

U.S. Patent No. 10,200,660 (“’660 Patent”)**U.S. Patent No. 7,583,191 (“Zinser”)**

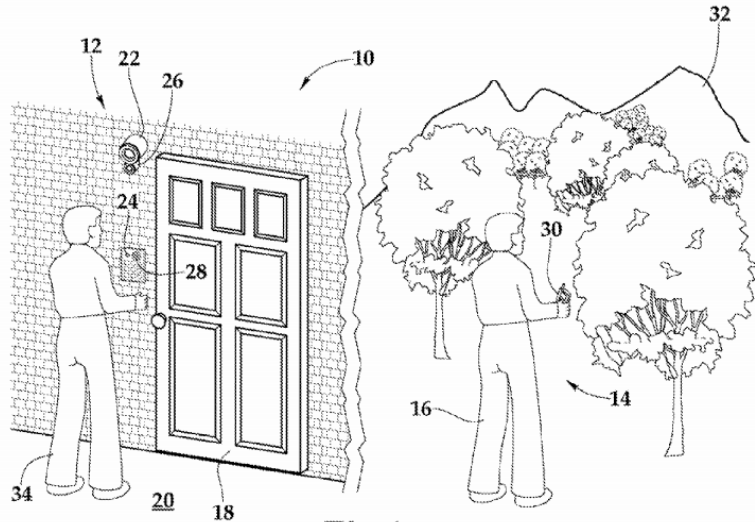
As demonstrated in the claim chart below, the asserted claims of U.S. Patent No. 10,200,660 (“’660 Patent”) are invalid (a) under one or more sections of 35 U.S.C. § 102 as anticipated by U.S. Patent No. 7,583,191 to Duke W. Zinser, entitled “Security system and method for use of same,” filed on November 14, 2006 (“Zinser”); and (b) under 35 U.S.C. § 103(a) as obvious in view of Zinser standing alone in view of the knowledge of a person of skill in the art and, additionally, combined with the knowledge of a person of ordinary skill in the art and one or more of the combinations below to render the claims at issue in the ’660 patent invalid.

- Zinser in view of Naifeh in view of Ramirez-Diaz
- Zinser in view of Naifeh in view of Naidoo
- Zinser in view of Naifeh in view of Milinusic in view of Ramirez-Diaz
- Zinser in view of Naifeh in view of Milinusic in view of Naidoo
- Zinser in view of Katz in view of Naifeh
- Zinser in view of Courtney in view of Naifeh
- Zinser in view of Ramirez-Diaz in view of Naifeh
- Zinser in view of Katz in view of Ramirez-Diaz in view of Naifeh
- Zinser in view of Courtney in view of Ramirez-Diaz in view of Naifeh
- Zinser in view of Ramirez-Diaz in view of Naifeh
- Zinser in view of Ramirez-Diaz in view of Naidoo

