

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.  
Petitioner

v.

IMAGE PROCESSING TECHNOLOGIES, LLC  
Patent Owner

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Patent No. 8,983,134

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PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 8,983,134

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The undersigned certifies pursuant to 37 C.F.R. § 42.6(e) and § 42.105 that on November 30, 2016, a true and correct copy of Petitioner Petition for *Inter Partes* Review of U.S. Patent No. 8,983,134 was served via express mail on the Petitioner at the following correspondence address of record: .....74

LIST OF EXHIBITS<sup>1</sup>

1001	U.S. Patent No. 8,983,134 (“the ’134 patent”)
1002	Declaration of Dr. John C. Hart
1003	Curriculum Vitae for Dr. John C. Hart
1004	Prosecution File History of U.S. Patent No. 8,983,134
1005	Alton L. Gilbert et al., <i>A Real-Time Video Tracking System</i> , PAMI-2 No. 1 IEEE Transactions on Pattern Analysis and Machine Intelligence 47 (Jan. 1980) (“Gilbert”)
1006	U.S. Patent 5,521,843 (“Hashima”)
1007	U.S. Patent 5,150,432 (“Ueno”)
1008	D. Trier, A. K. Jain and T. Taxt, “Feature Extraction Methods for Character Recognition-A Survey”, <i>Pattern Recognition</i> , vol. 29, no. 4, 1996, pp. 641–662
1009	M. H. Glauberman, “Character recognition for business machines,” <i>Electronics</i> , vol. 29, pp. 132-136, Feb. 1956
1010	Declaration of Gerard P. Grenier (authenticating Ex. 1005)

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<sup>1</sup> Citations to non-patent publications are to the original page numbers of the publication, and citations to U.S. patents are to column:line number of the patents.

## I. INTRODUCTION

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Petitioner”) request *inter partes* review (“IPR”) of Claims 1-2 of U.S. Patent No. 8,983,134 (“the ’134 Patent”) (Ex. 1001), which, on its face, is assigned to Image Processing Technologies, LLC (“Patent Owner”). This Petition presents several non-cumulative grounds of invalidity that the U.S. Patent and Trademark Office (“PTO”) did not consider during prosecution. These grounds are each likely to prevail, and this Petition, accordingly, should be granted on all grounds and the challenged claims should be cancelled.

## II. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8

Real Parties-in-Interest: Petitioner identifies the following real parties-in-interest: Samsung Electronics Co., Ltd.; Samsung Electronics America, Inc.

Related Matters: Patent Owner has asserted the ’134 Patent against Petitioner in *Image Processing Technologies LLC v. Samsung Elecs. Co.*, No. 2:16-cv-00505-JRG (E.D. Tex.). Patent Owner has also asserted U.S. Patent Nos. 6,959,293; 7,650,015; 8,805,001; and 8,989,445 in the related action. Petitioner is concurrently filing IPR petitions for all of these asserted patents.

Lead and Back-Up Counsel:

- Lead Counsel: John Kappos (Reg. No. 37,861), O’Melveny & Myers LLP, 610 Newport Center Drive, 17th Floor, Newport Beach,

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