

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,

Petitioner,

v.

CLEAR IMAGING RESEARCH LLC,

Patent Owner.

Case IPR2026-00181
U.S. Patent No. 9,860,450

**PATENT OWNER CLEAR IMAGING RESEARCH LLC'S
PRELIMINARY RESPONSE**

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PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
2001	Order Granting Motion to Dismiss, Dkt. 55, <i>Clear Imaging Research LLC v. Google LLC</i> , No. 3:25-cv-00221-GPC-BLM (S.D. Cal. Jan. 30, 2026)
2002	Complaint, Dkt. 1, <i>Clear Imaging Research LLC v. Google LLC</i> , No. 3:25-cv-00221-GPC-AHG (S.D. Cal. Jan. 30, 2025)
2003	Reuters Article, Google to develop, manufacture high-end smartphones in Vietnam, Nikkei Asia says, https://www.reuters.com/world/asia-pacific/google-develop-manufacture-smartphones-vietnam-nikkei-asia-says-2026-01-13/ (Jan. 13, 2026)

I. INTRODUCTION

Patent Owner Clear Imaging Clear Imaging Research LLC (“Patent Owner”) submits this Preliminary Response to Google LLC’s (“Petitioner” or “Google”) Petition for *Inter Partes Review* of U.S. Patent No. 9,860,450 (Paper 1, “Pet.”). Patent Owner timely filed a Patent Owner’s Request for Discretionary Denial of Institution (Paper 6) on April 9, 2026. As discussed below and in Paper 6, this Petition, which relies on recycled prior art, should be denied on the merits as well as under 35 U.S.C. §§ 314(a) and 325(d).

The primary reference, Dutta, was substantively discussed in the prosecution history and Petitioner has not established that the Patent Examiner made a mistake or misread the Dutta reference, although the Patent Examiner did in fact err by asserting that the Dutta reference disclosed video despite the fact that the Dutta reference is plainly directed to “a method and handheld device for scanning an object and creating a complete image of the object, even under low light conditions.” EX-1007, [0006]. The Dutta reference does not disclose video as claimed in the ’450 Patent.

The secondary reference, Akifumi, does disclose video, but a Person of Ordinary Skill in the Art (“POSITA”) would not have been motivated to combine Dutta and Akifumi to achieve the claimed invention in view of, *inter alia*, the inherent incompatibility of the underlying architectures disclosed in Dutta and

Akifumi and also because of Akifumi's disparagement of storage of the original captured images or motion data as "wasteful." EX-1007, [00224]. Akifumi teaches away from the inventions claimed in the '450 Patent.

Because a POSITA would not have been motivated to combine the Dutta and Akifumi references, neither of which discloses all of the limitations of challenged claims 1-26 or 28-32, Google has not established a reasonable likelihood that these challenged claims are unpatentable under Ground 1A. Creative Camcorder's superficial disclosure of a user interface without any implementation details does not fill in the gaps left by the alleged combination of the Dutta and Akifumi references and Google has not established a reasonable likelihood that challenged claims 13, 26, and 32 are unpatentable under Ground 1B. Similarly, Balmer's disclosure of multiple processors does not fill in the gaps left by the alleged combination of the Dutta and Akifumi references and Google has not established a reasonable likelihood that challenged claim 27 is unpatentable under Ground 1C.

II. CLEAR IMAGING IS AN INNOVATIVE COMPANY THAT BROUGHT IMAGE CORRECTION AND SELECTIVE BLUR REDUCTION TO DIGITAL PHOTOGRAPHY

Dr. Ozluturk, the sole inventor of the patents-in-suit, founded Clear Imaging in 2004. Dr. Ozluturk was awarded a Ph.D. in Electrical Engineering from University of Massachusetts, Amherst in 1994 and worked as an engineer at

InterDigital, a mobile technology research and development company with over 300 employees, for almost 20 years.

Combining his background in electrical engineering and signal processing with his knowledge of photography, Dr. Ozluturk developed a number of patented inventions that enable a digital camera to produce higher-quality videos. Dr. Ozluturk invented a way for a digital camera or video camera to remove (or add) blur from video by combining multiple consecutive images obtained through the device's image sensor. This method was possible, but not practical, at the time because cameras did not either (1) contain sufficient memory to hold multiple images or (2) have the processing power to correct these images in the manner taught by Dr. Ozluturk's patents.

