UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC., Petitioner

v.

THALES VISIONIX, INC., Patent Owner

U.S. PATENT NO. 6,922,632

IPR2022-01305

PATENT OWNER'S RESPONSE

June 14, 2023



TABLE OF CONTENTS

TAB	LE OF	F AUTHORITIES	iv	
LIST	OF E	XHIBITS	vi	
I.	INTE	INTRODUCTION		
II.	BACKGROUND			
	A.	The '632 Patent	2	
	В.	Welch 2001	6	
	C.	Welch 1997 and Welch Thesis	8	
	D.	Horton		
	E.	Person of Ordinary Skill in the Art	10	
III.	CLAIM CONSTRUCTION			
	A.	"Estimation Subsystem / Estimation Module," "Sensor Subsystem," and "Coupling"		
	В.	"Sensor Module"		
	C.	"Configuration Information"		
	D.	"Enumerating a set of sensing elements available to a tracking system"		
	E.	"Expected Utility of a Measurement"	23	
IV.	PETITIONER FAILS TO DEMONSTRATE OBVIOUSNESS OF ANY CHALLENGED CLAIM			
	A.	The Petition Fails To Establish that Welch 2001 and Welch 1997 Rendered Any of the Challenged Claims Obvious (Ground I)		
		1. Petitioner Fails to Show that Welch 2001 and Welch 1997 Rendered Claims 30-32 Obvious	25	
		2. Petitioner Fails to Show that Welch 2001 and Welch 1997 Rendered Claims 33-36 Obvious	28	
		3. Petitioner Fails to Show that Welch 2001 and Welch 1997 Rendered Claims 44-45 Obvious	34	



		4.	Petitioner Fails to Show that Welch 2001 and Welch 1997 Rendered Claims 47-49, 51-53, and 59-61 Obvious	36	
	В.	The Petition Fails to Establish that Welch 2001, Welch 1997, and Welch Thesis Rendered Claim 50 Obvious (Ground II)			
	C.	Woul	Petition Fails to Establish that Claims 54-55 and 57-58 ld Have Been Obvious over Welch 2001 and Welch 1997 ew of Harris (Ground III)	45	
	D.	The Petition Fails to Establish that Horton Rendered Any Challenged Claim Obvious (Ground IV)			
		1.	Petitioner Fails to Show that Horton Rendered Claims 30-32 Obvious	46	
		2.	Petitioner Fails to Show that Horton Rendered Claim 33 Obvious	51	
		3.	Petitioner Fails to Show that Horton Rendered Claims 47, 50-53, and 59-61 Obvious	54	
	Е.	The Petition Fails to Establish that Horton in View of Welch 1997 Rendered Any Challenged Claim Obvious (Ground V)			
		1.	Claim 34	66	
	F.	F. The Petition Fails to Establish that Horton in View of Harris Rendered Any Claim Obvious (Ground VI)			
V.	OBJE	ECTIV	E INDICIA OF NON-OBVIOUSNESS	67	
CON	CLUS	ION		68	



TABLE OF AUTHORITIES

CASES

ActiveVideo Networks, Inc. v. Verizon Commc'ns, Inc., 694 F.3d 1312 (Fed. Cir. 2012)	46
Arkie Lures, Inc. v. Gene Larew Tackle, Inc., 119 F.3d 953 (Fed. Cir. 1997)	68
Becton, Dickinson & Co. v. Tyco Healthcare Grp., 616 F.3d 1249 (Fed. Cir. 2010)	12, 18, 26, 48
CAE Screenplates Inc. v. Heinrich Fiedler GmbH & Co. KG, 224 F.3d 1308 (Fed. Cir. 2000)	48, 50
Comcast Cable Commc'ns, LLC v. Promptu Sys. Corp., 838 F. App'x 551 (Fed. Cir. 2021)	13
Digital-Vending Servs. Int'l, LLC v. Univ. of Phoenix, Inc., 672 F.3d 1270 (Fed. Cir. 2012)	22
Ex parte Vembu, No. 2020-005681, 2021 WL 5756111 (P.T.A.B. Dec. 2, 2021)	26
In re Cyclobenzaprine Pat. Litig., 676 F.3d 1063 (Fed. Cir. 2012)	34
In re IPR Licensing, Inc., 942 F.3d 1363 (Fed. Cir. 2019)	42
Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co., 868 F.3d 1013 (Fed. Cir. 2017)	10
Personal Web Techs., LLC v. Apple, Inc., 848 F.3d 987 (Fed. Cir. 2017)	
Phillips v. AWH Corp., 415 F.3d 1303 (Fed. Cir. 2005)	15
Securus Techs., Inc. v. Glob. Tel*Link Corp., 701 F. App'x 971 (Fed. Cir. 2017)	45



TQ Delta, LLC v. Cisco Sys., Inc.,	
942 F.3d 1352 (Fed. Cir. 2019)	31
Trs. of Columbia Univ. v. Symantec Corp.,	
811 F.3d 1359 (Fed. Cir. 2016)	15
Wi-LAN Inc. v. Sharp Elecs. Corp.,	
992 F.3d 1366 (Fed. Cir. 2021)	13
REGULATIONS	
37 C.F.R. § 42.104	42

DOCKET A L A R M

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.

