

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

OMNIVISION TECHNOLOGIES, INC.,

Plaintiff,

v.

RE SECURED NETWORKS, LLC,

Defendant.

C.A. No. 24-187-JLH

JURY TRIAL DEMANDED

**OMNIVISION TECHNOLOGIES, INC.’S
IDENTIFICATION OF PRIOR ART REFERENCES**

Plaintiff OmniVision Technologies, Inc. (“Plaintiff” or “OmniVision”) makes the following disclosure of prior art references for U.S. Patent Nos. 6,838,651 (“the ’651 patent”), 7,323,671 (“the ’671 patent”), 7,495,274 (“the ’274 patent”), and 7,800,145 (“the ’145 patent”) (collectively, “the Asserted Patents”).

OmniVision awaits infringement contentions served by Defendant RE Secured Networks, LLC (“Defendant” or “RESN”) that address elements in the asserted claims for which RESN has failed to identify corresponding structure or functionality. Deficiencies were most recently listed in OmniVision’s July 17, 2025 letter to which OmniVision has not received a response. OmniVision’s prior art invalidity disclosures are responsive to RESN’s application of the elements of the Asserted Claims as alleged to be present in the charted OmniVision products in RESN’s Preliminary Infringement Contentions. OmniVision reserves the right to supplement, modify, or amend these prior art invalidity positions to the extent that RESN supplements, modifies, or amends its Infringement Contentions, the Court provides claim constructions, new information becomes available through discovery, or as otherwise necessary.

Exemplary prior art references anticipating and/or rendering obvious one or more of the Asserted Claims are listed in the tables below. OmniVision may also rely upon the following: (i) prior art contained within the prosecution histories of the asserted patents; (ii) prior art contained within the prosecution histories of patents or patent applications related to the asserted patents; and (iii) prior art identified during the remainder of discovery. Each of these prior art patents, publications, and systems qualifies as prior art under one or more of 35 U.S.C. § 102(a), (b), (e), (f), and/or (g).

Reference to a granted patent by patent number also refers to the corresponding publication numbers and provisional application numbers and vice versa. Within these disclosures of prior art is any system or device that practices the invention that may independently qualify as prior art to one or more of the claims.

1. Identification of Prior Art for the '651 Patent

a. Patents, Patent Applications, and Patent Publications

Issuing Country	Number	Filing Date	Issue/Publication Date	First Named Inventor
United States	3,971,065	Mar. 5, 1975	July 20, 1976	Bayer
United States	4,541,010	June 17, 1983	Sept. 10, 1985	Alston
United States	4,742,238	Oct. 1, 1986	May 3, 1988	Sato
United States	5,293,430	Jan. 12, 1993	March 8, 1994	Shiau
United States	5,327,246	Jan. 23, 1992	July 5, 1994	Suzuki
United States	5,446,297	Feb. 8, 1994	Aug. 29, 1995	Lee
United States	5,477,345	Dec. 15, 1993	Dec. 19, 1995	Tse
United States	5,920,654	Dec. 14, 1995	July 6, 1999	Someya
United States	5,982,318	Oct. 10, 1997	Nov. 9, 1999	Yiannoulous
United States	5,982,984	Jan. 31, 1996	Nov. 9, 1999	Inuiya
United States	6,002,123	March 3, 1998	Dec. 14, 1999	Suzuki
United States	6,115,065	Nov. 7, 1996	Sept. 5, 2000	Yadid-Pecht

