

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In Re Patent of : Peter L. VENETIANER et al.
Patent No. : 7,868,912
Issued : January 11, 2011
Title : VIDEO SURVEILLANCE SYSTEM EMPLOYING
VIDEO PRIMITIVES
Application Serial No. : 11/098,385
Filed : April 5, 2005
Requester : Bosch Security Systems, Inc.

VIA EFS-WEB

Mail Stop *Inter Partes* Reexam
Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

**REQUEST FOR *INTER PARTES* REEXAMINATION
OF U.S. PATENT NO. 7,868,912 PURSUANT TO 37 C.F.R. § 1.915**

SIR:

Bosch Security Systems, Inc. (“Requester”), through its undersigned counsel, hereby respectfully requests *inter partes* reexamination of U.S. Patent No. 7,868,912 pursuant to 35 U.S.C. § 311 *et seq.* and the provisions of 37 C.F.R. § 1.902 *et seq.*

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EXHIBITS

- Exhibit 1 U.S. Patent No. 7,868,912 entitled “Video Surveillance System Employing Video Primitives,” issued January 11, 2011 to Peter L. Venetianer, Alan J. Lipton, Andrew J. Chosak, Matthew F. Frazier, Niels Haering, Gary W. Myers, Weihong Yin, and Zhong Zhang.
- Exhibit 2 “Complaint” filed on June 29, 2011 in *In the Matter of Certain Video Analytics Software, Systems, Components Thereof, and Products Containing Same*, U.S. International Trade Commission Investigation No. 337-TA-795.
- Exhibit 3 “Notice of Institution of Investigation” issued on July 27, 2011 for U.S. International Trade Commission Investigation No. 337-TA-795.
- Exhibit 4 “Response of Bosch Security Systems, Inc. and Robert Bosch GmbH to the Complaint of ObjectVideo, Inc. Under Section 337 of the Tariff Act of 1930, as Amended, and Notice of Investigation” filed September 6, in U.S. International Trade Commission Investigation No. 337-TA-795.
- Exhibit 5 Proposed Claim Constructions of Requester and Robert Bosch GmbH, filed October 26, 2011 in U.S. International Trade Commission Investigation No. 337-TA-795.
- Exhibit 6 “Joint Claim Construction Chart” filed October 28, 2011 in U.S. International Trade Commission Investigation No. 337-TA-795.
- Exhibit 7 “Amended Complaint” filed May 11, 2011 in *OBJECTVIDEO, INC. v. ROBERT BOSCH GMBH et al.*, Case No. 3:11-cv-00217-JAG (E.D. Va.).
- Exhibit 8 “Bosch Security Systems, Inc.’s Answer and Counterclaims to ObjectVideo Inc.’s Amended Complaint” filed June 8, 2011 in *OBJECTVIDEO, INC. v. ROBERT BOSCH GMBH et al.*, Case No. 3:11-cv-00217-JAG (E.D. Va.).
- Exhibit 9 “Reply to Counterclaims of Bosch Security Systems, Inc.,” filed June 22, 2011 in *OBJECTVIDEO, INC. v. ROBERT BOSCH GMBH et al.*, Case No. 3:11-cv-00217-JAG (E.D. Va.).
- Exhibit 10 “Order” Granting Motion to Stay, dated August 10, 2011 in *OBJECTVIDEO, INC. v. ROBERT BOSCH GMBH et al.*, Case No. 3:11-cv-00217-JAG (E.D. Va.).
- Exhibit 11 U.S. Patent Application Serial No. 11/098,385, filed April 5, 2005 by Peter L. Venetianer, Alan J. Lipton, Andrew J. Chosak, Matthew F. Frazier, Niels Haering, Gary W. Myers, Weihong Yin, and Zhong Zhang.
- Exhibit 12 Listing of Prior Art Patents and Printed Publications that Provide a Showing that There Is a Reasonable Likelihood that the Requester Will

Prevail With Respect To At Least One of the Claims of U.S. Patent No. 6,868,912.

- Exhibit 13 German Patent Publication No. DE 101 53 484 A1 by Gilge.
- Exhibit 14 Certified English Translation of German Patent Publication No. DE 101 53 484 A1.
- Exhibit 15 “ObjectVideo Forensics: Activity-Based Video Indexing and Retrieval For Physical Security Applications,” Lipton et al.
- Exhibit 16 U.S. Patent No. 5,969,755 to Courtney.
- Exhibit 17 “Wide Area Surveillance with a Multi Camera Network,” Black et al.
- Exhibit 18 “Visual Surveillance in Retail Stores and in the Home,” Brodsky et al.
- Exhibit 19 “A New Network-Based Intelligent Surveillance System,” Liu et al.
- Exhibit 20 “Moving Object Detection and Event Recognition Algorithms for Smart Cameras,” Olson et al.
- Exhibit 21 “Object Tracking and Event Recognition in Biological Microscopy Videos,” Shotton et al.
- Exhibit 22 “VIGILANT: Content-Querying of Video Surveillance Streams,” Greenhill et al.
- Exhibit 23 German Patent Publication No. DE 198 48 490 by Rottman.
- Exhibit 24 Certified English Translation of German Patent Application Publication DE 198 48 49.
- Exhibit 25 U.S. Patent No. 7,447,331 to Brown et al.
- Exhibit 26 Certificate of Service Pursuant to 37 C.F.R. § 1.915(b)(6)

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