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. 7,725,253

IPR2022-01308

PETITION FOR *INTER PARTES* REVIEW UNDER 35 U.S.C. §312 AND 37 C.F.R. §42.104

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	A.	Ground I: Claims 1-2 and 6-9 Are Rendered Obvious by Welch 2001 and Welch 1997
		 Motivation to Combine

	9.	Claim 6[b]: "providing parameters specific to the enumerated sensing elements to the tracking system to enable the estimation subsystem to be configured based on the parameters specific to the enumerated sensing elements to enable the estimation subsystem to estimate the position or orientation of the object."
	11.	having a highest expected utility of a measurement among the sequence of candidates."
	12.	respect to the target."
B.		nd II: Claims 3-5 Are Rendered Obvious by Welch 2001 Velch 1997 in Combination with Harris
	1. 2.	Motivation to Combine
	3.	Claim 4: "The system of claim 2 wherein the interface enables the estimation subsystem to perform computations independently of an implementation of the sensor modules."
	4.	Claim 5: "The system of claim 1 further comprising a navigation subsystem to navigate the object in an environment based on the location estimate for the object."
C.		nd III: Claims 3 and 4 Are Rendered Obvious by Welch and Welch 1997 in Combination with Reitmayr54

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	1. 2. 3.	Motivation to Combine
	5.	enables the estimation subsystem to perform computations independently of an implementation of the sensor modules."
D.	Grour	nd IV: Claims 1-9 Are Rendered Obvious by Horton58
	1. 2. 3.	Claim 1[preamble]: "A tracking system comprising:"
	4.	subsystem for localizing an object;"
	5.	Claim 2: "The system of claim 1 wherein the sensor subsystem includes one or more sensor modules, each providing an interface for interacting with a
	6.	corresponding set of one or more sensing elements."
	7.	Claim 4: "The system of claim 2 wherein the interface enables the estimation subsystem to perform computations independently of an implementation of the sensor modules."
	8.	Claim 5: "The system of claim 1 further comprising a navigation subsystem to navigate the object in an environment based on the location estimate for the
	9.	object."

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