

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIVINT LLC
Petitioner,

v.

DUKE W. ZINSER,
Patent Owner,

U.S. Patent No. 7,583,191
Issue Date: September 1, 2009
Title: SECURITY SYSTEM AND METHOD FOR USE OF SAME

Inter Partes Review No.: IPR2026-00375

**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT 7,583,191
UNDER 35 U.S.C. §§311-319 AND 37 C.F.R. §§42.1-.80, 42.100-.107**

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PETITIONER'S EXHIBIT LIST

<i>Exhibit #</i>	<i>Description</i>
1001	U.S. Patent No. 7,583,191 (“’191 Patent”)
1002	Prosecution History of the ’191 Patent (“File History”)
1003	IPR2026-00300 Declaration of Petitioner’s Expert James Parker
1004	U.S. Patent Publication 2004/0086093 (“Schranz”)
1005	Re-Exam Prosecution History of the ’191 Patent
1006	U.S. Pat. No. 6,429,893
1007	U.S. Pat. No. 6,778,084
1008	U.S. Patent Publication 2002/0147982
1009	<i>Curriculum Vitae</i> of James Parker
1010	James Parker Patent Summary
1011	Zinser v. Vivint, LLC, Complaint, 4:25-cv-1030 (E.D. Tex. Sept. 18, 2025)
1012	Excerpts of Plaintiff’s Disclosure of Asserted Claims and Infringement Contentions (2026-04-16)
1013	PCT Publication No. WO 01/93220 (“Menard”)
1014	U.S. Patent Application No. 2004/0080615 (“Klein”)
1015	U.S. Patent No. 5,428,388 (“Von Bauer”)
1016	Letter from B. Greene to G. Sorden dated May 20, 2026
1017	IPR2026-00375 Declaration of Petitioner’s Expert James Parker

I. INTRODUCTION

Vivint LLC (“Petitioner”) hereby petitions for an *inter partes* review (IPR) of U.S. Patent No. 7,583,191 (“the ’191 Patent”, EX-1001). Petitioner respectfully submits that Claims 5, 7 and 15-18, (the “Challenged Claims”) of the ’191 Patent are unpatentable under 35 U.S.C. §103 in view of following ground:

Grounds	Claims	Basis	References
Ground 1	5, 7 and 15-18	103	U.S. Pat. Pub. No. 2004/0086093 (“Schranz”)

This Petition demonstrates by a preponderance of the evidence that there is a reasonable likelihood that Petitioner will prevail with respect to at least one of the Challenged Claims. Accordingly, it is respectfully requested that the Board institute an *inter partes* review.

In IPR2026-00300, Petitioner previously challenged Claims 21-47 of the ’191 Patent. Claims 21-47 issued pursuant to a Request for Reexamination (“Request”) filed by the Patent Owner. In the Request, Patent Owner asserted that Claims 1-20 of the ’191 Patent were invalid (“*Von Bauer with Menard renders claims 1-7 and 19-20 obvious....Claims 8-18 are obvious over Von Bauer in combination with Menard and Klein*”). EX-1005, 2-4. Due to Patent Owner’s failure to comply with 37 CFR 1.510(b), the Request was vacated, and Patent Owner subsequently pursued reexamination of only Claims 1, 8, 14, and 19 — all of which were ultimately cancelled. EX-1005, 345, 364, 1062.

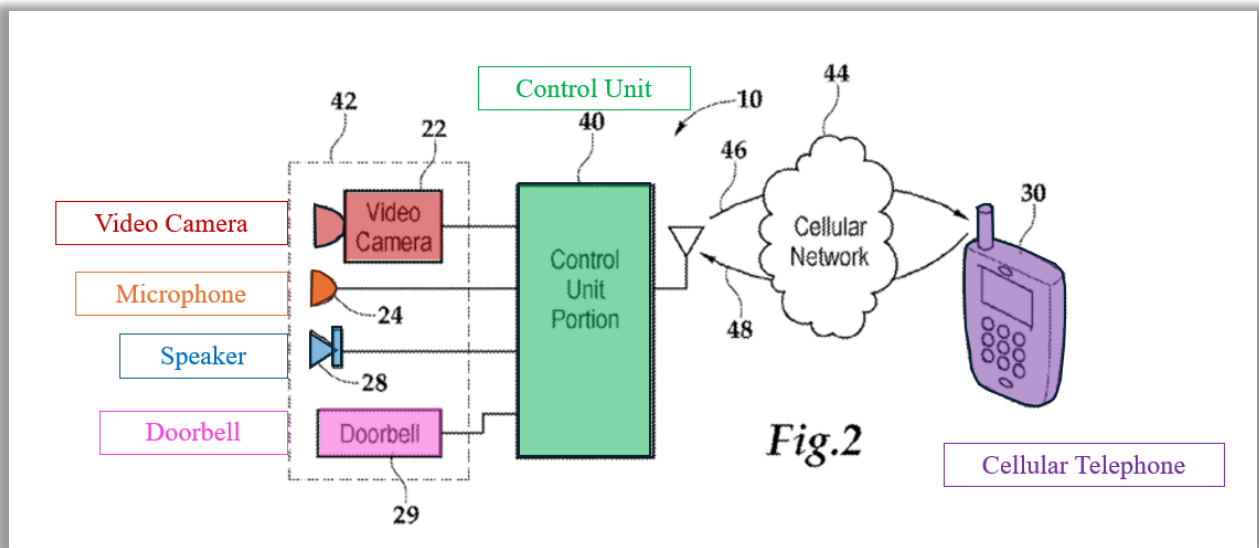
In the initial Complaint filed in the Related Litigation on September 18, 2025, Patent Owner only asserted the claims newly issued in the reexamination: “Claims 21 – 47 of the ’191 Patent.” EX-1011 ¶39. Relying on the Complaint and Patent Owner’s previous admission that the original dependent claims of the ’191 Patent were invalid in the Request for Reexamination, Petitioner filed IPR2026-00300 on March 16, 2026, challenging 21-47, the only claims that were added and issued during the reexamination. IPR2026-00300, Paper 1.

On April 16, 2026, after having received the Petition for IPR2026-00300, Patent Owner served its infringement contentions, asserting for the first time, originally issued claims 2-7, 15-18, and 20. EX-1012, 2. These are the very same claims that Patent Owner asserted “are invalid” in its Request for Reexamination. EX-1005, 4-5 (*“Accordingly, claims 2-7 and 20 are invalid for at least the reasons set forth with respect to claims 1 and 19....Accordingly, claims 9-13 and 15-18 are invalid for at least the reasons set forth with respect to claims 8 and 14.”*).

On May 8, 2026, Patent Owner withdrew its assertion of claims 2-4, 6, and 20. Accordingly, this Petition is only directed to the remaining asserted claims from the originally issued ’191 Patent: Claims 5, 7, and 15-18. Claims that the Patent Owner (a) previously represented to the USPTO “are invalid” and (b) did not include in the original complaint. EX-1005, 4-5; EX-1011 ¶39. This Petition uses the same prior art references that were the basis for the grounds in IPR2026-00300.

II. OVERVIEW

The '191 Patent is directed to a doorbell monitoring system to allow remote monitoring and surveillance. The architecture of the doorbell monitoring system is illustrated in Figure 2 of the '191 Patent and includes a control unit (green), in communication with video camera 22 (red), exterior microphone 24 (orange), exterior speaker 28 (blue) and doorbell 29 (pink).

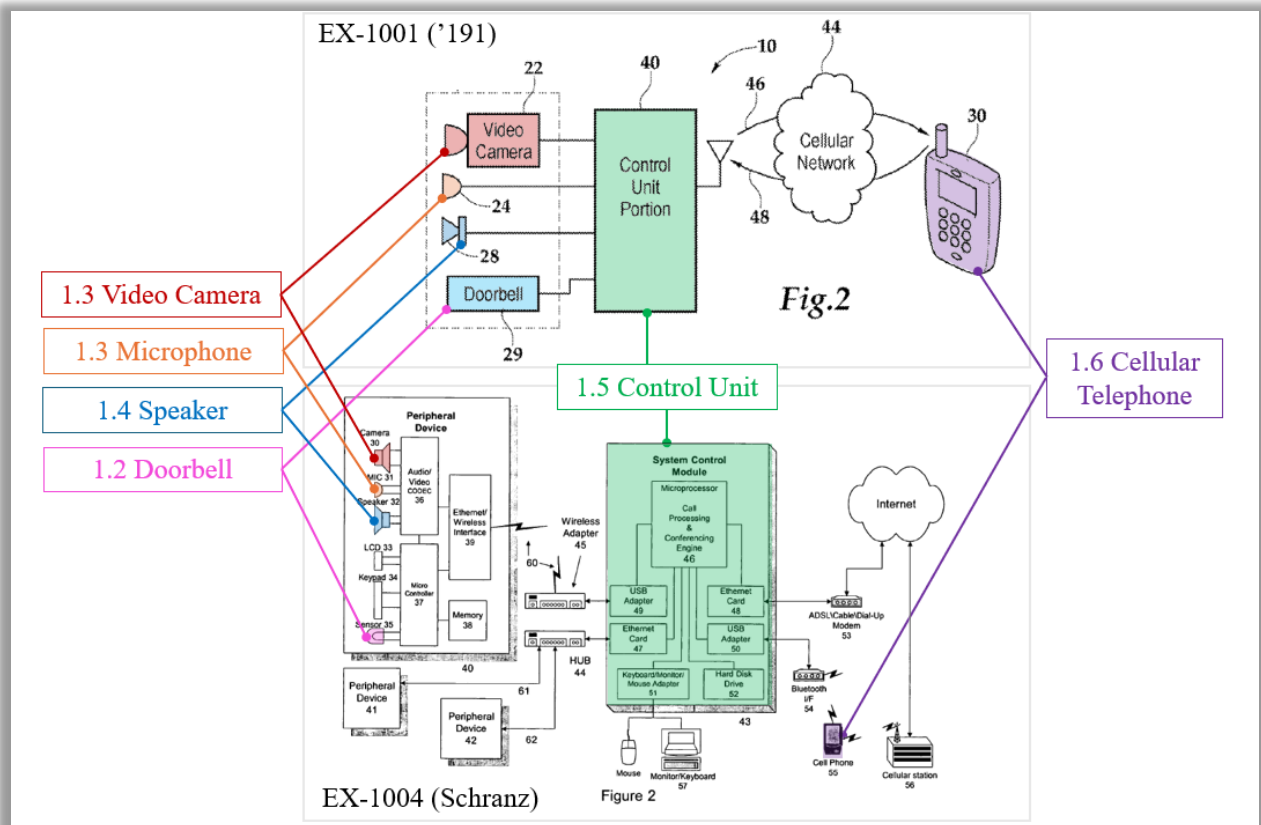


EX-1001, Figure 2 (annotated to show limitations recited in independent Claim 1).

The control unit 40 interfaces with communication portion 42 and relays data and communications between the communication portion 42 and the cellular telephone 30 (purple) via cellular network 44. In operation, when an individual approaches the doorway, an event is detected, e.g. by ringing of the doorbell. In turn, the video camera 22 and external microphone 24 capture visual and audio communications at doorway 18 (not shown). The doorway visual and audio

communications captured with the video camera 22, external microphone 24 are transmitted to the cellular telephone 30 of the homeowner 16 via the control unit 40 through cellular network 44.

The prior art Schranz reference discloses the identical architecture to provide doorbell monitoring services. The figure below illustrates a comparison of Figure 2 of the '191 Patent (top) with Figure 2 of Schranz (bottom) with common elements annotated with the limitations recited in independent Claim 1 of the '191 Patent:



EX-1001, Figure 2; EX-1004, Figure 2 (annotated).

Like the '191 Patent, Schranz discloses an architecture for a doorbell monitoring system that includes a control unit 43 (green), in communication with

video camera 30 (red), exterior microphone 31 (orange), exterior speaker 32 (blue) and doorbell 35 (pink).¹ The control unit 43 relays data and communications to the cellular telephone 55 (purple) via a cellular station 56. Like the '191 Patent, Schranz discloses that when an individual approaches the doorway, an event is detected, e.g., by ringing of the doorbell or the motion sensor. In turn, the video camera 30 and external microphone 31 capture visual and audio communications at the doorway. The captured doorway visual and audio communications are transmitted to the cellular telephone 55 via a control unit 43 that is in communication with the video camera 30, external microphone 31, exterior speaker 32, and cellular station 56 for communicating with the cellular telephone 55.

The Challenged Claims of the '191 Patent recite well-known features associated with a doorbell monitoring system as disclosed by Schranz and are therefore unpatentable.

III. GROUNDS FOR STANDING 37 C.F.R. § 42.104(a)

Petitioner certifies that the '191 Patent is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an inter partes review of the Challenged Claims on the grounds identified herein. 37 C.F.R. § 42.104(a). This Petition is filed pursuant to 37 C.F.R. § 42.106(a).

