

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GLOBAL TEL\*LINK CORPORATION  
Petitioner

v.

SECURUS TECHNOLOGIES, INC.  
Patent Owner

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Patent No. 9,083,850 B1

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**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 9,083,850**

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

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**Exhibit List**

<b>Exhibit No.</b>	<b>Description</b>
<b>1001</b>	U.S. Patent No. 9,083,850 B1 to Higgs
<b>1002</b>	Expert Declaration of Dr. Iain Richardson
<b>1003</b>	Expert CV of Dr. Iain Richardson
<b>1004</b>	U.S. Patent No. 9,106,789 to Shipman, Jr. et al. (“Shipman”), titled “Videoconference and Video Visitation Security”
<b>1005</b>	U.S. Patent No. 7,911,513 to Garrison et al. (“Garrison”), titled “Simulating Short Depth of Field to Maximize Privacy in Videotelophony”
<b>1006</b>	U.S. Patent No. 6,734,900 to Mayhew. (“Mayhew”), titled “Real Time Camera and Lens Control System for Image Depth of Field Manipulation”
<b>1007</b>	U.S. Patent Publication No. 2008/0201158 A1 to Johnson et al. (“Johnson”), titled “Real Time Camera and Lens Control System for Image Depth of Field Manipulation”
<b>1008</b>	“Remote Controlled DSP Based Image Capturing and Processing System Featuring Two-Axis Motion,” by Gotsopoulos et al. (“Gotsopoulos”)
<b>1009</b>	American Heritage Dictionary

**I. Introduction.**

Global Tel\*Link Corporation petitions for *inter partes* review of claims 1–21 of U.S. Patent No. 9,083,850 to Higgs, titled “Video Blurring in a Secure Environment” (hereinafter “the ’850 patent”)<sup>1</sup>. Petitioner Global Tel\*Link Corporation will demonstrate that a reasonable likelihood exists that all 21 claims of the ’850 patent are unpatentable.

The purported novelty of the ’850 patent is keeping an individual (or face of an individual) in focus while simultaneously blurring the background of a video by manipulating the depth of field of the camera image. But, such blurring techniques have existed for decades, and the concepts were well known to any person with even an ordinary knowledge of camera systems. (Richardson Decl., ¶ 72.) Indeed, these techniques disclosed in the ’850 patent for adjusting the depth of field in a camera system were disclosed in a U.S. Patent to Christopher Mayhew almost 15 years prior to the filing date of the ’850 patent.

The ’850 patent merely claims the application of these known blurring techniques to the specific scenario of a video call involving a resident of a secure environment. But, such a combination would have been obvious to a person of ordinary skill in the art at the time of the purported invention. Indeed, applying

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<sup>1</sup> The ’850 patent is provided as GTL 1001.

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