EXHIBIT 6

FINNEGAN
HENDERSON
FARABOW
GARRETT &
DUNNER LLP

901 New York Avenue, NW ▪ Washington, DC 20001-4413 ▪ 202.408.4000 ▪ Fax 202.408.4400
www.finnegan.com

JOYCE CRAIG-RIENT
202.408.6013
joyce.craig-rient@finnegan.com

March 2, 2007

T. Jesse Hindman, Esq.
DLA Piper
401 B Street
Suite 1700
San Diego, California 92101-4297

Via Electronic Mail
Confirmation by U.S. Mail

Re: Status of Discovery and Depositions
U.S. Philips v. Eastman Kodak, Civil Action No. 06-251-GMS

Dear Jesse:

I am writing to memorialize the substance of our telephone conversations regarding discovery and depositions in the above-referenced matter.

1. Discovery

The parties agree to extend the due date for responses to written discovery requests from March 5, 2007, until April 6, 2007. This includes the responses to requests for documents and things under Rule 34 relating specifically to Dr. John Morris, Norman Richards, Simon Turner, C. Brandis, U. Rothgordt, Gerald Weth, and Karl-Heinz Wenzel .

2. Depositions

The parties agree to postpone the 30(b)(6) deposition of U.S. Philips noticed by Kodak for March 28, 2007, until approximately 30 days from the date responses to written discovery requests are served as outlined above.

At the present time, the status of the deposition situation is as follows:

John Morris is currently employed by Philips. Philips will make Mr. Morris available in the United Kingdom at a time that is mutually convenient and agreeable to the parties within approximately 30 days from the date responses to written discovery requests are served.

Simon Turner and Norman Richards are retired employees of Philips. As such, Philips will make every effort to make them available in the United Kingdom at a time

that is mutually agreeable and within approximately 30 days from the date responses to written discovery requests are served. Philips is unable at this time to represent that Messrs. Turner and Richards will be available without service of process as they are not within Philips' control.

C. Brandis, U. Rothgordt, Gerald Weth, and Karl-Heinz Wenzel are not within the control of Philips. As such, Kodak would have to independently effect service of process on these individuals to ensure their attendance at any deposition.

Sincerely,

Joyce Craig-Rient

Joyce Craig-Rient

JCR/bat

EXHIBIT 7

ISO

INTERNATIONAL ORGANIZATION FOR STANDARDIZATION
ORGANISATION INTERNATIONAL DE NORMALISATION

ISO/IEC/JTC1/SC2/WG8

CODED REPRESENTATION OF PICTURE AND AUDIO INFORMATION

ISO/IEC/JTC1/SC2/WG8 N817 Rev 0
September 1988

JPEG 12-1-R0

Source:

Graham P Hudson, British Telecom
(Chairman Of The Joint Photographic Experts Group)

Title:

Report Of The Joint Photographic Experts Group Meeting 9-13 May 1988, Communications Canada, Ottawa

1.0 Opening Of Meeting/Review Of Papers/Approval Of Agenda
N714

The papers tabled, listed in annexe 3, were assigned to agenda items. The agenda, N714, shown in annexe 1 was approved. The members attending the meeting are given in annexe 2.

The JPEG met on Monday afternoon, Wednesday morning and Thursday afternoon. A special adaptive DCT enhancement group met on Tuesday and Wednesday evenings.

2.0 Approval Of The Report Of The Last JPEG Meeting
N715, N720, N721, N726, N747, N748, N757, N758, N762, N763

Some editorial corrections and a few clarifications were made to the draft report N715 Rev 0. In particular in the agreed statement, section 5.1, the term 'adaptive DCT' is to be used to refer to the adaptive discrete cosine transform that will result from the refinement and enhancement process.

N721 and N757 both confirm that the Copenhagen ADCT subjective testing pictures can be obtained from the executable code supplied. Details of the verification of the ABAC picture are given in N726. BSPC was verified with the exception of the 0.75bit/pixel stage as described in N720.

3.0 Functional Specification Review
N727, N742, N766

The draft functional specification N766 was presented and a number of modifications agreed. The Copenhagen quality should be maintained at the 0.25, 0.75 and 2.25 bit/pixel stages but exact compression targets are not required. A useful lower bit rate is also expected. A graceful progressive build-up with greater than 4 stages to a lossless picture is required. Reversibility should be achieved with a compression of typically 2:1. The technique should be capable of operating from 8 to 16 bits/pixel/component. A revised functionality document N766 was produced and agreed.

There was much discussion on the amount of detail that would have to be specified in the standard for the DCT and IDCT algorithms. Annex 2 for N766 was produced stating that:

DCT precision will require to be specified to ensure that there is no degradation of the picture. The IDCT used in the decoder and encoder must be identical for lossless applications. For many applications, however, not requiring lossless, a relaxed IDCT may be economically desirable. The specification of the DCT precision and the IDCT algorithm will require further study.

4.0 Enhancement Program Review
N724, N743, N744, N745, N752; N764, N753, N754, N777, N778

Current developments were discussed in special experts sessions chaired by Alain Leger. The papers listed above were presented. The main points raised for future consideration, as given in N776, are -

low bit-rate image
graceful progression
extensibility
accuracy
DCT kernal
implementations
testing and conformance.

A report of the enhancement sessions is given in N____.