III. CLAIM CONSTRUCTION

Google identifies two terms for claim construction in the Petition, "a processor configured to .../... by the processor" (claims 1-9, 11-22, and 24-32) and "display" / "user interface" (claims 10, 13, 23, 26, and 32). Paper 1, Pet., 10-13. Patent Owner contends that the District Court correctly held that these terms are not means-plus-function limitations and are not governed by § 112, ¶ 6 and have their plain and ordinary meanings without the need for further claim construction in every claim in which they appear. *See* EX-1029, 132-17, 20-29; EX-1030, 1.

IV. APPLIED REFERENCES

Google presents three grounds based on the various combinations of Dutta (EX-1007) and Akifumi (EX-1009) with either Creative Camcorder (EX-1008) or Ballmer (EX-1010). Paper 1, Pet., 2. Google appears to be relying on Creative Camcorder as an additional argument for the dependent claims with “user input” limitations (claims 13, 26, and 32) and Ballmer for dependent claim 27 – “wherein the processor is two or more processors.” Paper 1, Pet., 75-82.

As discussed below, a POSITA would not have been motivated to combine the Dutta and Akifumi references to achieve the inventions claimed in the ’450 Patent without using the ’450 Patent as a roadmap for impermissible hindsight reconstruction. Nor would a POSITA have been motivated to combine the teachings of Creative Camcorder with Dutta and Akifumi in view of the absence of any disclosure as to how the FlexiZone system works or if, let alone how, images would have been modified when recording video using the FlexiZone setting. Similarly, a POSITA would not have been motivated to combine the purported teachings of Ballmer (multiple processors) with Dutta and Akifumi, particularly in view of Dutta’s contrary teaching that it would be desirable to move the processing to an external processor, “thereby reducing the size, weight, power demands, etc. of the handheld device.” EX-1007, [0029].

A. Dutta – the primary reference applied in Ground 1 – does not disclose the claimed invention.

As discussed above and in Paper 6, Google’s primary reference, Dutta, was substantively discussed in the prosecution history. Petitioner has not established that the Patent Examiner made a mistake or misread the Dutta reference, although the Patent Examiner did in fact err by asserting that the Dutta reference disclosed video despite the fact that the Dutta reference is plainly directed to “a method and handheld device for scanning an object and creating a complete image of the object, even under low light conditions.” EX-1007, [0006]. The Dutta reference does not disclose video as claimed in the ’450 Patent, as Petitioner admits. Paper 1, Pet., 56 (“Dutta does not explicitly disclose that its motion corrected images are combined into a video.”).

Dutta discloses, teaches, and claims two things – a handheld device for scanning and for taking a picture of an object under suboptimal lighting conditions such that a picture taken by a conventional camera would not be sufficiently bright and would be blurred. EX-1007, [0026], [0028]. Dutta’s invention is explained in the Summary of the Invention.

The present invention is directed to a method and handheld device for **scanning an object** and creating a complete image of the object, **even under low light conditions**. The handheld device contains

a camera module and a motion sensor assembly. The handheld device is moved so that the camera module takes a plurality of images of an object. A motion sensor assembly in the handheld device detects motion of the handheld device and movement information from the motion sensor assembly is used to modify each of the plurality of images to removed distortions therein caused by movement of the camera module. **The plurality of images from the scanning motion are then combined to generate a reconstructed image of the object.** For taking images under low light conditions, each of the plurality of images are added together to generate a brightened image. In each case, the final image may then be viewed locally or remotely or further processed.

EX-1007, [0006] (emphasis added).

Dutta discloses two embodiments. The first embodiment is directed to scanning a line of text. EX-1007, [0025] (“the object 202 comprises a line of alphabet letters 502.”). As Dutta explains, “[t]he object 502 is scanned with a micro camera module 204 by gradually moving the handheld device 100 across a substantially stationary object 502.” EX-1007, [0026]. Dutta further notes that “[f]or this embodiment, it is preferred to use a motion sensor of the accelerometer

type which detects and measures linear acceleration because the handheld device is moved substantially along a line.” EX-1007, [0026].

