UNITED STATES PATENT AND TRADEMARK OFFICE
_____

BEFORE THE PATENT TRIAL AND APPEAL BOARD
_____

Prime Focus Creative Services Canada Inc.,

Petitioner

v.

Legend3D, Inc.,

Patent Owner

_____

U.S. Patent No. 7,907,793

IPR2016-01243
_____

PETITIONER'S REPLY
IN OPPOSITION TO PATENT OWNER'S RESPONSE

<u>Mail Stop: PATENT BOARD</u>
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Page(s)

Other Authorities

EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 7,907,793 ("the '793 Patent")
1002	File History for the '793 Patent
1003	U.S. Patent No. 7,181,081 ("the '081 Patent")
1004	U.S. Patent No. 7,333,670 ("the '670 Patent")
1005	U.S. Patent Application No. 12/241,992 ("Passmore")
1006	U.S. Patent No. 7,573,475 ("Sullivan")
1007	Declaration of Rob S. Schmitt from Business Wire, Inc. attaching: • Exhibit 1: "Legend Films Successfully Raise $5 Million in Venture Capital Funding" (press release) • Exhibit 2: "'Night of the Living Dead' to Be Released in Color and 3D" (press release)
1008	*Curriculum Vitae* of Dr. David Forsyth
1009	CORRECTED DECLARATION of David Forsyth, Ph.D.
1010	U.S. Patent No. 7,577,312
1011	Article: "*How do 3D firms work?*" available at http//www.physics.org/article-questions.asp?id=56
1012	Book excerpt: Rendering Techniques 2001, edited by Steven J. Gortler and Karol Myszkowski (2001)
1013	Article: Matt Sullivan, "*Trick and Treat: Behind the Scenes of the New Nightmare Before Christmas and the 3D Movie Revolution*," Popular Mechanics, *available at* http://www.popularmechanics.com/technology/gadgets/a3607/4200796/.
1014	Redline of specification from '081 Patent to '793 Patent
1015	Redline of specification from '670 Patent to '793 Patent

1016	Declaration of Jonathan Kagan in Support of Prime Focus Creative Services Canada Inc.'s Unopposed Motion for *Pro Hac Vice* Admission
1017	U.S. Patent No. 8,488,868
1018	Liang Zhang & Wa James Tam, *Stereoscopic Image Generation Based on Depth Images for 3D TV*, 51 IEEE Transactions on Broadcasting 191 (2005)
1019	Color Figures for U.S. Patent No. 9,286,941 (previously filed by Patent Owner as Exhibit 2003 in IPR2016-01491)
1020	U.S. Patent No. 8,897,596
1021	File History for Ex. 1005, U.S. Patent Application No. 12/241,992 ("Passmore")
1022	Georgia Superior Court Complaint by N4D, LLC against Charles Gregory Passmore a/k/a Greg Passmore, *et al.* (filed as Docket No. 28-5 in *N4D, LLC v. Legend3D, Inc.*, Case No. 3:13-cv-02656-BEN-NLS (S.D. Cal. Jan. 31, 2014))
1023	Declaration Authenticating Exs. 1022, 1027, and 1028 (filed as Docket No. 28-3 in *N4D, LLC v. Legend3D, Inc.*, Case No. 3:13-cv-02656-BEN-NLS (S.D. Cal. Jan. 31, 2014))
1024	Complaint by N4D, LLC against Legend3D, Inc., *et al.* (Docket No. 9, Case No. 3:13-cv-02656-BEN-NLS (S.D. Cal. Nov. 26, 2013))
1025	Article: "*Master of conversions: Legend3D's Barry Sandrew goes deep*," Film Journal International, *available at* http://www.filmjournal.com/content/master-conversions-legend3d%E2%80%99s-barry-sandrew-goes-deep, *including authenticating declaration*
1026	Docket No. 20-1, *N4D, LLC v. Legend3D, Inc.*, Case No. 3:13-cv-02656-BEN-NLS (S.D. Cal. Jan. 13, 2014)
1027	Docket No. 28-6, *N4D, LLC v. Legend3D, Inc.*, Case No. 3:13-cv-02656-BEN-NLS (S.D. Cal. Jan. 31, 2014)
1028	Docket No. 28-4, *N4D, LLC v. Legend3D, Inc.*, Case No. 3:13-cv-02656-BEN-NLS (S.D. Cal. Jan. 31, 2014)

DOCKET ALARM

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.