

Filed on behalf of Petitioner

By: Richard F. Giunta  
Daniel T. Wehner  
Randy J. Pritzker  
WOLF, GREENFIELD & SACKS, P.C.  
600 Atlantic Avenue  
Boston, MA 02210  
Tel: (617) 646-8000  
Fax: (617) 646-8646  
[RGiunta-PTAB@wolfgreenfield.com](mailto:RGiunta-PTAB@wolfgreenfield.com)

Paper No. \_\_

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

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RPX Corporation

*Petitioner*

v.

MD Security Solutions, LLC

*Patent Owner*

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Case No. TBD

Patent No. 7,864,983

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**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,864,983  
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.1 *et seq.***

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## I. INTRODUCTION

RPX Corporation (“RPX”) requests *inter partes* review of claims 1-20 of U.S. Patent No. 7,864,983 (“the ‘983 patent”) (Ex. 1001) pursuant to 35 U.S.C. § 311. The claimed subject matter of the ‘983 patent was well known before its filing date. *See, e.g.*, Declaration of Tal Lavian, Ph.D. (“Lavian”), ¶¶16-17.

The ‘983 patent is directed to a security alarm system for protecting a structure (e.g., home or building) and that can be remotely accessed via a handheld telecommunications unit such as a cell phone, personal digital assistant (PDA) or personal computer. (Ex. 1001 at 1:15-30; 5:67-6:6; 13:51-16:47). The security system includes one or more cameras and one or more motion detectors that activate the camera(s) when motion is detected in a monitored area proximate the structure. (*Id.*) The cameras capture images of the monitored area when the presence of a potential threat is detected and the images can be accessed locally or remotely to allow the potential threat to be evaluated. (*Id.*)

The security system may also analyze images captured by the camera(s) to classify objects detected therein and determine whether the detected objects pose a threat (e.g., by distinguishing between a young child who is likely not a threat and an adult or by distinguishing between a bear or other large animal that may pose a threat and a small animal like a cat that does not). (*Id.* at 9:35-46). The ‘983 patent describes several prior art security systems that included object identification (also

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