The second embodiment is directed to generating a brightened image where “[i]t is assumed that the object is not subject to the optimal lighting conditions so that individual images taken by a conventional camera would not be sufficiently bright, and would be blurred.” EX-1007, [0028]. Dutta explains the process for the second embodiment.

In accordance with the present invention, to overcome these deficiencies, a number of substantially identical images of the object are taken at a fast shutter speed, and then these images are combined. Movement of the camera module between the taking of images is measured and the images are appropriately corrected to ensure that each of the images are aligned properly with one another before they are combined. The multiple dark images, after alignment correction are then combined to produce a bright, clear image in which the signal to noise ratio is improved, thus resulting in a final picture with high quality.

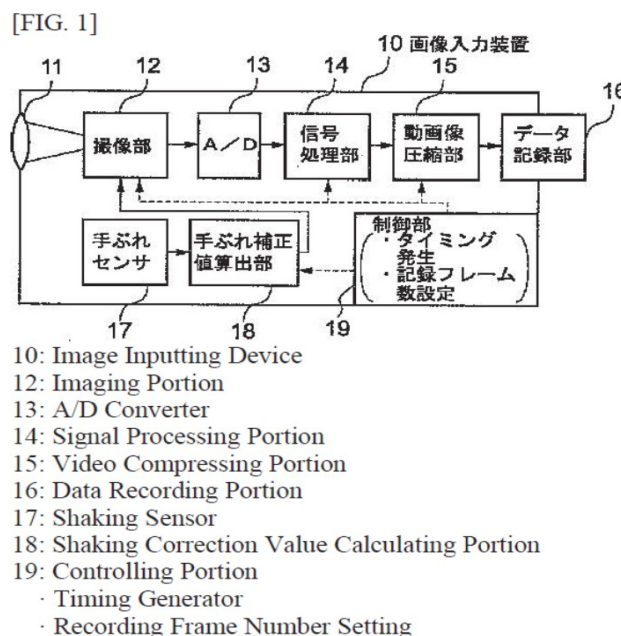
EX-1007, [0028]. Dutta further notes that “[f]or this embodiment, it is preferred to use a motion sensor of the gyroscope type which detects and measures rotation

because image destabilization is typically caused by movement of a hand holding the handheld device which movement is substantially rotational.” EX-1007, [0028].

Although the word “video” appears in the Dutta reference, it only does so in the context of generic descriptions of handheld device communication capabilities. EX-1007, [0004] (“These handheld devices enable the communication of data, voice and/or video at locations other than a residence, office or payphone.”); [0015] (“The handheld device 100 is configured to transmit information in the form of text, voice, images, audio, video and the like. ... The display 104 is configured to display any form of textual, image and video information.”). There is no discussion of “video” in the context of Dutta’s alleged invention.

B. Akifumi—a secondary reference—does not compensate for the deficiencies of Dutta and is not related to the claimed invention.

Akifumi discloses an “image inputting device” as shown in Figure 1.



EX-1009, Figure 1. The image inputting device includes a camera (imaging portion 12) and a shaking sensor 17. Images captured by the camera are stored in memory (the data recording portion 16). However, Akifumi discloses that the shaking correction value applied to the recorded video is based on the frame rate of the recording itself. EX-1009, [0039]-[0040].

Here, the shaking correction value is applied to the recorded image frame only when that frame is received from the imaging portion. *Id.*, [0046]. Once the shaking correction value has been applied, the image is passed through the A/D converter 13, the signal processing portion 14, and the video compressing portion before being stored in the data recording portion 16. *Id.*, Figure 1. Accordingly, while the corrected image is stored in memory, Google does not show the storing of a sequence of unmodified images that are subsequently corrected based at least in part on motion information. At best, Google points to disclosure showing a shaking correction value is applied *before* any images are ever captured. EX-1009, Figure 1.

Accordingly, Akifumi discloses an invention that is substantively different from Dutta and the '450 patent. Moreover, Akifumi has a substantively different structure from the primary reference, Dutta, and a POSITA would not be motivated to combine Dutta and Akifumi absent the road map provided by the specification and claims of the '450 patent.

