

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY CORPORATION
Petitioner

v.

YISSUM RESEARCH DEVELOPMENT COMPANY OF THE
HEBREW UNIVERSITY OF JERUSALEM
Patent Owner

Case No. IPR2013-00219 (SCM)¹

Patent No. 7,477,284
Issue Date: Jan. 13, 2009
Title: SYSTEM AND METHOD FOR CAPTURING AND VIEWING
STEREOSCOPIC PANORAMIC IMAGES

PETITIONER'S REQUEST FOR ORAL ARGUMENT

PURSUANT TO 37 C.F.R. § 42.70(a)

¹ The IPR2013-00327 proceeding has been joined with this proceeding.

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Board's September 23, 2013 Scheduling Order, Paper No. 17, Petitioner Sony Corporation ("Sony") respectfully requests one hour for oral argument on June 18, 2014, as scheduled by the Board. Sony intends to argue the following issues, which Sony understands fall within the matters that the Board may address in its Final Written Decision:

A. Arguments Regarding Patentability of Claims 1-4, 7, 10, 20, 27-29, and 36-38 of the '284 Patent

With respect to the patentability of the claims 1-4, 7, 10, 20, 27-29, and 36-38 of U.S. Patent No. 7,477,284 ("the '284 Patent"), Sony intends to argue issues framed by Sony's Petition, the Board's September 23, 2013 Decision on Institution, and Patent Owner's December 19, 2013 Response:

1. As to Kawakita and Asahi:
 - a. Whether "a processor [to] generate a plurality of mosaics . . . [that] provide a sense of depth of the scene" is a limitation of the claims at issue.
2. As to Kawakita:
 - a. Whether Kawakita discloses generating a stereoscopic panoramic image pair that does not require adjustment for "faithful" stereoscopic viewing.
 - b. Whether a stereoscopic image pair generated by Kawakita's method that requires adjustment for "faithful" stereoscopic viewing is within the scope of the claims at issue.

3. As to Asahi:

- a. Whether the Board's construction of the term "stereoscopic image pair" encompasses image pairs recorded from positions separated by distances larger or smaller than the human inter-ocular distance.
- b. Whether a person of ordinary skill in the art as of 1998 would have understood the term "stereoscopic viewing" as it is used in Asahi to mean human viewing of Asahi's mosaic images to obtain a perception of depth (as Sony contends), or to mean calculating height (as Yissum contends).
- c. Whether Asahi discloses generating a stereoscopic mosaic image pair that, if viewed, provides a perception of depth, within the scope of the claims at issue.

B. Arguments Regarding Procedural Matters

With respect to Patent Owner's Motion for Observation on Cross-Examination, Sony intends to argue that Patent Owner has raised new issues and has belatedly presented evidence that should not be considered.

Sony also intends to respond to any arguments of Patent Owner that Sony has raised new issues and belatedly presented evidence in its Reply.

C. Arguments Regarding Admissibility of Evidence

With respect to evidentiary issues, Sony intends to argue that the exhibits YRD-2012 and YRD-2013 are inadmissible, as stated in Sony's Motion to Exclude Evidence.

IPR2013-00219, *Inter Partes* Review of U.S. Pat. No. 7,477,284
Petitioner's Request for Oral Argument

Sony also intends to respond to any arguments of Patent Owner that Sony-1042, Sony-1043, and Sony-1044 are inadmissible, as stated in Patent Owner's in Motion to Exclude Evidence.

Dated: May 14, 2014

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Certificate of Service Under 37 C.F.R. § 42.6(e)(4)

I certify that I caused a true and correct copy of the forgoing to be served via

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Dated: May 14, 2014

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