

Filed on Behalf of Petitioner

Paper No. _____

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**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

RPX CORPORATION and
PROTECTION ONE, INC.,
Petitioner

v.

MD SECURITY SOLUTIONS LLC
Patent Owner

Case No. IPR2016-00285¹
Patent No. 7,864,983

REPLY TO PATENT OWNER'S RESPONSE

¹ Protection One, Inc., who filed a Petition in IPR2016-01235, has been joined as a party to the petitioner in this proceeding.

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PETITIONER'S EXHIBITS

EXHIBIT	DESCRIPTION
1001	U.S. Patent No. 7,864,983 (“the ‘983 patent”)
1002	U.S. Patent Publication No. 2005/0267605 (“Lee”)
1003	U.S. Patent No. 7,106,333 (“Milinusic”)
1004	U.S. Patent No. 7,253,732 (“Osann”)
1005	U.S. Patent Publication No. 2004/0120581 (“Ozer”)
1006	U.S. Patent Publication No. 2007/0070185 (“Dy”)
1007	U.S. Patent No. 7,463,145 (“Jentoft”)
1008	Website: http://www.apple.com/pr/library/2001/10/16Apple-Powers-Up-Titanium-PowerBook-G4-with-New-G4-Processors.html
1009	Website: http://searchnetworking.techtarget.com/definition/terminal
1010	Declaration of Tal Lavian, Ph.D.
1011	<i>Curriculum Vitae</i> of Tal Lavian, Ph.D.
1012	File History of U.S. Patent No. 7,526,105
1013	Deposition Transcript of James Parker, taken October 27, 2016

I. INTRODUCTION

The '983 patent is directed to a security system with motion detectors that activate cameras when motion is detected in a monitored area to capture video or still image data of a potential threat. Ex. 1001 at 1:15-30; 5:67-6:6; 13:51-16:47. The captured image data can be viewed by a person and/or image processing can be performed on the captured images to evaluate the threat. *Id.*; see also *Id.* at 9:35-46.

The instituted grounds (claims 1-8, 11 and 18-20 obvious over Milinusic and Osann, and claims 9, 10 and 12-17 obvious over Milinusic, Osann and Ozer) demonstrate the unpatentability of all claims (1-20) of the '983 patent.

The Patent Owner Response (“POR”) does not challenge the reasons for combining the references in either ground, nor that the resulting combinations meet the majority of the limitations in claims 1-20. The POR raises only two challenges to the instituted grounds.

For independent claims 1 and 11 and most of the dependent claims, the POR raises only the same argument the Board has twice rejected - that CPU 360 in Milinusic’s server allegedly does not receive an image obtained by at least one camera. POR at 1-2. This argument is based on (1) a narrow interpretation of “receive” that is not its broadest reasonable interpretation (“BRI”); and (2) a mischaracterization of Milinusic. Milinusic’s CPU “receives” image data under

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