C. Creative Camcorder—a tertiary reference—does not compensate for the failures of Dutta and Akifumi.

Google relies on Creative Camcorder for its alleged disclosure of a “user-interface” that enables a user to modify images in connection with its challenges to Claims 13, 26, and 32 of the ’450 patent. Paper 1, Pet., 75-82. Specifically, Creative Camcorder discloses a “FlexiZone” feature that enables a user to select a zone of an image seen through a viewfinder on which the user wants to focus. This functionality is described in four paragraphs of the magazine article cited by Google. EX-1008, 10. However, the functionality described in Creative Camcorder has no relationship to “modifying one or more images of the sequential images” or “combining the modified images to obtain a final video” based on the user input. EX-1001, Claim 13.

Creative Camcorder also discloses a substantively different system than what is disclosed in Dutta or Akifumi. For example, the image stabilization system disclosed in Creative Camcorder operates to correct an image *before the image is captured and recorded by the CCD*. In Creative Camcorder, a prism is positioned adjacent to the CCD. Motion information captured by the motion sensors is fed to prism actuators that adjust the image captured by the CCD. This is not analogous to the systems disclosed in Dutta and Akifumi in which motion information is used to adjust images after they are captured by the CCD or imager.

D. Balmer—a tertiary reference—only discloses a system with multiple processors.

Balmer is titled “Synchronized MIMD Multi-Processing System and Method Inhibiting Instruction Fetch at Other Processors on Write to Program Center of One Processor” and issued in 1999. The Abstract of Balmer describes the alleged invention as follows.

A multi-processor system arranged, in one embodiment, as an image and graphics processor. The processor is structured with several individual processors all having communication links to several memories. The individual processors can, on a cycle by cycle basis, be grouped in any configuration to run in synchronism (but from different instruction streams) with the other processors in that group. More than one such synchronized group can be formed concurrently. A crossbar switch serves to establish the processor memory links and the entire image processor, including the individual processors, the crossbar switch and the memories are contained on a single silicon chip.

EX-1010, Abstract. Balmer focuses on concurrent processing of different parts of recorded images. EX-1010, 10:10-34. Google relies on Balmer solely for its disclosure of a system having multiple processors in an effort to challenge Claim 27 of the '450 patent. However, there is simply no disclosure in Dutta or Akifumi that

supports on-camera synchronous storage of motion data or on-camera storage of a final, motion corrected video – much less disclosure of a multiprocessor system to perform these functions. Google is again using the '450 patent as a road map and references like Balmer to fill in the holes of its hindsight reconstruction of the challenged claims.

V. GOOGLE DOES NOT ESTABLISH A REASONABLE LIKELIHOOD THAT THE ALLEGED OBVIOUSNESS COMBINATIONS OF DUTTA AND AKIFUMI, AND CREATIVE CAMCORDER OR BALMER RENDER CHALLENGED CLAIMS 1-32 UNPATENTABLE.

A patent claim is only invalid as obvious if the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which the claimed invention pertains. *See* 35 USC § 103.

The Supreme Court set the framework for analyzing obviousness:

Under § 103, the scope and content of the prior art are to be determined; differences between the prior art and the claims at issue are to be ascertained; and the level of ordinary skill in the pertinent art resolved. Against this background, the obviousness or nonobviousness of the subject matter is determined.

Graham v. John Deere Co., 383 US 1, 17-18 (1966). A conclusion of obviousness requires more than a mere showing that the prior art includes separate references

covering each separate limitation” of the claimed invention. *Unigene Labs., Inc. v. Apotex, Inc.*, 655 F.3d 1352, 1360 (Fed. Cir. 2011). Obviousness is a question of law based on multiple underlying factual determinations including “whether a [person of ordinary skill in the art] would have been motivated to combine the prior art to achieve the claimed invention.” *In re Warsaw Orthopedic, Inc.*, 832 F.3d 1327, 1333 (Fed. Cir. 2016). Identifying a motivation to combine the prior art is important to prevent hindsight bias because “inventions in most, if not all, instances rely upon building blocks long since uncovered, and claimed discoveries almost of necessity will be combinations of what, in some sense, is already known.” *KSR Int’l Co. v. Teleflex Inc.*, 550 US 398, 418-19 (2007).

