UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CANON U.S.A., INC.,
Petitioner

vs.

CELLSPIN SOFT, INC.,
Patent Owner

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Case IPR2019-00127
Patent No. 9,258,698

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**PATENT OWNER'S RESPONSE
UNDER 37 C.F.R. § 42.120**

The undersigned, acting on behalf of the patent owner, Cellspin Soft, Inc. ("Cellspin"), and, pursuant to 37 U.S.C. § 42.120 and 35 U.S.C. § 316, respectfully responds in opposition to the petition of Canon U.S.A., Inc. ("Petitioner" or "Canon") for *Inter Partes* Review ("IPR").

Dated: July 22, 2019

Respectfully submitted,

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EXHIBIT LIST

No.	Short Name	Exhibit
2009	Foley Declaration	Declaration of Michael Foley, Ph.D.
2010	Foley CV	CV of Michael Foley, Ph.D.
2011	Techopedia definition for encryption	Definition of "encryption" from the Techopedia dictionary from https://www.techopedia.com/definition/5507/encryption
2012	Science Dictionary definition of cryptographic	Definition of "cryptographic" from Academic Press Dictionary of Science And Technology 556 (1992) (second edition)
2013	Schneier Excerpt	Excerpt from Bruce Schneier, Applied Cryptography: Protocols, Algorithms and Source Code in C, 2nd Edition, 1996, pp. 1-2.
2014	Stallings Excerpt	Excerpt from W. Stallings, "Cryptography And Network Security", 2nd, Edition, Chapter 13, IP Security, Jun. 8, 1998, pp. 399-440.
2015	CNSSI Excerpt	Excerpt from CNSSI No. 4009, which is a Committee on National Security Systems Glossary
2016	NISTIR Excerpt	Excerpt from NISTIR 7298, Revision 2, entitled "Glossary of Key Information Security Terms," which was published by the National Institute of Standards and Technology
2017	Zigbee Analysis	Security Analysis of Zigbee
2018	Bluetooth v2.1	Bluetooth v2.1 + EDR Core Specification
2019	Techopedia definition for authentication	Definition of "authentication" from the Techopedia dictionary from https://www.techopedia.com/definition/342/Authentication
2020	Techopedia definition for GUI	Definition of "authentication" from the Techopedia dictionary from https://www.techopedia.com/ definition/5435/graphical-user-interface-gui
2021	'802 Application	U.S. Patent Application No. No. 11/901,802
2022	Webster Definition of "along with"	Definition of "along with" from the Merriam-Webster dictionary: https://www.merriam-webster.com/dictionary/along%20with
2023	Bluetooth BIP Profile	Bluetooth Basic Imaging Profile, Interoperability Specification, dated July 30, 2003

I. INTRODUCTION

The lead inventor of USP 9,258,698 ("'698 patent"), Gurvinder Singh, is also the founder and president of Cellspin Soft, Inc. ("Cellspin" or "Owner"), an innovative company that, for many years, designed and provided innovative products and services, primarily its own line of social media, blogging, and advertising services.

Petitioner fails to demonstrate a preponderance of the evidence that claims 1-22 are unpatentable. Petitioner fails to appreciate the '698 patent's specific approach to, *inter alia,* media transfer comprising, *inter alia*, the use of an already paired wireless connection, wherein establishing the short- range paired wireless connection comprises the digital camera cryptographically authenticating identity of the cellular phone, wherein the cellular phone is configured to use HTTP to upload the received new-media file along with user information to a user media publishing website, provides a graphical user interface (GUI) for the received new-media file and to delete the created new media file. None of Petitioner's references practice or render obvious the claimed approaches, which of course have other meaningful limitations when properly considered as a whole.

Petitioner erroneously implies the '698 patent was only allowed due to adding language requiring the cellular phone to include "a user interface to delete an image file created by the digital camera." Petition at 1, 8-9. Petitioner only cites to a single addition even though multiple additions were made. *See* Exhibit 1002 at 394. Notably, the two substantial other additions were made in the same Examiner Amendment.Id.,395-396. Similar edits were made elsewhere in the Examiner's Amendment. Petitioner misstates the prosecution history. *See* Exhibit 1002. Further, Petitioner merely assumes that the rejections that prompted certain amendments were well-founded, which is not the case. *SeeId.,*327-366.

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