In order to provide a common foundation for developers KTAS agreed that to supply the ADCT source code in a Vax tape format.

5.0 Coding Syntax Development
N717, N725

There was very little time to discuss the coding syntax for the future photographic standard. The chairman asked members to be prepared to discuss at the next meeting whether WG8 DP9281 Pt1 (N717) or ISO8825 ASN1 coding rules would be most appropriate.

6.0 Standardization Schedule
N732

To further progress the technical enhancement and refinement process there will be a JPEG Ad-hoc meeting on 11-13 July in Rennes. The final proposal for technical options will be made at an Ad-hoc meeting following the PCS in Turin on 15-16 September. Agreement on the technique and initial work on the draft standard should be made at the next full JPEG meeting in London on 19-23 September. It is planned to agree a draft standard at the JPEG meeting in Morristown on 20-24 February, 1989.

7.0 Any Other Business

7.1 Liaison
N697, N718, N733, N769, N784, N789, N791

Document N697 and N733 were presented stating CEPT requirements for photographic videotex on the ISDN. It was considered that the JPEG adaptive DCT technique should meet all CEPT's functional requirements. It is hoped that the technique can be adopted as a European recommendation and the WG8/JPEG will keep CEPT informed of progress towards a draft standard by February 1989. A liaison statement N784 was drafted to this effect.

The recent SC18/WG5 work on colour reference models and the conversion between models described in the ODA addendum on colour (N718) was presented. This work is of great

interest to the JPEG and details of the Y,Cr,Cb colour components used in the JPEG compression techniques will be sent to WG5 by Istvan Sebestyen.

The JPEG was informed of a meeting of DCT experts that was to take place at Martlesham Heath on 23-24 May to discuss the specification of a DCT/IDCT for VLSI implementation. A liaison statement, N789, was produced stating our requirement for an exact IDCT specification for lossless applications.

A lack of time prevented discussion of the document N791 from the IPTC. Hiroshi Yasuda will reply apologising for the lack of discussion and encouraging IPTC participation.

7.2 **Publicity**
N730, N731, N739, 740

For PCS it was decided to incorporate material on the KTAS subjective testing system into the paper on subjective testing. A total of 6 papers will be presented at PCS and copies must be submitted to Dr Chiariglione by 1 June. It was decided to add the names of other major contributors to the authorship of the papers. Some changes were also made to the principle authors for the Globecom papers. Draft papers must be sent to Dr Yasuda and to the IEEE by 1 June. All the amendments to the titles and authors are given in N731 Rev 1.

Members attention was drawn to the International Broadcasting Convention at Brighton, 23-27 September and to the Image Processing Conference at Warwick in July 1989. It was also reported that there will be a conference on VLSI for Image Coding at Berkerly in November, 1988.

With regard to the increasing number of request for information on ADCT and for test images, it was decided that responsibility would have to rest with national members to respond to request from within their own country.

7.3 **Patent Issues**
N730, N741

It was reported in N741 that the patent search instigated by DEC had so far not turned up any obviously applicable patents. Known patents appeared to relate to moving picture coding. Members were advised to have searches of their own performed.

7.3 Conclusion

As this was his last meeting as JPEG chairman and UK delegate, Graham Hudson thanked all the members for their effort and cooperation during the technique selection process, and in particular Hiroshi Yasuda for his support. Hiroshi presented Graham with a Japanese print. Graham said it would remind him of the many happy times he had spent at WG8 meetings over the past 5 years. Greg Wallace, the new JPEG chairman, said that he looked forward to the challenge of creating an adative DCT standard.

Annexe 1

Draft Agenda And Timetable For The JPEG Meeting
9-13 May 1988, KTAS, Ottawa

1 Opening of Meeting/Review of Papers/Approval of Agenda

2 Approval of the Report of the Last JPEG Meeting

3 Functional Specification Review

4 Enhancement Program Review

5 Coding Syntax Development

6 Standarization Schedule

7 Any Other Business

Annexe 2

List of Attendees of 9-13 May, 1988, Ottawa

Name	Company	Country
Arps, Ronald	IBM	USA
Bheda, Hemant	AT&T Bell Labs	USA
Chamzas, Christos	AT&T Bell Labs	USA
Chiariglione, Leonardo	CSELT	Italy
Dimaggio, John	DIS	USA
Endoh, Toshiaki	KDD	Japan
Forman, Ronald M	Crosfield	Canada
Fujiwara, Hiroshi	GCT	Japan
Friemelt, Joachim	Siemens	Germay, F.R.
Hagiwara, Hiroyuki	NTT	Japan
Hampel, Horst	SEL	Germany, F.R.
Hashimoto, Yoshitaka	Sony	Japan
Haskall, Barry	AT&T Bell Labs	USA
Hidaka, Tsuneyoshi	JVC	Japan
Ho, Ben	COM	Canada
Horowotz, Michael	Wang	USA
Hudson, Graham P	BT	UK
Ibaraki, Hisashi	NTT	Japan
Jolivet, Jean-Claude	SAT	France
Kwan, Andrew	COM	Canada
LeGall, Didier	Bellcore	USA
Leafloer, R	COM	Canada
Leger, Alain	CCETT	France
Ligtenberg, Adrian	AT&T Bell Labs	USA
Lohscheller, Herbert	ANT	Germany, F.R.
Mitchell, Joan L	IBM	USA
Nadai, John	DEC	USA
Omachi, Takao	NEC	Japan
Pasco, Richard c	IBM	USA
Park, Sang Gyu	ETRI	Korea
Pennebaker, William	IBM	USA
Poulsen, Henning	KTAS	Denmark
Sebestyen, Istvan Dr	Siemens	Germany, F.R.
Sezan, M Ibrahim	Kodak	USA
Simon, Allen	SRI	USA
Storm, James E	IDC	Canada
Touchton, Charles F	IBM	USA
Tricker, Dennis J	BT	UK
Vaaben, Jorgen	KTAS	Denmark
Vivian, Roy H	IBA	UK
Wallace, Gregory	DEC	USA
Weth, Gerald	Philips	Germany, F.R.
Yamazaki, Yasuhiro	NTT	Japan
Yasuda, Hiroshi	NTT	Japan