Petitioner has the burden of proof of establishing that it is entitled to the requested relief. 37 CFR § 42.20(c). The Petition must include a full statement of the reasons for the relief requested, including a detailed explanation of the significance of the evidence. 37 CFR § 42.22(a). “The Board may exclude or give no weight to the evidence where a party has failed to state its relevance or to identify specific portions of the evidence that support the challenge.” *Id.* The Board is required to “address only the basis, rationale, and reasoning put forth by the Petitioner in the petition, and resolve all vagueness and ambiguity in Petitioner’s arguments against the Petitioner.” *Liberty Mutual Ins. Co. v. Progressive Casualty Ins. Co.*, Case CBM2012-00003, slip op. at 10 (PTAB Oct. 25, 2012) (Paper 8).

Petitioner failed to establish a reasonable likelihood that any claim of the '450 patent is obvious for at least the following reasons. First, Petitioner has cherry picked snippets from references and, with hindsight assistance of the '450 patent, stitched together a piecemeal obviousness case untethered from the teachings of the various prior art references. Second, the references themselves simply fail to disclose all of the limitations of the Challenged Claims.

A. Google has not established a reasonable likelihood that claims 1-26 and 28-32 are invalid under Ground 1A – Dutta and Akifumi.

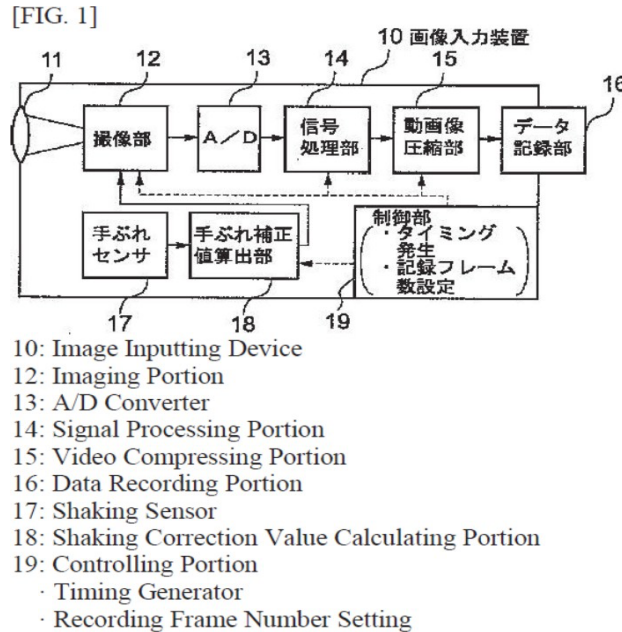
A POSITA would not have been motivated to combine the teachings of Dutta and Akifumi to achieve the claimed inventions without the roadmap of the '450 Patent claims. As discussed above, the Dutta reference teaches scanning and compensating for suboptimal lighting in separate embodiments. Dutta teaches that different motion sensors would be preferred for each of these embodiments. “For this [scanning] embodiment, it is preferred to use a motion sensor of the accelerometer type which detects and measures linear acceleration because the handheld device is moved substantially along a line.” EX-1007, [0027]. “For this [suboptimal lighting] embodiment, it is preferred to use a motion sensor of the gyroscope type which detects and measures rotation because image destabilization is typically caused by movement of a hand holding the handheld device which movement is substantially rotational.” EX-1007, [0028]. Dutta does not teach an embodiment optimized for both tasks, and does not disclose any implementation for

video (as recited in claim limitations [1.1], [1.5], [1.6], [4], [9], [10], [11], [13], [14.1], [14.5], [14.6], [17], [22], [23], [24], [26], [28.1], [28.5], [28.6], [29.1], [29.5], [29.6], and [32])).

The Akifumi reference, an unexamined Japanese patent application, discloses the following.

An image inputting device for inputting, into a signal processing portion 14 through an A/D converter 13, an image signal outputted from an imaging portion 12, carrying out Y/C separation and other processes, and further compressing in a video compressing portion 15, and then recording onto a recording medium through a data recording portion 16, wherein a shaking correction value is calculated by a shaking correction value calculating portion based on a shaking detection output from a shaking sensor 17, and when carrying out shaking correction through changing a position read out from the imaging element of the imaging portion in accordance with the shaking correction value 18, varying the shaking correction value calculation interval depending on a recording frame rate (number of frames recorded per-unit-time) that is set in a controlling portion 19.

