

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC.,
Petitioner

v.

VEDANTI SYSTEMS LIMITED,
Patent Owner

Case IPR2016-00212¹
Patent 7,974,339 B2

PETITIONER'S REPLY

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

¹ Case IPR2016-00215 has been consolidated with this proceeding.

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I. Introduction

U.S. Patent Number 7,974,339 ('339 patent) discloses a basic approach to reducing the amount of data transmitted for an image. The process described in the '339 patent divides an image into multiple regions. For each region, rather than transmitting all the pixels, the process transmits at least one pixel to represent the entire region. As demonstrated in Google's two Petitions, the '339 patent's approach was well known and not patentable.

In the Patent Owner Response (POR), Vedanti asserts one line of attack against the Spriggs-based grounds, and another line of attack against the Belfor-based grounds. Specifically, all of Vedanti's challenges to the Spriggs-based grounds contend that the Spriggs-Golin combination fails to include an "analysis system" and a "pixel selection system." All of Vedanti's challenges to the Belfor-based grounds contend that a POSA could not have combined Belfor and Thyagarajan.

As detailed below, Vedanti is wrong. As identified in the IPR2016-00212 Petition, the transmitter in the Spriggs-Golin combination includes both an "analysis system" and a "pixel selection system." (IPR2016-00212 Petition, 26-31). As further explained in the IPR2016-00215 Petition, a POSA would have combined Belfor with Thyagarajan to arrive at the claims of the '339 patent. (IPR2016-00215 Petition, 22-26.)

Google therefore requests that the Board cancel claims 1, 6, 7, 9, 10, 12, and 13 of the '339 patent as unpatentable in both the IPR2016-00212 and IPR2016-00215 proceedings.

II. Person Of Ordinary Skill In The Art

| Google | Vedanti |
|---|--|
| B.S. degree in Electrical Engineering, Computer Engineering, Computer Science, or an equivalent field, as well as at least one year of academic or industry experience in image processing or data transmission | a technical degree in Electrical Engineering, Computer Science or equivalent curriculum with coursework in image processing and at least one year of hands on experience with compression and communication techniques Or degree in Electrical Engineering, Computer Science or equivalent curriculum with coursework in compression and communication and at least one year of hands on experience in image compression |

Attempting to disqualify Google's expert Dr. Grindon, Vedanti proposes a standard for a person of ordinary skill in the art (POSA) that is directly at odds with the '339 patent. Vedanti's proposed standard requires a POSA to have either coursework in compression or one year of hands-on experience with compression. But the '339 patent is explicit that its alleged inventions involve "data transmission [] that use[s] data optimization *instead*² of compression." (GOOG 1001, 1:32-39;

² Emphasis added unless otherwise indicated.

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