Annexe 3

Documents Tabled At The JPEG Meeting, 9-13 May 1988, Ottawa

WG8 No	Author	Title
N697	CEPT	Liaison letter to ISO and CCITT
N723	Hudson	Selection of A Still Picture Compression Technique for International Standard
N724	Leger	Recent Discussions on ADCT
N725	Sebestyen	Information on CEPT Videotex, Protographic Mode Standard
N726	Tricker	Verification of IBM ABAC Final Selection Results
N727	Japan	Standardization of ADCT Algorithm
N730	Convenor	Patent Policy on JPEG Standard
N731	Convenor	Presentations on Our Activities in PCS '88 and GLOBECOM '88
N732	Convenor	Suggested Future Schedule of WG8 Meeting
N733	CEPT	Liaison Letter to ISO SC2/WG8
N739	Hudson	International Broadcasting Convention
N740	Hudson	Globecom 88
N741	Wallace	Patent Issues: ADCT and ISO in General
N742	Wallace	Alternative Approaches to Specifying DCT and IDCT
N743	NADAI	Suggested Modifications to the ADCT Proposal
N744	Wallace	Suggestion for Additional Option for the ADCT
N745	KTAS	Prediction of AC Coefficients from the DC values
N746	KTAS	Proposal for improved progression update
N747	Mitchell	Report of PTDG Meeting Dec 1987
N748	Touchton	ABAC Timing Tables
N751	ARPS	Adaptive Bilevel Image Compression (ABIC) Algorithm
N752	Pennebaker	Improving Image Quality in Low Bit Rate DCT
N753	SAT	Implementation of real time ADCT terminal for Still Image Communication Services
N754	CCETT	Filtering in the Cosine Transform Domain
N757	Clark	Verification Report for ADCT
N758	Touchton	Press Release: US Image Coding Committee
N762	Touchton	Algorithm Verification
N763	Poulsen	Problems of Replicating Exact Result from the January Meeting in IBM's implementation of the ADCT Decoder
N764	CCETT	ADCT Refinements

N766	Mitchell	CCITT/ISO Photographic Image Data Compression Standard Functionality and Goals
N767	SC18/WG5	Liaison Statement from ISO/IEC JTC/SC18/WG5 on Colour Raster Graphic
N769	Convenor	Meeting of DCT chip manufacturers
N777	Pennebaker	Visibility Threshold Robustness
N779	Mitchell	Results of using Adaptive Huffman Tables
N784	Hudson	Liaison statement to CEPT TE1
N785	Hudson	Recommendations of the JPEG meeting in Ottawa
N789	Wallace	Liaison letter to the Martlesham DCT Meeting
N791	IPTC	Statement of Requirement
N794	Convenor	Letter to IPTC

EXHIBIT 8

ISO

INTERNATIONAL ORGANIZATION FOR STANDARDIZATION
ORGANISATION INTERNATIONAL DE NORMALISATION

ISO/IEC JTC1/SC2/WG8

CODED REPREZENTATION OF PICTURE
AND AUDIO INFORMATION

ISO/JTC1/SC2/WG8 N 730
MAY 1988

SOURCE :Hiroshi Yasuda Convener of WG8

TITLE : Patent Policy on JPEG Standard

As we approach to the goal, patents relevant to the standard will affect very much. Attached CCITT document is their results on patent search concerning DCT coding which is great help for us.

We would like to make great efforts to find out relevant pantents, and if one or more such patents will be found, we would like to ask patent holders to declare to be obedient to the patent policy in ISO and CCITT. However, complete survey can not be done before standardization, thus I would like to suggest followings.

To ask each national member body to adopt our patent policy.

the holders of patents which are relevant to the standard, should first clarify the existance of patents, then should declare in ISO/CCITT meeting that they are obedient to the policy even if they are aware of the fact after the standardization.

As for the patent right concerned, non-discriminatory and reasonable term policy should be followed. However, this standard affects very much. I hope non-discriminatory, free of charge policy be adopted.

EXHIBIT 32

ISO/JTC1/SC2/WG8 N730
APRIL 1988

CCITT SGXV
Working Party XV/1
Specialists Group on Coding for Visual Telephony

Document #304
Jan. 26, 1988

SOURCE: Chairman
TITLE : Patents Relevant to the Flexible Hardware Specification (Issue 2)

This document lists up the patents which may be relevant to the Flexible Hardware specification based upon the submitted documents, #124, #161, #172, #209, #238, #262 and #278. Attached § numbers refer to corresponding sections in Doc. #249 (Flexible Hardware specification). It should be noted that further study is required for identifying to what extent these patents are relevant to the Flexible Hardware specification.

