

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.  
Petitioner

v.

GESTURE TECHNOLOGY PARTNERS LLC  
Patent Owner

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Case No. IPR2021-00923  
U.S. Patent No. 8,194,924

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 8,194,924**

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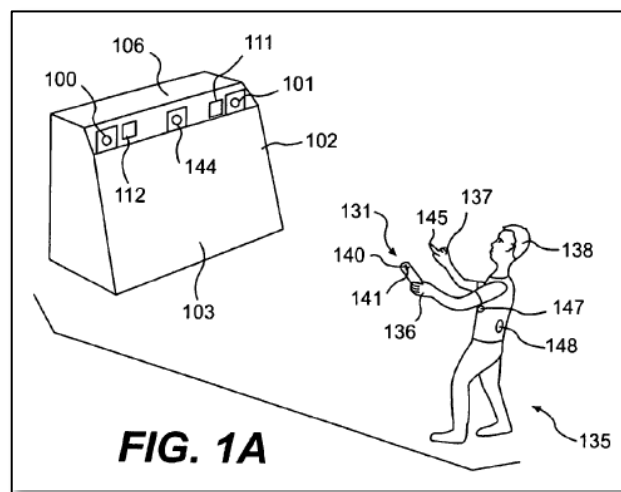
## I. INTRODUCTION

Petitioner Apple Inc. (“Petitioner”) requests an *Inter Partes* Review (“IPR”) of claims 1–14 (the “Challenged Claims”) of U.S. Patent No. 8,194,924 (“the ’924 Patent”).

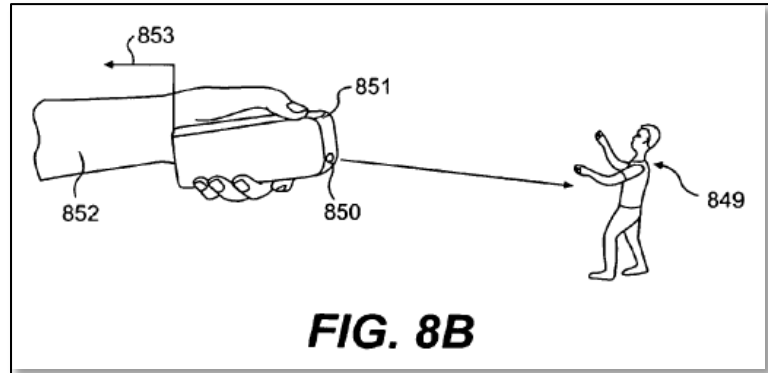
## II. SUMMARY OF THE ’924 PATENT

### A. The ’924 Patent’s Alleged Invention

The ’924 Patent describes computer devices that “optically sens[e] human input” using one or more cameras, contemplating applications in a “variety of fields such as computing, gaming, medicine, and education.” ’924 Patent (Ex. 1001), 2:7–23. A number of scenarios are described, including multiple cameras mounted in a fixed display as depicted in Fig. 1A below and a single camera mounted in a handheld device as depicted in Fig. 8B below:



*Id.* at Fig. 1A, 3:19-56 (describing cameras 100, 101, and 144).



*Id.* at Fig. 8B, 13:1-10 (describing camera 850).

The Challenged Claims each require a handheld device containing two separate cameras that face in different directions such that they have distinct fields of view. *Id.* at Claim 1 (claiming a “handheld device comprising . . . a first camera [and] a second camera . . . wherein the first and second cameras include non-overlapping fields of view”). During prosecution, the claims were rejected under 35 U.S.C. § 112, ¶ 1 for failing to satisfy the written description requirement. The Examiner noted that the specification failed to describe a handheld device with two cameras. *'924 File History* (Ex. 1002), 109. In response, the applicant amended the specification, adding Fig. 18 (reproduced below) and its corresponding disclosure:

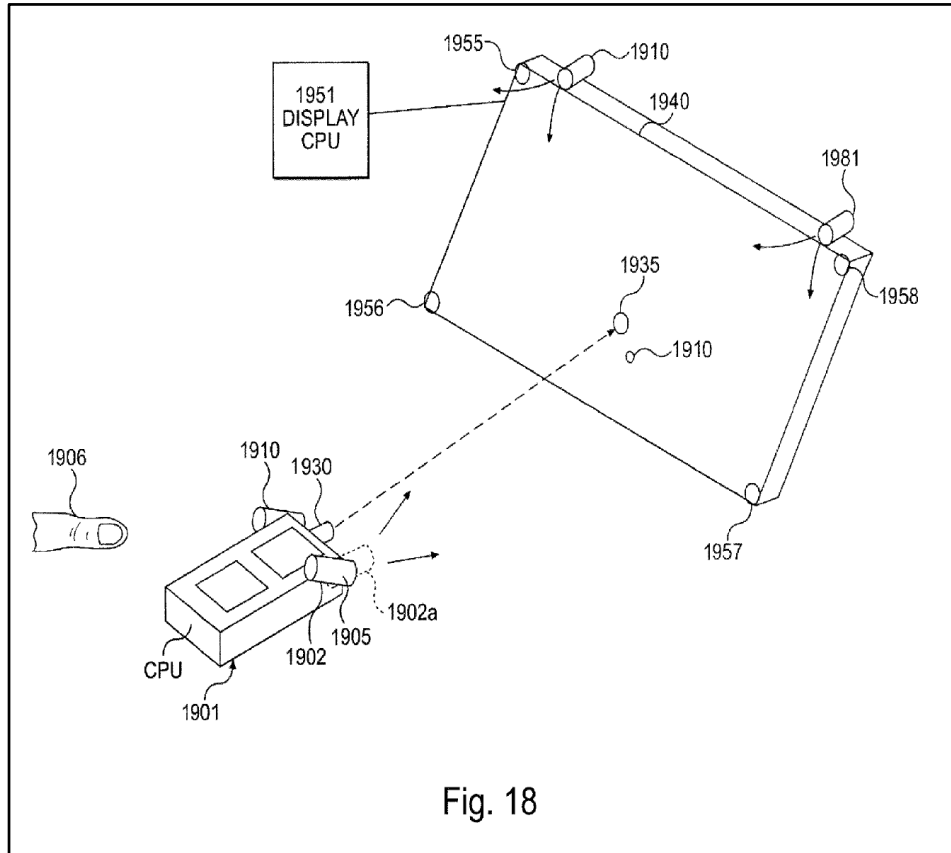


Fig. 18

*Id.* at Figure 18, 25:40-26:51 (describing the same); '924 *File History* (Ex. 1002), 122-129 (amending specification to add Fig. 18 and corresponding disclosure).

As illustrated, a handheld computer 1901 with central processing unit (CPU) houses a camera 1902 that can be paired in stereo with another camera 1910 (on handheld unit), either of which may rotate about axis 1905 to view a user or aspect of that user like finger 1906. *Id.* at 25:40-43. When aimed at the user, the camera(s) can be used to obtain images and video images of a user's fingers, hand, objects in the hand, gestures, and facial expressions. *Id.* at 25:50-63. Facing one or more of the cameras away from the user, they "can also be used to see gestures of others." *Id.* at 26:25.

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