

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. 6,717,518

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 6,717,518**

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**LIST OF EXHIBITS<sup>1</sup>**

1001	U.S. Patent No. 6,717,518 (“the ’518 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. 6,717,518
1005	Martin Eriksson et al., <i>Eye Tracking For Detection Of Driver Fatigue</i> , IEEE Conference on Intelligent Transportation Systems (Nov. 1997) (“Eriksson”)
1006	Luigi Stringa, <i>Eyes Detection For Face Recognition</i> , Applied Artificial Intelligence (1993) (“Stringa”)
1007	U.S. Patent No. 5,805,720, <i>Facial Image Processing System</i> (Filed Mar. 11, 1996) (“Suenaga”)
1008	U.S. Patent No. 5,293,427, <i>Eye Position Detecting System and Method Therefor</i> (Filed Dec. 11, 1991) (“Ueno”)
1009	U.S. Patent No. 5,008,946, <i>System For Recognizing Image</i> (Filed Sept. 9, 1988) (“Ando”)
1010	Declaration of William Garrity from U.C. Davis Regarding Stringa
1011	Declaration of Dr. Umit Ozguner Regarding Eriksson

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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 Claim 39 of U.S. Patent No. 6,717,518 (“the ’518 Patent”) (Ex. 1001), which Petitioner understands to be currently 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 claim 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. and Samsung Electronics America, Inc.

**Related Matters:** Patent Owner has asserted the ’518 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; 7,650,015; and 8,989,445 in the related action. Petitioner is concurrently filing additional IPR petitions for several of these asserted patents, and has previously filed the following IPR petitions:

- IPR2017-00355 against U.S. Patent 7,650,015

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