

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. 8,805,001

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,805,001**

TABLE OF CONTENTS

Contents	
I.	INTRODUCTION 1
II.	MANDATORY NOTICES UNDER 37 C.F.R. § 42.8..... 1
III.	PAYMENT OF FEES UNDER 37 C.F.R. § 42.15(a) 3
IV.	GROUND FOR STANDING..... 3
V.	PRECISE RELIEF REQUESTED 3
VI.	LEGAL STANDARDS 3
A.	Claim Construction 3
B.	Level Of Ordinary Skill In The Art..... 4
C.	This Petition Is Not Redundant 4
VII.	OVERVIEW OF THE RELEVANT TECHNOLOGY AND '001 PATENT 5
VIII.	DETAILED EXPLANATION OF GROUNDS..... 14
A.	Overview Of The Prior Art References 14
1.	U.S. Patent No. 5,481,622 to Gerhardt (Ex. 1013)..... 14
2.	U.S. Patent No. 6,044,166 to Bassman (Ex. 1014)..... 21
3.	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") (Ex. 1005)..... 24
4.	U.S. Patent No. 5,150,432 ("Ueno") (Ex. 1007) 33
IX.	Specific Explanation Of Grounds For Invalidity..... 38
A.	Ground 1: Gerhardt In View Of Bassman Renders Obvious Claims 5-13 38

1.	Reasons To Combine Gerhardt And Bassman	38
2.	Elements Incorporated Into Claims 5-7 As Claims Dependent From An Independent Claim	41
3.	Claim 5: “The process according to claim 1, wherein said image processing system comprises at least one components selected from a memory, a temporal processing unit, and a spatial processing unit”	47
4.	Claim 6: “The process according to claim 1, wherein said image processing system comprises at least two components selected from a memory, a temporal processing unit, and a spatial processing unit”	52
5.	Claim 7: “The process according to claim 1, wherein forming the at least one histogram further comprises successively increasing the size of a selected area until the boundary of the target is found”	53
6.	Claim 8	53
7.	Claim 9: “The process according to claim 8, wherein identifying the target in said at least one histogram further comprises determining a center of the target to be between X and Y minima and maxima of the target”	54
8.	Claim 10: “The process according to claim 8, wherein identifying the target in said at least one histogram further comprises determining the center of the target at regular intervals”	54
9.	Claim 11: “The process according to claim 8 further comprising drawing a tracking box around the target”	55
10.	Claim 12: “The process according to claim 8, wherein said image processing system comprises at least one components selected from a memory, a temporal processing unit, and a spatial processing unit”	56
11.	Claim 13: “The process according to claim 8, wherein said image processing system comprises at least two	

	components selected from a memory, a temporal processing unit, and a spatial processing unit”	56
12.	Gerhardt and Bassman Are Not Cumulative	56
B.	Ground 2: Gerhardt In View Of Gilbert And Ueno Renders Obvious Claims 5-13	57
1.	Reasons To Combine Gilbert, Gerhardt, And Ueno	57
2.	Elements Incorporated Into Claims 5-7 As Claims Dependent From An Independent Claim	60
3.	Claim 5: “The process according to claim 1, wherein said image processing system comprises at least one components selected from a memory, a temporal processing unit, and a spatial processing unit”	66
4.	Claim 6: “The process according to claim 1, wherein said image processing system comprises at least two components selected from a memory, a temporal processing unit, and a spatial processing unit”	69
5.	Claim 7: “The process according to claim 1, wherein forming the at least one histogram further comprises successively increasing the size of a selected area until the boundary of the target is found”	70
6.	Claim 8	70
7.	Claim 9: “The process according to claim 8, wherein identifying the target in said at least one histogram further comprises determining a center of the target to be between X and Y minima and maxima of the target”	71
8.	Claim 10: “The process according to claim 8, wherein identifying the target in said at least one histogram further comprises determining the center of the target at regular intervals”	72
9.	Claim 11: “The process according to claim 8 further comprising drawing a tracking box around the target”	73

10.	Claim 12: “The process according to claim 8, wherein said image processing system comprises at least one components selected from a memory, a temporal processing unit, and a spatial processing unit”	77
11.	Claim 13: “The process according to claim 8, wherein said image processing system comprises at least two components selected from a memory, a temporal processing unit, and a spatial processing unit”	77
12.	Gilbert, Gerhardt, And Ueno Are Not Cumulative.....	77
X.	CONCLUSION.....	80

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.