

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC.,

Petitioner,

v.

VEDANTI SYSTEMS LIMITED¹

Patent Owner.

Case No. IPR2016-00212²

Patent No. 7,974,339 B2

PATENT OWNER'S SUR-REPLY TO PETITIONER'S REPLY³

¹ Vedanti Systems Limited has assigned the patent to the current patent owner, Vedanti Licensing Limited.

² Case IPR2016-00215 has been consolidated with this proceeding.

³ This Sur-Reply is submitted pursuant to the Board's authorization dated December 6, 2016.

TABLE OF CONTENTS

PATENT OWNER’S EXHIBIT LIST	ii
I. Petitioner’s Reply Raises New Arguments	1
II. Petitioner Fails to Specify Where Each Element is Found in the Prior Art.....	2
III. Spriggs does Not Support Petitioner’s New Arguments	4

EXHIBIT LIST

IPR2016-00212

PATENT OWNER'S EXHIBIT LIST

Vedanti Exhibit #	<i>Description</i>
2001	Declaration of Dr. Omid Kia.
2002	Curriculum Vitae of Dr. Omid Kia.
2003	Transcript of Dr. John R. Grindon Deposition of July 15, 2016.
2004	PCT Patent No. WO 01/57804 A2 to Brown (filed August 9, 2001).
2005	U.S. Patent No. 5,576,767 to Lee et al. (filed September 21, 1995; issued November 19, 1996).
2006	Wiegand, T., "H.26L Test Model Long-Term Number 9 (TML-9) draft0," <i>ITU – Telecommunications Standardization Sector</i> , December 21, 2001, 78 pages.
2007	Lainema, J., "Motion Estimation and Representation for Video Coding Applications," <i>Tampereen Teknillinen Korkeakoulu Tietotekniikan Osasto</i> , June 5, 1996, 59 pages.
2008	Nokia Research Center, "Nokia Research Center: Proposal for Advanced Video Coding," <i>ITU – Telecommunications Standardization Sector</i> , February 1996, 38 pages.
2009	Sullivan, et al. "Rate-Distortion Optimization for Video Compression," <i>IEEE</i> , November 1998, pages 74-90.

Vedanti Exhibit #	Description
2010	Riley, M., et al., "Digital Video Communication," <i>Video Compression Techniques and Standards</i> , January 31, 1997, pages 26-39.
2011	Panusopone, K., et al., "Progressive Image Transmission by Refining Sampling Lattice," <i>IEEE</i> , 1997, pages 1294-1298.
2012	International Telecommunication Union Telecommunication Standardization Sector (ITU-T) Recommendation H.262 International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) International Standard 13818-2 ("MPEG-2") (1st ed. approved July 10, 1995).
2013	U.S. Patent No. 4,776,013 to Kafri et al. (filed April 1, 1987; issued October 4, 1988).
2014	U.S. Patent No. 7,050,639 to Barnes et al. (filed November 24, 1999; issued May 23, 2006).
2015	U.S. Patent No. 4,785,349 to Keith et al. (filed October 5, 1987; issued November 15, 1988).
2016	International Search Report for PCT/US02/00503 (May 31, 2002).
2017	U.S. Patent No. 5,982,937 to Accad (filed December 24, 1996; issued November 9, 1999).
2018	U.S. Patent No. 6,108,383 to Miller et al. (filed July 15, 1998; issued August 22, 2000).
2019	U.S. Patent No. 6,334,001 to de Queiroz et al. (filed December 7, 2000; issued December 25, 2001).

Vedanti Exhibit #	<i>Description</i>
2020	U.S. Patent No. 5,459,486 to Iverson et al. (filed April 18, 1994; issued October 17, 1995).
2021	U.S. Patent No. 6,633,611 to Sekiguchi et al. (filed October 24, 1997; issued October 14, 2003).
2022	U.S. Patent No. 6,373,988 to Thorell et al. (filed November 5, 1999; issued April 16, 2002).
2023	DE 100 22 331 to Robert Bosch GmbH (filed May 10, 2000; issued November 15, 2001).
2024	Melinda – Union Catalogue of Finnish Libraries, Record No. 004095995, Reference page for Lainema, J., “Motion Estimation and Representation for Video Coding Applications,” <i>Tampereen Teknillinen Korkeakoulu Tietotekniikan Osasto</i> , 1 page

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.