

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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Samsung Electronics Co., Ltd., and  
Samsung Electronics America, Inc.,  
Petitioners

v.

Image Processing Technologies, LLC,  
Patent Owner.

**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 6,959,293**

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**LIST OF EXHIBITS**

<b>Exhibit No.</b>	<b>Description</b>
1001	U.S. Patent No. 6,959,293
1002	Declaration of Dr. John C. Hart
1003	Curriculum Vitae of Dr. John C. Hart
1004	Prosecution File History of U.S. Patent No. 6,959,293
1005	WO 99/36893, Patrick Pirim and Thomas Binford, "Method and Apparatus for Detection of Drowsiness," published July 22, 1999
1006	Robert Rogers, "Real-Time Video Filtering with Bit-Slide Microprogrammable Processors," Ph.D. Dissertation, New Mexico State University (December 1978)
1007	U.S. Patent No. 5,546,125 to Tomitaka, et al., issued August 1996
1008	Alton L. Gilbert et al., "A Real-Time Video Tracking System," IEEE Transactions on Pattern Analysis and Machine Intelligence, Vol. PAMI-2, No. 2, January 1980
1009	Declaration of Susan E. Beck (authenticating Ex. 1006)
1010	D. Trier, A. K. Jain and T. Taxt, "Feature Extraction Methods for Character Recognition-A Survey", Pattern Recognition, vol. 29, no. 4, 1996, pp. 641-662.
1011	M. H. Glauberman, "Character recognition for business machines," Electronics, vol. 29, pp. 132-136, Feb. 1956
1012	Declaration of Gerard P. Grenier (authenticating Ex. 1008)

## I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.100, *et seq.*, Samsung Electronics Co., Ltd. (“Petitioner” or “Samsung”) hereby petitions the United States Patent and Trademark Office (the “Office”) to institute an *inter partes* review of claims 1, 18, 19, 22, and 29 of U.S. Patent No. 6,959,293 (“the ’293 Patent”). The ’293 Patent, attached as Ex. 1001, is assigned to Image Processing Technologies, LLC (“Patent Owner”). The ’293 Patent generally relates to a system and method of analyzing an aural or visual image or event by using histograms. *See, e.g.*, Ex. 1001 at claims 1, 18, 22, 29. As set forth below, claims 1, 18, 19, 22, and 29 of the ’293 Patent are invalid as obvious over the prior art. This petition presents non-cumulative grounds of invalidity based on combinations of prior art that were not before the Office during prosecution. These grounds are each reasonably likely to prevail, and this petition, accordingly, should be granted on all grounds.

## II. GROUNDS FOR STANDING, MANDATORY NOTICES, AND FEE AUTHORIZATION

**Grounds for Standing:** Petitioner certifies that the ’293 patent is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this petition.

**Real Party-In-Interest:** Samsung Electronics Co., Ltd.; and Samsung

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