

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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RPX CORPORATION  
Petitioners

v.

MD SECURITY SOLUTIONS LLC  
Patent Owner

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Case IPR2016-00285  
Patent 7,864,983 B2

Before SALLY C. MEDLEY, TRENTON A. WARD, AND WILLIAM M. FINK,  
*Administrative Patent Judges.*

FINK, *Administrative Patent Judge.*

**PATENT OWNER'S RESPONSE TO PETITION**

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Patent Owner MD Security Solutions LLC (“MD Security) respectfully submits this response to RPX Corporation’s (“RPX”) Petition for *Inter Partes* Review of U.S. Patent No. 7,864,983 (“’983 patent”). This filing is timely under 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42.120.

The ’983 patent claims and describes an improved system and method for monitoring a structure, which uses motion detectors, video cameras, image processing, and telecommunications networks and devices, to provide the user of the system with a more intelligent and responsive means of monitoring the structure. RPX contends that Claims 1-8, 11, and 18-20 of the ’983 patent are unpatentable as obvious over Milinusic<sup>1</sup> and Osann,<sup>2</sup> and that claims 9, 10 and 12–17 are obvious over Milinusic, Osann, and Ozer.<sup>3</sup>

“In an *inter partes* review instituted under this chapter, the petitioner shall have the burden of proving a proposition of unpatentability by a preponderance of the evidence.” 35 U.S.C. § 316(e). RPX fails to meet its burden to establish obviousness as to any claim of the ’983 patent because each of the proposed combinations fails to teach, suggest or otherwise disclose the “processor” limitations of independent Claims 1 and 11. In system Claim 1, a “processor” is “arranged to control said at least one camera and receive the image obtained by

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<sup>1</sup> U.S. Patent No. 7,106,333 B1, issued September 12, 2006 (“Milinusic”).

<sup>2</sup> U.S. Patent No. 7,253,732 B2, issued August 7, 2007 (Ex. 1004) (“Osann”).

<sup>3</sup> U.S. Patent Application Publication No. 2004/0120581 A1, published June 24, 2004 (Ex. 1005) (“Ozer”).

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