¹ Schranz discloses that sensor 35 may be a doorbell signal. EX-1004, ¶48.

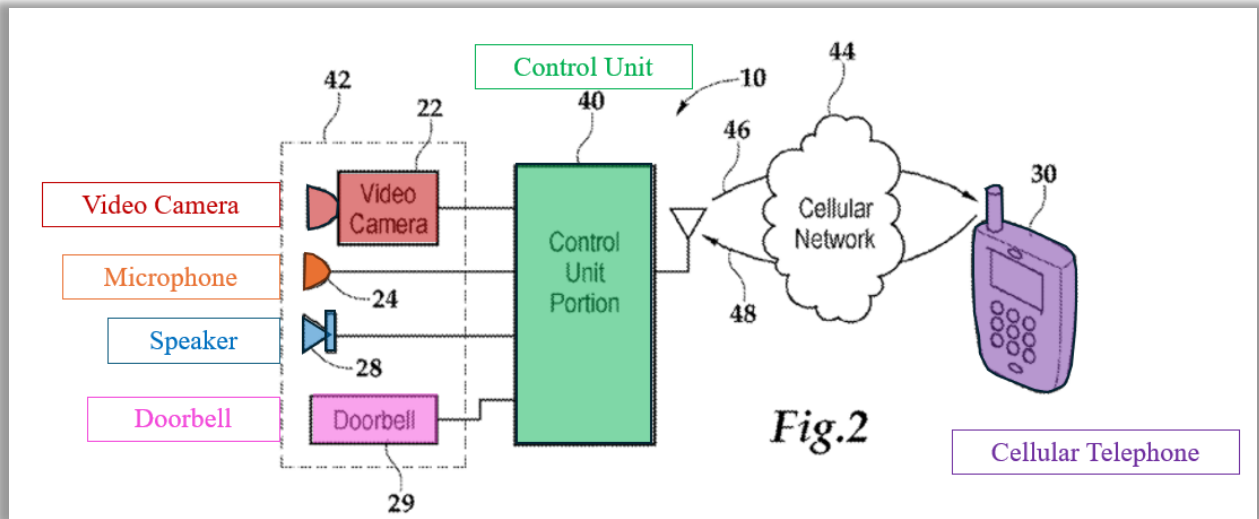
IV. REASONS FOR THE REQUESTED RELIEF

As explained in §§II and IV-V of this Petition and in the attached Declaration of Petitioner's Expert, EX-1017, the subject matter claimed in the '191 Patent was obvious over the prior art to a person of ordinary skill in the art ("POSITA") at the time of the purported invention.

A. Overview of the '191 Patent

The '191 Patent is directed to a conventional security system that wirelessly streams audio and video from a property's entry point to a remote user's cellular telephone. EX-1001, Abstract. The '191 Patent explains that previous systems are merely "reactive" and typically only provide alarm monitors to predetermined third parties. EX-1001, 1:13-14, 1:23-26. The '191 Patent explains that there exists a need a for a "proactive" system that relays audio and visual information from the property to the remote user (*i.e.*, the property owner) during an alarm thereby deterring unwanted individuals. EX-1001, 1:31-44; EX-1017, ¶33.

Figure 2 illustrates the doorbell monitoring security system and connection to the remote user's cellular telephone.

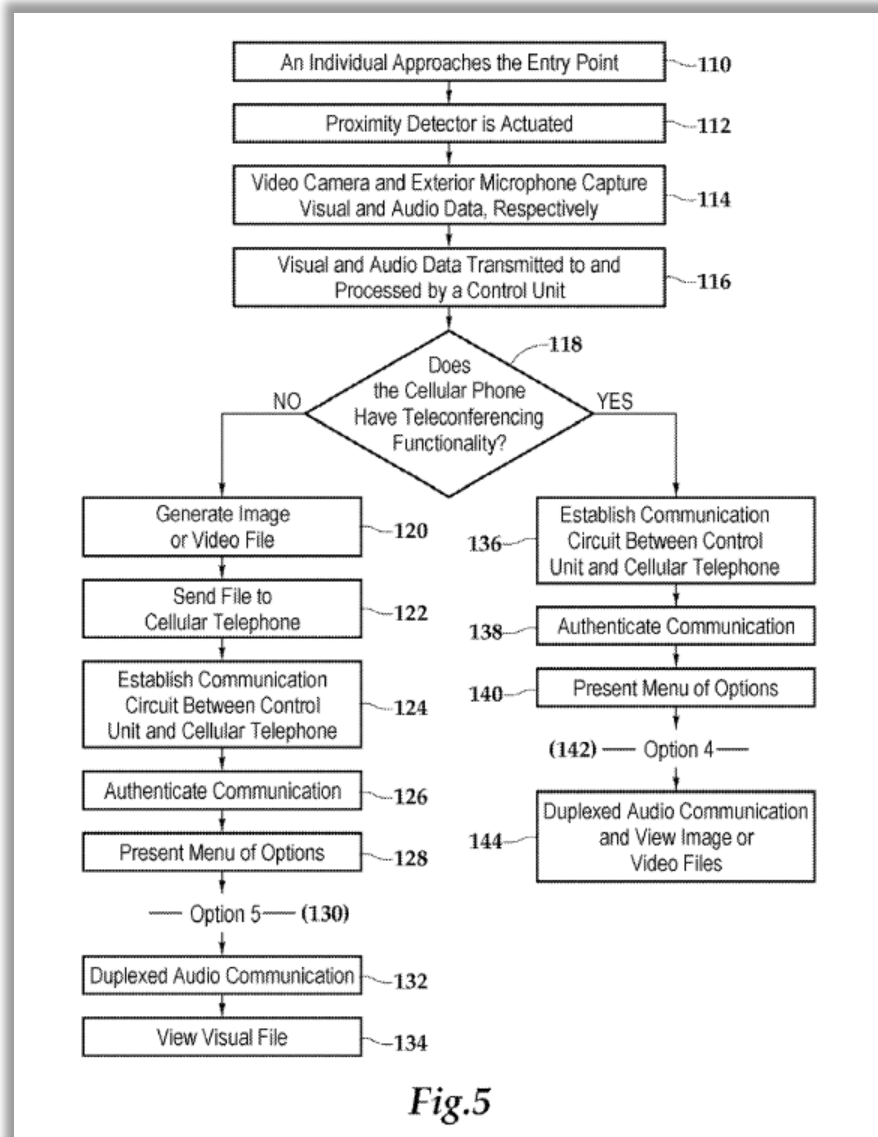


EX-1001, Figure 2; EX-1017, ¶33.

As illustrated, the doorbell monitoring system utilizes a control unit 40 (green) to relay data from a communication portion 42 to the cellular network 44 and the remote user's telephone 30 (purple). EX-1001, 3:10-13. The communication portion 42 includes a video camera 22 (red) and microphone 24 (orange) for capturing audio and visual information at the doorway. EX-1001, 2:36-37, 3:13-17. The communication portion 42 also includes doorbell 29 (pink) for detecting a triggering event and speaker 28 (blue) to transmit audio from the remote user to the doorway. EX-1001, 2:38-47, 3:13-17; EX-1017, ¶35.

The '191 Patent explains that the system operates as follows: (1) An individual approaches the doorway; (2) The proximity detector is actuated; (3) Video camera 22 and microphone 24 capture the visual and audio data; (4) The control unit processes the received audio-visual data from the video camera and microphone; (5)

The control unit notifies the remote user that a triggering event has occurred; (6) The control unit interfaces with the remote user's telephone allowing the remote user to receive additional information (*i.e.*, an image or a video file), and establish a real-time teleconferencing stream to the communication portion 42. EX-1001, Figure 5, 4:46-59, 6:13-67. The general operation of the system is illustrated by Figure 5 below. EX-1001, Figure 5; EX-1017, ¶36.



EX-1001, Figure 5.

The '191 Patent issued with twenty claims where Claims 1, 8, 14 and 19 are independent. However, as discussed below, the '191 patent was subject to a reexamination proceeding which resulted in a Reexamination Certificate that cancelled Claims 1, 8, 14 and 19, and found new Claims 21-47 patentable.

This Petition is only directed to original dependent Claims of the '191 Patent. Dependent Claim 5, which depends from cancelled independent Claim 1 is representative:

[1.0] *A doorbell monitoring system comprising:*

[1.1] *a doorway having an environment;*

[1.2] *a doorbell located in the doorway, the ringing of the doorbell being a triggering event;*

[1.3] *a video camera and an external microphone disposed in the entry point, the video camera and external microphone, responsive to the triggering event, for capturing entry point visual and audio communications at the entry point and transmitting the captured entry point visual and audio communications;*

[1.4] *an external speaker disposed in the entry point, the external speaker for rendering received cellular audio communications;*

[1.5] *a control unit disposed in communication with the video camera, the doorbell, and the external microphone, the control unit for communicating at least one portion of the entry point visual and audio communications received from the video camera and external*

microphone, and for communicating the received cellular audio communications to the external speaker; and

[1.6] a cellular telephone disposed remotely to the doorway and the control unit, the cellular telephone for capturing cellular audio communications at the cellular telephone, transmitting the cellular audio communications to the control unit, and rendering the at least one portion of entry point communications received from the control unit.

[5] The system as recited in claim 1, wherein the at least one portion of the entry point visual and audio communications comprises data selected from the group consisting of audio data, at least one image and audio data, and streaming visual and audio data.

B. Prosecution History of the '191 Patent

1. The Original Prosecution

The '191 Patent was filed on November 14, 2006, as Application No. 11/559,808. EX-1001, (21)-(22). During prosecution, the examiner initially rejected claims 1-20 as anticipated by Chang (U.S. 6,778,084). EX-1002, 58. In response, the applicant revised the independent claims to disclose a “doorbell monitoring system” rather than a “security system” and included a limitation requiring “a doorbell located in the doorway, the ringing of the doorbell being a triggering event.” EX-1002, 80. The Applicant argued that Chang’s intrusion detection devices, which include “glass breakage sensors or other shock sensors, motion detectors, contact switches, proximity or alignment sensors” (U.S. 6,778,084, 4:1-4), does not disclose a “doorbell.” EX-1002, 92. The examiner

subsequently allowed the claims, and the Patent issued as U.S. 7,583,191 on September 1, 2009. EX-1002, 100.

2. The Reexamination

On June 19, 2024, **Patent Owner** requested an *Ex Parte* Reexamination of the '191 Patent. In the Request for Reexamination filed June 19, 2024 ("Request"), the Patent Owner stated:

In particular, pursuant to 37 U.S.C. § 1.510(b)(1), Patent Owner/Assignee submits the following statement pointing out the substantial new questions of patentability ("SNQP"):

- SNQP 1: Claims 1-7 and 19-20 are obvious over *Von Bauer* in combination with *Menard*.
- SNQP 2: Claims 8-18 are obvious over *Von Bauer* in combination with *Menard* and *Klein*.

EX-1005, 2.

On July 31, 2024, the USPTO vacated the Request because it failed to provide a detailed explanation for why the dependent claims were invalid over the cited art and instead, just stated that the challenged dependent claim "depend directly or indirectly" from the independent base claims and "inherit all features and limitations" of the base claims and are therefore "invalid for the same reasons" as the base claims. EX-1005, 345-47.

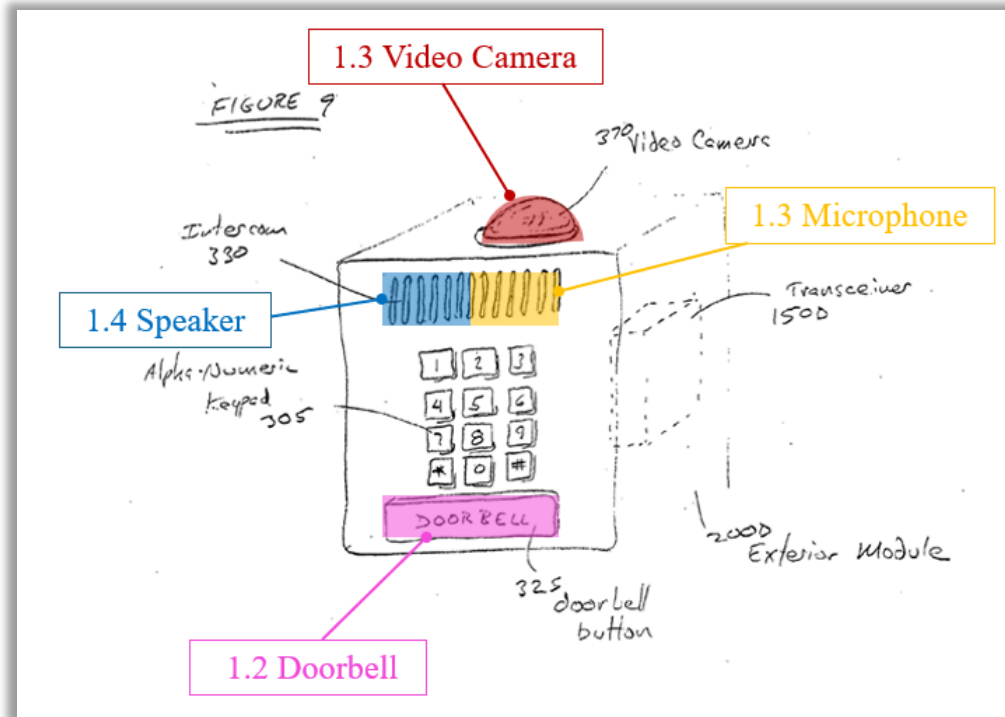
On August 15, 2024, the Patent Owner filed a corrected Request, seeking only reexamination of independent claims 1, 8, 14 and 19. EX-1005, 364.

