

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARASHI VISION (U.S.) LLC (D/B/A INSTA360)
Petitioner,

v.

GOPRO, INC.
Patent Owner.

Patent No. 10,015,413

Inter Partes Review No. IPR2024-00984

PETITIONER'S OBJECTIONS TO DEMONSTRATIVES

Petitioner hereby objects to the demonstrative exhibits submitted by Patent Owner in the above-captioned proceeding (Paper 50). In accordance with the Board's Order Setting Oral Argument (Paper 43), this objection is being timely filed and served no later than at the time of the hearing Petitioner has met and conferred with Patent Owner, but the parties were unable to resolve the objections below.

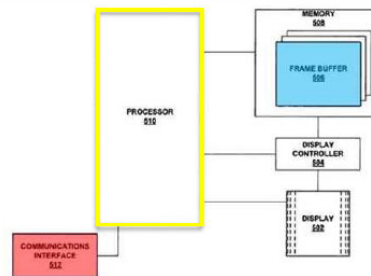
Pursuant to Paper 43, the objections "shall identify with particularity which portions of the demonstratives are subject to objection (and should include a copy of the objected-to portions) and include a one (1) sentence statement of the reason for each objection. No argument or further explanation is permitted." The following is an inclusion of the objected-to demonstratives, as well as an identification of the portions being objected to and a statement of the reason for each objection:

- **Slide 27:** The citation to Ex. 1007 at 12:26-43 is new evidence because it is not cited in any of the papers.

Ground 4: Meulen Does Not Disclose an “Input Image” From the Camera

- Meulen’s *communications interface* and *processor*:

“As shown, the frame buffer 506 may be implemented by a **memory 508**. In various embodiments, the memory 508 may comprise any machine-readable or computer-readable media capable of storing data, including both volatile and non-volatile memory. For example, memory may include read-only memory (ROM), random-access memory (RAM), dynamic RAM (DRAM), Double-Data-Rate DRAM (DDR-RAM), synchronous DRAM (SDRAM), static RAM (SRAM), programmable ROM (PROM), erasable programmable ROM (EPROM), electrically erasable programmable ROM (EEPROM), flash memory (e.g., NOR or NAND flash memory), content addressable memory (CAM), polymer memory (e.g., ferroelectric polymer memory), phase-change memory (e.g., ovonic memory), ferroelectric memory, silicon-oxide-nitride-oxide-silicon (SONOS) memory, disk memory (e.g., floppy disk, hard drive, optical disk, magnetic disk), or card (e.g., magnetic card, optical card), or any other type of media suitable for storing information.”



Ex. 1007 (Meulen) at 12:26-43; Surreply 10, Ex. 1014 (Katsaggelos Supp. Decl.) at ¶55

- **Slide 28:** The citation to Ex. 1007 at 12:44-47 is new evidence because it is not cited in any of the papers.

Ground 4: Meulen Does Not Disclose an “Input Image” From the Camera

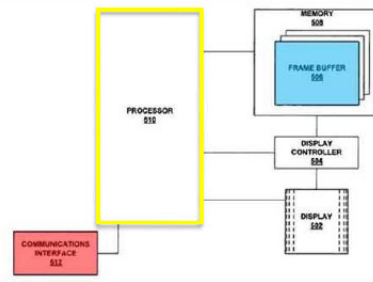
- Meulen’s *communications interface* and *processor*:

“The computing system 500 may comprise a processor 510 such as a central processing unit (CPU). In various embodiments, the processor 510 may be implemented as a **general purpose processor**...”

Ex. 1007 (Meulen) at 12:44-47; Surreply 10

“In various embodiments, the processor 510 may be arranged to run an operating system (OS) and various mobile applications. Examples of an OS include, for example, a Microsoft® Windows OS, a Palm OS®, and any other proprietary or open source OS.”

Ex. 1007 (Meulen) at 12:62-66; Surreply 10



- **Slide 30:** “Palm Treo . . . establish motivation to modify Meulen” is a new argument.

Ground 4: Meulen Does Not Disclose an “Input Image” From the Camera

- **New reply argument:** Palm Treo, **as evidenced by new, unauthenticated documents submitted on Reply**, establish motivation to modify Meulen Reply 6-7

“Also, Meulen’s device is a Palm® Treo™. (EX1007, 2:12.) Palm Treos *[as allegedly established by newly submitted documents]* at that time displayed images captured by its built-in camera.”

