

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LG ELECTRONICS, INC. and LG ELECTRONICS U.S.A., INC.  
Petitioner

v.

GESTURE TECHNOLOGY PARTNERS LLC  
Patent Owner

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Case No. IPR2022-00092  
U.S. Patent No. 8,878,949

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 8,878,949**

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## **I. INTRODUCTION**

Petitioner LG Electronics, Inc. and LG Electronics U.S.A. Inc. (“Petitioner”) requests an *Inter Partes* Review (“IPR”) of claims 1–18 (the “Challenged Claims”) of U.S. Patent No. 8,878,949 (“the ’949 Patent”). This petition is substantively the same as IPR2021-00921 (which is currently pending institution), and is being filed concurrently with a motion for joinder with respect to that proceeding.

## **II. SUMMARY OF THE ’949 PATENT**

### **A. The ’949 Patent’s Alleged Invention**

Generally directed to digital imaging, the ’949 Patent seeks to automate the process of taking a picture by analyzing the scene and capturing an image when “certain poses of objects, sequences of poses, motions of objects, or any other states or relationships of objects are represented.” ’949 Patent (Ex. 1001), 1:50-2:8. The patent describes a number of different scenarios that, when detected, cause the camera to capture an image. Some examples include detecting (1) a “[s]ubject in a certain pose,” (2) a “[s]ubject in a sequence of poses,” (3) a “[p]ortion of [s]ubject in a sequence of poses (e.g., gestures),” (4) a “[s]ubject or portion(s) in a specific location or orientation,” (5) a “[s]ubject in position relative to another object or person” such as a “bride and groom kissing in a wedding,” and (6) “a subject undertak[ing] a particular signal comprising a position or gesture” such as “raising one’s right hand.” *Id.* at 5:30-49. Only gestures are claimed,

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