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 IPR2017-00353
Patent No. 8,983,134

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

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1. Gilbert does not teach or suggest "forming at least one histogram of the pixels in the one or more of a plurality of classes in the one or more of a plurality of domains, said at least one histogram referring to classes defining said target".....36

2. Hashima does not teach or suggest "forming at least one histogram of the pixels in the one or more of a plurality of classes in the one or more of a plurality of domains, said at least one histogram referring to classes defining said target".....39

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