UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners,

v.

Avigilon Fortress Corporation,

Patent Owner.

Case No. IPR2019-00314

U.S. Patent No. 7,932,923

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

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F. "wherein the applying the new user rule to the plurality of detected attributes comprises applying the new user rule to only the plurality of detected attributes" (Claims 1-19, 22-29); "wherein the analysis of the combination of the attributes to detect the event comprises analyzing only the combination of the attributes" (Claims 20-21); "wherein the applying the selected new user rule to the plurality of attributes stored in memory comprises applying the selected new user rule to only the plurality of attributes stored in memory" (Claims 30-41) 14

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3. Petitioners Fail to Show *Dimitrova* in Combination with *Brill* Renders Obvious the Limitation "identifying an event of the object that is not one of the detected attributes of the object by applying the new user rule to the plurality of detected attributes; wherein the applying the new user rule to the plurality of detected attributes comprises applying the new user rule to only the plurality of detected attributes" (Claims 1-41) 45

4. Petitioners Fail to Show *Dimitrova* in Combination with *Brill* Renders Obvious the Limitation "the plurality of attributes that are detected are independent of which event is identified" (Claims 1-41) 50

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