UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
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TOYOTA MOTOR CORPORATION,

Petitioner,

IPR2013-00412
VS. IPR2013-00413
IPR2013-00416

AMERICAN VEHICULAR SCIENCES, LLC,

Patent Owner.
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DEPOSITION OF

NIKOLAOS PAPANIKOLOPOULOS, PH.D.

Monday, February 24, 2014

New York, New York

Reported By:

LINDA J. GREENSTEIN

JOB NO. 89371

Nikolaos Papanikolopoulos, Ph.D.
exploited -- we had a camera mounted inside the car, and we use a location of the license plate with respect to the rest of the car, and we tried to compute also other characteristics; say, characteristics of the license plate.

And then based on the size, we try to keep the size constant, it allows us to keep constant distance as part of a vehicle following application.

Q. Did that system use a pattern recognition algorithm?

MR. BERKOWITZ: Object to form.

A. Again, let me clarify since we have these terms in my -- the claim construction I was given. Do you want me to answer --

Q. As you normally use that term, did that system, the one that you refer to in paragraph 4 of your 419 application, use a pattern recognition algorithm?

MR. BERKOWITZ: Object to form.

Lack of foundation.

A. Normally use -- again, under the

Nikolaos Papanikolopoulos, Ph.D.
assumption of the claim construction that I was given, the answer is yes.
Q. What about under your ordinary usage of that term?
MR. BERKOWITZ: Object to form and lack of foundation.
A. By using the claim construction of pattern recognition, yes.
Q. I wasn't asking about the claim construction in this case.
I was just asking about as you would normally use that term in your research, did the system of paragraph 4 use a pattern recognition algorithm?
MR. BERKOWITZ: Object to form.
Lack of foundation.
A. Given the precision that I need to provide with respect -- since we have many terms which are used, I think I need to stick to use of the term in my declaration. So in this case, yes.
Q. So you've used the term "pattern recognition" in some of your papers, haven't you?

Nikolaos Papanikolopoulos, Ph.D.

part of the claim construction, so I'm going to ask you the same clarification.

Q. First, as you've construed the claims in this case, did your license plate system involve trained pattern recognition?

MR. BERKOWITZ: Object to form and foundation.

A. So given the claim construction I have here, we didn't use trained pattern recognition means.

Q. And then as you used that term before these IPR matters, would you have said that that used trained pattern recognition?

MR. BERKOWITZ: Object to form and lack of foundation.

A. The term "trained pattern recognition" is not really common. I mean, we use other terms, so I would say no.

Q. Okay.

How did the system detect a license plate?

A. So I can give you my recollection.

Nikolaos Papanikolopoulos, Ph.D.

perimeter of the license plate, so it was a scale or a number, to I don't want to be -- but mainly images.

Q. Okay.

And did you have on the system any data or images relating to license plates?

A. I don't recall this, to be precise.

One thing I recall is actually we used to have rectangles, or models of rectangles.

I don't recall exactly if we had the license plates or -- and also, I'm not sure in Yue Du's thesis -- I asked him do this, but I'm not sure if this was ever implemented.

Q. So it's possible in a system of this type to have the system look for rectangles rather than specifically compare captured images to stored images of license plates?

MR. BERKOWITZ: Object to form. Foundation.

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