

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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PANASONIC CORPORATION OF NORTH AMERICA *et al.*,  
Petitioner

vs.

CELLSPIN SOFT, INC.,  
Patent Owner

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Case IPR2019-00131  
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 Panasonic Corporation of North America *et al.* (“Petitioner” or “Panasonic”) for *Inter Partes* Review (“IPR”) be denied, including because Petitioner fails to establish a reasonable likelihood that it would prevail on any claim.

Dated: January 30, 2019

Respectfully submitted,

/s/ John J. Edmonds

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## EXHIBIT LIST

<b>No.</b>	<b>Short Name</b>	<b>Exhibit</b>
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 <a href="https://www.techopedia.com/definition/5507/encryption">https://www.techopedia.com/definition/5507/encryption</a>
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 <a href="https://www.techopedia.com/definition/342/Authentication">https://www.techopedia.com/definition/342/Authentication</a>
2020	Techopedia definition for GUI	Definition of “graphical user interface” from the Techopedia dictionary from <a href="https://www.techopedia.com/definition/5435/graphical-user-interface-gui">https://www.techopedia.com/definition/5435/graphical-user-interface-gui</a>
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: <a href="https://www.merriam-webster.com/dictionary/along%20with">https://www.merriam-webster.com/dictionary/along%20with</a>
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 prove by a preponderance of the evidence that claims 1, 3, 4, 5, 7, 8, 10, 11, 12, 13, 15, 16, 17, 18, 19, and 20 are unpatentable. Petitioner’s argument fails to render any claim obvious due to, *inter alia*, at least six essential claimed requirements noted in the Summary of Arguments below. Moreover, Petitioner’s declaration of Dr. Strawn impermissibly uses hindsight to arrive at alleged obviousness, it fails to provide a logical nexus between alleged motivations to combine and the specific features being combined, and it fails to support rendering any of the challenged claims obvious.

## I. SUMMARY OF ARGUMENTS.

The references and combination of references do not disclose many of the teachings of the ‘698 patent. Without limitation, these key points are **not** shown or rendered obvious any of the prior art asserted by Petitioner:

- Paired wireless connection between a camera and a mobile device;
- Cryptographic authentication of the mobile device by the camera;
- Mashita teaches away from a cellular phone using HTTP;
- Combining Mashita with Hirashi would not work;
- GUI’s in general and specifically not for image deletion on the wirelessly connected digital camera; and
- For claims 5 and 8, a single mobile application performing all the required functions (e.g., request, store, HTTP media upload, delete using GUI).

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