

UNITED STATES PATENT AND TRADEMARK OFFICE

IN THE UNITED STATES PATENT TRIAL AND APPEAL BOARD

DIGITAL CHECK CORP. d/b/a ST IMAGING
Petitioner

v.

E-IMAGEDATA CORP.
Patent Owner

CASE: IPR2017-00178
U.S. PATENT NO. 9,179,019

PETITION FOR *INTER PARTES* REVIEW

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

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION	1
II. PAYMENT OF FEES	2
III. MANDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8	2
A. Real Party In Interest (37 C.F.R. § 42.8(b)(1))	2
B. Related Matters (37 C.F.R. § 42.8(b)(2)).....	2
C. Notice Of Lead And Backup Counsel (37 C.F.R. § 42.8(b)(3)).....	3
D. Service Information (37 C.F.R. § 42.8(b)(4)).....	3
IV. STANDING.....	3
V. STATEMENT OF PRECISE RELIEF REQUESTED	4
VI. REASONS FOR THE REQUESTED RELIEF	4
A. Summary of ‘019 Petition	4
B. Overview of the Prior Art Specifically Cited Below	4
1. <i>Fujinawa</i>	5
2. <i>Kokubo</i>	5
3. Minolta Film Carrier Manuals (“ <i>Minolta</i> ”)	5
C. Background of the Technology and Summary of ‘019 Patent.....	7
1. Chassis Limitation	10
2. Lead Member Limitation	10
3. Fold Mirror Limitation.....	11
4. Drive Mechanism Limitations	12
5. Carriage Limitations	12
6. Motor Limitations	13
7. Area Sensor Limitation	13
8. Lens Limitation	14
9. Film Carrier Limitation.....	14

Petition For *Inter Partes* Review of U.S. Patent No. 9,179,019

D.	The Relied-On Art Has Not Been Previously Considered.....	15
VII.	PERSON OF ORDINARY SKILL IN THE ART	15
VIII.	CLAIM CONSTRUCTION	16
IX.	PROPOSED GROUNDS OF REJECTION.....	17
A.	Ground 1: Claims 1-3, 5-9, 20-32, 41, 43, 44, 47, 53 and 63 Are Unpatentable Under 35 U.S.C. § 103 As Obvious Over <i>Fujinawa</i> In View Of Kokubu.	18
1.	Claim 1	18
2.	Claim 2	30
3.	Claim 3	31
4.	Claim 5	32
5.	Claim 6	32
6.	Claim 7	32
7.	Claim 8	35
8.	Claim 9	36
9.	Claim 20	36
10.	Claim 21	37
11.	Claim 22	37
12.	Claim 23	40
13.	Claim 24	40
14.	Claim 25	41
15.	Claim 26	41
16.	Claim 27	42
17.	Claim 28	43
18.	Claim 29	44
19.	Claim 30	44
20.	Claim 31	46
21.	Claim 32	46

Petition For *Inter Partes* Review of U.S. Patent No. 9,179,019

22.	Claim 41	47
23.	Claim 43	50
24.	Claim 44	51
25.	Claim 47	52
26.	Claim 53	52
27.	Claim 63	52
B.	Ground 2: Claims 33-35, 37, 39-41, and 54-57 Are Unpatentable Under 35 U.S.C. § 103 As Obvious Over <i>Fujinawa</i> In View Of <i>Kokubu</i> and <i>Minolta</i>	53
1.	Claim 33	53
2.	Claim 34	58
3.	Claim 35	60
4.	Claim 37	60
5.	Claim 39	64
6.	Claim 40	65
7.	Claim 54	65
8.	Claim 55	65
9.	Claim 56	66
10.	Claim 57	66
C.	Ground 3: Claims 64-68, 74, 79, 81, 84-87, 91-96, and 101 Are Unpatentable Under 35 U.S.C. § 103 As Obvious Over <i>Fujinawa</i> In View Of <i>Minolta</i>	66
1.	Claim 64	66
2.	Claims 65 and 66.....	71
3.	Claim 67	71
4.	Claim 68	75
5.	Claim 74	75
6.	Claim 79	76
7.	Claim 81	76

Petition For *Inter Partes* Review of U.S. Patent No. 9,179,019

8.	Claim 84.....	77
9.	Claim 85.....	77
10.	Claim 86.....	77
11.	Claim 87.....	78
12.	Claim 91.....	78
13.	Claim 92.....	78
14.	Claim 93.....	78
15.	Claim 94.....	79
16.	Claim 95.....	79
17.	Claim 96.....	80
18.	Claim 101.....	80
X.	CONCLUSION.....	81

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.