The list also includes those patents which are related to the implementation of the specification.

Reference to the corresponding part of the Recommendation will be made if it is drafted.

This document is an updated version of TD No. 3(Red Bank). Amendments are indicated by lines in the left margin.

US 3,632,865 (Jan. 4, 1972)
PREDICTIVE VIDEO ENCODING USING MEASURED SUBJECTIVE VELOCITY
B. Haskell, J.O. Limb
Bell Telephone Laboratories
- Motion compensated interframe prediction.
- One vector per moving region.

§1.2.2

US 3,679,821 (July 25, 1972)
TRANSFORM CODING OF IMAGE DIFFERENCE SIGNALS
M.R. Shroeder
Bell Telephone Laboratories
- Prediction errors are transformed, quantized.

§1.2

US 4,281,344 (July 28, 1981)
VIDEO INTERFRAME TRANSFORM CODING TECHNIQUE
F.W. Mounts, A.N. Netravali
Bell Telephone Laboratories
- Interframe prediction errors are transformed. Non significant error pels are replaced by some significant pels, thus number of transmitted coefficients are reduced.
- Shares common idea with variable blocksize transform.

§1.2

US 3,553,361 (Jan. 5, 1971)
CONDITIONAL REPLENISHMENT VIDEO SYSTEM SAMPLE GROUPING
US 3,553,362 (Jan. 5, 1971)
CONDITIONAL REPLENISHMENT VIDEO SYSTEM WITH RUN LENGTH CODING OF POSITION
F.W. Mounts
Bell Telephone Laboratories
- Conditional replenishment with PCM.
- Number of consecutive significant pels are coded with RLC/EOR.
§1.2.3

US 3,609,244 (Sep. 28, 1971)
CONDITIONAL REPLENISHMENT VIDEO SYSTEM WITH VARIABLE LENGTH ADDRESS CODE
F.W. Mounts
Bell Telephone Laboratories
- Address of significant samples are transmitted as the length of the interval between the location of its respective sample and the of the group.
- Address is variable length coded.
§2.2.3

US 4,541,012 (Jan. 4, 1982) / EP 0,084,270
VIDEO BANDWIDTH REDUCTION SYSTEM EMPLOYING INTERFRAME BLOCK DIFFERENCING AND TRANSFORM DOMAIN CODING
A.G. Tesher
Compression Labs, Inc.
- Block based conditional replenishment according to interframe difference.
- Significant blocks are transformed.
- Relevant to the 'intra mode' of the Flexible Hardware.
§1.2.3

JP 57-041069-A (Mar. 6, 1982)
INTERFRAME-ENCODING SYSTEM
H.Kuroda, T.Matsuoka
NTT
- Demand refresh
§3.7

JP 60-029068-A (Feb. 14, 1985)
TRANSMISSION ERROR DETECTION SYSTEM
M. Nishiwaki, S. Tsugane, H. Kuroda, N. Mukawa, K. Matsuda, M. Hiraoka
NEC, NTT, FUJITSU
- Parity check between frame memory contents in the coder and decoder for demand refresh.
§2.2.1

US XXXXXX (applied Jan. 7, 1986)
PictureTel Corp.
- Filtering control of the motion compensated block by sending side information.
§1.2.1

JP 61-288678-A (Dec. 18, 1986)
QUANTIZING NOISE SUPPRESSING SYSTEM IN INTERFRAME CODING
H. Kuroda, H. Hashimoto
NTT
- Motion vector control of loop filter
§1.2.1

US 4,562,466 (Dec. 31, 1985)
DIGITAL DATA TRANSMISSION/RECEPTION HAVING ADAPTIVE ERROR CONTROL
C.S. Clapp, D.P. Devimeux, JC.R. Jolivet, A.Riou, N.L. Shilston
BT
- Lines of the raster are numbered cyclically in groups of 8, the numbers being part of line synchronizing code words
§2.2.1

US 4,698,672 (Dec. 6, 1987)
CODING SYSTEM FOR REDUNDANCY REDUCTION
W. Chen, D.J. Klenke
CLI
- Two runlength coding codes, one is for the run followed by the first non-zero value, the second is for the run followed by other non-zero values
§2.2.3?

Note: Block matching motion compensation scheme first appeared in an IECEJ convention record published in July 1974 (July 25-27). The paper was authored by Y. Taki, M. Hatori and S. Tanaka (Tokyo University). The scheme was not filed as a patent.

IMPLEMENTATION METHODS

The following patents are not directly relevant to the Flexible Hardware specification but describe implementation methods.

