

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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Case IPR2016-01362  
Patent 9,083,850

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**PETITIONER GLOBAL TEL\*LINK CORPORATION'S  
OBJECTIONS TO PATENT OWNER'S DEMONSTRATIVES**

***Mail Stop "PATENT BOARD"***  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-14

Pursuant to the Board's Trial Hearing Order (Paper 35), Petitioner submits the following objections to Patent Owner's demonstrative exhibits, served on Petitioner on September 7, 2017. (Paper 35, pp. 3-4.)

1. Petitioner objects to Patent Owner's Slide 8, titled "Level of Ordinary Skill," because Slide 8 relies on evidence, for example, paragraph 52 of Dr. Bovik's declaration, that was never cited in any paper before the Board. *St. Jude Medical, Cardiology Division, Inc. v. The Board of Regents of the University of Michigan*, IPR2013-00041, Paper 65 at 2-3 (P.T.A.B. Jan. 27, 2014).

2. Petitioner objects to Patent Owner's Slide 14, titled "The Term 'depth of field' Means 'the distance between the nearest and farthest objects in a scene that appear acceptably sharp in an image,'" because Slide 14 relies on evidence, for example, Dr. Richardson's deposition testimony, that was never cited in any paper before the Board. *St. Jude Medical*, Paper 65 at 2-3.

3. Petitioner objects to Patent Owner's Slide 15, titled "The Term 'depth of field' Means 'the distance between the nearest and farthest objects in a scene that appear acceptably sharp in an image,'" because Slide 15 contains new arguments that rely on citations to Dr. Richardson's deposition testimony, which were not previously presented in any paper before the Board. *St. Jude Medical*, Paper 65 at 3.

4. Petitioner objects to Patent Owner’s Slide 18, titled “The Term ‘depth of field’ Means ‘the distance between the nearest and farthest objects in a scene that appear acceptably sharp in an image,’” because Slide 18 contains new arguments that directly respond to Petitioner’s Reply and were not previously presented in any paper before the Board. *St. Jude Medical*, Paper 65 at 3.

5. Petitioner objects to Patent Owner’s Slide 19, titled “The Phrase ‘a depth of field parameter for the video’ Means ‘any set of properties of a camera system that determines a depth of field,’” because Slide 19 contains new arguments not previously presented in any paper before the Board, for example discussing a “blurring parameter.” *St. Jude Medical*, Paper 65 at 3.

6. Petitioner objects to Patent Owner’s Slide 22, titled “The Phrase ‘a depth of field parameter for the video’ Means ‘any set of properties of a camera system that determines a depth of field,’” because Slide 22 adds new evidence (e.g., images with captions) not in the record or previously presented in any paper before the Board. *St. Jude Medical*, Paper 65 at 2.

7. Petitioner objects to Patent Owner’s Slides 26, 29-31, and 35-37, each titled “The Phrase ‘a depth of field parameter for the video’ Means ‘any set of properties of a camera system that determines a depth of field,’” because Slides 26, 29-31, and 35-37 contain new arguments that directly respond to Petitioner’s Reply

and were not previously presented in any paper before the Board. *St. Jude Medical*, Paper 65 at 3.

8. Petitioner objects to Patent Owner's Slides 27 and 28, both titled "The Claimed Inventions of the '850 Patent vs. Prior Art Object and Facial-Recognition Techniques," because Slides 27 and 28 add new evidence (e.g., images) not in the record or previously presented in any paper before the Board. *St. Jude Medical*, Paper 65 at 2.

9. Petitioner objects to Patent Owner's Slides 32 and 33, both titled "The Phrase 'a depth of field parameter for the video' Means 'any set of properties of a camera system that determines a depth of field,'" because Slides 32 and 33 contain new arguments and evidence that directly respond to Petitioner's Reply and were not previously presented in any paper before the Board. *St. Jude Medical*, Paper 65 at 2-3.

10. Petitioner objects to Patent Owner's Slides 42-45, each titled "Garrison Fails to Disclose 'adjusting a depth of field parameter for the video,'" because Slides 42-45 contain new arguments that directly respond to Petitioner's Reply and were not previously presented in any paper before the Board. *St. Jude Medical*, Paper 65 at 3.

11. Petitioner objects to Patent Owner's Slide 49, titled "Persons of Ordinary Skill Would Not Have Combined Shipman and Garrison with Mayhew to

Arrive at the Claimed Inventions,” because Slide 49 adds new evidence (e.g., images with captions) not in the record or previously presented in any paper before the Board. *St. Jude Medical*, Paper 65 at 2.

12. Petitioner objects to Patent Owner’s Slide 50, titled “Persons of Ordinary Skill Would Not Have Combined Shipman and Garrison with Mayhew to Arrive at the Claimed Inventions,” because at least the third bullet point of Slide 50 contains new arguments not previously presented in any paper before the Board. *St. Jude Medical*, Paper 65 at 3.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/ Byron L. Pickard /

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Attorney for Petitioner

Date: September 11, 2017

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