Issuing Country	Number	Filing Date	Issue/Publication Date	First Named Inventor
United States	6,130,710	May 22 1995	Oct. 10, 2000	Yasuda
United States	6,140,630	Oct. 14, 1998	Oct. 31, 2000	Rhodes
United States	6,222,986	Aug. 11, 1999	April 24, 2001	Inuiya
United States	6,246,043	Sept. 22, 1998	June 12, 2001	Merrill
United States	6,380,880	March 30, 2001	April 30, 2002	Bidermann
United States	6,403,998	Nov. 8, 1999	June 11, 2002	Inoue
United States	6,453,068	Sept. 17, 1999	Sept. 17, 2002	Li
United States	6,466,265	June 22, 1998	Oct. 15, 2002	Lee
United States	6,486,911	Nov. 29, 1996	Nov. 26, 2002	Denyer
United States	6,504,193	June 29, 2000	Jan. 7, 2003	Ishiwata
United States	6,512,546	July 17, 1998	Jan. 28, 2003	Decker
United States	6,529,238	Sept. 1, 1998	March 4, 2003	Mahant-Shetti
United States	6,529,622	Oct. 30, 1998	March 4, 2003	Pourjavid
United States	6,570,201	Oct. 11, 2001	May 27, 2003	Shim
United States	6,583,641	Apr. 25, 2001	June 24, 2003	Wang
United States	6,600,471	July 27, 2001	July 29, 2003	Lee
United States	6,630,706	Aug. 30, 2001	Mar. 6, 2003	Yang
United States	6,642,962	Sept. 1, 1999	Nov. 4, 2003	Lin
United States	6,661,457	March 22, 1999	Dec. 9, 2003	Mathur
United States	6,674,471	May 28, 1999	Jan. 6, 2004	Masuyama
United States	6,690,000	Dec. 1, 1999	Feb. 10, 2004	Maramatsu
United States	6,690,423	March 19, 1999	Feb. 10, 2004	Nakamura
United States	6,704,049	Feb. 23, 1998	March 9, 2004	Fossum
United States	6,720,592	June 29, 2001	April 13, 2004	Kindt
United States	6,724,945	May 24, 2000	April 20, 2004	Yen
United States	6,741,754	Feb. 19, 2001	May 25, 2004	Hamilton, Jr.
United States	6,768,513	Oct. 6, 2000	July 27, 2004	Watanabe
United States	6,781,626	Jan. 13, 2000	Aug. 24, 2004	Wang

Issuing Country	Number	Filing Date	Issue/Publication Date	First Named Inventor
United States	6,784,928	Dec. 15, 1998	Aug. 31, 2004	Sakurai
United States	6,806,902	June 8, 1999	Oct. 19, 2004	Donovan
United States	6,839,084	June 16, 1999	Jan. 4, 2005	Hiyama
United States	6,850,278	Nov. 24, 1999	Feb. 1, 2005	Sakurai
United States	6,882,364	Dec. 2, 1998	April 19, 2005	Inuiya
United States	6,927,089	Jan. 16, 2003	Aug. 9, 2005	Rhodes
United States	6,947,087	Dec. 28, 2000	Sept. 20, 2005	Egawa
United States	6,965,395	Sept. 12, 2000	Nov. 15, 2005	Neter
United States	6,965,408	Feb. 26, 2001	Nov. 15, 2005	Hiyama
United States	6,970,194	Nov. 16, 1999	Nov. 29, 2005	Smith
United States	6,985,180	June 19, 2001	Jan. 10, 2006	Chang
United States	7,067,792	Oct. 9, 2003	June 27, 2006	Cazaux
United States	7,068,319	Feb. 1, 2002	June 27, 2006	Barna
United States	7,106,373	Dec. 14, 1999	Sept. 12, 2006	Dierickx
United States	7,110,030	March 9, 1999	Sept. 19, 2006	Kochi
United States	7,129,978	July 13, 1999	Oct. 31, 2006	Brehmer
United States	7,133,073	Feb. 2, 2000	Nov. 7, 2006	Neter
United States	7,420,602	May 29, 2002	Sept. 2, 2008	Fraenkel
United States	7,688,371	Aug. 15, 2001	March 30, 2010	Koizumi
United States	2001/0036305	Dec. 29, 2000	Nov. 1, 2001	Jun
United States	2002/0054390	Aug. 15, 2001	May 9, 2002	Koizumi
United States	2002/0085237	Jan. 2, 2001	July 4, 2002	Bradburn
United States	2002/0196354	June 19, 2001	Dec. 26, 2002	Chang
United States	2003/0146991	Feb. 1, 2002	Aug. 7, 2003	Barna
Korea	100254642	Aug. 11, 1997	May 1, 2000	Murakami
Korea	19990084630	May 8, 1998	Dec. 6, 1999	Kim
Korea	20000019972	Sept. 16, 1998	April 15, 2000	Nam
Japan	1992-304091	Apr. 1, 1991	Oct. 27, 1992	Suzuki

