## UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC
Petitioner

v.

GESTURE TECHNOLOGY PARTNERS LLC Patent Owner

Case No. IPR2022-00361 U.S. Patent No. 8,194,924

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



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### I. INTRODUCTION

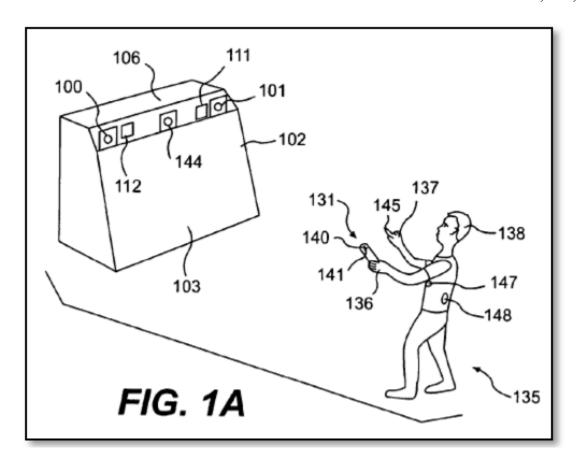
Petitioner Google LLC ("Petitioner") requests an *Inter Partes* Review ("IPR") of claims 1-14 (the "Challenged Claims") of U.S. Patent No. 8,194,924 ("the '924 Patent"). This petition is substantively the same as IPR2021-00923 (which is instituted), and is being filed concurrently with a motion for joinder with respect to that proceeding.

#### II. SUMMARY OF THE '924 PATENT

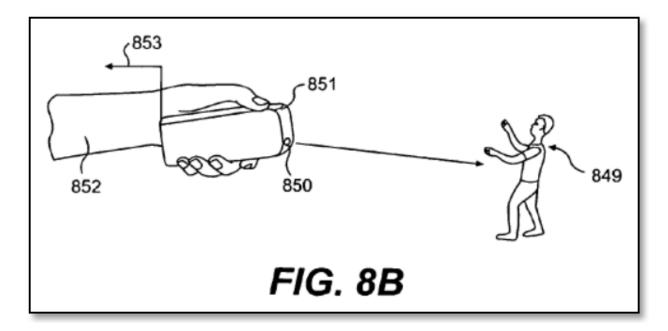
## A. The '924 Patent's Alleged Invention

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:



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