

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Patent of: Monroe  
U.S. Patent No.: 7,643,168 Attorney Docket No.: 18768-0065IP1  
Issue Date: January 5, 2010  
Appl. Serial No.: 11/617,509  
Filing Date: December 28, 2006  
Title: APPARATUS FOR CAPTURING, CONVERTING AND TRANSMITTING  
A VISUAL IMAGE SIGNAL VIA A DIGITAL TRANSMISSION SYSTEM

**Mail Stop Patent Board**

Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT NO. 7,643,168**  
**PURSUANT TO 35 U.S.C. §§ 311-319, 37 C.F.R. § 42**

## TABLE OF CONTENTS

I.	MANDATORY NOTICES UNDER 37 C.F.R § 42.8(A)(1).....	1
	A. Real Parties-In-Interest Under 37 C.F.R. § 42.8(b)(1) .....	1
	B. Related Matters Under 37 C.F.R. § 42.8(b)(2).....	1
	C. Lead And Back-Up Counsel Under 37 C.F.R. § 42.8(b)(3) and Service Information.....	2
II.	PAYMENT OF FEES – 37 C.F.R. § 42.103.....	3
III.	REQUIREMENTS FOR IPR UNDER 37 C.F.R. § 42.104.....	3
	A. Grounds for Standing Under 37 C.F.R. § 42.104(a).....	3
	B. Challenge Under 37 C.F.R. § 42.104(b) and Relief Requested .....	3
	C. Claim Construction under 37 C.F.R. §§ 42.104(b)(3).....	5
	1. “Transmission Protocol” (claim 16-18) .....	5
	2. “Media being suitable to embody ... algorithm” (claims 1, 22, 24, 26, 27).....	5
IV.	SUMMARY OF THE ’168 PATENT .....	6
	A. Brief Description.....	6
	B. Summary of the Prosecution History of the ’168 Patent.....	7
	C. Invention Date of the ’168 Patent.....	7
V.	MANNER OF APPLYING CITED PRIOR ART TO EVERY CLAIM FOR WHICH IPR IS REQUESTED, THUS ESTABLISHING A REASONABLE LIKELIHOOD THAT AT LEAST ONE CLAIM OF THE ’168 IS UNPATENTABLE .....	10
	A. Ground 1 – McNelley (Ex. 1004) Renders Obvious Claims 1-31 .....	10

B. Ground 2 – McNelley (EX-1004) and Nagai (EX-1005) Combine to Render Obvious Claims 16-18.....	33
C. Ground 3 – Nagai (Ex. 1005) Renders Obvious Claims 1-18, and 21-31.....	36
D. Ground 4 – Nagai (Ex. 1005) and Sakata (EX-1006) Render Obvious Claims 19 and 20.....	57
VI. NON-REDUNDANCY OF GROUNDS PRESENTED .....	58
VII. CONCLUSION.....	60

EXHIBITS

- LG 1001 U.S. Patent No. 7,643,168 to Monroe (“the ’168 patent”)
- LG 1002 Prosecution History of the ’168 patent with appended physical exhibits (“the Prosecution History”)
- LG 1003 Declaration of Dr. Robert Stevenson
- LG 1004 U.S. Patent No. 5,550,754 (“McNelley”)
- LG 1005 Japanese Patent No. H9-37129 (“Nagai”) and Certified Translation
- LG 1006 Japanese Patent No. H8-191435 (“Sakata”) and Certified Translation
- LG 1007 McGraw-Hill Dictionary of Scientific and Technical Terms Fifth Edition, 1994.
- LG 1008 Roger Cheng, The First Call from a Cell Phone Was Made 40 Years Ago Today, CNET (April 13, 2013 7:13 AM PDT)  
<http://www.cnet.com/news/the-first-call-from-a-cell-phone-was-made-40-years-ago-today/>
- LG 1009 BellSouth, IBM Unveil Personal Communicator Phone  
<http://research.microsoft.com/en-us/um/people/bibuxton/buxtoncollection/a/pdf/press%20release%201993.pdf>

- LG 1010 Buxton Collection: Simon, <http://research.microsoft.com/en-us/um/people/bibuxton/buxtoncollection/a/pdf/press%20release%201993.pdf>.
- LG 1011 Walke, *The Roots of GPRS: The first System for Mobile Packet based Global Internet Access*. *IEEE Wireless Communications*, October 2013
- LG 1012 ETSI GSM Technical Specification 7.07, *Digital cellular telecommunications system (Phase 2+); AT command set for GSM Mobile Equipment (ME)*, July 1996
- LG 1013 Richards, *The 30 Most Important Digital Cameras of All time*, PopPhoto.com (Oct. 22, 2013), <http://www.pop-photo.com/gear/2013/10/30-most-important-digital-cameras>.
- LG 1014 Canon Camera Museum: Canon Camera Story, 1976-1986, [http://www.canon.com/camera-museum/history/canon\\_story/1976\\_1986/1976\\_1986.html](http://www.canon.com/camera-museum/history/canon_story/1976_1986/1976_1986.html).
- LG 1015 Kriss, et al., *Critical technologies for electronic still imaging systems*, SPIE vol. 1082, pp. 157-184.
- LG 1016 NikonWeb.com, <http://www.nikonweb.com/rc760/> (last visited Dec. 08, 2014)
- LG 1017 U.S. Patent 5,477,264.

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.