On September 26, 2024, the PTO granted the reexamination request. During prosecution, the Patent Owner cancelled claims 1, 8, 14 and 19, and added claims 21-47. EX-1005, 1020-1029.

**a. The Patent Owner's Admission in the Reexamination
that All Claims were Obvious was Well Grounded.**

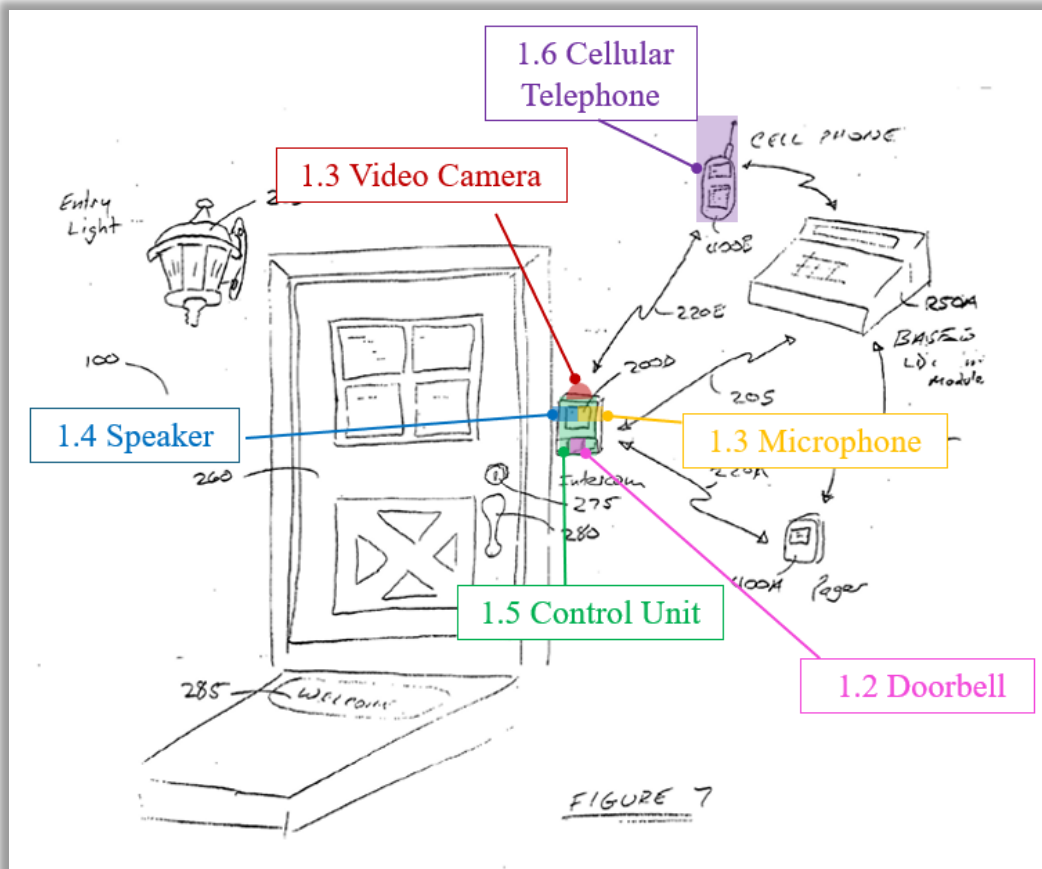
In their June 19, 2024 reexamination request, the Patent Owner admitted that “[t]he combination of Von Bauer with Menard renders claims 1-7 and 19-20 obvious” and “[c]laims 8-18 are obvious over Von Bauer in combination with Menard and Klein.” The Patent's Owner's admissions were well grounded, and, as illustrated by the cancellation of the independent claims, all claims were obvious over the identified prior art: Menard (EX-1013), Klein (EX-1014), and Von Bauer (EX-1015).

Specifically, the Menard reference (WO 01/93220), titled “Modular communication and control system and method” and published in December 2001, discloses a doorbell monitoring system with an external unit placed in an entry point to a residence that includes a doorbell, video camera, and an intercom containing a speaker and microphone. EX-1013, 21:11-29, 22:14-23. Menard's architecture, as shown below, parallels the disclosure of the '191 Patent (with elements in common to the '191 Patent annotated in a common color):



EX-1013, Fig. 9; EX-1017, ¶55.

Moreover, Menard's doorbell monitoring system includes an external unit positioned in a doorway, in communication with a control unit and a cellular phone:



EX-1013, Fig. 7; EX-1017, ¶56.

The external unit and a user of the cell phone can engage in bidirectional communications, including sending real-time video images from the external unit to the cellular phone. EX-1013 21:11–29; EX-1017, ¶56.

(i) The Patent Owner Admitted Claims 5 and 7 are Invalid

In the Request for Reexamination Request, the Patent Owner did not identify any features in Claims 5 and 7 that provided patentability but instead admitted that the claims were invalid for the same reasons that Independent Claim 1 was invalid. EX-1002, 4 (“Claims 2-7 and 20 depend directly or indirectly from independent

claims 1 and 19 and inherit all features and limitations of the base claim from which they depend.”) In other words, Claim 5’s recitation that the audio and video captured at the doorway and sent to the cell phone includes one of audio data, image and audio data and streaming visual and audio data imparted no independent patentability apart from Claim 1. This admission is accurate as Menard’s disclosure clearly shows the external unit providing captured video and audio data to a cell phone (personal data unit (“PDU”)):

In one embodiment, arrival of the caller is detected by video camera 370. In response to actuation of the button, or detection by camera 370, exterior module 200D transmits a wireless signal...The signal is communicated to PDU 400 (not shown in this figure). A user, equipped with PDU 400 can respond in a number of ways. In one embodiment, the user may elect to open an audio communication channel by entering a command using PDU 400. Upon opening an audio communication channel, the caller and user can engage in bidirectional verbal discourse. In one embodiment, the user may opt to receive a graphical image of the caller using PDU 400. Entry of an appropriate command causes exterior module 200D to capture an image using exterior video camera 370 and transmit said image to PDU 400. The graphical image may include a still image or real-time video images.

EX-1013, 21:11-29. Likewise, Claim 7’s recitation that the connection between the control unit and the cellular telephone comprises a cellular network is clearly disclosed in FIG. 7 of Menard (above). Therefore, as admitted by the Patent Owner, Claims 5 and 7 are obvious over Von Bauer in combination with Menard.

(ii) The Patent Owner Admitted Claims 15-18 are Invalid

In the Request for Reexamination, the Patent Owner did not identify any features in Claims 15-18 that provided patentability but instead admitted that the claims were invalid for the same reasons that Independent Claim 14 was invalid. EX-1002 p. 5 (“Claims 9-13 and 15-18 depend directly or indirectly from independent claims 8 and 14 and inherit all features and limitations of the base claim from which they depend.”) In other words, Claim 15’s recitation that the means for relaying at least a portion of the captured visual and audio communications and means for relaying the audio communications for the cellular phone operate substantially simultaneously is met by Menard’s control unit providing audio and video from the external unit to the cellular phone, and providing audio communications from the cell phone to the external unit. EX-1013, 21:11-29 (“...Entry of an appropriate command causes exterior module 200D to capture an image using exterior video camera 370 and transmit said image to PDU 400. The graphical image may include a still image or *real-time video images*.”) (emphasis added). Likewise, Claim 16’s recitation of audio duplexed communication is clearly shown by Menards’ disclosure of in bidirectional communications between the external unit and the cellular phone. *Id.* (“...Upon opening an audio communication channel, the caller and user can engage in bidirectional verbal discourse...”)

Moreover, Claim 17’s recitation of forwarding the captured visual and audio communications to data storage onsite is disclosed by Klein’s disclosure of a video

management system for recording the video feed received by the camera 60 to a local storage medium associated with the host computer 20, or alternatively with a storage medium associated with the remote computer 120 by means of the remote communication module 26. EX-1014, ¶23; EX-1017, ¶57.

Finally, Claim 18's recitation of forwarding the captured visual and audio communications to a video monitor is disclosed by Klein's disclosure of a video rendering unit that receives a feed from the video camera 60 via the video interface 40, and renders the feed to a monitor 48 associated with the host computer 20. EX-1014, ¶21. Therefore, as admitted by the Patent Owner, Claims 15-18 are obvious over Von Bauer in combination with Menard and Klein.

3. The Current IPR Petition

In order to simplify the issues for the Board in view of the previously filed IPR2026-00300 which was directed to the claims newly issued in the reexamination, Claims 21-47, the current IPR is modeled after and uses the same prior art reference as IPR2026-00300 in order to provide a strong basis for joinder of the two Petitions. Accordingly, this Petition is directed only at the original dependent claims: 5, 7 and 15-18.

C. Priority Date of the Challenged Claims

The '191 Patent issued from an application filed on November 14, 2006. Thus, the priority date is November 14, 2006.

D. Claim Construction

Petitioner proposes that each claim term in the Challenged Claims be given its plain and ordinary meaning in this proceeding, and that no specific construction of any claim term is required because the prior art relied on in this Petition meets each of the claim terms under any reasonable construction. EX-1017, ¶40.

For Claims 14-18 written in mean-plus-function format, Petitioner sets forth the structure recited in the specification of the '191 Patent for performing each function pursuant to 37 C.F.R. § 42.104(b)(3) in the Detailed Application of Schranz to the Challenged Claims below.

E. Level of Ordinary Skill in the Art

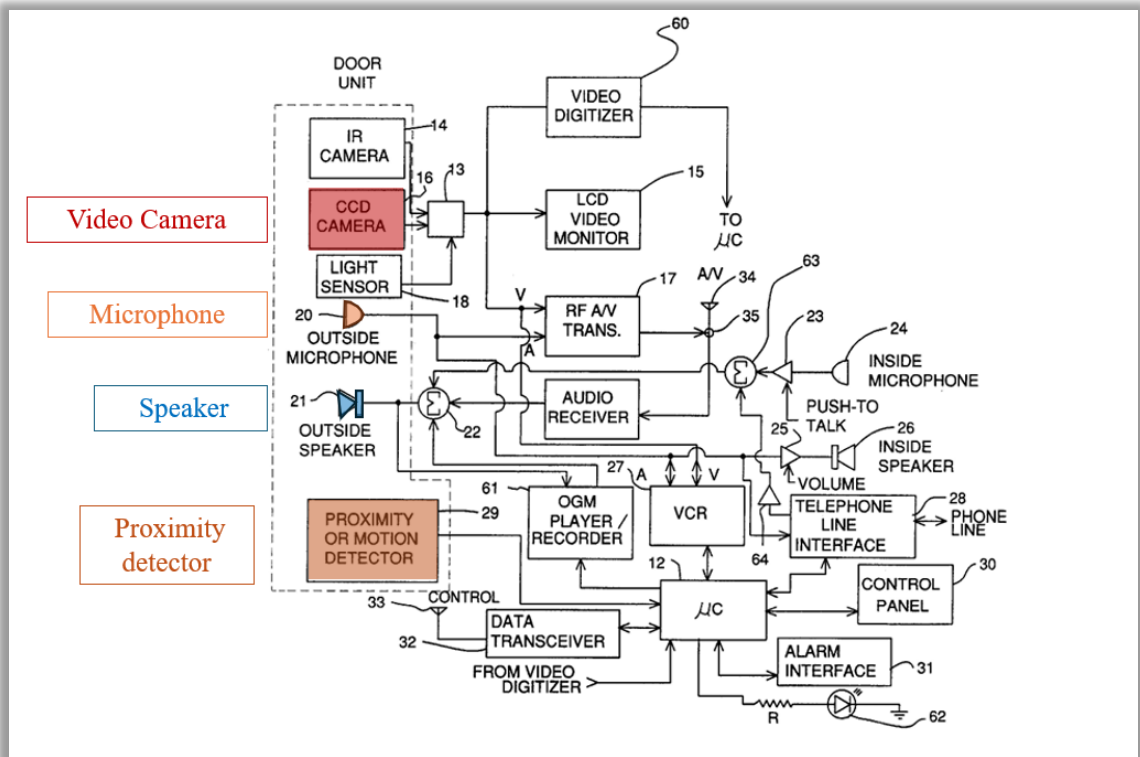
A Person of Ordinary Skill in the Art (“POSITA”) in November 2006 would have been someone knowledgeable and familiar with communication protocols used by components in a security system for transferring information between components. A POSITA would have gained knowledge of these concepts through a mixture of training and work experience, such as by having at least a bachelor’s degree in electrical or electronic engineering, computer science, or a related field, and at least two to three years of training or additional work experience in the area of security system components, or a related field. Additional hands-on and design experience could compensate for less formal education, and vice versa. The

knowledge and skill of a POSITA is further reflected in the prior art references themselves, as well as the State of the Art, discussed below. EX-1017, ¶¶44-45.

