

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Fatih M. Ozluturk
U.S. Patent No.: 10,171,740 Attorney Docket No.: 39843-0080IP1
Issue Date: January 1, 2019
Appl. Serial No.: 15/714,558
Filing Date: September 25, 2017
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. 10,171,740 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42**

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EXHIBITS

SAMSUNG-1001	U.S. Patent No. 10,171,740 to Ozluturk (“the ’740 Patent”)
SAMSUNG-1002	Excerpts from the Prosecution History of the ’740 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 (<i>Clear Imaging Research, LLC v. Samsung Electronics Co. Ltd.</i> , 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 1-29 (“the Challenged Claims”) of U.S. Patent No. 10,171,740 (“the ’740 Patent”).

I. THE ’740 PATENT

A. Overview

The ’740 Patent relates to an approach to correcting blur in digital images by combining captured images to create a combined image such that a main subject is blur free and other areas are blurred. SAMSUNG-1001, Abstract, 12:54-62; SAMSUNG-1003, [0010].

B. Prosecution History

The sole claim was rejected as “being a substantial duplicate of claim 1 of US Patent 9,774,785;” was subject to double patenting rejections over claims of US 9,774,785, US 9,392,175, and US 9,154,699; and was rejected as anticipated over US 2003/0076408. SAMSUNG-1002, 140-148. In response, claim 1 was cancelled and claims 2-30 were introduced. *Id.*, 92-105. A Notice of Allowance followed. *Id.*, 50.

II. REQUIREMENTS FOR IPR

A. Standing

Samsung certifies that the ’740 Patent is available for IPR. The present 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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