Issuing Country	Number	Filing Date	Issue/Publication Date	First Named Inventor
Japan	1999-261046	Mar. 12, 1998	Sept. 24, 1999	Kochi
Japan	2000-012819	June 17, 1998	Jan. 14, 2000	Isogai
Japan	2000-150847	Nov. 17, 1998	May 30, 2000	Ihara
Japan	2001-148474	Nov. 24, 1999	May 29, 2001	Nakajima
Japan	2001-197367	Jan. 6, 2000	July 19, 2001	Fukunaga
Japan	2924250	Apr. 1, 1991	July 26, 1997	Suzuki
Japan	3070640	Sept. 1, 1992	July 31, 2000	Akiyama
Japan	11284166	March 31, 1998	Oct. 15, 1999	Nakamura
Japan	S63-252469	April 9, 1987	Oct. 19, 1988	Natori

b. Non-Patent Publications

Title	Date	Author(s)	Publication	Page Number(s)
Progress in CMOS active pixel image sensors	Feb. 1994	Sunetra K, Mendis, Sabrina Kemeny, Russell C, Gee, Bedabrata Pain, Quiesup Kim and Eric R, Fossum	Proceedings of the SPIE vol. 2172, Charge-Coupler Devices and Solid-State Optical Sensors IV (1994)	1–11
CMOS Active Pixel Image Sensor	March 1994	Sunetra Mendis, Sabrina E. Kemeny, and Eric R. Fossum	IEEE Transactions on Electron Devices Vol. 41, No. 3	452–53
Interactions between color plane interpolation and other image processing functions in electronic photography	March 1995	James E. Adams, Jr.	Proc. SPIE 2416, Cameras and Systems for Electronic Photography and Scientific Imaging	144–51
An active pixel sensor fabricated using CMOS/CCD process technology	April 1995	Paul P.K. Lee, Russel C. Gee, Michael Guidash, T-H. Lee, Eric R. Fossum	Proc. IEEE Workshop CCDs Adv. Image Sensors	115–19
Silicon Processing for the VLSI Era, Vol. 3: The Submicron MOSFET	1995	Stanley Wolf	Treatise	

