

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MINDGEEK USA INC., MINDGEEK S.À.R.L.,
MG FREESITES LTD., MG FREESITES II LTD.,
MG CONTENT RK LTD., MG CONTENT DP LTD.,
MG CONTENT RT LTD., MG PREMIUM LTD.,
MG CONTENT SC LTD., MG CYPRUS LTD.,
LICENSING IP INTERNATIONAL S.À.R.L.,
9219-1568 QUÉBEC INC. d/b/a ENTREPRISE MINDGEEK CANADA, and
COLBETTE II LTD.,

Petitioners

v.

UNIVERSITY OF SOUTHERN CALIFORNIA

PRESERVATION TECHNOLOGIES LLC

Patent No. 6,212,527

Issue Date: July 18, 2000

Title: Method and Apparatus for Cataloguing Multimedia Data

**PETITION FOR *INTER PARTES* REVIEW
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 *ET SEQ.***

EXHIBIT LIST

Exhibit Number	Description
1001	U.S. Patent No. 6,212,527 to Gustman
1002	Canadian Patent Application No. 2,128,667 to Jones-Lee
1003	Objective video quality assessment system based on human perception to Webster et al.
1004	European Patent Application Pub. No. 0 609 517 to Braden-Harder et al.
1005	U.S. Patent No. 5,668,897 to Stolfo
1006	U.S. Patent No. 5,307,266 to Hayashi et al.
1007	Declaration of Dr. Jagadish
1008	U.S. Patent No. 6,212,527 File History
1009	<i>DexMedia, Inc. v. Click-to-Call Technologies, Inc., et al.</i> , Case No. 15-1242, Dkt. Nos. 127-128.
1010	Patent 2128667 Summary, Canadian Intellectual Property Office
1011	Help: Bibliographic and Text Data Fields, Canadian Intellectual Property Office
1012	Dr. Jagadish CV

1013	Query by Image and Video Content: The QBIC System to Flickner et al.
1014	Efficient Organization and Access of Multi-Dimensional Datasets on Tertiary Storage Systems to Chen et al.
1015	A Distributed Hierarchical Storage Manager for a Video-on-Demand System to Federighi et al.
1016	Content-Based Video Indexing and Retrieval to Smoliar et al.
1017	Media Streams: An Iconic Visual Language for Video Representation to Davis
1018	IDIC: Assembling Video Sequences from Story Plans and Content Annotations to Sack et al.

TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	MANDATORY NOTICES	2
	A. Lead and Backup Counsel and Service Information.....	2
	B. Real Parties-in-Interest	3
	C. Related Matters.....	3
III.	CERTIFICATION OF GROUNDS FOR STANDING.....	5
IV.	THRESHOLD REQUIREMENT FOR <i>INTER PARTES</i> REVIEW.....	7
V.	STATEMENT OF PRECISE RELIEF REQUESTED.....	7
VI.	OVERVIEW OF THE '527 PATENT AND PRIOR ART	8
	A. State of the Technology Prior to the '527 Patent	8
	B. The '527 Patent.....	9
	C. The Prior Art.....	10
	1. Jones-Lee.....	10
	2. Webster.....	12
	3. Braden-Harder	13
	4. Stolfo	14
	5. Hayashi.....	15
VII.	CLAIM CONSTRUCTION	15
VIII.	LEVEL OF ORDINARY SKILL IN THE ART	16
IX.	CLAIM-BY-CLAIM EXPLANATION OF GROUNDS FOR UNPATENTABILITY.....	16
	A. Ground 1: Claims 1-4 are Obvious in view of Jones-Lee and Webster.....	16
	B. Ground 2: Claims 14, 15, 17, and 18 are Anticipated by Braden-Harder	25
	C. Ground 3: Claim 16 is Obvious in view of Braden-Harder and Stolfo	37
	D. Ground 4: Claims 5-9 and 11 are Obvious in view of Braden-Harder and Hayashi.....	38

E. Ground 5: Claims 10, 12, and 13 are Obvious in view of Braden- Harder, Hayashi, and Solfo	52
X. CONCLUSION	56

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.