

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBAL TEL*LINK CORPORATION
Petitioner

v.

SECURUS TECHNOLOGIES, INC.
Patent Owner

Patent No. 9,083,850
IPR2016-01362

PETITIONER'S REPLY TO PATENT OWNER RESPONSE

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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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669 F.3d 1362 (Fed. Cir. 2012)13

Exhibit List

Exhibit No.	Description
1001	U.S. Patent No. 9,083,850 B1 to Higgs
1002	Expert Declaration of Dr. Iain Richardson
1003	Expert CV of Dr. Iain Richardson
1004	U.S. Patent No. 9,106,789 to Shipman, Jr. et al. (“Shipman”), titled “Videoconference and Video Visitation Security”
1005	U.S. Patent No. 7,911,513 to Garrison et al. (“Garrison”), titled “Simulating Short Depth of Field to Maximize Privacy in Videotelophony”
1006	U.S. Patent No. 6,734,900 to Mayhew. (“Mayhew”), titled “Real Time Camera and Lens Control System for Image Depth of Field Manipulation”
1007	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”
1008	“Remote Controlled DSP Based Image Capturing and Processing System Featuring Two-Axis Motion,” by Gotsopoulos et al. (“Gotsopoulos”)
1009	American Heritage Dictionary
1010	European DSP in Education and Research Conference (2010) (served May 1, 2017)
1011	Declaration of Gerard P. Grenier (served May 1, 2017)
1012	July 18, 2017 Deposition Transcript of Dr. Alan Bovik

The Board should find that claims 1-21 of the '850 patent are not patentable. The '850 patent broadly claims old, conventional techniques of adjusting the depth of field for video (using optical techniques or using digital processing techniques) and simply places them in the context of a controlled environment. The prior art in this IPR identified the same problem as the '850 patent and provided the same solution of focusing some objects while blurring others, teaching all of the claim elements.

To avoid the compelling evidence showing obviousness, Patent Owner (“PO”) mainly hangs its rebuttal on a proposed over-narrow interpretation of the claims that would limit them only to optical adjustments of the properties of a camera, even though the specification describes, and the claims recite, that “adjusting the depth of field parameter includes digitally processing the video received from the video visitation device.”

I. Claim construction.

In its Institution Decision, the Board determined that express constructions for the claim terms were not necessary. (Institution Decision, 5-6.) In response, PO attempts to improperly limit the claims.

A. “a depth of field parameter for the video”

PO argues that the BRI of “a depth of field parameter for the video” is “any set of properties of a camera system that determines a depth of field.” PO’s

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