

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Google Inc.

Petitioners,

v.

Vedanti Systems Limited

Patent Owner.

Case No. IPR2016-00212

Patent No. 7,974,339

PATENT OWNER VEDANTI SYSTEMS LIMITED'S PRELIMINARY
RESPONSE

UNDER 35 U.S.C. § 313 and 37 C.F.R. § 42.107

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	OVERVIEW OF THE ‘339 PATENT.....	1
III.	CLAIM CONSTRUCTION	11
	A. “Frame Data”	12
	B. “Region and Matrix”	13
	C. “Region Data/Matrix Data/Matrix Definition Data/Optimized Matrix Data”	14
	D. “Matrix Size Data”	17
	E. “Pixel Variation Data”	18
	F. “Pixel Selection Data”/“Selection Pixel Data”	18
IV.	OVERVIEW OF THE PRIOR ART	20
	A. Overview of Spriggs	20
	B. Overview of Golin	21
V.	SINCE THE PRIOR ART DOES NOT RENDER ANY CLAIM OBVIOUS, NO <i>INTER PARTES</i> REVIEW SHOULD BE INITIATED.....	22
	A. Because Petitioner conflates the terms “region data” and “pixel data,” the Petitioner has failed to show that the prior art teaches “a pixel selection system” that receives “region data” and generates “pixel data” for each region according to claim 1 and therefore, Petitioner has failed to establish a <i>prima facie</i> case of obviousness for claims 1, 6, and 13.	22

B.	As found for the “selection system” of claim 1, the Petitioner has failed to show that the prior art teaches “selecting one of two or more sets of pixel data based on the optimized matrix data” according to claim 7 and therefore, Petitioner has failed to establish a <i>prima facie</i> case of obviousness for claims 7 and 9.....	27
C.	As found for the “selecting” step of claim 7, the Petitioner has failed to show that the prior art teaches “selecting a set of pixel data from each region according to claim 10 and therefore, Petitioner has failed to establish a <i>prima facie</i> case of obviousness for claims 10 and 12.....	29
VI.	CONCLUSION.....	30

TABLE OF AUTHORITIES

Cases

<i>In re Cortright</i> , 165 F.3d 1353, 1358 (Fed. Cir. 1999)	12
<i>In re NTP, Inc.</i> , 654 F.3d 1279, 1288 (Fed. Cir. 2011)	12
<i>In re Suitco Surface, Inc.</i> , 603 F.3d 1255, 1260 (Fed. Cir. 2010).....	11
<i>Microsoft Corp. v. Proxycorr, Inc.</i> , 789 F.3d 1292, 1297-1298 (Fed. Cir. 2015).....	11
<i>Phillips v. AWH Corp.</i> , 415 F.3d 1303 (Fed. Cir. 2005) (<i>en banc</i>)	11

Statutes

35 U.S.C. § 314.....	1
----------------------	---

Regulations

37 C.F.R. § 42.100(b).....	11
----------------------------	----

I. INTRODUCTION

Patent Owner Vedanti Systems Limited (“Vedanti” or “Patent Owner”) respectfully requests that the Board decline to initiate *inter partes* review of claims 1, 6, 7, 9, 10, 12 and 13 of U.S. Patent No. 7,974,339 (the “339 Patent”) because Petitioner Google Inc., (“Petitioner”) has failed to show that it has a reasonable likelihood of prevailing with respect to any of the challenged claims. 35 U.S.C. § 314.

Petitioner has submitted proposed grounds for challenge based on obviousness. To establish obviousness, Petitioner must show that the references teach all of the elements of the claimed combination. The present petition fails to present a reasonable likelihood of establishing obviousness because for each proposed ground at least one claim element is missing from the relied-upon combination of references.

II. OVERVIEW OF THE ‘339 PATENT

The ‘339 Patent is directed to, among other things, to systems and methods for reducing the amount of frame data to be transmitted between a first transmitting location and a second receiving location through a communications medium such as the Internet, optical or wireless networks. Exhibit 1001, col. 1 lines 32-33; col. 2 lines 60-63. The transmitted frame

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.