

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 No. IPR2017-00218
Patent No. 8,983,134

**PETITIONER'S RESPONSE TO THE NOTICE OF DEFECTIVE
PETITION (PAPER NO. 3)**

In response to the Notice of Defective Petition (Paper No. 3), dated April 12, 2017, Petitioner submits herewith a corrected Exhibit 1001.

Petitioner will request, by email to trials@uspto.gov, that the original, incorrectly filed exhibit be expunged.

By: */John Kappos/*
John Kappos (Reg. No. 37,861)

CERTIFICATE OF SERVICE

The undersigned certifies pursuant to 37 C.F.R. § 42.6(e) and § 42.105 that on April 12, 2017, a true and correct copy of Petitioner's Response To The Notice Of Defective Petition (Paper No. 3) was served via express mail on the Petitioner at the following correspondence address of record:

Gregory Nelson
FOX ROTHSCHILD LLP
222 Lakeview Avenue, Suite 700
West Palm Beach, FL 33401

Gregory Nelson
FOX ROTHSCHILD LLP
997 Lennox Drive, Bld. 3
Lawrenceville, NJ 08648

Courtesy copies were also sent to Patent Owner's litigation counsel via electronic mail:

S. Calvin Capshaw
CAPSHAW DERIEUX, LLP
114 E. Commerce Ave.
Gladewater, TX 75647
ccapshaw@capshawlaw.com

Christopher J. Coulson
ANDREWS KURTH KENYON
LLP
One Broadway
New York, NY 10004
CCoulson@kenyon.com

Michael N. Zachary
ANDREWS KURTH KENYON LLP
1801 Page Mill Road, Suite 210
Palo Alto, CA 94304
MZachary@kenyon.com

Respectfully submitted,

/s/ John Kappos
John Kappos (Reg. No. 37,861)
O'Melveny & Myers LLP
610 Newport Center Drive, 17th Floor
Newport Beach, CA 92660
Telephone: (949) 760-9600

Attorney for Petitioner