EP 113514-A (Nov. 30, 1982)
TELEVISION SIGNAL TRANSMISSION SYSTEM USING CONDITIONAL REPLENISHMENT - USES DIFFERING SCANNING RATES FOR TRANSMITTER AND RECEIVER WHICH USES STANDARD RATE
M.D. Carr, D.G. Morrison, R.C. Nicol
BT
- Asynchronous operation between coder and decoder
§3.4, §1.1

EP 103380-A (July 23, 1982)
TRANSMISSION OF VIDEO INFORMATION USING CONDITIONAL REPLENISHMENT - HAS DATA FED TO PATH AT CONSTANT RATE FROM ENCODER BUFFER AND RECEIVED AT DECODER BUFFER, AND DATA READ AT UNEVEN RATE FROM BUFFER
JC.R. Jolivet, D.P. Devimeux, S.K. Clapp, A. Riou, N.L. Shilston
BT
- Marker signals are stored in an auxiliary buffer store for reference by the reading device.
§3.4

JP 55-158784-A (Dec. 10, 1980)
INTER-FRAME CODING DEVICE
A. Hirano
NEC
- Multi-step motion vector detection
§1.2.2

JP 56-143776-A (Nov. 9, 1981)
INTERFRAME ENCODER
A. Hirano
NEC
- Multi-step motion vector detection with use of the previous frame motion vector as the first step
§1.2.2

JP 57-037988-A (Mar. 2, 1982)
TELEVISION SIGNAL ENCODING EQUIPMENT
A. Hirano
NEC
- Matching error accumulation method using quantized values
§1.2.2

JP 58-107785-A (June 27, 1983)
ENCODER BETWEEN MOVEMENT COMPENSATION FRAMES
A. Hirano
NEC
- Use of forced simple interframe prediction
§1.2.2

JP 60-146588-A (Aug. 2, 1985)
SYSTEM AND DEVICE FOR ENCODING ANIMATION PICTURE SIGNAL
J. Ooki
NEC
- Halting of motion compensation in case of update operation
§1.2.2

XXXXXX (applied 9 July 1987)
CLASSIFIER IMPLEMENTATION
BT
- Circuit to find the optimum order of transmission for a set of transform coefficients
§1.2.5

END

EXHIBIT 9

I S O

INTERNATIONAL ORGANIZATION FOR STANDARDIZATION
ORGANISATION INTERNATIONAL DE NORMALISATION

ISO/IEC JTC1/SC2/WG8

CODED REPREZENTATION OF PICTURE
AND AUDIO INFORMATION

ISO/JTC1 SC2/WG8 N810REV
October 1988

SOURCE :Hiroshi Yasuda Convener of WG8

TITLE :Attendants of London Meeting (September 19-23, 1988)

Active Members ( ):abscent in London		Participation Notice	
Dr. Delogne, P.	Univ. Cathorique, Belgium	X	+32-10-45-0345
(Mr. Andrew Kwan	DOC, CANADA)		
Mr. Poulsen, Henning	KTAS, Denmark	X	+45-1-14-1373
Mr. Vaaben, Jorgen	KTAS, Denmark	X	
Mr. Jolivet, Jean C.	SAT, France	X	
Dr. Leger, Alain	CCETT, France	X	+33-99-02-4098
Ms. Nicole, Texier	CNET, France	X	+33-145-29-5435
Mr. Trocherie, Barnard	BULL, France	X	+33-16-447-8447
(Mr. Friemelt, Joahim	Siemens, FRG)	X	+49-897-224-7713
Mr. Hepper, Dietmar	D. Thomson, FRG	X	+49-511-418-2483
(Dr. Lohscheller, H	ANT, FRG)	X	+49-718-113-321
Mr. Krupa, Burkhard	PKI, FRG	X	
Dr. Sebestyen, Istvan	Siemens, FRG	X	+49-897-224-7713
Mr. Weth, Gerald	PKI, FRG	X	+49-911-526-2278
Dr. Chiariglione, Leonardo	CSELT, Italy	X	+39-11-216-9520
Mr. Lettera, Cataldo	CSELT, Italy	X	+39-11-216-9520
Ms. Conte, Luisa	CSELT, Italy	X	+39-11-216-9520
Mr. Asai, Koutarou	Mitsubishi, JAPAN	X	
Mr. Endoh, Toshiaki	KDD, Japan	X	+81-492-66-7404
(Mr. Ibaraki, Hiasshi	NTT, Japan)	X	+81-468-592829
Mr. Kawamura, Naoto	Canon, Japan	X	+81-3-758-0046
Mr. Kogure, Takuyo	Matushita, Japan	X	+81-6-906-3498
Mr. Hagiwara, Hiroyuki	NTT, Japan	X	+81-3-5565-1498
Mr. Hashimoto, Yoshitaka	SONY, Japan	X	+81-462-30-6284
Mr. Hidaka, Tsuneyoshi	JVC, Japan	X	+81-468-36-8540
Mr. Kondou, Tetsujirou	Sony, Japan	X	
Mr. Murakami, Tokumichi	Mitubishi, Japan	X	+81-467-47-1251
Mr. Ohsawa, Hidefumi	Canon, Japan	X	+81-3-758-0046
Mr. Ohta, Mutsumi	NEC, Japan	X	+81-44-856-2239
Mr. Ohzeki, Kazuo	Toshiba, Japan	X	+81-44-555-2074