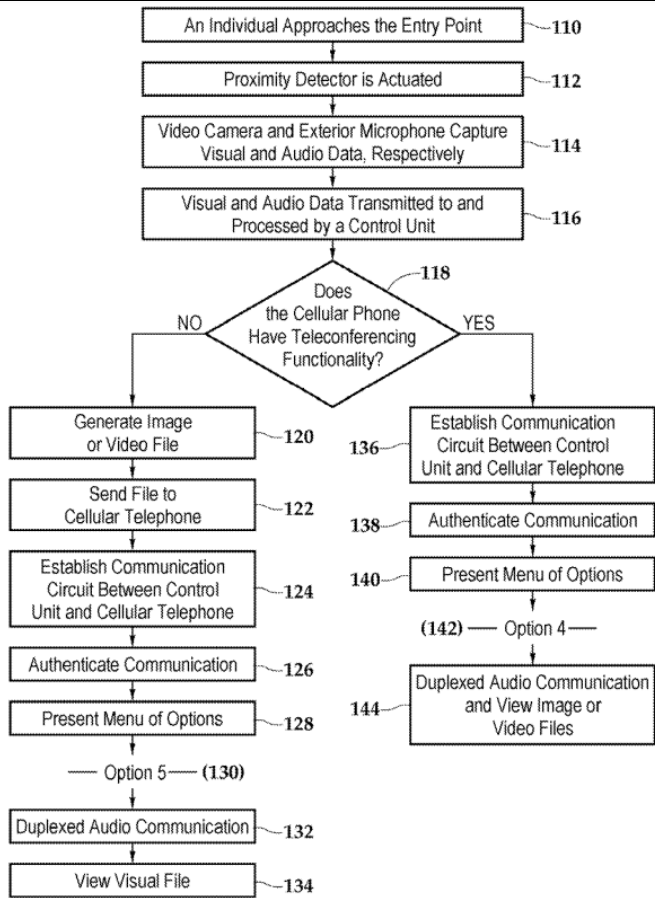
- Zinser in view of Ramirez-Diaz in view of Naifeh in view of Okayama
- Zinser in view of Ramirez-Diaz in view of Naidoo in view of Okayama
- Zinser in view of Ramirez-Diaz in view of Naifeh in view of Matsukawa in view of Okayama
- Zinser in view of Ramirez-Diaz in view of Naidoo in view of Matsukawa in view of Okayama
- Zinser in view of Courtney in view of Naifeh in view of Matsukawa in view of Okayama
- Zinser in view of Ramirez-Diaz in view of Naifeh in view of Matsukawa in view of Okayama
- Zinser in view of Katz in view of Ramirez-Diaz in view of Matsukawa in view of Okayama
- Zinser in view of Courtney in view of Naifeh in view of Milinusic in view of Naidoo in view of Katz in view of Ramirez-Diaz in view of Matsukawa in view of Okayama
- Zinser in view of Menard in view of Howarter in view of Von Bauer in view of Klein in view of Panasonic in view of Axis 2100
- Zinser in view of other references cited herein
- Prior art references as described in the cover pleading to these contentions

One of ordinary skill in the art, as of the priority date of the '660 patent, would have known to combine the prior art elements disclosed by the foregoing references using known methods, and to use these elements according to their established functions in order to achieve a known and predictable result.

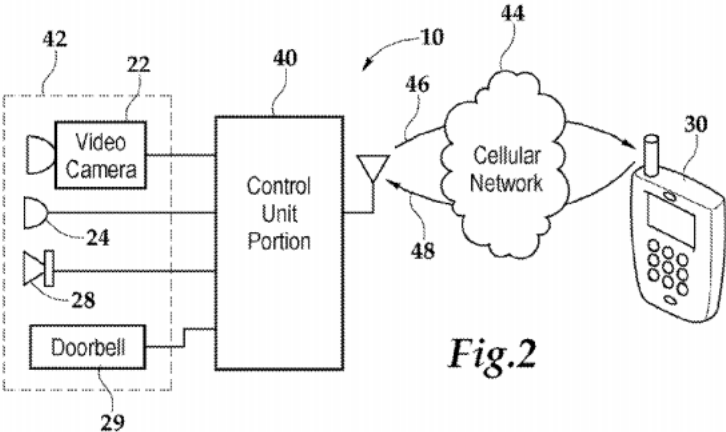
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
Claim 9	
[9.1] A detection and viewing system associated with an entrance comprising:	To the extent the preamble is limiting, Zinser, alone or in combination with ordinary skill in the art, or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions discloses a detection and viewing system associated with an entrance. For example, Zinser discloses:

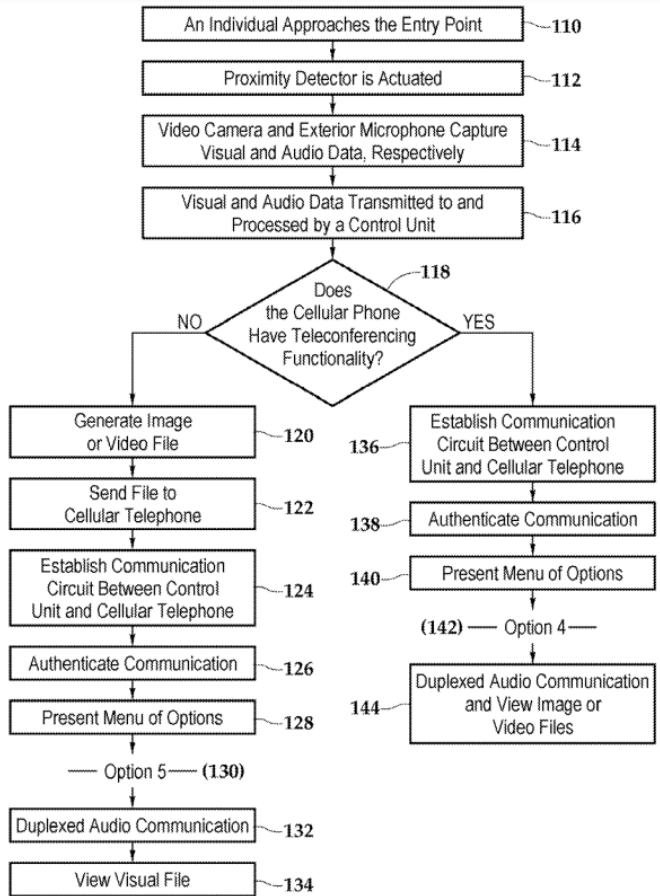
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	“A video camera 22 and an external microphone 24 are disposed in the doorway 18. A proximity detector 26 and an external speaker 28 are also disposed in the doorway 18. A cellular telephone 30 is disposed in the possession of the homeowner 16 who is away from the home in a park 32. It should be appreciated, however, that any homeowner location is within the teachings of the present invention. For example, the homeowner 16 may be in the backyard of the home or in a remote site such as an office. Moreover, the teachings presented herein apply to persons, such as family members, security personal, or friends, for example, other than the homeowner 16 that are monitoring or assisting with the monitoring of the home.” 2:22–34.  Fig.1 Fig. 1. “FIG. 1 is a perspective illustration of an entry point equipped with one embodiment of the security system described herein and a remote location wherein an individual is utilizing the security system to monitor the entry point” 1:54–57.

