Filed on behalf of Securus Technologies, Inc.
By: Justin B. Kimble (JKimble-IPR@bcpc-law.com)
Jeffrey R. Bragalone (jbragalone@bcpc-law.com)
Daniel F. Olejko (dolejko@bcpc-law.com)
Bragalone Conroy PC
2200 Ross Ave.
Suite 4500 – West
Dallas, TX 75201
Tel: 214.785.6670
Fax: 214.786.6680

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBAL TEL*LINK CORPORATION,
Petitioner,

v.

SECURUS TECHNOLOGIES, INC.,
Patent Owner.

Case IPR2016-01362
U.S. Patent No. 9,083,850

PATENT OWNER'S RESPONSE

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313-1450

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

Table of Contents

Exhibit List iii

I. INTRODUCTION 1

A. Grounds in the Petition 4

B. The Claims of the '850 Patent Manipulate a Depth of Field by Adjusting Depth of Field Parameters. 5

C. The Level of Ordinary Skill in the Art Should Include Education and Experience in Optics and Camera System Design. 9

D. Dr. Richardson Lacks Experience in the Field of the Invention and Fails to Qualify as a Person of Ordinary Skill, Much Less an Expert. 12

II. CLAIM CONSTRUCTION 14

A. The Claim Term "depth of field" Means "the distance between the nearest and farthest objects in a scene that appear acceptably sharp in an image." 16

B. The Claim Phrase "a depth of field parameter for the video" means "any of a set of properties of a camera system that determines a depth of field." 17

C. The Board's Interpretation of "adjusting a depth of field parameter" Renders the Claim Language Superfluous. 24

D. Dr. Richardson's Testimony Regarding the Claim Term "depth of field" or "depth of field parameter" Should Be Given Little or No Weight 26

III. ARGUMENT 26

A. Ground 1: Petitioner Fails to Prove Unpatentability of Claims 1, 5, 8, 9, and 14 26

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

1. The Combination of Shipman and Garrison Fails to Disclose "adjusting a depth of field parameter for the video" in the Independent Claims. 28

2. There Is No Motivation to Combine Shipman and Garrison. 39

B. Ground 2: Petitioner Fails to Prove Its Proposition of Unpatentability Regarding Claims 2-4, 15-18. 46

C. Ground 3: Petitioner Fails to Prove that Claims 6, 7, 10, 11, and 19 Are Unpatentable. 48

1. Petitioner Has Not Established that Gotsopoulos Is a Prior Art Publication. 48

2. The Combination of Shipman, Garrison, and Gotsopoulos Fails to Disclose a Depth of Field Parameter that is Remotely Controllable by a Third Party. 49

D. Grounds 4 and 5: Petitioner Fails to Prove that Claims 12, 13, 20, and 21 Are Unpatentable. 53

IV. CONCLUSION 57

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

Exhibit List

Exhibit Number	Description
2001	US9083850 File History
2002	Declaration of Dr. Alan C. Bovik
2003	Definition of "parameter" Merriam-Webster's dictionary
2004	Deposition Transcript of Dr. Iain Richardson
2005	US 7,027,659 (Thomas)
2006	DSKeye Gigabit Product Brief

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

I. INTRODUCTION

Pursuant to 35 U.S.C. § 316(a)(8) and 37 C.F.R. § 42.120, Patent Owner Securus Technologies, Inc. ("Securus" or "Patent Owner") responds to the Petition (Paper 2) (the "Petition") for *inter partes* review in IPR2016-01362 filed by Global Tel*Link Corporation ("GTL" or "Petitioner") challenging claims 1-21 of U.S. Patent No. 9,083,850 (Ex. 1001, hereinafter the "'850 patent"). The Board instituted *inter partes* review (Paper 11) of the '850 patent based on Grounds 1-5, each of which depend on the combination of Garrison and Shipman.

The '850 patent claims methods and systems for focusing a video camera in a controlled environment visitation system on the authorized user(s) and blurring other users and objects by adjusting a depth of field parameter, *without the use of prior art facial and object recognition techniques*. Both of Petitioner's primary references, Shipman and Garrison, disclose techniques that do not adjust a depth of field parameter like the claims of the '850 patent, but instead implement prior art facial and object recognition techniques that were disclaimed by the Patent Owner during prosecution and suffer from the very problems solved by the '850 patent.

Neither Shipman nor Garrison, alone or in combination, disclose "adjusting a depth of field parameter for the video" that focuses "an image of a first object at *a first distance* from the video visitation device" and blurs "an image of a second ob-

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

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.