F. State of the Art

This section describes the state of the art as of the Priority Date. This section, and the expert testimony and documentary evidence cited, provide additional factual support for the general knowledge, common understanding and skill of a POSITA at the Priority Date. This section provides additional factual support and motivation to modify and combine the teachings in the references and further demonstrates why doing so would involve a reasonable expectation of success. EX-1017, ¶47.

Prior art security systems were generally used to monitor entrances to a building in order to prevent unauthorized access to the building. These systems used various sensors to detect unauthorized persons. One such system is shown below in Figure 1:



EX-1006, Figure 1; EX-1017, ¶48.

The security system includes a door unit with several different types of sensors for generating signals, including a video camera 16 (red) for generating a video signal, an outside microphone 20 (orange) for generating an audio signal, an outside speaker 21 (blue) for playing an audio signal, and a proximity or motion detector 29 (brown) for detecting motion in the vicinity of the door. EX-1006, 4:10-54. A remote unit allows a person to remotely monitor the activity at the door, play video and audio captured at the door unit, and control the security system. EX-1006, 1:37-50. The remote unit also allows the remote user to communicate orally with a person at the door. EX-1006, 6:6-8; EX-1017, ¶49.

Another prior art security system, EX-1007, includes one or more cameras capable of capturing video and audio data, one or more audio devices capable of capturing and broadcasting audio data, and one or more intrusion devices capable of detecting any intrusion onto the premises, such as glass breakage sensors, motion detectors, contact switches, proximity or alignment sensors. One skilled in the art will appreciate that such system components are placed and installed about the premises to provide optimum surveillance and security capabilities while being inconspicuous or resistant to disablement. EX-1007, 3:56-4:8; EX-1017, ¶50.

The security components communicate with an on-premises master terminal box, and the master terminal box communicates wirelessly with a remote command unit. The master terminal box is capable of two-way wireless audio and video communication with the command unit. The remote command unit includes an LCD screen, speaker, video camera, and microphone to allow two-way wireless audio and video communication between the user of the remote command unit and the security components connected to the master terminal box. EX-1007, 4:9-5:2; EX-1017, ¶51.

Another prior art security system provided real-time monitoring with remote access through use of broadband features, including audio and video capabilities, web access and wireless capabilities. EX-1008, ¶30. The security system includes various types of sensors to detect alarm conditions including magnetic contact switches, audio sensors, infrared sensors, motion detectors, fire alarms, and carbon

monoxide sensors. EX-1008, ¶36. In addition, the security system includes one or more video cameras that are operable to capture video of the monitored premises. EX-1008, ¶37; EX-1017, ¶52.

The video cameras can include “smart” cameras to perform video capture, compression and storage and to communicate with the security system using a wireless network. EX-1008, ¶84. The smart camera may perform many functions including but not limited to analyzing data from the video camera to determine whether an alarm condition exists, accessing data stored in memory; generating alarm video to transmit to the security system in response to detection of an alarm condition; and communicating with the security system and a remote user. The video camera may capture and record video continuously in memory, and then based on predefined criteria, older video may be discarded. The remote user may adjust the predetermined criteria including adjusting the recording times, duration, and total length of recordings. EX-1008, ¶81; EX-1017, ¶53.

In one prior art example, the video sent to the security system begins at least just prior to the occurrence of the alarm condition and may end after the conclusion of the alarm condition, which helps identify false alarms. EX-1008, ¶38. The remote user has the ability to control the functionality of the security system. Once authenticated, the remote user can control the functionality of the system including arming or disarming the security system; adjusting sensitivities of the sensors;

adjusting alarm condition detection sensitivity; remote surveillance; adjusting camera settings; and reviewing alarms and recordings. These functions may also include remote surveillance, referred to as “lifestyle video.” EX-1008, ¶43. The smart camera is capable of streaming live audio and video from the residence during alarm conditions, as well as for lifestyle viewing over the world wide web. EX-1008, ¶82; EX-1017, ¶54.

V. IDENTIFICATION OF HOW CLAIMS ARE UNPATENTABLE

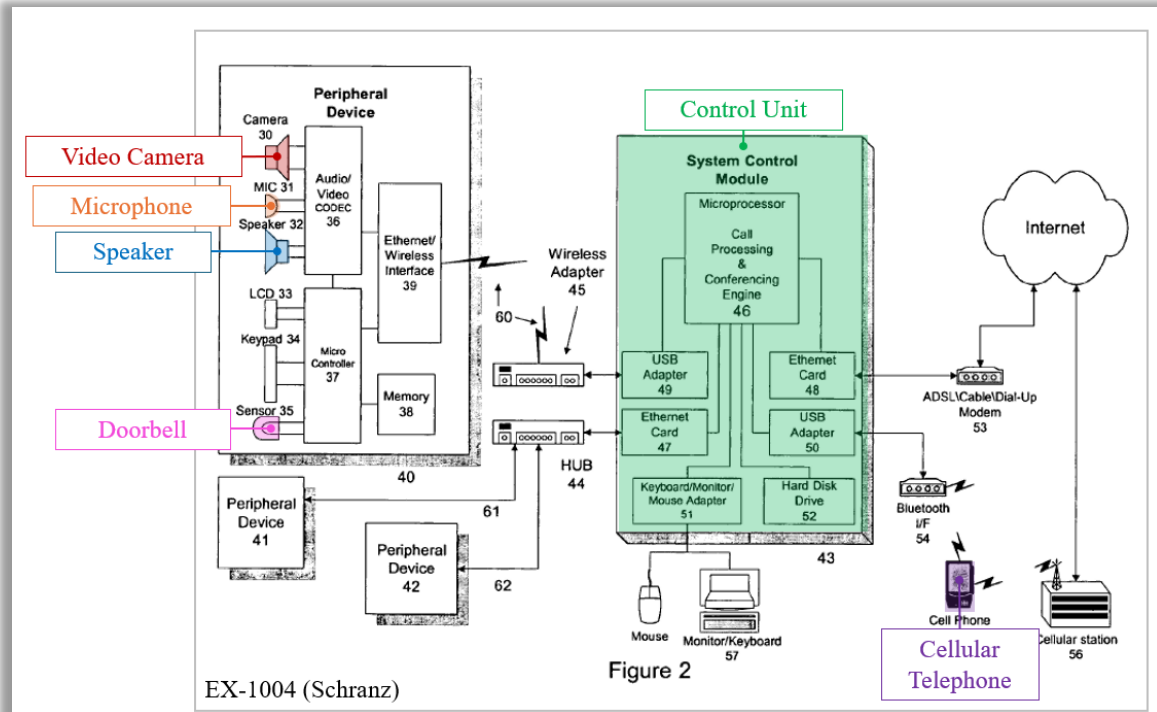
A. Ground 1: Claims 5, 7 and 15-18 are Obvious over Schranz

1. The Schranz Reference

Schranz published as U.S. Patent Publication 2004/0086093 (EX-1004) titled “VOIP Security Monitoring & Alarm System” on May 6, 2004, from Application No. 10/694,678 filed on October 29, 2003, and claims priority to Provisional Application No. 60/421,849 filed on October 29, 2002. Schranz qualifies as prior art under §102(b). It was not cited nor applied by the examiner during prosecution of the Challenged Claims.

Schranz is directed to a residential, commercial or industrial security monitoring and alarm system. It includes a plurality of peripheral devices in communication with a system control module (SCM). The peripheral devices 40, 41, and 42, shown below in Figure 2, are situated throughout the user premises at strategic exterior or interior locations, such as doors, windows, hallways or rooms. EX-1004, ¶¶47-48. These devices detect an event, called the detected agent, and

signal detection to the system control module (SCM) 43 via a wireline or wireless physical interface 60, 61 and 62, respectively. EX-1004, ¶¶47-48; EX-1017, ¶60.



EX-1004 Fig. 2; EX-1017, ¶60.

An Internet interface connects the SCM 43 to the Internet. Once notified of an alarm, the SCM 43 begins the process of establishing a VoIP call, defined as “Voice/Video over Internet Protocol” in Schranz (EX-1004, Abstract), with a remote user using VoIP call signaling protocols such as SIP or H.323. The remote user can be in the IP network, the PSTN or a cellular network. EX-1004, ¶47; EX-1017, ¶61.

The peripheral devices include a camera 30 (red), microphone 31 (orange), speaker 32 (blue), and sensor 35 which may be different types including a doorbell

signal (pink). The peripheral devices will be located in various strategic locations including an intercom located in hallways and rooms, a doorbell-intercom located at the main entrance to the premises, and an environmentally hardened security surveillance unit located exterior to the building. EX-1004, ¶¶47-48; EX-1017, ¶62.

Upon detection of an event the system establishes a Voice/Video over Internet Protocol (VoIP) call to a remote user or monitoring service. Schranz discloses that using VoIP technology leverages several inherent advantages related to IP packet networks. A VoIP call is one that uses a VoIP call signaling protocol to set up a call and a VoIP transport protocol to deliver the payload (audio and video information). Examples of VoIP call signaling protocols include, but are not limited to, the Session Initiation Protocol (SIP) from the Internet Engineering Task Force (IETF) and H.323 from the International Telecommunications Union (ITU). An example of a VoIP transport protocol includes, but is not limited to, the Real-Time Transport Protocol (RTP) from the IETF. EX-1004, ¶1; EX-1017, ¶63.

Schranz explains that the peripheral devices, including the camera 30 (red) and microphone 31 (orange), are typically placed in “a doorbell-intercom located at the main entrance to the premises.” EX-1004, ¶48. In armed mode, the peripheral devices, including camera 30 and microphone 31, monitor the environment and notify the system control module (SCM) when someone is at the door or when motion takes place. EX-1004, ¶¶58-59, 61. The SCM then provides a notification

to the remote user. EX-1004, ¶¶61, 64. The SCM routes the audio and video data from the peripheral device to the remote agent. EX-1004 ¶¶24, 63-64; EX-1017, ¶64.

Schranz also discloses that a web server runs on the SCM and contains a user web application. The user can access this website remotely and securely through monitor/keyboard 57 using any Internet browser that supports the https protocol. The website is a graphical monitor and control program. The user can visually see the current configuration and the status of all peripheral devices. Moreover, the user can change the configuration and initiate a VoIP call to any one of the peripheral devices and can control all aspects of the system. EX-1004, ¶50; EX-1017, ¶65.

2. Detailed Application of Schranz to the Challenged Claims

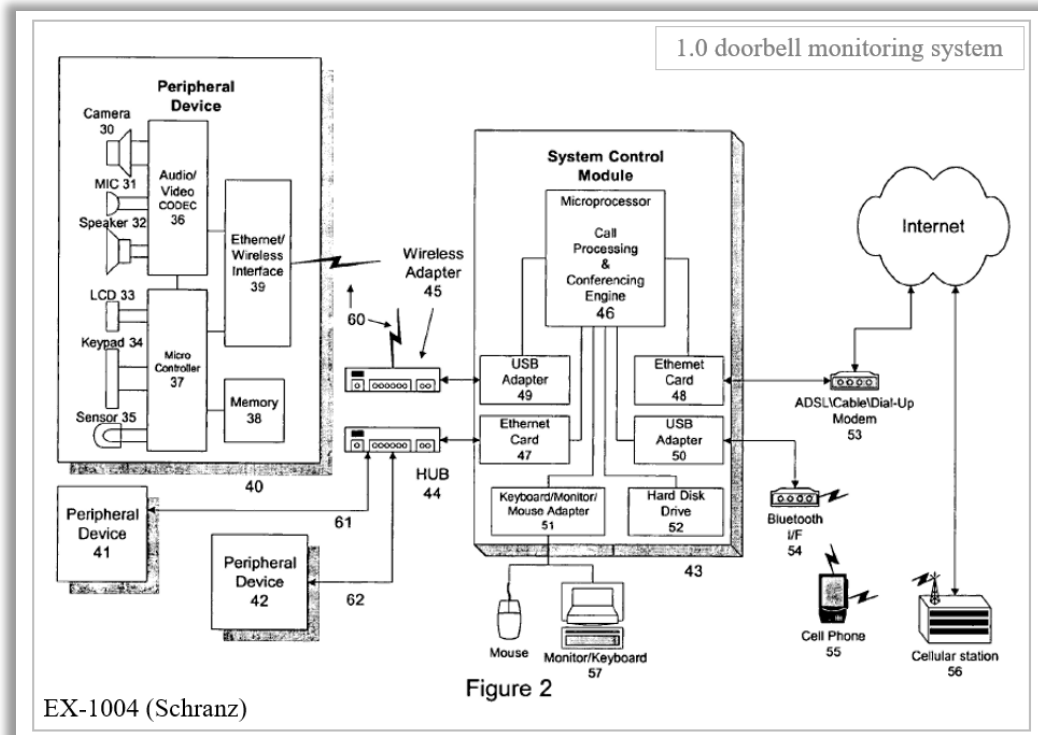
Because the Challenged Claims are directed to dependent claims only, the analysis below includes the independent base claims as those limitations are part of the dependent claims.

