

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In Re Patent of : Alan J. LIPTON et al.
Patent No. : 7,932,923
Issued : April 26, 2011
Title : VIDEO SURVEILLANCE SYSTEM EMPLOYING
VIDEO PRIMITIVES
Application Serial No. : 12/569,116
Filed : September 29, 2009
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. 7,932,923 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. 7,932,923 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. 7,932,923 entitled “Video Surveillance System Employing Video Primitives,” issued April 26, 2011 to Alan J. Lipton, Thomas M. Strat, Peter L. Venetianer, Mark C. Allmen, William E. Severson, Niels Haering, Andrew J. Chosak, Zhong Zhang, Matthew F. Frazier, James S. Seekas, Tasuki Hirata, and John Clark.
- 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. 12/569,116, filed September 29, 2009 by Alan J. Lipton, Thomas M. Strat, Peter L. Venetianer, Mark C. Allmen, William E. Severson, Niels Haering, Andrew J. Chosak, Zhong Zhang, Matthew F. Frazier, James S. Seekas, Tasuki Hirata, and John Clark.

- 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. 7,932,923.
- Exhibit 13 U.S. Patent No. 5,969,755 to Courtney.
- Exhibit 14 “Moving Object Detection and Event Recognition Algorithms for Smart Cameras,” by Olson et al.
- Exhibit 15 “Object Tracking and Event Recognition in Biological Microscopy Videos,” by Shotton et al.
- Exhibit 16 U.S. Patent No. 6,628,835 to Brill et al.
- Exhibit 17 European Patent Application No. EP 0 967 584 by Courtney.
- Exhibit 18 “Automatic Video Indexing Via Object Motion Analysis,” by Courtney.
- Exhibit 19 U.S. Patent No. 5,875,305 to Winter et al.
- Exhibit 20 “Moving Target Classification and Tracking from Real-Time Video,” by Lipton et al.
- Exhibit 21 U.S. Patent No. 7,653,635 to Paek et al.
- Exhibit 22 U.S. Patent No. 6,721,454 to Qian et al.
- Exhibit 23 Certificate of Service Pursuant to 37 C.F.R. § 1.915(b)(6).

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