Mr. Omachi, Takao	NEC, Japan	X	+81-44-856-2239
Mr. Ono, Fumitaka	Mitubishi, Japan	X	+81-467-47-1251
Mr. Osawa, Hidefumi	Canon, Japan	X	
Dr. Sugiyama, Kenji	JVC, Japan	X	
Mr. Yamada, Yasuhiro	JVC, Japan	X	
Dr. Yamazaki, Yasuhiro	KDD, Japan	X	+81-492-66-7400
Dr. Yasuda, Hiroshi	NTT, Japan	X	+81-468-59-2800
Mr. Kerr, Gordon W.	BTRL, UK	X	+44-473-64-3791
Dr. Nicol, R. C.	BTRL, UK	X	+44-473-64-3791
Mr. Simpson, David	Crossfield, UK	X	
Mr. Tricker, Dennis	BTRL, UK	X	+44-473-64-3035
Mr. Ahlgren, David R.	TCI, USA	X	
Dr. Arps, Ronald	IBM, USA	X	
Dr. Chamzas, Christos	AT&T Bell, USA	X	+1-201-949-1342
Mr. Dimaggio, John	DIS, USA	X	
Mr. Dellert, David	Kodac, USA	X	
Dr. Haskell, Barry G.	AT&T BELL, USA	X	
Dr. LeGall, Didier	BELLCORE, USA	X	
Mr. Ligtenberg, Adriaan	AT&T BELL, USA	X	+1-201-949-3897
Dr. Mitchell, Joan	IBM, USA	X	
Mr. Nier, Michael	KODAC, USA	X	
Dr. Pasco, Richard	IBM, USA	X	
Dr. Pennebaker, William	IBM, USA	X	
Mr. Rabbani, Majid	Kodak, USA		
Mr. Simon, Allen	SRI, USA	X	
Dr. Szabo, Joan	DEC, USA	X	
(Mr. Thelen, Donald R.	AT&T, USA)	X	
Mr. Touchton, Charles F.	IBM, USA	X	+1-813-878-5360
(Mr. Urban, Stephan J.	DIS, USA)	X	+1-215-657-5273
Mr. Wallace, Gregory R.	DEC, USA	X	+1-617-568-4681

EXHIBIT 10

INTERNATIONAL ORGANIZATION FOR STANDARDIZATION
ORGANISATION INTERNATIONAL DE NORMALISATION

ISO/TC97/SC2/WG8

CODED REPRESENTATION OF PICTURE AND AUDIO INFORMATION

ISO/TC97/SC2/WG8 N458 Rev0
March 1987

Source:

Graham P Hudson, British Telecom
(Chairman Of The Joint Photographic Experts Group)

Title:

Information To Be Given On Photographic Compression Techniques

Description Of Techniques

It is proposed that for an algorithm to be considered by JPEG for standardisation the following information should be provided -

description of the principles of the technique*

block diagram of the encoder and decoder*

detailed flow diagram of the encode and decode processes*

details of quantisers, thresholds, classification criteria, Huffmann code tables and address coding*

the data syntax for transmission/storage of the compressed image based on ISO DPX3/DPX2.2*

results of compression technique on all the test pictures for each stage of build-up on COST 211 format

executable code for the encoder and decoder to run on a Vax computer

The eventual standard should contain the above items marked* and photographs of the results for each stage of the progressive build-up. The information should enable a professional engineer to implement an encoder and decoder. All the parameters used in the encoder must be described and the values needed to give the specified values of compression must be given. The information must provide a precise, complete and unambiguous description of the technique.

Although the proposer has to give away a lot of information the proposer still has a commercial advantage in having his technique standardised as he will have much experience in the technique,

operating software including maybe real-time decoders and possibly custom hardware under development.

Intellectual Property (Patents)

Before a photographic technique can be considered for standardisation the proposer must state if the technique is the subject of any patents. The ISO directive states that a proposal for an international standard may include a patent if the following procedure is complied with -

1 member bodies putting forward proposals must draw the committees attention to any patents that are applicable

2 the patent holder must state that he is willing to negotiate licenses throughout the world on reasonable terms and conditions.

The relevant section of the ISO directive giving the precise details of the conditions is attached.

ANNEX 1E

Rules for reference to patented items in International Standards

If it is considered by a technical committee or sub-committee that technical reasons justify the preparation of an International Standard in terms which include the use of a patented item, there is no objection in principle to such a step, even if the terms are such that there are no alternative means of compliance. In such case, it is then recommended that the following procedures should be complied with:

a) ISO cannot give authoritative or comprehensive information about evidence, validity and scope of patent and like rights but it is desirable that the fullest available information be disclosed. *Therefore the member body putting forward a* proposal of such a kind should draw the technical committee's or sub-committee's attention to any known patent and like rights on a world-wide basis or any known pending applications, although ISO is not in a position to guarantee the authority of any such information.

b) If the proposal is accepted on technical grounds, the proposing member body should ask any known patent holder for a statement that he would be willing to negotiate licences under patent and like rights with applicants throughout the world on reasonable terms and conditions. A record of the patent holder's statement should be placed in the files of the Central Secretariat. If the patent holder does not provide such a statement, the technical committee should only proceed with the inclusion of a patented item if Council decides that exceptional circumstances justify this.

c) Should it be revealed after publication of the International Standard that licences under a patent and like rights cannot be obtained under reasonable terms and conditions, the International Standard should be referred back to the technical committee for further consideration.

EXHIBIT 11

JPEG
JOINT PHOTOGRAPHIC EXPERTS GROUP
ISO/IEC JTC1/SC2/WG10
CCITT SGVIII

JPEG-722
19 Aug 1991

SOURCE: Convenor (G.K.Wallace, Digital Equipment)

TITLE: Draft Annex L on patents for CD/DIS/IS

It has been widely requested that

(1) all known patents which are believed to be required for implementation of any specified coding process, be listed in 10918-1, and that

(2) there be a means to update this list whenever additional patents are identified.

