

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ROBERT BOSCH LLC  
Petitioner

v.

MONUMENT PEAK VENTURES, LLC  
Patent Owner

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Case IPR2019-01473  
Patent 6,654,507

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PATENT OWNER'S RESPONSE

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## EXHIBIT LIST

<b>Exhibit No.</b>	<b>Description</b>
2001	U.S. Patent 6,282,317 to Luo et al.
2002	Transcript of deposition of John R. Grindon, D. Sc.

## I. INTRODUCTION

The challenged claims of U.S. Patent 6,654,507 (the “507 patent”) should not be found unpatentable because the Petitioner has failed to prove by a preponderance of evidence that the challenged claims are unpatentable.

Petitioner relies solely on Toyama for teaching claim 1’s requirement of determining a crop window having a shape factor and a zoom factor where the shape and zoom factors determine the size of the crop window. However, Petitioner’s argument that this limitation is met because, “*Toyama* discloses a zoom factor to determine a size of the crop window because it discloses that sub-regions are ‘defined for a limited range of scales’ and that each cropped image is resized into a canonical image size,” misses the mark because the “scales” referred to by Toyama are not zoom factors, but rather represent how large a section of the image is to be evaluated. Consequently, Petitioner has failed to prove its obviousness case with respect to claim 1 and its dependent claims.

Further, Petitioner’s contention that Toyama alone or the combination of Toyama and Itti teach or suggest computing a belief map, as required by claim 1, is wrong. Toyama only describes a hypothesis that may indicate areas of an image that should be examined for a particular object (a face), but there is no suggestion that the face is the “main subject” of the image, or that any likelihood values are assigned to any of the sub-regions thought to contain faces. Moreover, and

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