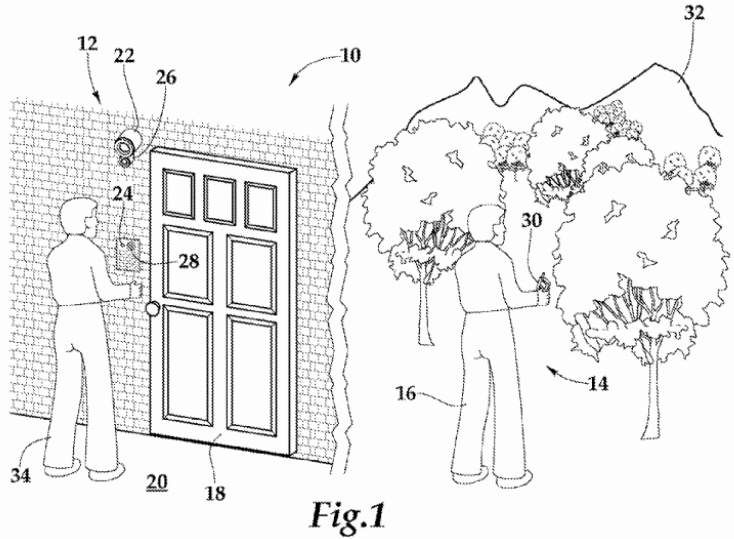
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	“Referring initially to FIG. 1, therein is depicted an illustration of one embodiment of the security system 10 described herein being utilized at an entry point 12. Further, a remote location 14 is depicted wherein an individual 16 is utilizing the security system 10 to monitor the entry point 12 which includes a doorway 18 to a home having an environment 20. It should be appreciated that the security system 10 described herein may be utilized with any type of structure and entry point 12. In particular, the security system 10 presented herein is well suited for doorways at houses, apartments, lofts, condominiums, and townhouses, for example.” 2:11–21. “In operation, an individual 34 approaches the doorway 18 and the proximity detector 26 is actuated. In turn, the video camera 22 and external microphone 24 capture visual and audio communications at the doorway 18. At least a portion of the data related to the captured doorway visual and audio communications is transmitted to the cellular telephone 30 of the homeowner 16 via a control unit that is in communication with the video camera 22, external microphone 24, proximity detector 26, and exterior speaker 28 as well as a cellular network for communicating with the cellular telephone 30.” 2:35–44. “Accordingly, the security system 10 and accompanying method presented herein permit the homeowner 16 or designated entity or individual, who may be onsite or at a remote location, to view and talk to a visitor (or perpetrator) in realtime or substantially realtime, without the homeowner's location being disclosed. The visitor (or perpetrator) can hear the homeowner's voice but cannot see the homeowner, since the video is communicated one-way from the doorway 18 to the cellular telephone 30 of the homeowner 16. In application, an honest visitor with good intentions will assume that the homeowner 16 is on premises. Similarly, a perpetrator will assume that the homeowner 16 is at home and the perpetrator can be expected to move on if his motives are unlawful.” 2:53–65.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	 <pre> graph TD 110[An Individual Approaches the Entry Point] --> 112[Proximity Detector is Actuated] 112 --> 114[Video Camera and Exterior Microphone Capture Visual and Audio Data, Respectively] 114 --> 116[Visual and Audio Data Transmitted to and Processed by a Control Unit] 116 --> 118{Does the Cellular Phone Have Teleconferencing Functionality?} 118 -- YES --> 136[Establish Communication Circuit Between Control Unit and Cellular Telephone] 136 --> 138[Authenticate Communication] 138 --> 140[Present Menu of Options] 140 -- "(142) — Option 4 —" --> 144[Duplexed Audio Communication and View Image or Video Files] 118 -- NO --> 120[Generate Image or Video File] 120 --> 122[Send File to Cellular Telephone] 122 --> 124[Establish Communication Circuit Between Control Unit and Cellular Telephone] 124 --> 126[Authenticate Communication] 126 --> 128[Present Menu of Options] 128 -- "— Option 5 — (130)" --> 132[Duplexed Audio Communication] 132 --> 134[View Visual File] </pre> Fig.5 Fig. 5. “FIG. 5 is a flow chart depicting another embodiment of a method for providing security.” 1:66–67.