Title	Date	Author(s)	Publication	Page Number(s)
CMOS Active Pixel Image Sensor with Simple Floating Gate Pixels	Sept. 1995	Jun-ichi Nakamura, Sabrina E. Kemeny, and Eric R. Fossum	IEEE Transactions on Electron Devices Vol. 42, No. 9	1693–94
256 x 256 CMOS Active Pixel Sensor Camera-on-a-Chip	Dec. 1996	R. H. Nixon, S. E. Kemeny, B. Pain, C. O. Staller, and E. R. Fossum	IEEE Journal of Solid-State Circuits Vol. 31, No. 12	2046–50
CMOS Active Pixel Image Sensors for Highly Integrated Imaging Systems	Feb. 1997	S. K. Mendis, S. E. Kemeny, R. C. Gee, C. O. Staller, Quiesup Kim, and E. R. Fossum	IEEE Journal of Solid-State Circuits Vol. 32, No. 2	187–97
CMOS Active Pixel Sensor Star Tracker with Regional Electronic Shutter	Feb. 1997	Orly Yadid-Pecht, Bedabrata Pain, Craig Staller, Christopher Clark, and Eric Fossum	IEEE Journal of Solid-State Circuits Vol. 32, No. 2	285–88
Multiresolution Image Sensor	Aug. 1997	Sabrina E. Kemeny, Roger Panicacci, Bedabrata Pain, Larry Matthies, and Eric R. Fossum	IEEE Transactions on Circuits and Systems for Video Technology Vol. 7, No. 4	575–83
CMOS Image Sensors: Electronic Camera-on-a-Chip	Oct. 1997	Eric R. Fossum	IEEE Transactions on Electron Devices Vol. 44, No. 10	1689–98
Wide Intrascene Dynamic Range CMOS APS Using Dual Sampling	Oct. 1997	Orly Yadid-Pecht and Eric R. Fossum	IEEE Transactions on Electron Devices Vol. 44, No. 10	1721–23
On-Focal-Plane Signal Processing for Current-Mode Active Pixel Sensors	Oct. 1997	Junichi Nakamura, Bedabrata Pain, Tetsuo Nomoto, Tsutomu Nakamura, and Eric R. Fossum	IEEE Transactions on Electron Devices Vol. 44, No. 10	1747–58
CMOS Active Pixel Sensor with On-Chip Successive Approximation Analog-to-Digital Converters	Oct. 1997	Zhimin Zhou, Bedabrata Pain, and Eric R. Fossum	IEEE Transactions on Electron Devices Vol. 44, No. 10	1759–63

Title	Date	Author(s)	Publication	Page Number(s)
Frame-Transfer CMOS Active Pixel Sensor with Pixel Binning	Oct. 1997	Zhimin Zhou, Bedabrata Pain, and Eric R. Fossum	IEEE Transactions on Electron Devices Vol. 44, No. 10	1764–68
Noise performance of a color CMOS photogate image sensor	Dec. 1997	Andrew J. Blanksby, Marc J. Loinaz, David A. Inglis, and Bryan D. Ackland	International Electron Devices Meeting. IEDM Technical Digest	205-208
Digital Camera System on a Chip	May–June 1998	Eric R. Fossum	IEEE Micro Vol. 18, No. 3	8–15
A Circuit for the Correction of Pixel Defects in Image Sensors	Sep. 22-24, 1998	Guy Meynants	Presented at European Solid-State Circuits Conference, Den-Haag; Published in European Solid-State Circuits Conference 1998	312-315
A 200-mW, 3.3-V, CMOS Color Camera IC Producing 352 x 288 24-b Video at 20 Frames/s	Dec. 1998	Marc J. Loinaz, Kanwar Jit Singh, Andrew J. Blanksby, David A. Inglis, Kamran Azadet, and Bryan D. Ackland	IEEE Journal of Solid-State Circuits, Vol. 33, No. 12	2092-2103
Single-Chip Video Camera With Multiple Integrated Functions	Feb. 17, 1999	U. Ramacher, I. Koren, H. Geib, C. Heer, T. Kodytek, J. Werner, J. Dohndorf, J.-U. Schlüßler, J. Poidevin, S. Kirmser	IEEE International Solid-State Circuits Conference, Session 17, Paper WA 17.4	306-307, 416
A Nyquist-Rate Pixel-Level ADC for CMOS Image Sensors	March 1999	David X. D. Yang, Boyd Fowler, and Abbas El Gamal	IEEE Journal of Solid-State Circuits, Vol. 34, No. 3	348-356
A CMOS image sensor with a simple fixed-pattern-noise-reduction technology and a hole accumulation diode	Dec. 2000	Kazuya Yonemoto and Hirofumi Sumi	IEEE Journal Of Solid-State Circuits, Vol. 35, No. 12	2038-2043
Silicon Processing for the VLSI Era, Vol. 1: Process Technology	2000	Stanley Wolf	Treatise	

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