

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Fatih M. Ozluturk
U.S. Patent No.: 9,154,699 Attorney Docket No.: 39843-0078IP1
Issue Date: October 6, 2015
Appl. Serial No.: 14/586,297
Filing Date: December 30, 2014
Title: METHOD AND APPARATUS TO CORRECT BLUR IN ALL OR
PART OF A DIGITAL IMAGE BY COMBINING PLURALITY
OF IMAGES

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**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT
NO. 9,154,699 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42**

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EXHIBITS

- SAMSUNG-1001 U.S. Patent No. 9,154,699 to Ozluturk (“the ’699 Patent”)
- SAMSUNG-1002 Excerpts from the Prosecution History of the ’699 Patent (“the Prosecution History”)
- SAMSUNG-1003 Declaration of Dr. Irfan Essa
- SAMSUNG-1004 Reserved
- SAMSUNG-1005 U.S. Patent Publication No. 2001/0022860 to Kitamura (“Kitamura”)
- SAMSUNG-1006 U.S. Patent No. 6,977,687 to Suh (“Suh”)
- SAMSUNG-1007 U.S. Patent Publication No. 2005/0018927 to Manabe (“Manabe”)
- SAMSUNG-1008 Certified Translation of Japanese Patent Publication No. 2002057933 (“Noriyuki”)
- SAMSUNG-1009 Unopposed Motion for Extension of Time to Move, Answer, or Otherwise Respond to Plaintiff’s Complaint (*Clear Imaging Research, LLC v. Samsung Electronics Co. Ltd.*, 2:19-cv-326-JRG (E.D. Tex. Oct. 15, 2019))
- SAMSUNG-1010 Reserved
- SAMSUNG-1011 Reserved
- SAMSUNG-1012 Excerpt of The New Oxford American Dictionary (Second Edition, 2005)
- SAMSUNG-1013 Reserved
- SAMSUNG-1014 Reserved

- SAMSUNG-1015 U.S. Patent No. 6,809,759 to Chiang
- SAMSUNG-1016 U.S. Patent No. 7,369,161 to Easwar
- SAMSUNG-1017 Joseph Guzman, “Fauci says second wave of coronavirus is ‘inevitable’”, TheHill.com (Apr. 29, 2020), available at: <https://thehill.com/changing-america/resilience/natural-disasters/495211-fauci-says-second-wave-of-coronavirus-is>
- SAMSUNG-1018 Peter Wells, et al. “Texas puts reopening on hold in face of new Covid-19 outbreak”, Financial Times (June 25, 2020), available at <https://www.ft.com/content/e35f3148-a797-4e6e-bf7a-1a7ce3181e97>
- SAMSUNG-1019 Order Granting Joint Motion to Amend the Docket Control Order and Time for Claim Construction Expert Disclosures (*Clear Imaging Research, LLC v. Samsung Electronics Co. Ltd.*, 2:19-cv-326-JRG (E.D. Tex. June 12, 2020))
- SAMSUNG-1020 Email to Clear Imaging counsel dated February 10, 2020
- SAMSUNG-1021 Email from Clear Imaging counsel dated July 3, 2020
- SAMSUNG-1022 Stipulation by Samsung
- SAMSUNG-1023 Reserved
- SAMSUNG-1024 P.R. 4-3 Joint Claim Construction and Prehearing Statement (*Clear Imaging Research, LLC v. Samsung Electronics Co. Ltd.*, 2:19-cv-326-JRG (E.D. Tex. July 23, 2020))
- SAMSUNG-1025 Plaintiff’s Disclosure of Asserted Claims and Infringement Contentions Pursuant to Patent Local Rules (*Clear Imaging Research, LLC v. Samsung Electronics Co. Ltd.*, 2:19-cv-326-JRG (E.D. Tex. Jan. 14, 2020))

Samsung petitions for *Inter Partes* Review (“IPR”) of claims 1-30 (“the Challenged Claims”) of U.S. Patent No. 9,154,699 (“the ’699 Patent”).

I. THE ’699 PATENT

A. Overview

The ’699 Patent relates to a method and apparatus for use in a digital imaging device for correcting image blur in digital images by combining a plurality of captured images to create a combined photographic image such that a main subject is blur free and other areas are blurred. SAMSUNG-1001, Abstract, 12:48-55. SAMSUNG-1003, [0010].

B. Prosecution History

In the only office action, the claims were rejected on the ground of nonstatutory double patenting over claims 1-30 of U.S. Patent No. 8,630,484. SAMSUNG-1002, 77-81. The applicant filed a terminal disclaimer and the application was allowed. *Id.*, 18, 48.

II. REQUIREMENTS FOR IPR

A. Standing

Samsung certifies that the ’699 Patent is available for IPR. This petition is being filed within one year of service of a complaint against Samsung in the Eastern District of Texas. SAMSUNG-1009. Samsung is not barred or estopped from requesting this review.

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