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 IPR2017-01218
Patent No. 8,983,134

PETITIONER'S REPLY

TABLE OF CONTENTS

LIST OF EXHIBITS

Exhibit No.	Description	Filing/Service Status
1001	U.S. Patent No. 8,983,134 ("the '134 patent")	Filed and served on 03/31/2017
1002	Declaration of Dr. John C. Hart	Filed and served on 03/31/2017
1003	Curriculum Vitae for Dr. John C. Hart	Filed and served on 03/31/2017
1004	Prosecution File History of U.S. Patent No. 8,983,134	Filed and served on 03/31/2017
1005	Alton L. Gilbert et al., *A Real-Time Video Tracking System*, PAMI-2 No. 1 IEEE Transactions on Pattern Analysis and Machine Intelligence 47 (Jan. 1980) ("Gilbert")	Filed and served on 03/31/2017
1006	U.S. Patent 5,521,843 ("Hashima")	Filed and served on 03/31/2017
1007	Reserved	
1008	D. Trier, A. K. Jain and T. Taxt, "Feature Extraction Methods for Character Recognition-A Survey", Pattern Recognition, vol. 29, no. 4, 1996, pp. 641–662	Filed and served on 03/31/2017
1009	M. H. Glauberman, "Character recognition for business machines," Electronics, vol. 29, pp. 132-136, Feb. 1956	Filed and served on 03/31/2017
1010	Declaration of Gerard P. Grenier (authenticating Ex. 1005)	Filed and served on 03/31/2017
1011	Reserved	
1012	Reserved	

1013	U.S. Patent No. 5,481,622 to Gerhardt ("Gerhardt")	Filed and served on 03/31/2017
1014	U.S. Patent No. 6,044,166 to Bassman ("Bassman")	Filed and served on 03/31/2017
1015	Reserved	
1016	Reserved	
1017	Reserved	
1018	Reserved	
1019	Reserved	
1020	Reserved	
1021	Reserved	
1022	Prosecution File History of U.S. Patent No. 8,805,001	Filed and served on 03/31/2017

I.   INTRODUCTION

The Board instituted review of claim 3 of the '134 Patent on two grounds:
A) claim 3 is obvious over Gerhardt and Bassman; and B) claim 3 is obvious over
Gilbert, Gerhardt, and Hashima. Institution Decision, 29.

Regarding Ground A, Patent Owner Image Processing Technologies ("IPT")
does not in its Response dispute that Gerhardt and Bassman disclose elements
1[pre], 1[b], or claim 3.[1] IPT only challenges 1[a] and 1[c]. PO Resp., 53-56.
That the combination of Gerhardt and Bassman discloses 1[pre], 1[b], and claim 3
should therefore be deemed admitted. 37 CFR §42.23(a).

Regarding Ground B, IPT similarly disputes only that Gilbert, Gerhardt, and
Hashima disclose elements 1[a] and 1[c]. PO Resp., 2-3, 57-61; Ex. 2007, ¶45.
That the combination of Gilbert, Gerhardt, and Hashima discloses 1[pre], 1[b], and
claim 3 should therefore be deemed admitted. 37 CFR §42.23(a).

As discussed below, IPT provides no argument that claim 3 is not rendered
obvious under either Ground A or B under the proper constructions preliminarily
adopted by the Board in its Institution Decision. Accordingly, to the extent IPT's
incorrect claim constructions are rejected, claim 3 is invalid. Furthermore, even
under IPT's constructions, claim 3 is invalid.

---

[1] Elements 1[pre], 1[a], 1[b], and 1[c] are defined in the Petition at 39, 41, 43, 45.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.

fastcase®
Smarter legal research.