

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioner

v.

Avigilon Fortress Corporation,

Patent Owner

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Case: IPR2019-00236

U.S. Patent No. 7,868,912

Issue Date: January 11, 2011

Title: Video Surveillance System Employing Video Primitives

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

**TABLE OF CONTENTS**

	<u>Page</u>
<b>I. INTRODUCTION .....</b>	<b>1</b>
<b>II. BACKGROUND .....</b>	<b>2</b>
A. The ’912 Patent .....	2
B. Overview of the Claims of the ’912 Patent .....	4
C. The Petition Proposes One Anticipation and Two Obviousness Challenges .....	5
<b>III. LEVEL OF ORDINARY SKILL.....</b>	<b>5</b>
<b>IV. CLAIM CONSTRUCTION.....</b>	<b>6</b>
A. Single Processor Claims (Claims 6, 9, 12, 18, 24, 25, 27–30, 32, 33).....	6
B. “Filtering” (Claims 23–25, 31–36) .....	8
C. “analyzing a combination of the received determined attributes” or “wherein analyzing the combination of the received determined attributes comprises filtering” (Petitioners’ “Independence Argument (1)” Discussion) (Claims 1, 6, 8, 11, 12, 16, 18, 23–27, 29–36).....	9
D. “Event” (Petitioners’ “Independence Argument (3)”) (Claims 1, 3, 4, 6, 8, 9, 11, 12, 16–18, 22–36) .....	11
E. “Independent” (Petitioners’ “Independence Argument (2)”) (Claims 1, 6, 9, 15, 18, 23–28, 30–33).....	12
F. “Analyzing only the attributes” (Claims 3, 8, 11).....	14
<b>V. THE BOARD SHOULD REJECT THE PETITION IN ITS ENTIRETY. ....</b>	<b>15</b>

## Patent Owner's Preliminary Response

A.	The Board Should Exercise Its Discretion To Dismiss This Petition As Cumulative To Prior Examination Of The '912 Patent. ....	15
B.	Petitioners Fail To Prove <i>Talmon</i> and <i>Aspectus</i> Are Prior Art. ....	20
1.	It is uncontested that the claims of the '912 patent reciting only one processor are entitled to a priority date earlier than <i>Talmon</i> and <i>Aspectus</i> . ....	20
2.	All claims of the '912 patent are entitled to a priority date earlier than the alleged effective date of <i>Talmon</i> and <i>Aspectus</i> . ....	21
3.	Petitioners fail to prove <i>Aspectus</i> is a "printed publication." ....	39
C.	Ground 1: Petitioners Fail To Prove <i>Talmon</i> Anticipates Claims 1–4 And 6–36. ....	41
1.	Overview of <i>Talmon</i> ....	41
2.	Petitioners fail to prove <i>Talmon</i> teaches a system or method that "determines attributes independent of a selection of the first event." (Claims 1–4, 6–36) ....	42
3.	Petitioners fail to prove <i>Talmon</i> teaches "a first processor which analyzes a video to determine attributes of objects detected in the video." (Claims 1–4, 23, 26, 31) ....	47
D.	Ground 2: Petitioners Fail To Prove <i>Talmon</i> in Combination With <i>Aspectus</i> Renders Claims 1–4 And 6–36 Obvious. ....	51
1.	Overview of <i>Aspectus</i> ....	51
2.	<i>Aspectus</i> does not remedy any of the failings of <i>Talmon</i> addressed above. (Claims 1–4, 6–36) ....	51
E.	Ground 3: Petitioners Fail To Prove <i>Talmon</i> In Combination With <i>Brill</i> Renders Claims 1–4 And 6–36 Obvious. ....	52
1.	Overview of <i>Brill</i> ....	52

Patent Owner’s Preliminary Response

- 2. Petitioners fail to show a POSITA would combine *Talmon* with *Brill*. .....55
- 3. 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).....57

**VI. CONCLUSION .....60**

**PATENT OWNER'S EXHIBIT LIST**

<b>Exhibit No.</b>	<b>Description</b>
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 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, <i>Moving Object Detection &amp; Event Recognition Algorithms for Smart Cameras</i> , 1 PROC. 1997 IMAGE UNDERSTANDING WORKSHOP 159-175 (1997).
2006	Jonathan D. Courtney, <i>Automatic Video Indexing Via Object Motion Analysis</i> , 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, <i>Moving Object Detection &amp; Event Recognition Algorithms for Smart Cameras</i> , 1 PROC. 1997 IMAGE UNDERSTANDING WORKSHOP 159-175 (1997).
2011	Scanned Cover and Front Matter of Jonathan D. Courtney, <i>Automatic Video Indexing Via Object Motion Analysis</i> , 30(4) PATTERN RECOGNITION 607-625 (1997)

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