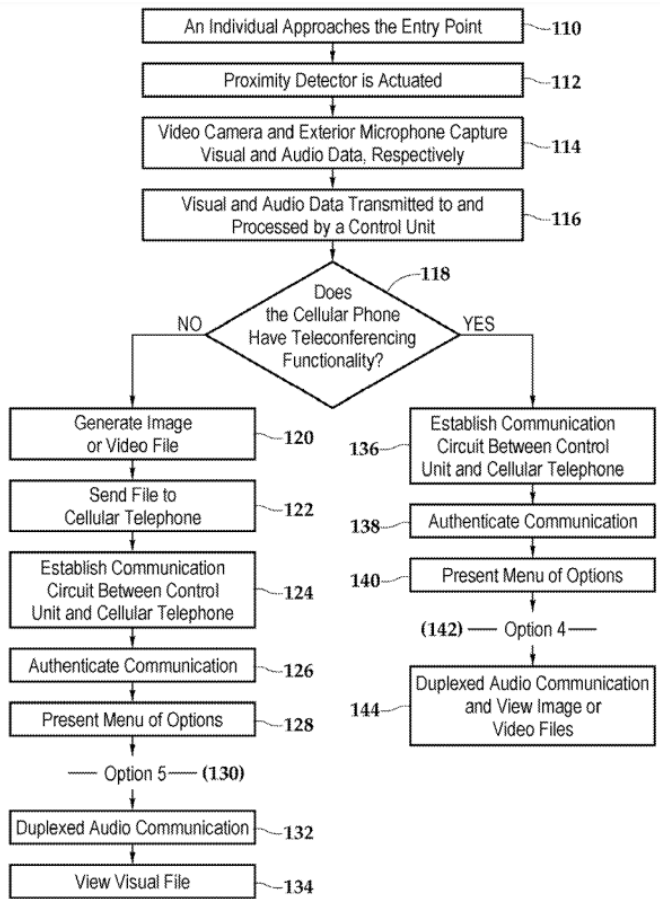
<u><i>Asserted Claims</i></u>	<u><i>Prior Art Disclosures</i></u>
	“FIG. 5 depicts a flow chart of another embodiment of a method for providing security. At block 110, an individual approaches the entry point. As a result, a proximity detector is actuated at block 112 and, in turn, as shown in block 114, the video camera and exterior microphone begin capturing visual and audio data, respectively. This visual and audio data is rendered on the video monitor for individuals including the homeowner (if home) inside the home to digest. At block 116, the data is transferred to the control unit. This operation may occur substantially simultaneously with or even prior to the operations of block 114. At the control unit, in one implementation, the data is stored in the data storage.” 6:13–24. <i>See also</i> Abstract; 1:31–45; 2:22–34; 6:25–67; Tbl. 2; 7:36–48; 7:66–8:8; Tbl. 3; 8:32–42; Fig. 2; 1:58–60; 3:9–26; Fig. 3; 4:64–5:6.
[9.2] an exterior device comprising: (i) a camera; (ii) a microphone; (iii) a speaker; (iv) a motion detector; and (v) one or more buttons	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents’ invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses an exterior device comprising: (i) a camera; (ii) a microphone; (iii) a speaker; (iv) a motion detector; and (v) one or more buttons. For example, Zinser discloses: “In operation, an individual 34 approaches the doorway 18 and the proximity detector 26 is actuated. In turn, the video camera 22 and external microphone 24 capture visual and audio communications at the doorway 18. At least a portion of the data related to the captured doorway visual and audio communications is transmitted to the cellular telephone 30 of the homeowner 16 via a control unit that is in communication with the video camera 22, external microphone 24, proximity detector 26, and exterior speaker 28 as well as a cellular network for communicating with the cellular telephone 30.” 2:35–44.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	22 and the exterior microphone 24, respectively, may be stored at the data storage unit 74. Moreover, data stored in the data storage unit 74 may be transferred to a different medium or played on the video monitor 76. The video monitor 76 is preferably located onsite at the home and renders in substantially realtime the visual and audio data collected by the video camera 22 and external microphone 24. The internal microphone 80 with the push-to-talk circuit 82 allows an onsite homeowner or, as previously discussed, another individual, to talk to a visitor. The video monitor 76 and interior microphone 80, when used together, provide a traditional monitor with intercom system for the homeowner.” 5:49–6:12.  Fig.2 Fig. 2. “FIG. 2 depicts one embodiment of the security system 10. A control unit portion 40, or control unit 40, controls a communication portion 42 and relays data and communications between the communication portion 42 and the cellular telephone 30 via a cellular network 44. As illustrated, the communication portion 42 includes the video camera 22, the exterior microphone 24, the exterior speaker 28 and a doorbell 29, which may included as part of the communication portion 42 in particular embodiments. Preferably, the control unit 40 is located onsite with the components of the communication portion 42 and each of the components of the communication portion 42 may be connected to the control unit

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	portion by a wired connection, such as a conventional circuit board or internal computer connection, a Category 5 (CAT 5) cable, or coaxial cable, for example, a wireless connection scheme, such as a network utilizing wireless local area technology or radio frequency technology, for example, or some combination thereof.” 3:9–26.  <pre> graph TD 110[An Individual Approaches the Entry Point] --> 112[Proximity Detector is Actuated] 112 --> 114[Video Camera and Exterior Microphone Capture Visual and Audio Data, Respectively] 114 --> 116[Visual and Audio Data Transmitted to and Processed by a Control Unit] 116 --> 118{Does the Cellular Phone Have Teleconferencing Functionality?} 118 -- YES --> 136[Establish Communication Circuit Between Control Unit and Cellular Telephone] 136 --> 138[Authenticate Communication] 138 --> 140[Present Menu of Options] 140 -- "(142) — Option 4 —" --> 144[Duplexed Audio Communication and View Image or Video Files] 118 -- NO --> 120[Generate Image or Video File] 120 --> 122[Send File to Cellular Telephone] 122 --> 124[Establish Communication Circuit Between Control Unit and Cellular Telephone] 124 --> 126[Authenticate Communication] 126 --> 128[Present Menu of Options] 128 -- "— Option 5 — (130)" --> 132[Duplexed Audio Communication] 132 --> 134[View Visual File] </pre> Fig.5

