UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Axis Communications AB, Canon Inc., and Canon U.S.A., Inc.,

Petitioners,

v.

Avigilon Fortress Corporation,

Patent Owner.

Case: IPR2019-00235

U.S. Patent No. 7,868,912
Issue Date: January 11, 2011
Title: Video Surveillance System Employing Video Primitives

PATENT OWNER'S PRELIMINARY RESPONSE TO PETITION FOR *INTER PARTES* REVIEW

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4. Petitioners fail to prove *Kellogg* in combination with *Flinchbaugh* teaches a system or method that "determines attributes independent of a selection of the first event." (Claims 1–11) 40

5. Petitioners fail to prove *Kellogg* in combination with *Flinchbaugh* teaches "a first processor which analyzes a video to determine attributes" and "a second processor, separate from the first . . . which determines a first event." (Claims 1–4) 44

6. Petitioners fail to prove *Kellogg* in combination with *Flinchbaugh* teaches "attributes of objects detected in the video." (claims 1–4). 48

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3. Petitioners fail to prove *Brill* teaches a system or method that "determines a first event . . . by analyzing a combination of the received determined attributes." (1–4, 6–36) 53

4. Petitioners fail to prove *Brill* teaches a system or method that "determines attributes independent of a selection of the first event." (Claims 1–4, 6–36).....54

5. Petitioners fail to prove *Brill* teaches "a first processor which analyzes a video to determine attributes" and "a second processor, separate from the first . . . which determines a first event." (Claims 1–4, 23, 26, 31) 55

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PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
2001	Declaration of Michael W. De Vries in Support of Unopposed Motion to Appear Pro Hac Vice on Behalf of Patent Owner Avigilon Fortress Corporation.
2002	Declaration of Adam R. Alper in Support of Unopposed Motion to Appear Pro Hac Vice on Behalf of Patent Owner Avigilon Fortress Corporation.
2003	Declaration of Akshay S. Deoras s in Support of Unopposed Motion to Appear Pro Hac Vice on Behalf of Patent Owner Avigilon Fortress Corporation.
2004	37 C.F.R. § 1.132 Declaration of Kenneth A. Zeger (excerpt of U.S. Patent No. 7,868,912 Reexamination).
2005	Thomas Olson & Frank Brill, *Moving Object Detection & Event Recognition Algorithms for Smart Cameras*, 1 PROC. 1997 IMAGE UNDERSTANDING WORKSHOP 159-175 (1997).
2006	Jonathan D. Courtney, *Automatic Video Indexing Via Object Motion Analysis*, 30(4) PATTERN RECOGNITION 607-625 (1997).
2007	Patent Application No. 09/987707.
2008	U.S. Patent No. 6,628,835 to Brill et al.
2009	Declaration of Jennifer A. Babbitt.
2010	SearchWorks Catalog Entry for Thomas Olson & Frank Brill, *Moving Object Detection & Event Recognition Algorithms for Smart Cameras*, 1 PROC. 1997 IMAGE UNDERSTANDING WORKSHOP 159-175 (1997).
2011	Scanned Cover and Front Matter of Jonathan D. Courtney, *Automatic Video Indexing Via Object Motion Analysis*, 30(4) PATTERN RECOGNITION 607-625 (1997))

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