Claim 1

[1.0] A doorbell monitoring system comprising:

To the extent the preamble is limiting, Schranz discloses a VoIP security monitoring and alarm system in the form of a doorbell-intercom. EX-1004, Title, ¶48. The VoIP security monitoring and alarm system utilizes peripheral devices, including cameras, microphones, motion detectors, and doorbell signals, to detect an

event and notify a remote user. EX-1004 Abstract, ¶48, *See also* ¶53 (“Peripheral devices with varying functionality can be chosen and installed simultaneously, such as intercoms, doorbell-intercoms or surveillance units.”). The VoIP security monitoring and alarm system can be located in hallways or “at the main entrance to the premises.” EX-1004 ¶48. Therefore, Schranz discloses a *doorbell monitoring system* as shown below. EX-1004, ¶48; EX-1017, ¶66.



EX-1004, Figure 2 (annotated); EX-1017, ¶66.

[1.1] a doorway having an environment;

Schranz discloses this limitation. Schranz’s VoIP security monitoring and alarm system can be “situated throughout the user premises at strategic exterior or interior locations, such as doors, windows, hallways or rooms.” EX-1004, ¶47. The

VoIP security system utilizes a number of peripheral devices such as “intercoms, doorbell-intercoms or surveillance units” that are mounted at strategic exterior locations to monitor “entrances to the building such as doors and windows.” EX-1004, ¶53. Further, Schranz discloses a system control module connected to the peripheral devices that can be “located anywhere in the home.” EX-1004, ¶53. A POSITA understood that Schranz discloses that a doorway located at an entrance to a building is the recited *doorway having an environment*. EX-1017, ¶67.

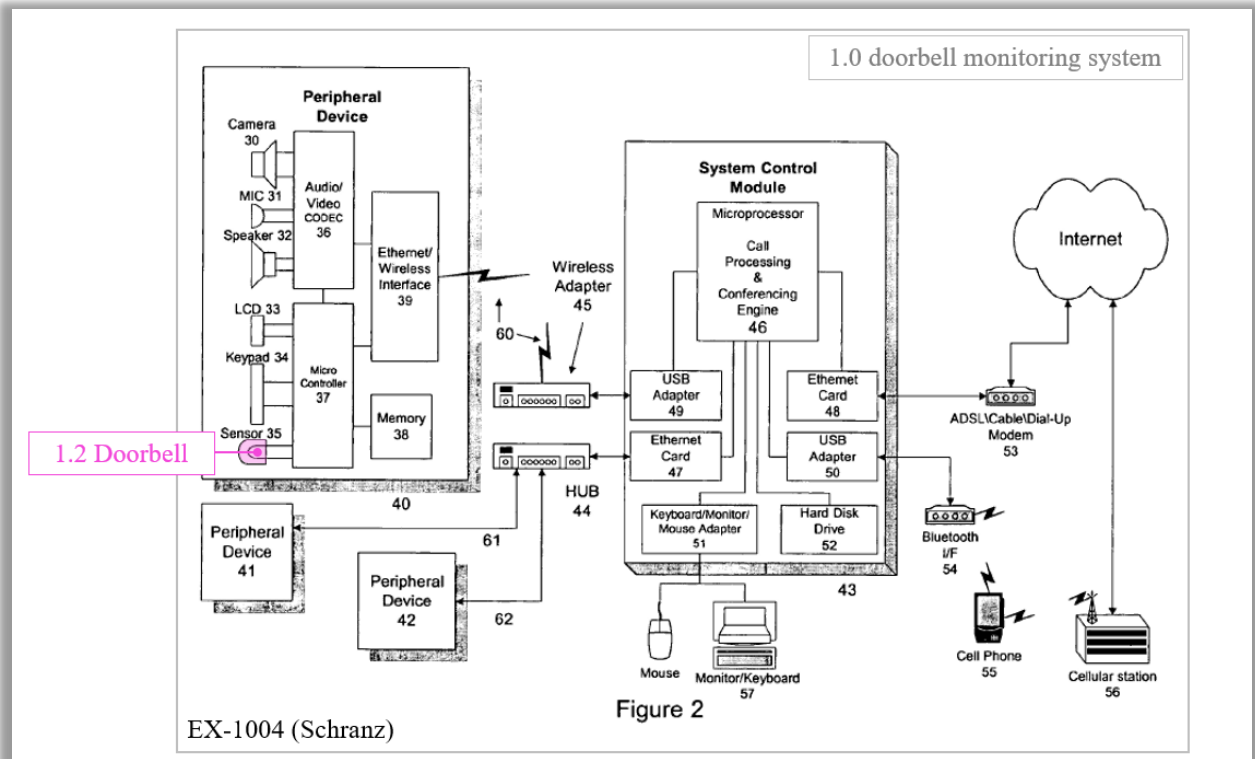
[1.2] a doorbell located in the doorway, the ringing of the doorbell being a triggering event;

Schranz discloses this limitation. Schranz’s VoIP security monitoring and alarm system utilizes a number of peripheral devices such as “intercoms, doorbell-intercoms or surveillance units.” EX-1004, ¶53. In particular and as shown below, one such device, peripheral device 40, includes sensor 35 (pink) which can be “a motion detector, infrared radiation sensor or ***doorbell signal***.” EX-1004, ¶48 (emphasis added). Schranz further discloses that the its peripheral devices, one of which is a doorbell, are mounted at strategic exterior locations to monitor “entrances to the building such as doors and windows” [*a doorbell located in the doorway*]. EX-1004, ¶53; EX-1017, ¶68.

Schranz explains that the doorbell signal functions in two modes: normal mode and armed mode. EX-1004, ¶58. In normal mode, the doorbell, sensor 35, can simply be used to detect an event and notify that someone is at the door. In this

mode, the peripheral devices function as intercoms and doorbells. They can be used to page people in the house, place outgoing or answer incoming VoIP calls and notify that someone is at the door. They still notify the SCM when an event like motion, infrared radiation or vibration detection takes place. EX-1004, ¶59; EX-1017, ¶69.

In alarm mode, the doorbell, sensor 35, “functions as normal, but in addition to notifying people locally with a chime when pressed, it also places a call to a pre-configured VoIP address.” EX-1004, ¶60. In other words, the only difference between the normal and armed modes of Schranz’s system is that “[i]n Alarm Mode the SCM will generate an outbound call when a peripheral device notifies it of an event.” EX-1004, ¶61. Schranz discloses that the peripheral devices detect an event, called the detected agent, and signals the system control module (SCM) [*ringing of the doorbell being a triggering event*]. EX-1004 ¶47. Therefore, a POSITA understood that Schranz discloses that ringing of a doorbell is an event that causes the triggering of actions [*a doorbell located in the doorway, the ringing of the doorbell being a triggering event*]. EX-1017, ¶70.



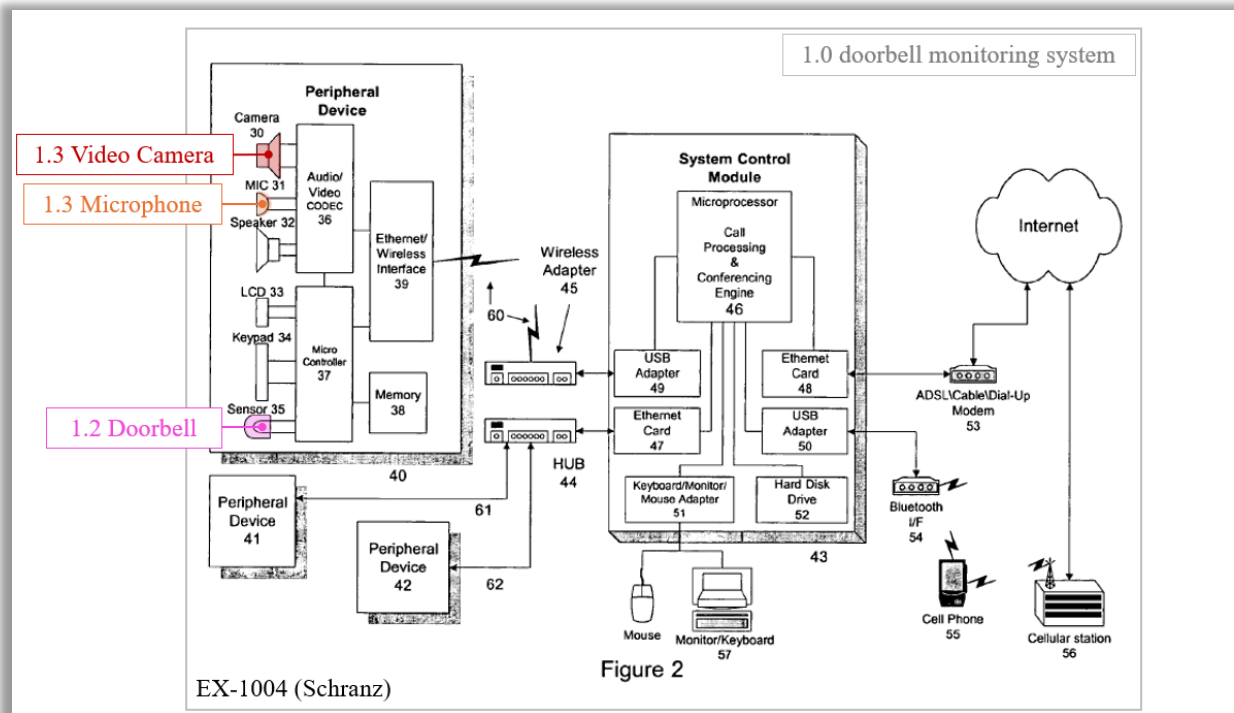
EX-1004, Figure 2 (annotated) ; EX-1017, ¶70.

[1.3] a video camera and an external microphone disposed in the entry point, the video camera and external microphone, responsive to the triggering event, for capturing entry point visual and audio communications at the entry point and transmitting the captured entry point visual and audio communications;

Schrantz discloses this limitation. Schrantz discloses a VoIP security monitoring and alarm system with peripheral devices (*i.e.*, camera 30, microphone 31, speaker 32) situated at doors, windows, hallways or rooms [*a video camera and an external microphone disposed in the entry point*]. EX-1004, ¶47. The peripheral devices, including the doorbell, “detect an event” and notify the system control module. EX-1004, Abstract. The system control module then establishes a VoIP

call with a remote user so that the remote user “will hear ambient audio and see video images from the peripheral device in the location of the alarm” [*for capturing visual and audio communications at the entry point and transmitting the captured visual and audio communications*]. EX-1004, Abstract, Claim 1; EX-1017, ¶71.

Specifically with respect to Figure 2 below, Schranz discloses a VoIP security monitoring and alarm system utilizing peripheral device 40 which includes “**camera 30, microphone 31**, speaker 32, LCD 33, keypad 34, sensor 35, audio/video CODEC 36.” EX-1004, ¶48 (emphasis added). Schranz states that camera 30 (red) [*video camera*] may be a CCTV board camera that supports both video and audio through CODEC 36. Schranz explains that CODEC 36 “digitizes the analog video signal into a standard digital format.” EX-1004, ¶48; EX-1017, ¶72.



EX-1004, Figure 2 (annotated); EX-1017, ¶72.

Schrantz further explains that the peripheral devices, including the camera 30 (red) [video camera] and microphone 31 (orange) [external microphone], are typically placed in “a doorbell-intercom located at the main entrance to the premises” [disposed in the entry point]. EX-1004, ¶48. Further Schrantz states that, in armed mode, the peripheral devices, including the doorbell monitor the environment, and when someone rings the doorbell, in addition to notifying people locally with a chime when pressed, it also places a call to a pre-configured VoIP address via the SCM [responsive to the triggering event]. EX-1004, ¶¶60-61. The SCM then provides a notification to the remote user. EX-1004, ¶¶64, 61. The SCM

routes the audio and video data captured from the peripheral device to the remote agent. EX-1004 ¶¶24, 63-64. In other words, the microphone and camera of the peripheral device at the entry point send audio and video data to the SCM which routes the audio and video data to a remote user when a person rings the doorbell [*capturing visual and audio communications at the entry point and transmitting the captured visual and audio communications*]. EX-1017, ¶73.

