

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.
Petitioner

v.

IMAGE PROCESSING TECHNOLOGIES LLC,
Patent Owner

CASE IPR2017-00336
Patent No. 6,989,293

**PATENT OWNER IMAGE PROCESSING TECHNOLOGIES LLC'S
RESPONSE PURSUANT TO 37 C.F.R. § 42.120**

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 1. “an input multiplexer adapted to receive data describing one or more parameters of the event being detected, and to output data describing a selected one of the one or more parameters in response to a selection signal” (Claim 22)14

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 A. Pirim does not disclose “an input multiplexer adapted to receive data describing one or more parameters of the event being detected, and to output data describing a selected one of the one or more parameters in response to a selection signal”22

 B. Claim 22 is not obvious over Pirim because a POSA would not have been motivated to modify the multiplexer of Pirim to be capable of receiving both “one” or “more” than one parameter24

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Statutes

35 U.S.C. § 10318

LIST OF EXHIBITS

Exhibit	Description
Ex. 2009	Declaration of Dr. Peggy Agouris
Ex. 2010	WO 98-05002; PCT/FR97/01354
Ex. 2011	The Authoritative Dictionary of IEEE Standards Terms, 7th Ed. IEEE 100 (2000)
Ex. 2012	Excerpt from Memorandum Opinion and Order on Claim Construction, <i>Image Processing Techs. LLC v. Samsung Elecs. Co.</i> , No. 2:16-CV-505 (E.D. Tex.) (D.I. 174)

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