EX-1009, [MEANS FOR RESOLUTION]. The basic architecture of Akifumi is shown in Figure 1 reproduced below.



EX-1009, Figure 1. In Akifumi, an image signal is captured through an imaging portion (12) and passed, through an analog to digital converter (13), to a signal processing portion (14). After being processed, video can be compressed in the video compressing portion (15) before being stored in the data recording portion (16). The embodiment also includes shaking sensor (17), shaking correction value calculating portion (18), and controlling portion (19). EX-1009, [0028]. The shaking sensor (17) is described as “a sensor for detecting shaking of the user who is holding the image inputting device 10, and is structured from, for example, acceleration sensors that can detect acceleration in the vertical direction and in the horizontal direction due to shaking.” EX-1009, [0032].

In Akifumi, the “correction” applied from the shaking correction value calculating portion (18) is applied to the image captured in the imaging portion. This

is an important part of the invention of Akifumi because “the wasteful operation for the writing to, and reading out from, the frame memory is rendered unnecessary through storing, in frame memory, the image signal for only a frame that is to be recorded and calculating, and reading out from the frame memory, the difference in shaking from the image signal of the frame stored in frame memory earlier.” EX-1009, [0024]. Thus, Akifumi describes a system in which the motion the shaking correction is performed on a frame by frame basis “at the instant an image is output from the imaging portion.” EX-1009, [0046].

Accordingly, Akifumi does not disclose, among other things, storage of the original captured images or of motion data and, in fact, describes this process as “wasteful.” EX-1009, [0024]. A POSITA would have understood that Akifumi teaches away from such storage (as recited in independent claim limitations [1.2], [14.1], and [14.2]). In view thereof, as well as the substantial differences in the underlying architecture and intended goals of the Dutta and Akifumi references, a POSITA would not have been motivated to combine the references absent a prohibited usage of the claims of the ’450 Patent as a roadmap for hindsight reconstruction.

B. Google has not established a reasonable likelihood that claims 13, 26 and 32 are invalid under Ground 1B – Dutta , Akifumi and Creative Camcorder or that claim 27 is invalid under Ground 1C – Dutta, Akifumi, and Balmer.

As an initial matter and as discussed above, Google fails to establish a reasonable likelihood that any of the independent claims of the '450 Patent would have been obvious to a POSITA. Accordingly, Google has not established a reasonable likelihood that any of the dependent claims, including claims 13, 26, 27 or 32, would have been obvious to a POSITA.

If an independent claim is nonobvious, then the dependent claim is also nonobvious. *In re Fine*, 837 F.2d 1071, 1076 (Fed. Cir. 1988) (“A claim that depends from a non-obvious independent claim is non-obvious because it contains all the limitations of the independent claim, plus a further limitation.”). The Board does not need to consider “arguments that certain dependent claim limitations would have been obvious where the base claim has not been proven invalid.” *SynQor, Inc. v. Artesyn Techs., Inc.*, 709 F.3d 1365, 1375 (Fed. Cir. 2013).

VI. CONCLUSION

For the reasons discussed above, as well as in Paper 6, Patent Owner’s Request for Discretionary Denial of Institution, institution of this *Inter Partes* Review should be denied.

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CERTIFICATE OF WORD COUNT (37 C.F.R. § 42.24(d))

The undersigned hereby certifies that the word count in this Patent Owner Preliminary Response is no more than 3,804 words, as counted by the word-processing program Microsoft Word that was used to generate this Patent Owner Preliminary Response, where such word count excludes the table of contents, table of authorities, mandatory notices, certificate of service, appendix of exhibits, claim listing, and this certificate of word count. This Patent Owner Preliminary Response is in compliance with the 14,000-word limit set forth in 37 C.F.R. § 42.24(b)(1).

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned hereby certifies that the above document was served on May 11, 2026, by filing this document through the Patent Trial and Appeal Case Tracking System as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

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