To the extent that Patent Owner asserts that Schranz does not expressly disclose capturing of the video and audio data responsive to the ringing of the doorbell, a POSITA would be motivated to modify the teachings of Schranz to capture video and audio data responsive to the ringing of the doorbell and would have a reasonable expectation of success in doing so. As discussed in the State of the Art section, it was well-known and common at the time of the alleged invention to allow a user to adjust the system parameters, including sensor sensitivities, camera settings, and remote surveillance settings. EX-1008, ¶43. The purpose of this well-known configurability was to allow the user to adjust the amount of time to capture the video and audio data from before, during, and after triggering events (pushing of the doorbell button). EX-1017, ¶74.

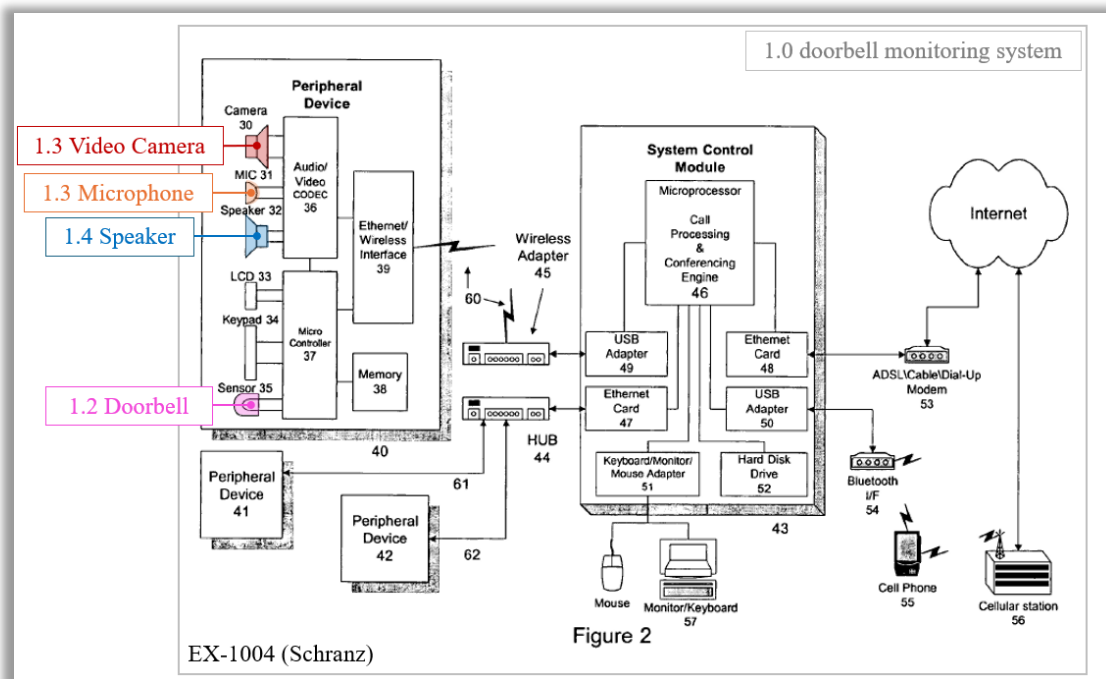
Schranz itself contemplates this type of user-driven configurability, and specifically discloses that the user sets up system control parameters. EX-1004, ¶¶56, 57. Accordingly, a POSITA would have found it obvious to capture video and

audio data responsive to the ringing of the doorbell, with the amount of time defined by the user's system control parameters. Such a modification would have amounted to nothing more than the application of a known technique—configurable capture timing—to improve a similar device in the same, predictable way. EX-1017, ¶75.

[1.4] an external speaker disposed in the entry point, the external speaker for rendering received cellular audio communications;

Schranz discloses this limitation. Specifically with respect to Figure 2 as shown below, Schranz's VoIP security monitoring and alarm system utilizes a peripheral device 40 which includes "a camera 30, microphone 31, ***speaker 32***, LCD 33, keypad 34, sensor 35, audio/video CODEC 36." EX-1004, ¶48 (emphasis added). The speaker 32 (blue) in conjunction with CODEC 36 and system control module 43 allows the remote user to play an announcement, prerecorded message, or to enable audio to be sent from the remote location to speaker 32. EX-1004, ¶¶33, 65. Schranz discloses numerous methods for the remote user to connect to the system control module, including through "the IP network 20, the PSTN 21 or a cellular network 22." EX-1004, ¶47. In the cellular network configuration, Schranz discloses that the remote user's cellphone 55 communicates with a cellular station 56 and modem 53 to handle "two way audio communication" through the VoIP call processing engine on the system control module 43. EX-1004, ¶49-50. The system control module 43 then sends and receives packets to CODEC 36 which allows an "audio path...in either direction separately." EX-1004, ¶48. Specifically, in one

direction, CODEC 36 decodes PCM samples from the system control module 43 into an analog audio signal to be played by speaker 32. EX-1004, ¶48. In other words, Schranz discloses that the remote user can enable audio to be sent from his location through cellular network 22 to the system control module 43 such that it is rendered at speaker 32 [*for rendering received cellular audio communications*]. EX-1004, ¶¶49, 65. Moreover, as explained above, Schranz's peripheral devices, including speaker 32 (blue below), are typically placed in a "a doorbell-intercom located at the main entrance to the premises" [*disposed in the entry point*]. EX-1004, ¶48; EX-1017, ¶76.

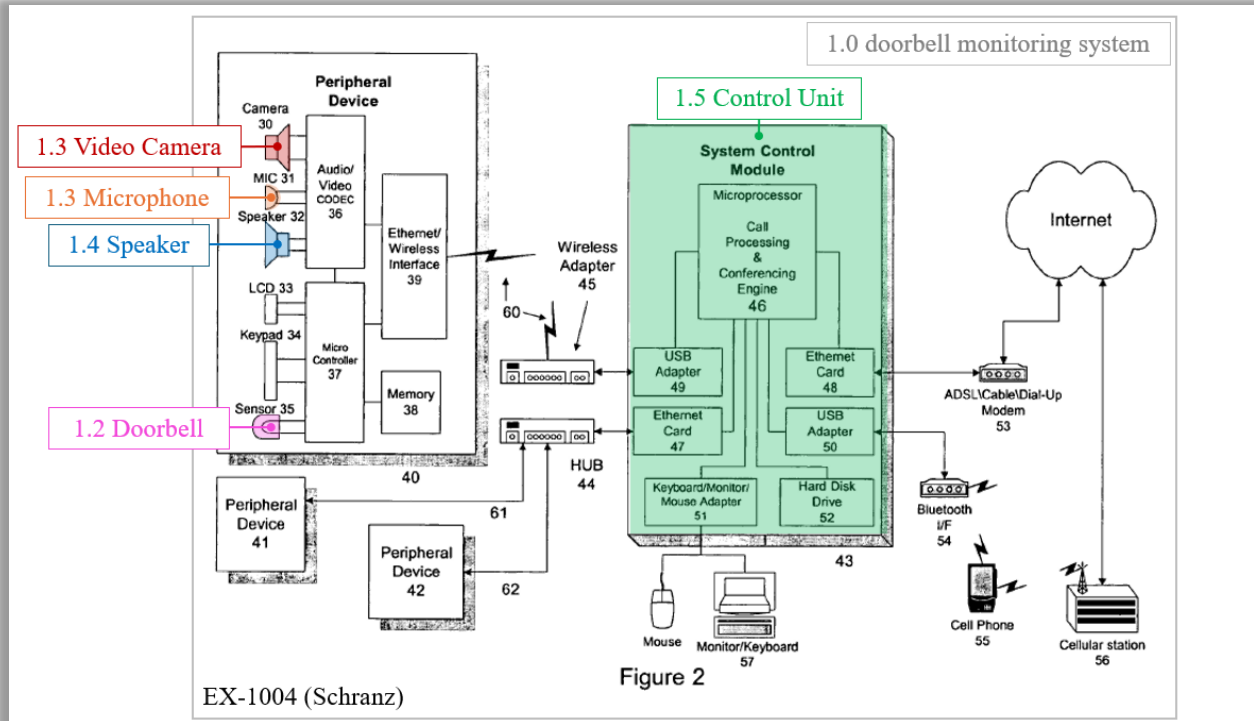


EX-1004, Figure 2 (annotated); EX-1017, ¶76.

[1.5] a control unit disposed in communication with the video camera, the doorbell, and the external microphone, the control

unit for communicating at least one portion of the entry point visual and audio communications received from the video camera and external microphone, and for communicating the received cellular audio communications to the external speaker; and

Schranz discloses this limitation. As shown below in Figure 2, Schranz discloses a system control module 43 (green) [*control unit*] in communication with a set of peripheral devices, including camera 30 (red) [*video camera*], microphone 31 (orange) [*external microphone*], and speaker 32 (blue) [*external speaker*], via either ethernet or wireless connections, and in communication with a remote user with cell phone 55. EX-1004, ¶¶48, 49. Schranz explains that the system control module [*control unit*] is “any hardware platform that runs the Windows 98, 2000, ME, XP or Linux operating system.” EX-1004., ¶49; EX-1017, ¶77.



EX-1004, Figure 2 (Annotated) ; EX-1017, ¶77.

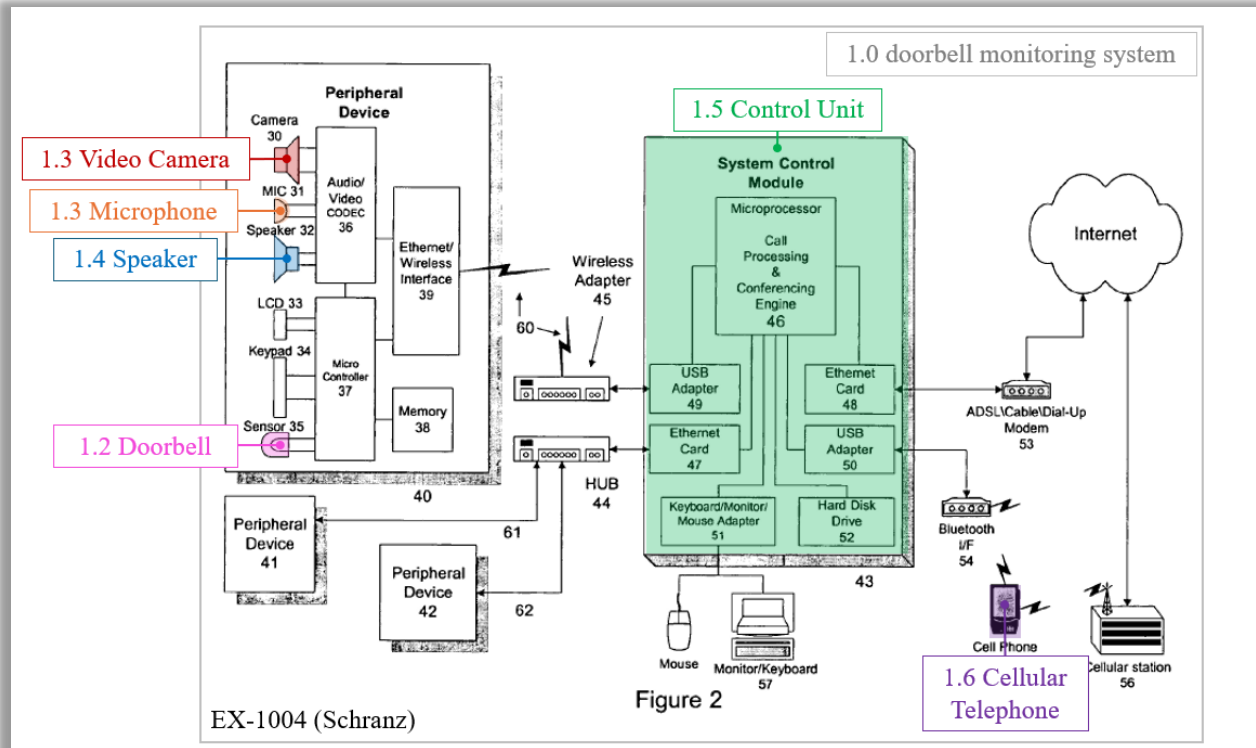
Further, Schranz explains that CODEC 36 “digitizes the analog video signal” from camera 30 and “codes the analog audio signal” from microphone 31 to provide the data to the system control module via wireless or wired channel. EX-1004, ¶48. Upon event detection (*i.e.*, the ringing of the doorbell), the system control module then establishes a VoIP communication call to transmit voice and video information from the peripheral devices (*i.e.*, camera 30 and microphone 31) to the system control module and from the system control module to the remote user. EX-1004, Claim 1. Accordingly, Schranz system control module 43 is *for communicating at least one portion of the visual and audio communications received from the video camera and the external microphone*. EX-1017, ¶78.

