

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Harvey et al.
U.S. Patent No.: 7,752,650 Attorney Docket No.: 39843-0030IP1
Issue Date: July 6, 2010 IPR Control No. IPR2017-00291
Appl. Serial No.: 08/460,711
Filing Date: June 2, 1995
Title: SIGNAL PROCESSING APPARATUS AND METHODS

IPR Control No.: IPR2017-00291

Mail Stop Patent Board

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

**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT
NO. 7,752,650 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. §§ 42.1-
42.123**

TABLE OF CONTENTS

	<u>Page</u>
I. MANDATORY NOTICES UNDER 37 C.F.R § 42.8.....	2
A. Real Party-In-Interest	2
B. Related Matters.....	2
C. Lead and Back-Up Counsel.....	2
D. Service Information.....	2
II. PAYMENT	3
III. REQUIREMENTS FOR IPR.....	3
A. Grounds for Standing	3
B. Challenge and Relief Requested	3
IV. INTRODUCTION	7
A. Overview of the ‘650 Patent.....	7
1. Description of the Alleged Invention of the ‘650 Patent.....	7
B. Summary of the Prosecution History of the ‘650 Patent	8
C. Level of Ordinary Skill in the Art as of the Critical Date.....	9
V. CLAIM CONSTRUCTION.....	10
A. “digital television signals” (claims 1, 2, 4, 18, 32, 33).....	11
B. “digital video signals” (claims 18, 32, 33).....	13
C. “processor” (all Challenged Claims).....	14
D. 37 C.F.R. § 42.104(b)(4): How the Claims are Unpatentable	16
E. 37 C.F.R. § 42.104(b)(5): Evidence Supporting Challenge.....	16
VI. THERE IS A REASONABLE LIKELIHOOD THAT AT LEAST ONE CLAIM OF THE ‘650 PATENT IS UNPATENTABLE.....	16
A. Summary of Grounds of Unpatentability.....	16
B. Claim-By-Claim Explanation of Grounds of Unpatentability	17
1. Ground 1: The Challenged Claims Are Invalid Over Mustafa.17	17

2.	Ground 2: In the Alternative to Ground 1, the Challenged Claims are Obvious Based on Mustafa in View of Iijima.	33
3.	Grounds 3A and 3B: The Challenged Claims Are Invalid Over Campbell in View of the Knowledge of A POSITA.	37
4.	Ground 4: In the Alternative to Ground 3, the Challenged Claims are Obvious Based on Campbell in View of Widergren.	51
VII.	CONCLUSION	55

EXHIBITS

SAMSUNG-1001	Declaration of Stuart Lipoff Under 37 C.F.R. § 1.68 in Support of Petition for Inter Partes Review of U.S. Patent No. 7,752,650
SAMSUNG-1002	U.S. Patent No. 7,752,650 to Harvey, et al.
SAMSUNG-1003	U.S. Patent No. 4,694,490 to Harvey, et al.
SAMSUNG-1004	U.S. Patent Appl. No. 08/449,097: 8/27/1996 Non-Final Rejection
SAMSUNG-1005	Continuity Data of U.S. Patent Appl. No. 07/096,096
SAMSUNG-1006	U.S. Patent Appl. No. 08/449,097: 4/2/1998 Non-Final Rejection
SAMSUNG-1007	U.S. Patent No. 7,752,649 to Harvey, et al.
SAMSUNG-1008	Plaintiff's Disclosure of Asserted Claims and Infringement Contents, <i>Personalized Media Communications, LLC v. Samsung Electronics America, Inc. et al.</i> , Civil Action No. 2:15-cv-01754-JRG-RSP (E.D. Texas Feb. 8, 2016)
SAMSUNG-1009	U.S. Patent No. 4,789,895 to Mustafa, et al.
SAMSUNG-1010	U.S. Patent No. 4,215,369 to Iijima
SAMSUNG-1011	U.S. Patent No. 4,536,791 to Campbell, et al. ("Campbell-1B")
SAMSUNG-1012	U.S. Patent No. 4,302,775 to Widergren, et al.
SAMSUNG-1013	U.S. Patent Appl. No. 08/460,711: 7/22/1996 Non-Final Rejection.

SAMSUNG-1014	U.S. Patent Appl. No. 08/460,711: 11/30/1998 Applicant Arguments and Remarks Made in an Amendment
SAMSUNG-1015	U.S. Patent Appl. No. 08/449,097: 10/2/1998 Amendment
SAMSUNG-1016	U.S. Patent No. 8,559,635 to Harvey, et al.
SAMSUNG-1017	Institution Decision, Apple, Inc. v. Personalized Media Communications, LLC, IPR2016-00753 (Paper 8) (Sep. 20, 2016)
SAMSUNG-1018	Plaintiff's Identification of Claim Terms Requiring Construction, Personalized Media Communications, LLC. v. Apple Inc., C.A. No. 2:15-cv-01366-JRG-RSP (E.D.T.X. Jan. 27, 2016)
SAMSUNG-1019	Institution Decision, Amazon.com, Inc. v. Personalized Media Communications, LLC, IPR2014-01532 (Paper 8) (Mar. 31, 2015)
SAMSUNG-1020	Plaintiff's Joint Claim Construction Submission Exhibit A, Personalized Media Communications, LLC. v. Amazon.com, Inc., C.A. No. 1:13-cv-01608-RGA (D. Del. Sept. 23, 2014)
SAMSUNG-1021	Personalized Media Communications LLC v. Zynga, Inc., C.A. No. 2:12-cv-68-JRG-RSP, 2013 WL 4630447 (E.D.T.X. Aug. 28, 2013)
SAMSUNG-1022	Examiner Interview Summary
SAMSUNG-1023	U.S. Patent Appl. No. 08/460,711 12/21/2009 Ex Parte Quayle Action
SAMSUNG-1024	U.S. Patent Appl. No. 08/460,711: 2/17/2010 Index of Claims

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.