

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Exhibit No.	Description
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	U.S. Patent No. 5,239,594 to Yoda, issued August 24, 1993
1007	WO 99/35606, Richard Jungiang Qian, "System for Human Face Tracking," published July 15, 1999
1008	Martin Eriksson and Nikoalaos P. Papanikolopoulos, "Eye-Tracking for Detection of Drive Fatigue," 0-7803-4269-0/97 (IEEE 1998)
1009	Hennessy and Patterson, "Computer Architecture: A Quantitative Approach," Morgan-Kaufman (1990) (excerpts)
1010	Declaration of Umit Ozguner (establishing publication of 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 2-17, 20-21, and 23-28 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”). As set forth below, claims 2-17, 20-21, and 23-28 of the ’293 Patent are invalid as obvious over the prior art. Petitioner has also challenged claims 1, 18-19, 22, and 29 of the 293 Patent in co-pending case No. IPR2017-00336, in which an institution decision has not yet issued.

This petition presents non-cumulative grounds of invalidity based on combinations of prior art that were not relied upon by the Office during prosecution. Each ground presented is reasonably likely to prevail, and this petition 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.

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