Finally, Schranz discloses that the remote user using cell phone 55 can enable audio to be sent from their location and device to the peripheral devices (*i.e.*, speaker 32). EX-1004, ¶¶49, 65 (“The remote user can enable audio to be sent from his location to the peripheral device currently sourcing the ambient audio.”). In this case, the system control module establishes an audio call with the cell phone 55 at the remote user and provides the data to CODEC 36 which “decodes PCM samples into an analog audio signal to the speaker.” EX-1004, ¶¶48, 63. Accordingly, Schranz system control module 43 is *for communicating the received cellular audio communications to the external speaker*. EX-1017, ¶79.

[1.6] a cellular telephone disposed remotely to the doorway and the control unit, the cellular telephone for capturing cellular audio communications at the cellular telephone, transmitting the cellular audio communications to the control unit, and rendering the at least one portion of entry point communications received from the control unit.

Schranz discloses this limitation. Schranz’s VoIP security monitoring and alarm system provides notification of an alarm event to a remote user via the remote user’s “***cell phone*** 150, a laptop computer 155, a VoIP phone 160...” in the IP network, the PSTN or a cellular network 22. EX-1004, ¶¶47, 62, FIG. 4, FIG 6. In reference to Figure 2, Schranz explains that the SCM is connected to the internet via Ethernet Card 48 and ADSL or cable modem 54. Further, Schranz explains that “the cellphone 55 communicates with a cellular station 56” to connect to the internet.

EX-1004, ¶49. A POSITA understood that the remote user's cell phone is disposed remotely to the doorway and control unit as shown below in Figure 2. EX-1017, ¶¶80-81.



EX-1004, Figure 2 (annotated) ; EX-1017, ¶81.

Upon an alarm event, Schranz's system control module establishes a VoIP communication call to transmit voice and video information from the peripheral devices (*i.e.*, camera 30 and microphone 31) to the system control module (*control unit*) and from the system control module to the remote user. EX-1004 ¶24, Claim 1. The system control module "knows beforehand which device to contact (work phone, *cell*, laptop) and what method of message to send (text, voice, *video*, email)." EX-1004, ¶63 (emphasis added). In other words, the system control module may

contact the remote user's cell phone with an audio or video message from the alarm event thereby *rendering the at least one portion of entry point visual and audio communications received from the control unit*. EX-1017, ¶82.

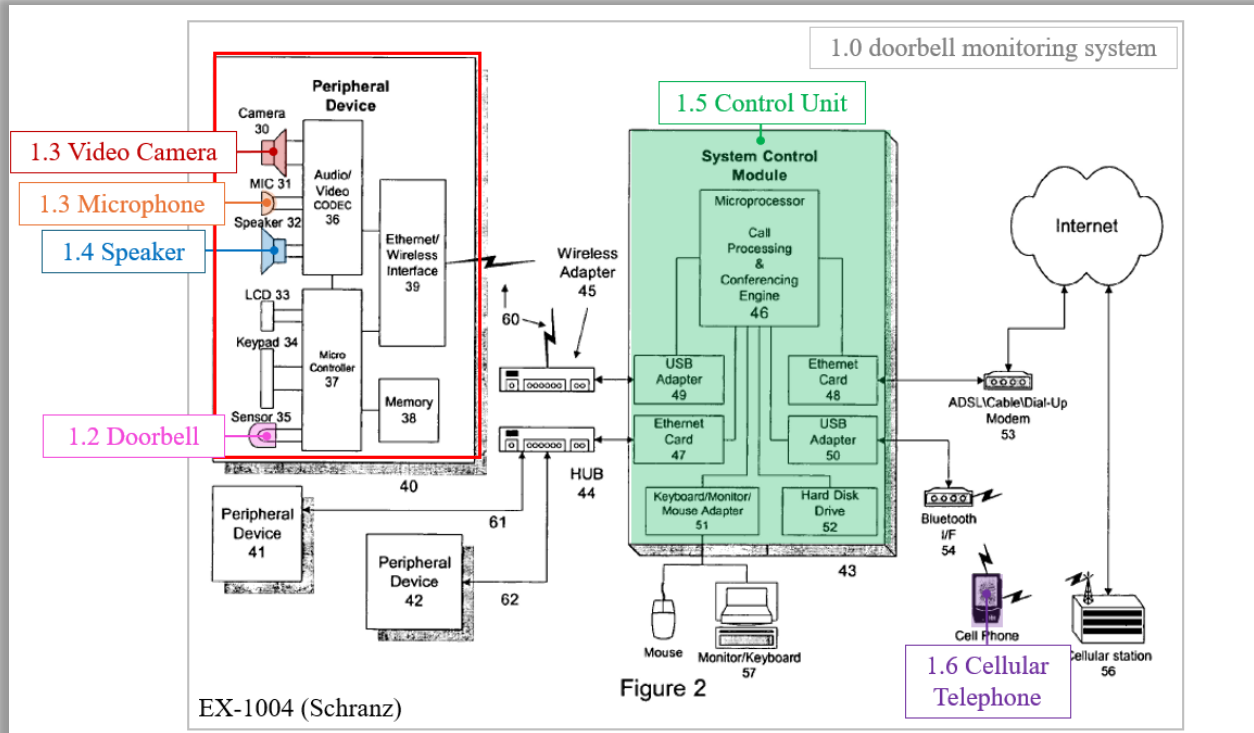
Once the audio call is established, the remote user can “enable audio to be sent from his location to the peripheral device currently sourcing the ambient audio” through the control module. EX-1004, ¶¶64-65. A POSITA understood that remote user's cellphone disclosed by Schranz is therefore *for capturing cellular audio communications at the cellular telephone, transmitting the cellular audio communications to the control unit*. EX-1017, ¶83.

Claim 5

[5] The system as recited in claim 1, wherein the at least one portion of the entry point visual and audio communications comprises data selected from the group consisting of audio data, at least one image and audio data, and streaming visual and audio data.

Schranz discloses several examples of this limitation.

First, as shown below in Figure 2, Schranz discloses a peripheral device 40 with a camera 30 (red) and microphone 31 (orange) connected to system control module 43 (green). EX-1004, ¶48; EX-1017, ¶85.



EX-1004, Figure 2 (annotated); EX-1017, ¶85.

Schranz explains that CODEC 36 “digitizes the analog video signal” [*image data*] from camera 30 and “codes the analog audio signal” [*audio data*] from microphone 31 to provide the data to the system control module via wireless or wired channel. EX-1004, ¶48. The system control module “routes the audio and/or video data from the peripheral device to the remote agent” [*wherein the at least one portion of the entry point visual and audio communications comprises audio data, at least one image and audio data*] EX-1004, ¶24. EX-1017, ¶86.

Second, Schranz discloses that upon event detection (*i.e.*, the ringing of the doorbell), the system control module then establishes a VoIP communication call to transmit voice and video information [*wherein the at least one portion of the entry*

point visual and audio communications comprises ...streaming visual and audio data] from the peripheral devices (*i.e.*, camera 30 and microphone 31) to the system control module and from the system control module to the remote user. EX-1004, Claim 1, ¶24; EX-1017, ¶87.

Claim 7

[7] The system as recited in claim 1, wherein the connection between the control unit and cellular telephone comprises a network connection over a cellular network.

Schranz discloses this limitation for the same reason as discussed with respect to limitation [1.6]. Specifically, Schranz discloses that once a peripheral device detects an event it notifies the SCM, which then initiates a VoIP call to a remote agent using a pre-programmed VoIP uniform resource locator (URL). This VoIP call can reach a user in the IP network using an IP enabled communication device such as a VoIP phone and by going through a gateway it can terminate on a cellular phone. The SCM then routes the audio and/or video data from the peripheral device to the remote agent [*wherein the connection between the control unit and cellular telephone comprises a network connection over a cellular network*]. EX-1004, ¶¶24, 47, 60, 62; EX-1017, ¶88.

Claim 14

[14.0] A doorbell monitoring system comprising:

Schranz discloses this limitation for the same reasons as discussed with respect to limitation [1.0]. EX-1017, ¶89.

[14.1] a doorbell located at an entry point;

Schranz discloses this limitation for the same reasons as discussed with respect to limitation [1.1]. EX-1017, ¶90.

[14.2] means, responsive to the ringing of the doorbell, for capturing visual and audio communications at the entry point;

The '191 Patent discloses that the *means responsive to the ringing of the doorbell, for capturing visual and audio communications at the entry point* is a video camera and external microphone. EX-1001 2:22-23, 3:9-17, 8:55-60, Figs. 1 and 2. Schranz discloses this limitation for the same reasons as discussed with respect to limitation [1.3]. EX-1017, ¶91.

[14.3] means for relaying at least a portion of the captured visual and audio communications to a cellular phone;

The '191 Patent discloses that the *means for relaying at least a portion of the captured visual and audio communications to a cellular phone* is a control unit. EX-1001 3:9-13. Schranz discloses this limitation for the same reasons as discussed with respect to limitations [1.5] and [1.6]. EX-1017, ¶92.

[14.4] means for rendering the least a portion of the captured visual and audio communications at the cellular phone;

The '191 Patent discloses that the *means for rendering the least a portion of the captured visual and audio communications at the cellular phone* is a display and

speaker on the cellular phone. EX-1001 Fig. 2. Schranz discloses this limitation for the same reasons as discussed with respect to limitation [1.6]. EX-1017, ¶93.

[14.5] means for capturing audio communications at the cellular phone;

The '191 Patent discloses that the *means for capturing audio communications at the cellular phone* is a microphone on the cellular phone. EX-1001 Fig. 2. Schranz discloses this limitation for the same reasons as discussed with respect to limitation [1.6]. EX-1017, ¶94.

[14.6] means for relaying the audio communications from the cellular phone to the entry point; and

The '191 Patent discloses that the *means for relaying the audio communications from the cellular phone to the entry point* is a control unit. EX-1001 Abstract, 2:45-47. Schranz discloses this limitation for the same reasons as discussed with respect to limitations [1.5] and [1.6]. EX-1017, ¶95.

[14.7] means for rendering the audio communications at the entry point.

The '191 Patent discloses that the *means for rendering the audio communications at the entry point* is an external speaker at the entry point. EX-1001 2:23-24, 8:61-63. Schranz discloses this limitation for the same reasons as discussed with respect to limitation [1.4]. EX-1017, ¶96.

Claim 15

[15] The system as recited in claim 14, wherein the means for relaying at least a portion of the captured visual and audio communications and means for relaying the audio communications for the cellular phone operate substantially simultaneously.

Schranz discloses this limitation. Schranz discloses that once peripheral device 41 detects an event, the device notifies the system control module 43 which initiates a VoIP notification to a remote agent. EX-1004, ¶¶24, 60, 62. The VoIP notification may be sent to the remote user's cell phone 150 [*cellular telephone*] and the remote user can then send "a text message commanding the SCM to make an ***audio and video call*** to the same device." EX-1004, ¶¶62, 63 (emphasis added). When the audio and video call is established, the remote user will hear the audio from microphone 31 and video from camera 30 at the location of the event. EX-1004, ¶¶64, ¶¶24, Abstract. Further, Schranz discloses a VoIP communication call such that "voice and/or video information is exchanged between the said peripheral device... and the remote person." EX-1004, Claim 1. A POSITA understood that a VoIP communication relays visual and audio communications substantially simultaneously. Thus, a POSITA understood that the control module [*the means for relaying at least a portion of the captured visual and audio communications and means for relaying the audio communications for the cellular phone*] operates *substantially simultaneously* when establishing a VoIP call between the peripheral device and the remote cellular telephone. EX-1017, ¶¶97-98.

Claim 16

[16] The system as recited in claim 14, wherein the means for relaying at least a portion of the captured visual and audio communications and the means for relaying the audio communications for the cellular phone operate to provide duplexed audio communication.

