

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s) : Patrick Pirim
Patent Owner : Image Processing Technologies LLC
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Examiner : Majid Banankhah
Art Unit : 3992

Mail Stop Ex Parte Reexam
Commissioner for Patents
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APPEAL BRIEF

Applicant submits this Appeal Brief in response to the Final Rejection (“Rejection”) mailed September 7, 2018. Notice of Appeal was timely filed in this case on November 6, 2018.

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I. REAL PARTY OF INTEREST

Image Processing Technologies, LLC

General Patent Corporation (managing member of Image Processing Technologies, LLC)

II. RELATED PROCEEDINGS

The Board is advised that U.S. Patent *No.* 6,959,293 (the “‘293 patent”) is or was involved in the following proceedings:

1. *Image Processing Technologies, LLC v. Canon Inc., et al.*, Case No. 10 CV 03867 (E.D.N.Y) (Dismissed).
2. *Image Processing Technologies, LLC v. Samsung Electronics Co., Ltd., et al.*, Case No. 2:16 CV 505 (“the Samsung litigation”) (E.D. Tex.) (Pending).
3. *Samsung Electronics Co., Ltd., et al. v. Image Processing Technologies, LLC*, IPR2017 00336 (“IPR I”) (Concluded; Claim 1 held to be not invalid over Pirim PCT in combination with other art (, IPR2017-00336, paper 38 (5-9-2018) at page 10)).
4. *Samsung Electronics Co., Ltd., et al. v. Image Processing Technologies, LLC*, IPR2017 01189 (“IPR II”) (Institution Denied, see Institution Decision, paper 9).

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