

Microsoft Corporation, Petitioner

*v.*

Bradium Technologies LLC, Patent  
Owner

IPR2015-01432

U.S. Patent No. 7,139,794

September 19, 2016

## Grounds for Institution

We institute *inter partes* review on the following challenges to patentability:

Claim 1 as obvious under 35 U.S.C. § 103(a) over the combination of Rutledge, Ligtenberg, and Cooper; and

Claim 2 as obvious under 35 U.S.C. § 103(a) over the combination of Rutledge, Ligtenberg, Cooper, and Migdal.

## There is No Dispute That . . .

- 1) Rutledge and Ligtenberg display a “flat” top-down view
- 2) Rutledge displays map tiles at a single, common resolution at any one time.
- 3) The Ligtenberg file format deconstructs an image into image tiles in a hierarchical structure.
- 4) The Ligtenberg file format allows for reconstruction and display at a single resolution at any one time.
- 5) Rutledge/Ligtenberg do not prioritize tiles or data.

(1) Paper 32, pp. 5, 10, 15; Ex. 2001 ¶¶ 66–67, 91, 94, 98, 117; (2) Paper 32, pp. 10, 15–17; Ex. 2001 ¶ 66; (3) Pa

## There is No Dispute That . . .

- 6) Cooper does not disclose “image parcels” or prioritization of “image parcels.”
- 7) Cooper discloses ranking of objects that are comprised of vertices in a 3D environment.
- 8) Migdal employs calculated “clip maps” for multiple layers, each “clip map” being updated on a row-by-row basis as the viewpoint shifts.

# '794 Patent Claim 1

1. A client system for dynamic visualization of image data provided through a network communications channel, said client system comprising:

a parcel request subsystem, including a parcel request queue, operative to request discrete image data parcels in a priority order and to store received image data parcels in a parcel data store, said parcel request subsystem being responsive to an image parcel request of assigned priority to place said image parcel request in said parcel request queue ordered in correspondence with said assigned priority;

an parcel rendering subsystem coupled to said parcel data store to selectively retrieve and render received image data parcels to a display memory, said parcel rendering system providing said parcel request subsystem with said image parcel request of said assigned priority;

wherein said parcel rendering subsystem provides said assigned priority based on a determined image resolution level;

wherein said display memory is coupled to provide a display of predetermined resolution and said parcel rendering subsystem provides a determined optimal image resolution level based on said predetermined resolution;

wherein said assigned priority further reflects a determined proximity of the image parcel referenced by said image parcel request to a predetermined resolution level;

wherein said discrete image data parcels include a first fixed size as received by said parcel request subsystem and of a second fixed size as rendered by said parcel rendering subsystem; and

wherein said discrete image data parcels include a fixed-size array of pixel data.

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