Reply 6

“[PO] argues that there is no need for Meulen to perform aspect ratio conversion. (POR, 16.) Again, that is not what Meulen discloses. . . . Palm Treos’ aspect ratios also do not match *[as allegedly established by newly submitted documents]*.”

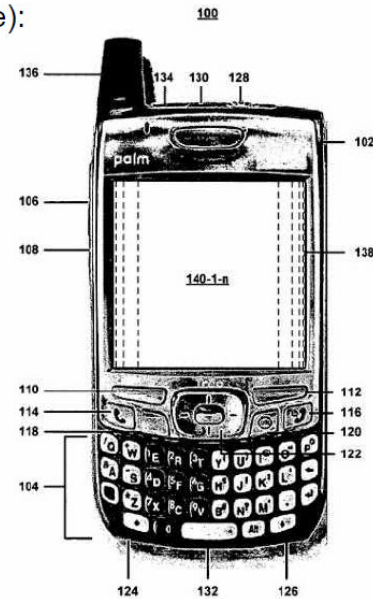
Reply 7

- **No dispute:** Meulen does not disclose the resolution of its camera sensor
- Petitioner **does not** contend that Meulen incorporates by reference any Palm Treo documentation
- Petitioner **does not** contend that Palm Treo was within the knowledge of a POSITA
- Petitioner **does not** argue its newly submitted, unauthenticated evidence was properly submitted with the petition

- **Slide 32:** the picture of Palm Treo 600 is new evidence because it is not cited in any of the papers.

Ground 4: Meulen Does Not Disclose an “Input Image” From the Camera

- Petitioner’s new evidence (subject to motion to strike):



Ex. 1018 (Palm Treo 600 User Manual); Ex. 1022; Reply 7, Ex. 1014 (Katsaggelos Supp. Decl.) at ¶ 37

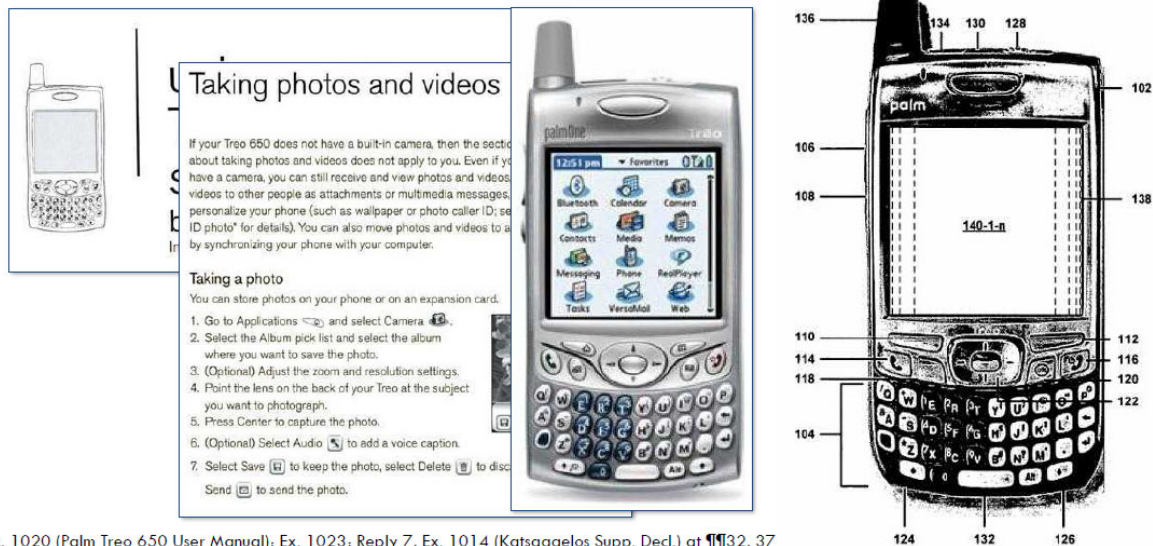
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

32

- **Slide 33:** The screenshot of “Taking photos and videos” and the picture of the Palm Treo 650 are new evidence because they are not cited in any of the papers.

Ground 4: Meulen Does Not Disclose an “Input Image” From the Camera

- Petitioner’s new evidence (subject to motion to strike):



Ex. 1020 (Palm Treo 650 User Manual); Ex. 1023, Reply 7, Ex. 1014 (Katsaggelos Supp. Decl.) at ¶¶32, 37

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

33

- **Slide 46:** The citation at Ex. 2026 at 21:1-18 is new evidence because it is not cited in any of the papers.

