Filed on behalf of Global Tel*Link Corporation.

By: Michael D. Specht, Reg. No. 54,463

Joseph E. Mutschelknaus, Reg. No. 63,285 Sterne, Kessler, Goldstein & Fox P.L.L.C.

1100 New York Avenue, NW

Washington, D.C. Tel: (202) 371-2600 Fax: (202) 371-2540

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBAL TEL*LINK CORPORATION Petitioner

v.

SECURUS TECHNOLOGIES, INC. Patent Owner

PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 9,007,420

Mail Stop PATENT BOARD

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



TABLE OF CONTENTS

INT	RODU	JCTION AND RELIEF REQUESTED (37 C.F.R. § 42.22	(a)) 1		
A.		± • • • • • • • • • • • • • • • • • • •	2		
B.			9		
IDE	NTIF	ICATION OF CHALLENGE (37 C.F.R. § 42.104(b))	11		
A.	Citat	tion of Prior Art	11		
B.	Statu	itory grounds for the challenge	12		
THE '420 PATENT					
A.	Spec	rification	13		
B.	Ordi	nary Skill in the Art	16		
C.	Clair	ms for Review	17		
	1.	Claims 1, 11, and 20: Independent claims	17		
	2.	Claims 2 and 12: Prompting the user	20		
	3.	Claims 3, 4, 13, and 14: Capturing still image and video	20		
	4.	Claims 5, 10, 15 and 20: Facial recognition and 3D face detection	20		
	5.	Claims 6 and 16: Storing the captured image	21		
	6.				
	7.	Claims 9 and 19: Action when face not in image	21		
D.	Claim Construction				
	1.	· · · · · · · · · · · · · · · · · · ·			
	2.	characteristics of an image, such as measurements of feature	res of		
GROUNDS OF REJECTION24					
A.			view 25		
	A. B. THE A. B. C.	A. The curse B. Condobvi IDENTIFIE A. Citat B. Statu THE '420 A. Spect B. Ordi C. Clair 1. 2. 3. 4. 5. 6. 7. D. Clair 1. 2. 4. GROUND A. Grou	cursory examination. B. Connecting a video conference in response to a face detection is obvious in view of Kenoyer. IDENTIFICATION OF CHALLENGE (37 C.F.R. § 42.104(b))		



IPR Petition of U.S. Patent No. 9,007,420

VII	CON	JCT TI	SION	60
VI.	MAN	NDAT	ORY NOTICES (37 C.F.R. § 42.8(a)(1))	59
V.	GRO	OUND	S FOR STANDING (37 C.F.R. § 42.104(a))	59
		2.	Claim 21	53
		1.	Claims 10 and 20.	51
	B.		and 2: Claims 10, 20, and 21 are obvious over Torgersrud in venoyer in further view of Zhang.	
		8.	Claims 9 and 19: Action when face not in image	49
		7.	Claims 7, 8, 17, and 18: In or out of the controlled-environment facility	
		6.	Claims 6 and 16: Storing the captured image	46
		5.	Claims 5 and 15: Facial recognition	45
		4.	Claims 3, 4, 13, and 14: Capturing still image and video	45
		3.	Claims 2 and 12: Prompting the user	44
		2.	Claim 11	42
		1.	Claim 1	26



EXHIBIT LIST

	,
GTL Exhibit #	Description
1001	U.S. Patent No. 9,007,420 to Passe, filed January 10, 2014, issued April 14, 2015.
1002	Prosecution History of U.S. Patent No. 9,007,420.
1003	U.S. Patent Application Publication No. 2012/0262271 by Torgersrud <i>et al.</i> , filed April 18, 2011, published October 18, 2012.
1004	U.S. Patent No. 8,218,829 to Kenoyer, filed July 31, 2006, issued July 10, 2012.
1005	U.S. Patent No. 7,436,988 to Zhang <i>et al.</i> , filed June 3, 2005, issued Oct. 14, 2008.
1006	Declaration of Dr. Hoyamoon Beigi.
1007	E. Hjelmås <i>et al.</i> , "Face detection: A Survey," Computer Vision and Image Understanding, Vol. 83, No. 3, September 2001; pp. 236-74.
1008	M. Yang <i>et al.</i> , "Detecting Faces in Images: A Survey," IEEE Transactions on Pattern Analysis and Machine Intelligence, Vol. 24, No. 1, January 2002; pp. 34-58.
1009	C. Zhang <i>et al.</i> , "A Survey of Recent Advances in Face Detection," Microsoft Research Technical Report No. MSR-TR-2010-66, Microsoft Corporation, 2010.
1010	M. Kirby <i>et al.</i> , "Application of the Karhunen-Loeve Procedure for the Characterization of Human Faces,", IEEE Transactions on Pattern Analysis and Machine Intelligence, Vol. 12, No. 1, January 1990; pp. 103-08.
1011	M. Turk <i>et al.</i> , "Eigenfaces for Recognition," Journal of Cognitive Neuroscience, Vol. 3, No. 1, 1991; pp. 71-86.
1012	J. Cartoux <i>et al.</i> , "Face Authentication or Recognition by Profile Extraction from Range Images," IEEE Proceedings of the Workshop on Interpretation of 3D Scenes, November 1989; pp. 194-99.
1013	K. Bowyer <i>et al.</i> , "A survey of approaches and challenges in 3D and multi-modal 3D+2D face recognition," Computer Vision and Image Understanding, Vol. 101, No. 1, 2006; pp. 1-15.
1014	U.S. Patent No. 9,064,257 to Beigi, filed November 2, 2011, issued June 23, 2015.



IPR Petition of U.S. Patent No. 9,007,420

GTL Exhibit #	Description
1015	U.S. Patent No. 6,219,640 to Basu <i>et al.</i> , filed August 6, 1999, issued April 17, 2001.
1016	P. Viola <i>et al.</i> , "Rapid Object Detection Using a Boosted Cascade of Simple Features," Computer Vision and Pattern Recognition, 2001.
1017	L.Sanchez Lopez, "Local Binary Patterns Applied to Face Detection and Face Recognition," Final Research Project, Universitat Politecnica de Catalunya, November 2010.
1018	Y. H. Huang <i>et al.</i> , "Face Detection and Smile Detection," Proceedings of IPPR Conference on Computer Vision, Graphics, and Image Processing, Shitou, Taiwan, A5-6, 2009.
1019	M. Felsberg, "Robot Vision Systems, PhD course spring term 2015," Computer Vision Laboratory PowerPoint Presentation, 2015.



DOCKET A L A R M

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.