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	Fig. 5. “FIG. 5 depicts a flow chart of another embodiment of a method for providing security. At block 110, an individual approaches the entry point. As a result, a proximity detector is actuated at block 112 and, in turn, as shown in block 114, the video camera and exterior microphone begin capturing visual and audio data, respectively. This visual and audio data is rendered on the video monitor for individuals including the homeowner (if home) inside the home to digest. At block 116, the data is transferred to the control unit. This operation may occur substantially simultaneously with or even prior to the operations of block 114. At the control unit, in one implementation, the data is stored in the data storage.” 6:13–24.  Fig. 1. “In operation, an individual 34 approaches the doorway 18 and the proximity detector 26 is actuated. In turn, the video camera 22 and external microphone 24 capture visual and audio communications at the doorway 18. At least a portion of the data related to the captured doorway visual and audio communications is transmitted to the cellular telephone 30 of the homeowner 16 via a control unit that is

<u><i>Asserted Claims</i></u>	<u><i>Prior Art Disclosures</i></u>
	in communication with the video camera 22, external microphone 24, proximity detector 26, and exterior speaker 28 as well as a cellular network for communicating with the cellular telephone 30.” 2:35–44. “Further, in another embodiment, the security system 10 includes a plurality of video cameras 22 positioned around the perimeter of the property. The video cameras 22 may be each be motion activated and begin recording video in response to actuation at any type of entryway to any time of property or structure. In this implementation, a triggering event such as the ringing of a doorbell, initiates the contact of the control unit to the homeowner 16; however, the plurality of video cameras 22 collect video for the homeowner’s review irrespective of the occurrence of the triggering event.” 2:66–3:8. <i>See also</i> 2:22–44, 4:64–5:6, 6:13–24, Figs. 3–5; 4:46–63; 1:54–57; 2:11–21; 5:66–6:12; cls. 1, 8, 14, 19; 5:7–16; 5:20–38; 5:49–6:12. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Ramirez-Diaz, Naifeh, and Naidoo to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[9.3] wherein the exterior device is capable of wirelessly transmitting digital streaming video,	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents’ invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses wherein the exterior device is capable of wirelessly transmitting digital streaming video. For example, Zinser discloses: “In operation, an individual 34 approaches the doorway 18 and the proximity detector 26 is actuated. In turn, the video camera 22 and external microphone 24 capture visual and audio communications at the doorway 18. At least a portion of the data related to the captured doorway visual and audio

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	communications is transmitted to the cellular telephone 30 of the homeowner 16 via a control unit that is in communication with the video camera 22, external microphone 24, proximity detector 26, and exterior speaker 28 as well as a cellular network for communicating with the cellular telephone 30.” 2:35–44.  <pre> graph TD 110[An Individual Approaches the Entry Point] --> 112[Proximity Detector is Actuated] 112 --> 114[Video Camera and Exterior Microphone Capture Visual and Audio Data, Respectively] 114 --> 116[Visual and Audio Data Transmitted to and Processed by a Control Unit] 116 --> 118{Does the Cellular Phone Have Teleconferencing Functionality?} 118 -- YES --> 136[Establish Communication Circuit Between Control Unit and Cellular Telephone] 136 --> 138[Authenticate Communication] 138 --> 140[Present Menu of Options] 140 -- "(142) — Option 4 —" --> 144[Duplexed Audio Communication and View Image or Video Files] 118 -- NO --> 120[Generate Image or Video File] 120 --> 122[Send File to Cellular Telephone] 122 --> 124[Establish Communication Circuit Between Control Unit and Cellular Telephone] 124 --> 126[Authenticate Communication] 126 --> 128[Present Menu of Options] 128 -- "— Option 5 — (130)" --> 132[Duplexed Audio Communication] 132 --> 134[View Visual File] </pre> Fig.5