I propose that WG10 respond to these requests by adding an informative annex to 10918-1, and that WG10 update this annex whenever a version of 10918-1 is published, including CD, DIS, IS, and any revisions to these. Also, if after IS publication, additional patents are identified, I propose that WG10 revise the IS to include the additional patents, by means of the ISO defect-reporting process.

A draft of the proposed annex is attached, and needs to be completed at the Santa Clara meeting, for publication with the DIS-10918-1 (or CD-10918.1-1, if a second CD ballot is required).

The criteria for including a patent on the list are proposed in item 4 of document JPEG-717.

Annex L (informative)

Patents

L.1 Introductory remarks

The user's attention is called to the possibility that - for some of the coding processes specified in Annexes F, G, H, and J - compliance with this International Standard may require use of an invention covered by patent rights.

By publication of this International Standard, no position is taken with respect to the validity of this claim or of any patent rights in connection therewith. However, for each patent listed in this Annex, the patent holder has filed with the ITTF a statement of willingness to grant a license under these rights on reasonable and non-discriminatory terms and conditions to applicants desiring to obtain such a license.

The criteria for including patents in this Annex are:

1) The patent has been identified by someone who is familiar with the technical fields relevant to this International Standard, and who believes use of the invention covered by the patent is *required* for implementation of one or more of the coding processes specified in Annexes F, G, H, and J.

2) The patent-holder has written a letter to the ITTF, stating willingness to grant a license to an unlimited number of applicants throughout the world under reasonable terms and conditions that are demonstrably free of any unfair discrimination.

This list of patents shall be updated during preparation and maintenance of this International Standard. During preparation, the list shall be updated upon publication of the Draft Intenational Standard and any subsequent revisions, and upon publication of the International Standard. During maintenance, the list shall be updated, if necessary, upon publication of any revisions to the Intenational Standard.

L.2 List of patents

The following patents patents may be required for implementation of any one of the processes specified in Annexes F, G, H, and J which uses arithmetic coding:

[list a.c. patents believed to be required for all implementations, not just some implementations; include contact department and mailing address at company which owns patents]

The following patents patents may be required for implementation of process(es) _____ specified in Annex(es) _____ :

[any others?]

EXHIBIT 12

JPEG
JOINT PHOTOGRAPHIC EXPERTS GROUP
ISO/IEC JTC1/SC2/WG10
CCITT SGVIII

JPEG-718
4 Aug 1991

SOURCE: Convenor (G.K.Wallace, Digital Equipment)

TITLE: Request for Patent Statements or Re-statements

Dear WG10 Participant,

As described in section 4.1 of JPEG-717 ("Proposed procedures for idenitfying patents in WG10), I hereby request that you identify the following:

> All patents which you believe, with reasonable likelihood, MUST be used in EVERY implementation (whether encoder or decoder) of any one or more of the 29 defined coding processes specified at the start of Annexes F through J of CD 10918-1.

Please include all such patents that you know of, whether they are held by you, by another member of your company or organization, or by any individual, company, or organization anywhere in the world.

(This is not a request to do a patent search - only to identify any patents you currently know of, which meet the criteria above.)

Please bring a letter with you to the August WG10 meeting in Santa Clara, answering the above request. If you know of no such patents, except those which have already been brought to JPEG's attention, please state that in your letter.

If you do know of any patents which meet the above critieria, and have not yet been brought to JPEG's attention, please include the patent numbers, titles, and patent-holder's names in your letter. If possible, please also attach a copy of the patents themselves.

EXHIBIT 13

ISO

INTERNATIONAL ORGANIZATION FOR STANDARDIZATION
ORGANISATION INTERNATIONAL DE NORMALISATION

ISO/JTC97/SC2/WG8

CODED REPRESENTATION OF PICTURE
AND AUDIO INFORMATION

ISO JTC97/SC2/WG8 N 741
May 9, 1988

SOURCE: Gregory Wallace

TITLE: Patent Issues: ADCT and ISO in General

1. Patent Search and Generic Infringement Issues

I am working with a prominent Boston law firm, specializing in patent law, to determine whether there might be any US, European, or Japanese patents which could possibly be infringed by implementations of the ADCT proposal.

We have performed an initial patent search, searching the patent databases back to the early 1970's for patents containing text strings like Discrete Cosine Transform, Cosine Transform, DCT, etc. We've also searched on the basis of individual and company names known to be in the business of image coding.

There are two basic ways by which an image codec implementation could infringe an existing patent. One is if a specific component within the codec were claimed within a patent. The other, of course, is if the entire image codec, viewed as a system, were too similar to an image codec system claimed within a patent.

2. Patents Found to Date: ADCT Looks Safe

Regarding system similarity, I have found patents on image codec systems that use the DCT and IDCT, but all that I have found to date have been for motion image coding, and are not at all like the system of the ADCT's proposal. They do not claim the DCT or IDCT as unique components; they claim their entire system as unique. Regarding component similarity, the major components of the ADCT proposal are DCT, quantizer, Huffman coder, etc. I have not found any patents which claim any of these components as unique.

