IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Fatih M. Ozluturk

U.S. Patent No.: 8,630,484 Attorney Docket No.: 39843-0081IP1

Issue Date: Jan. 14, 2014 Appl. Serial No.: 12/274,057 Filing Date: Nov. 19, 2008

Title: METHOD AND APPARATUS TO CORRECT DIGITAL

IMAGE BLUR DUE TO MOTION OF SUBJECT OR

IMAGING DEVICE

Mail Stop Patent Board

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

PETITION FOR INTER PARTES REVIEW OF UNITED STATES PATENT NO. 8,630,484 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42



TABLE OF CONTENTS

I.	REQUIREMENTS FOR IPR1			
	A.	Grounds for Standing1		
	B.	Challenge and Relief Requested		1
		1.	The '484 patent is not entitled to its claimed priority	2
		2.	The cited prior art	5
II.	THE '484 PATENT			6
	A.	Brief Description		6
	B.	Leve	of Ordinary Skill in the Art	6
	C.	Clair	Claim Construction	
		1.	"[processor/receiver] configured to" (claims 8, 12, 13, 15, 19, 20, 23, 24, 26, 28, and 30)	7
		2.	"designating/detecting a main subject" (claims 1, 5, 6, 8, 12-13, 15, 19-20, 22-24, and 27-30)	9
III.	THE CHALLENGED CLAIMS ARE UNPATENTABLE		10	
	A.	[GROUND 1A] – Claims 1, 5-8, 12-15, and 19-30 are rendered obvious by Adachi in view of Manabe and Noriyuki		10
		1.	Overview of Adachi	
		2.	Overview of Manabe	
		3.	Overview of Noriyuki	
		4.	The combination of Adachi, Manabe, and Noriyuki	
		5.	Reasons to combine Adachi, Manabe, and Noriyuki	
		6.	Analysis	
	В.	[GROUND 1B]: – Claims 2, 9, and 16 are rendered obvious by Adachi, Manabe, and Noriyuki in view of Dutta		
		1.	Overview of Dutta	
		1.	○ 1 •1 1 1 • 11 · 01 1 • 04 • 04 • 04 • 04 • 04 • 04 • 04 • 0	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,



	2.	The combination of Adachi, Manabe, Noriyuki, and Dutta	36	
	3.	Reasons to combine Adachi, Manabe, Noriyuki, and Dutta	36	
	4.	Analysis	37	
C.	[GROUND 1C] – Claims 27 and 28 are rendered obvious by Adachi in view of Manabe and Suh			
	1.	Overview of Suh	38	
	2.	The combination of Adachi, Manabe, and Suh	41	
	3.	Reasons to combine Adachi, Manabe, and Suh	42	
	4.	Analysis	42	
D.	[GROUND 2A]: – Claims 1, 5-8, 12-15, and 19-30 are rendered obvious by Kawahara in view of Noriyuki			
	1.	Overview of Kawahara	45	
	2.	The combination of Kawahara and Noriyuki	47	
	3.	Reasons to combine Kawahara and Noriyuki	48	
	4.	Analysis	48	
E.	_	[GROUND 2B] – Claims 2, 9, and 16 are rendered obvious by Kawahara and Noriyuki in view of Dutta		
	1.	The combination of Kawahara, Noriyuki, and Dutta	65	
	2.	Reasons to combine Kawahara, Noriyuki, and Dutta	65	
	3.	Analysis	66	
F.	[GROUND 2C] – Claims 27 and 28 are rendered obvious by Kawahara in view of Aizawa			
	1.	Overview of Aizawa	67	
	2.	The combination of Kawahara and Aizawa	68	
	3.	Reasons to combine Kawahara and Aizawa	69	
	4.	Analysis	69	
		-		



	G.	[GROUND 3A]: – Claims 1, 5-8, 12-15, and 19-30 are rendered obvious by Kawahara in view of Noriyuki and Manabe		
		The combination of Kawahara, Noriyuki, and Manabe	73	
		2. Reasons to combine Kawahara, Noriyuki, and Manabe	74	
		3. Analysis	74	
	Н.	[GROUND 3B] – Claims 2, 9, and 16 are rendered obvious by Kawahara, Noriyuki, and Manabe in view of Dutta	79	
IV.	PTAB DISCRETION SHOULD NOT PRECLUDE INSTITUTION			
	Α.	Factor 1: Institution Will Enable Stay		
	В.	Factor 2: District Court Schedule		
	C.	Factor 3: Samsung's Investment in IPR Outweighs Forced Investment in Litigation to Date		
	D.	Factor 4: The Petition Raises Unique Issues	82	
	E.	Factor 5: The Petition Enables Invalidity of Claims that Might be Reasserted	82	
	F.	Factor 6: Other Circumstances Support Institution	83	
V.	PAY	MENT OF FEES	83	
VI.	CON	ICLUSION	83	
VII.	MANDATORY NOTICES UNDER 37 C.F.R § 42.8(a)(1)			
	A.	Real Party-In-Interest Under 37 C.F.R. § 42.8(b)(1)		
	B.	Related Matters Under 37 C.F.R. § 42.8(b)(2)		
	C.	Lead And Back-Up Counsel Under 37 C.F.R. § 42.8(b)(3)		
	A.	Service Information	84	



EXHIBITS

SAMSUNG-1001	U.S. Patent No. 8,630,484 to Ozluturk ("the '484 patent")
SAMSUNG-1002	Excerpts from the Prosecution History of the '484 Patent ("the Prosecution History")
SAMSUNG-1003	Declaration of Dr. Hany Farid
SAMSUNG-1004	Certified Translation of Japanese Patent Publication No. 2002-084412 to Adachi ("Adachi")
SAMSUNG-1005	U.S. Patent Publication No. 2005/0018927 ("Manabe")
SAMSUNG-1006	U.S. Patent Publication No. 2003/0076408 to Dutta ("Dutta")
SAMSUNG-1007	Reserved
SAMSUNG-1008	Reserved
SAMSUNG-1009	U.S. Patent No. 7,095,001 to Kawahara ("Kawahara")
SAMSUNG-1010	U.S. Patent Publication No. 2001/0013895 to Aizawa ("Aizawa")
SAMSUNG-1011	Certified Translation of Japanese Patent Publication No. 2002057933 ("Noriyuki")
SAMSUNG-1012	U.S. Patent No. 6,977,687 to Suh ("Suh")
SAMSUNG-1013	U.S. Provisional App. No. 60/556,230 (the "March 2004 Provisional")
SAMSUNG-1014 to SAMSUNG-1016	Reserved
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



DOCKET

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.