Ground 4: Meulen Does Not Disclose “Determine a Portion”

- Meulen does not disclose **determining** the less distorted region **after** obtaining the image
- Meulen’s transformations use **pre-determined** portions

TABLE 1

	Region					
	1	2	3	4	5	Total
Pixels/Region	10	50	200	50	10	320
Compression Ratio	4:1	2:1	none	2:1	4:1	
Source Pixels	40	100	200	100	40	480

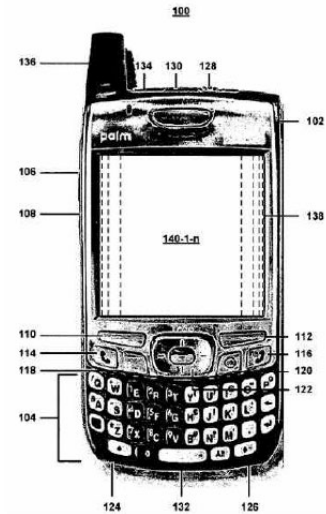
“Table 1 illustrates an implementation for one embodiment of a **display 138** comprising display regions 140-1-5.”

Ex. 1007 (Meulen) at 5:50-60; Reply 11

“Q. You agree that in table 1 region 3 is **allocated in advance** 200 pixels of the display and a compression ratio of zero, correct?”

A. **Yeah**, this, again, is an example where this portion that needs to be determined of the input image is represented by this 200 pixels.”

Ex. 2026 (Katsaggelos Tr.) at 21:1-18; POR 21



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

46

- **Slide 49:** The citation at Ex. 2026 at 21:1-18 is new evidence because it is not cited in any of the papers.

Ground 4: Meulen Does Not Disclose “Determine a Portion”

- **Petitioner:** Different compression ratios in different regions requires determination *Reply 3*
- Petitioner is **Incorrect:**
 - Meulen describes different **embodiments**
 - Each of Meulen’s embodiments has **pre-determined** regions before the image is obtained

“Q. Those different examples in Meulen that you cited to me, those are all **alternative implementations** of the wireless device, correct?

A. **Yeah**, examples of embodiments.”

Ex. 2026 (Katsaggelos Tr.) at 23:3-6; POR 21

“Q. You agree that in table 1 region 3 is **allocated in advance** 200 pixels of the display and a compression ratio of zero, correct?

A. **Yeah**, this, again, is an example where this portion that needs to be determined of the input image is represented by this 200 pixels.”

Ex. 2026 (Katsaggelos Tr.) at 21:1-18; POR 21

- **Slide 53:** Mischaracterization of Petitioner’s expert’s opinion is improper.

Ground 4: Claim Construction of “Non-Uniform” Transformation

- **Claim Language:** “the transformation non-uniformly shifts the pixels”

Proposed Construction of “non-uniform”	
Patent Owner	Petitioner
Plain meaning: “non-linear” transformation	“not the same in all parts or areas”

- Petitioner is **incorrect:**
 - Specification consistently requires “non-linear” transformation
 - Petitioner’s construction includes linear scaling, which the patent distinguished
 - Petitioner’s expert consistently described “non-uniform” transformation as “non-linear”

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

53

Dated: October 6, 2025

Respectfully submitted,

By: /s/ Jean Nguyen

Jean Nguyen, Reg. No.: 71,051

MORRISON & FOERSTER LLP

707 Wilshire Blvd., Suite 6000

Los Angeles, CA 90017

Email: JNguyen@mofo.com

Tel: 213-892-5200

Counsel for Petitioner

Certificate of Service (37 C.F.R. § 42.6(e)(4))

I hereby certify that the attached PETITIONER’S OBJECTIONS TO
PATENT OWNER’S DEMONSTRATIVES was served as of the below date via e-
mail (by agreement) to the following counsel of record for Patent Owner:

James M. Glass, Registration No. 46,729
John T. McKee, Registration No. 65,926
Quincy Lu, Registration No. 76,954
Patrick Schmidt (*pro hac vice*)
Nathaniel A. Hamstra, Registration No. 65,680
Quinn Emanuel Urquhart & Sullivan LLP
Email: jimglass@quinnemanuel.com
Email: johnmckee@quinnemanuel.com
Email: quincylu@quinnemanuel.com
Email: patrickschmidt@quinnemanuel.com
Email: nathanhamstra@quinnemanuel.com

Dated: October 6, 2025

/s/ Jean Nguyen
Jean Nguyen