

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

Patent No. 7,650,015

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 7,650,015**

Exhibit 2003
IPR2017-00355

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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 <i>Inter Partes</i> Review of U.S. Patent No. 7,650,015 was served via express mail on the Petitioner at the following correspondence address of record:	80

LIST OF EXHIBITS¹

1001	U.S. Patent No. 7,650,015 (“the ’015 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. 7,650,015
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 No. 5,521,843 (“Hashima”)
1007	U.S. Patent No. 5,150,432 (“Ueno”)
1008	W. B. Schaming, <i>Adaptive Gate Multifeature Bayesian Statistical Tracker</i> , 359 Applications of Digital Image Processing IV 68 (1982) (“Schaming”)
1009	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
1010	M. H. Glauberman, “Character recognition for business machines,” <i>Electronics</i> , vol. 29, pp. 132-136, Feb. 1956
1011	Declaration of Gerard P. Grenier (authenticating Ex. 1005)
1012	Declaration of Eric A. Pepper (authenticating Ex. 1008)

¹ 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 Claim 6 of U.S. Patent No. 7,650,015 (“the ’015 Patent”) (Ex. 1001), which, on its face, is assigned to Image Processing Technologies, LLC (“Patent Owner”). This Petition presents three 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 ’015 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; 8,805,001; 8,983,134; 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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