The Discrete Cosine Transform itself, as a mathematical operator, is very unlikely to be claimed in any patent, any more than the Fourier Transform would be. Various Cosine Transforms have been discussed in the technical literature for over 20 years, longer than the the 17-year life of a patent in the U.S.

It is possible, though, that there may be specific algorithms for computing the DCT, and particularly, specific hardware implementations of an algorithm, that will be patented. To date, JPEG has not talked of specifying any particular algorithms for computing the DCT. If JPEG does specify any, it may be desirable to avoid any which are patented.

3. What if Someone Does Claim a Patent on the ADCT?

Though I and the law firm I'm working with are trying to do a thorough determination of whether any part of the ADCT will likely infringe some patent, it is impossible to PROVE that no one ever will come forward and claim to hold a patent which covers all or part of the ADCT. But, this situation would hold no matter which proposal JPEG had selected for refinement.

I have learned that ISO will NOT take a position on whether a patent legitimately does or does not cover an ISO standard. This is a legal issue, which can be decided only by a court, and only within a particular country.

If a party comes forward during the standards-development process, and claims to hold a patent covering a proposed standard, ISO takes a pragmatic approach. ISO asks the party to write a letter, stating it will grant an unrestricted worldwide license on fair and reasonable terms.

I talked to an expert on patents and ISO standards, who said he had never heard of a case where such a party was unwilling to write such a letter. Doing so is virtually always in that party's own interest. Furthermore, I have learned that ISO will NOT give any interpretation of what "fair and reasonable terms" are. So, by writing such a letter, the party is not agreeing in advance to any particular fee (for example, a fee it feels may be too low).

To repeat, ISO does NOT make any judgment about whether any patent-holder has a legitimate claim on a standard. Just because ISO has accepted a letter about licensing does not mean ISO recognizes the claim as valid. It is up to every prospective implementor of the standard to make its own decision about such a claim. The implementor may choose to ignore the claim, to pay the fee whether it feels the claim is not valid or not, to negotiate for a lower fee, to challenge the patent-holder in court, etc.

4. Conclusion

My conclusion is that the only difference between our present patent situation with the ADCT, and the patent situation with the other JPEG proposals considered at Copenhagen in January, is that to date, no party has claimed a patent covering the ADCT. For the other proposals, there would also be no guarantee that some party would not come forward in the future and claim to have a patent on some part of that proposal.

The ADCT patent search and examination I've initiated will complete within the next two months. At that time, I'll issue a final report to JPEG. As of this writing, I've not found any patent which appears to cover the ADCT.

EXHIBIT 14

JPEG
JOINT PHOTOGRAPHIC EXPERTS GROUP
ISO/IEC JTC1/SC2/WG8
CCITT SGVIII

JPEG-11.2-R1
February 24, 1989

Source: JPEG Chairman (Gregory Wallace, Digital Equipment Corporation)
Title: Recommendations from Livingston N.J. JPEG Meeting

Recommendation 1: Structure Of Standard

JPEG recommends that the Still-Frame Continuous-Tone Image Compression standard be structured as follows:

A. BASELINE SYSTEM: Every system is required to have the following capability, in order to guarantee image communication between any two systems:

Function: Sequential Build-up, Non-Reversible Compression.
Entropy coding: Huffman.

Other Requirements:

- Store default Huffman Tables, Quantization Matrices. (Encoder and Decoder).
- Receive custom Tables and Matrices. (Decoder).
- Handle Resynchronization Codes. (Decoder).

B. EXTENDED SYSTEM: In addition to the Baseline System capability, an extended system may select any of the following capabilities as options:

- Extended Huffman Coding
- Arithmetic Coding
- "Front-End" A.C. Prediction
- Bit-Slice
- Spectral Selection
- Hierarchical
- Reversible (Difference Image)
- Resynchronization Codes

C. INDEPENDENT FUNCTION: This function is a simple algorithm for Reversible encoding and decoding. The algorithm is identical to the one used to encode the D.C. terms in the Extended System. It can be used independently of the Extended or Baseline Systems.

EXHIBIT 41

Recommendation 2: JPEG's Release of Technical Specification

At this time, the JPEG Editing Committee is preparing a detailed draft technical specification according to the recommended structure above. The first draft of this specification to be released by JPEG will be available by July 1, 1989.

Recommendation 3: Thanks To Dr. LeGall and Bellcore

JPEG expresses its sincere appreciation to its hosts, Dr. Didier LeGall and Bellcore, for their kind hospitality and excellent facilities, for the Livingston JPEG meeting.

Recommendation 4: Thanks to Kodak and Crossfield

JPEG Expresses Great Thanks To:

- Mr. Michael Nier and Kodak
- Mr. Graham Webb and Crossfield

For their kind and professional assistance in testing the JPEG algorithm for High-Resolution Printing Applications.

Recommendation 5: Patent Restatements Due by June 5, 1989

All Proposers of any Part of the JPEG algorithm being considered for Standardization, must attempt to identify any Patents which Proposer believes would apply to his/her proposed Part of the JPEG algorithm. (This does not include Patents which, in the Proposer's opinion, are only related, but do not apply, to the Part he/she is proposing). If any such Patents are identified, the Proposer must obtain from the Patent Holder(s) a Statement of whether they will follow the ISO requirements. All of this information must be sent to JPEG Chairman by June 5, 1989.