

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Mark Dronge
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**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT
NO. 7,864,983 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42**

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EXHIBITS

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

Protection One, Inc. (“POI”) petitions for *Inter Partes* Review (“IPR”) under 35 U.S.C. §§ 311–319 and 37 C.F.R. § 42 of claims 1-20 (“the Challenged Claims”) of U.S. Patent No. 7,864,983 (“the ‘983 patent”). The Challenged Claims are unpatentable based on teachings set forth in at least the references presented in this petition. 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. An IPR should therefore be instituted, and the Challenged Claims canceled as unpatentable.

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 known as classification) functionality. (*Id.* at 1:51-2:26).

As discussed below, systems meeting all of the requirements of the claims were known to those of skill in the art before the '983 patent was filed. Multiple independent grounds are provided below based upon prior art references that describe security systems that are used to protect structures, including systems that use motion-activated cameras to capture images of monitored areas, perform image analysis to classify objects to distinguish between objects that may pose a threat and those that do not, and that are accessible by the types of remote telecommunications devices described in the '983 patent. All of the challenged claims would have been obvious to a person of ordinary skill in the art.

I. MANDATORY NOTICES UNDER 37 C.F.R § 42.8(a)(1)

A. Real Party-In-Interest Under 37 C.F.R. § 42.8(b)(1)

Protection One, Inc., Protection Holdings II, Inc., Protection One Alarm Monitoring, Inc., Prime Security Services TopCo Parent, L.P., Prime Security Services Parent, Inc., Prime Security Services Holdings, LLC and Prime Security Services Borrower, LLC are the real parties-in-interest.

B. Related Matters Under 37 C.F.R. § 42.8(b)(2)

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