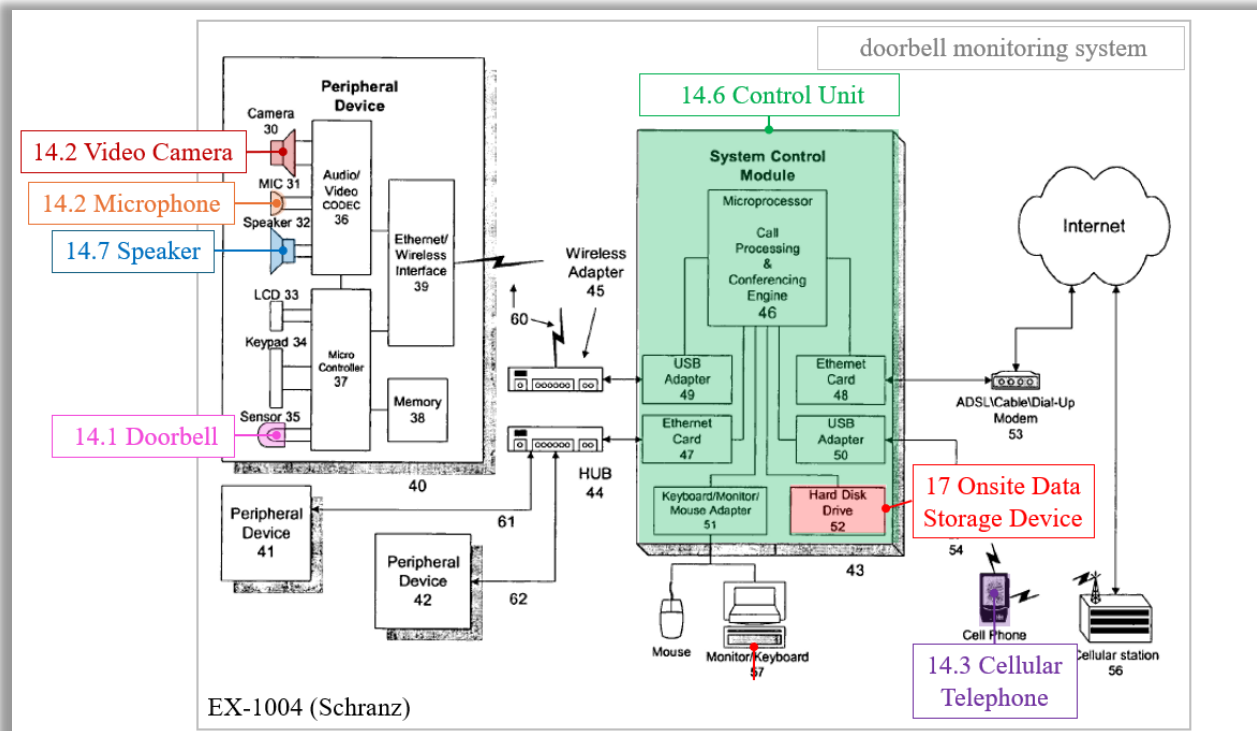
Schranz discloses this limitation for the same reasons as discussed with respect to limitation [1.6]. A POSITA understood that the control module [*the means for relaying at least a portion of the captured visual and audio communications and the means for relaying the audio communications for the cellular phone*] operates to provide duplexed audio communication when it establishes a VoIP call between the peripheral device and the remote cellular telephone. EX-1017, ¶99.

Claim 17

[17] The system as recited in claim 14, further comprising means for forwarding the captured visual and audio communications to means for data storage located onsite to the entry point.

The '191 Patent discloses that the *means for forwarding the captured visual and audio communications to means for data storage located onsite to the entry point* is a control unit that forwards the captured visual and audio communications to data storage unit. Ex-1001 6:20-24. Schranz system control module 43 is “any hardware platform that runs the Windows 98, 2000, ME, XP or Linux operating system.” EX-1004, ¶49. As shown below, the system control module 43 (green)

[means for forwarding the captured visual and audio communications] is connected to hard disk drive 52 (red) [means for data storage located onsite to the entry point] which is designed “to record audio and video data from the peripheral devices during an alarm situation using standard formats” [forwarding the captured visual and audio communications]. EX-1004, ¶¶24, 49. EX-1017, ¶100.



EX-1004, Figure 2 (annotated) ; EX-1017, ¶100.

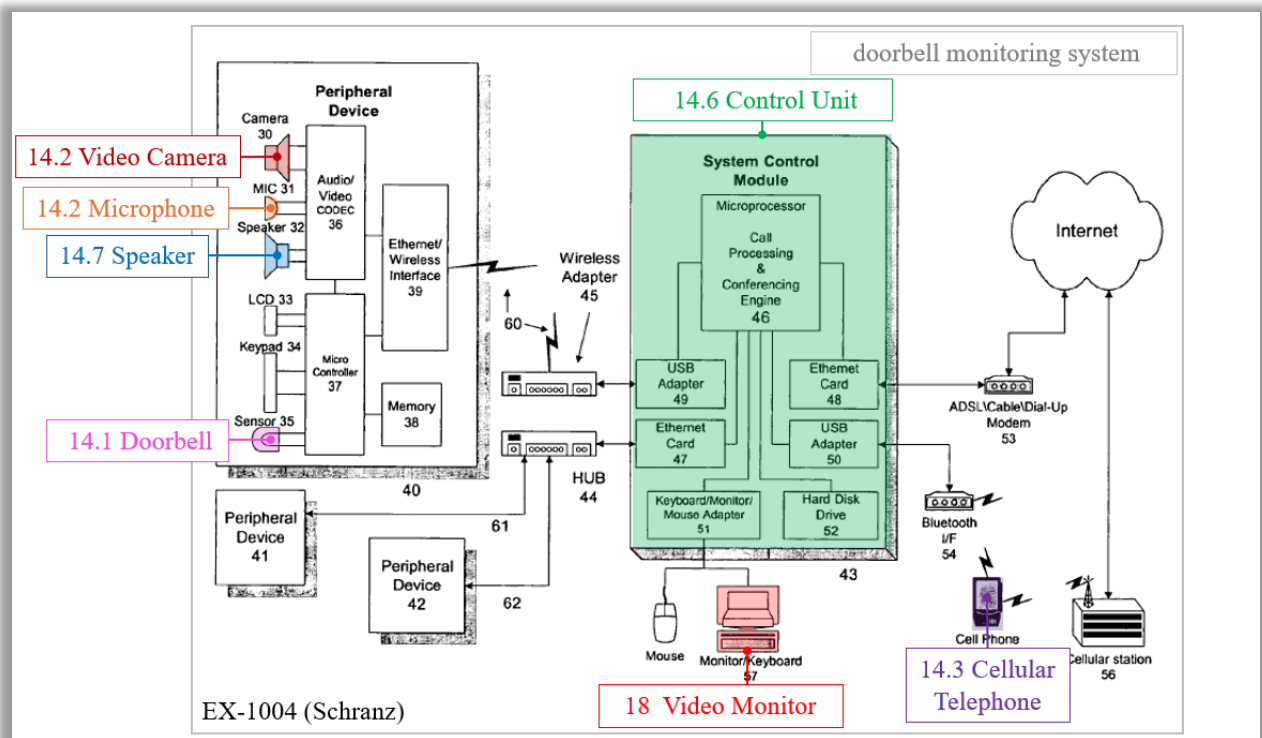
Claim 18

[18] The system as recited in claim 14, further comprising means for forwarding the captured visual and audio communications to a video monitor located onsite to the entry point.

The '191 Patent discloses that the *means for forwarding the captured visual and audio communications to a video monitor located onsite to the entry point* is a

control unit that forwards the captured visual and audio communications to a video monitor. EX-1001 5:14-19. Schranz's discloses a system control module 43 (green) that is "any hardware platform that runs the Windows 98, 2000, ME, XP or Linux operating system" and typically is an "off the shelf computer" that is located "on premises." EX-1004, ¶¶22, 49. As shown below, the system control module 43 or off the shelf computer includes a keyboard, mouse and monitor 57 (red) [*video monitor*] "to set up the configurable parameters of the system." EX-1004, ¶¶49, 56. Further, the system control module runs a web server and website where "[t]he user can visually see the current configuration and the status of all peripheral devices." EX-1004, ¶50. As shown below, the system control module 43 is in communication with a set of peripheral devices, including camera 30 (red) and microphone 31 (orange). EX-1004, ¶48. The system control module 43 [*means for forwarding the captured visual and audio communications*] receives audio and video communication from camera 30 and microphone 31 via CODEC 36 which "digitizes the analog video signal into a standard digital format, codes the analog audio signal from the microphone into PCM samples" [*the captured visual and audio communications*]. EX-1004, ¶48. Therefore, the user can see the audio and visual data from camera 30 and microphone 31 through the webserver and website on the system control module 43. EX-1017, ¶101.

Schranz further explains that the user can access the website to see the audio and video data from “any Internet browser that supports the https protocol.” EX-1004, ¶50. As discussed above, the system control module 43 is typically an off the shelf computer and therefore has an internet browser that supports the https protocol. EX-1004, ¶49. A user can thereby access the website to see the audio and video data on the system control module 43 itself through a keyboard, mouse and video monitor 57 on premises at the control unit [*a video monitor located onsite to the entry point*]. Therefore, Schranz discloses *means for forwarding the captured visual and audio communications to a video monitor located onsite to the entry point*. EX-1017, ¶102.



EX-1004, Figure 2 (annotated); EX-1017, ¶102.

VI. MANDATORY NOTICES UNDER 37 C.F.R. §42.8

A. Real Party-in-Interest Under 37 C.F.R. §42.8(b)(1)

Petitioner certifies that the real party-in-interest in this Petition is Vivint LLC.

B. Related Matters Under 37 C.F.R. § 42.8(b)(2)

1. Judicial Matters

To Petitioner's knowledge, the '191 Patent is involved in the following pending litigation:

Case Heading	Number	Tribunal	Date
<i>Duke W. Zinser v. Vivint, LLC and Vivint, Inc.</i>	4:25-cv-01030	EDTX	September 18, 2025

2. Administrative Matters

As of this Petition's filing and to the best knowledge of Petitioner, the '191 Patent has been subject to *inter partes* review no. IPR2026-00300. The '191 Patent was subject to Reexamination No. 90/019,542.

3. Related Patents

To the best knowledge of Petitioner, there are no patents related to the '191 Patent.

C. Lead and Back-Up Counsel Under 37 C.F.R. § 42.8(b)(3)

Lead Counsel	Back-Up Counsel
Patrick D. McPherson Reg. No. 46,255 PDMcpherson@duanemorris.com DUANE MORRIS LLP 901 New York Avenue NW Suite 700 East Washington, D.C. 20001 T: (202) 776-7800	Patrick C. Muldoon Reg. No. 47,343 PCMuldoon@duanemorris.com DUANE MORRIS LLP 901 New York Avenue NW Suite 700 East Washington, D.C. 20001 T: (202) 776-7800 Gilbert A. Greene, Reg. No. 48,366 BGreene@duanemorris.com DUANE MORRIS LLP Terrace 7, 2801 Via Fortuna, Suite 200 Austin, TX 78746 T: 512-277-2246 Joseph Powers Reg. No. 47,006 japowers@duanemorris.com DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103 T: 215-979-1000

D. Service Information 37 C.F.R. §42.8(b)(4)

Please direct all correspondence to lead and back-up counsel at the above addresses. Petitioner consents to electronic service at the email addresses above as well as to our docketing department at the following address:
DC_IPDocketing@duanemorris.com.

E. Payment of Fees – 37 C.F.R. §42.103

The required fee is being paid using the Patent Review Processing System.

VII. CONCLUSION

Petitioner requests the Board institute an IPR and cancel the Challenged Claims.

Respectfully submitted,

DUANE MORRIS LLP

Dated: June 1, 2026

/ Patrick D. McPherson /
Patrick D. McPherson
USPTO Reg. No. 46,255
DUANE MORRIS LLP
901 New York Avenue NW
Suite 700 East
Washington, D.C. 20001

LEAD COUNSEL FOR PETITIONER

CERTIFICATE OF COMPLIANCE WITH WORD COUNT

Pursuant to 37 C.F.R. §42.24 *et seq.*, the undersigned certifies that this document complies with the type-volume limitations. This document contains 8,853 words as calculated by the “Word Count” feature of Microsoft Word 365, the word processing program used to create it.

Pursuant to 37 C.F.R. §42.24(d), this word count excludes the table of contents, table of authorities, mandatory notices under §42.8, certificate of service, and certificate of word count.

Dated: June 1, 2026

/ Patrick D. McPherson /

Patrick D. McPherson

Reg. No. 46,255

Lead Counsel for Petitioner

CERTIFICATION OF SERVICE ON PATENT OWNER

Pursuant to 37 C.F.R. §§42.6(e), 42.8(b)(4) and 42.105, the undersigned certifies that on June 1, 2026, a complete and entire copy of this Petition for *Inter Partes* Review of U.S. Patent 7,583,191 and all supporting exhibits were served via Federal Express, postage prepaid, to the correspondence address of record for the '191 Patent:

Date of service June 1, 2026

Manner of service FEDERAL EXPRESS

Documents served Petition for *Inter Partes* Review Under 35 U.S.C. § 312 and 37 C.F.R. § 42.104 of U.S. 7,583,191; Petitioner's Exhibit List; All Exhibits; Petitioner's Power of Attorney.

Persons served Kirby Drake Law PLLC
2550 Pacific Avenue
Suite 700
Dallas, TX 75226
UNITED STATES

Courtesy copies of the Petition and supporting exhibits were sent by email to the litigation Counsel below:

Gary R. Sorden
gsorden@coleschotz.com
Aaron Davidson
adavidson@coleschotz.com
Brian A. Carpenter
bcarpenter@coleschotz.com
Timothy J.H. Craddock
tcraddock@coleschotz.com
Brian L. King
bking@coleschotz.com
Jeffrey M. Saltman
jsaltman@coleschotz.com

Petition for *Inter Partes* Review of U. S. Patent No. 7,583,191

/ Patrick D. McPherson /

Patrick D. McPherson

Reg. No. 46,255

Lead Counsel for Petitioner