

M wits 4:30 Saturday.

Call some body who knows about something?