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	Fig. 5. “FIG. 5 depicts a flow chart of another embodiment of a method for providing security. At block 110, an individual approaches the entry point. As a result, a proximity detector is actuated at block 112 and, in turn, as shown in block 114, the video camera and exterior microphone begin capturing visual and audio data, respectively. This visual and audio data is rendered on the video monitor for individuals including the homeowner (if home) inside the home to digest. At block 116, the data is transferred to the control unit. This operation may occur substantially simultaneously with or even prior to the operations of block 114. At the control unit, in one implementation, the data is stored in the data storage.” 6:13–24. “At block 118, if the cellular telephone has teleconferencing functionality or the ability to simultaneously receive both data and voice, then the method advances to block 136 (see paragraph 41). On the other hand, if this functionality is not present in the cellular telephone or if the cellular telephone network being utilized does not support this type of functionality, then the method advances to block 120 wherein the control unit generates an image or video file that includes at least a portion of the visual or audio/visual data collected by the video camera and the exterior microphone. Whether an image file or video file is generated depends on the preferences programmed into the instant security system as well as the capabilities of the cellular network and the cellular telephone.” 6:25–38. “Returning now to decision block 118, for cellular telephones that have teleconferencing functionality or an equivalent thereof, at block 136, a communication circuit is established between the control unit and cellular telephone. As previously alluded to, by way of example, some cellular telephones provide for the simultaneous or near simultaneous transfer of voice and data by utilizing the cellular network in conjunction with the Internet. At block 138, similar to block 126, the identify of the homeowner is authenticated. Continuing to block 140, a menu of options, such as the exemplary menu of Table 3, is available to the homeowner.” 8:32–42.

Asserted ClaimsPrior Art Disclosures

TABLE 3

Options for Cellular Telephones with
Teleconferencing or Equivalent Functionality

Option Number	Option
1	No Action
2	Play a Pre-Recorded Greeting
3	Observe Only
4	Duplexed Communication
5	Notify Alarm Company
6	Conference Call

8:20–30 (Tbl. 3).

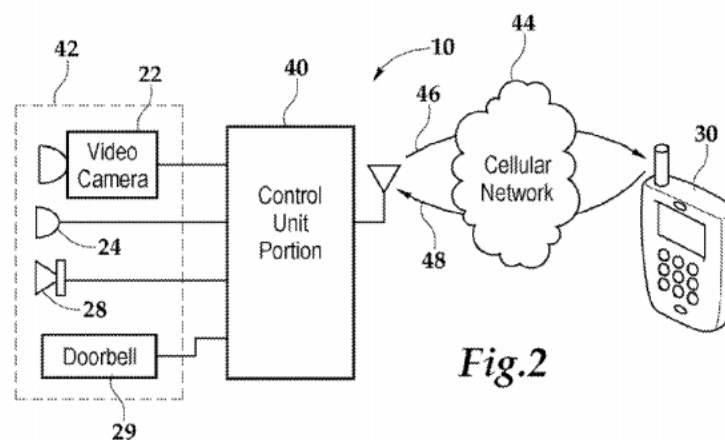
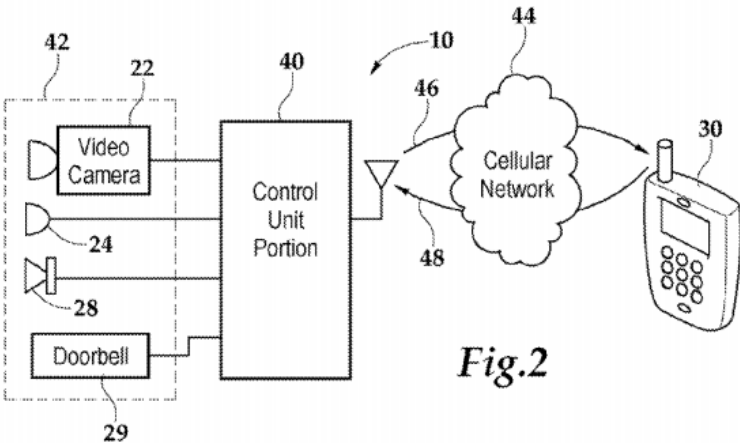


Fig. 2.

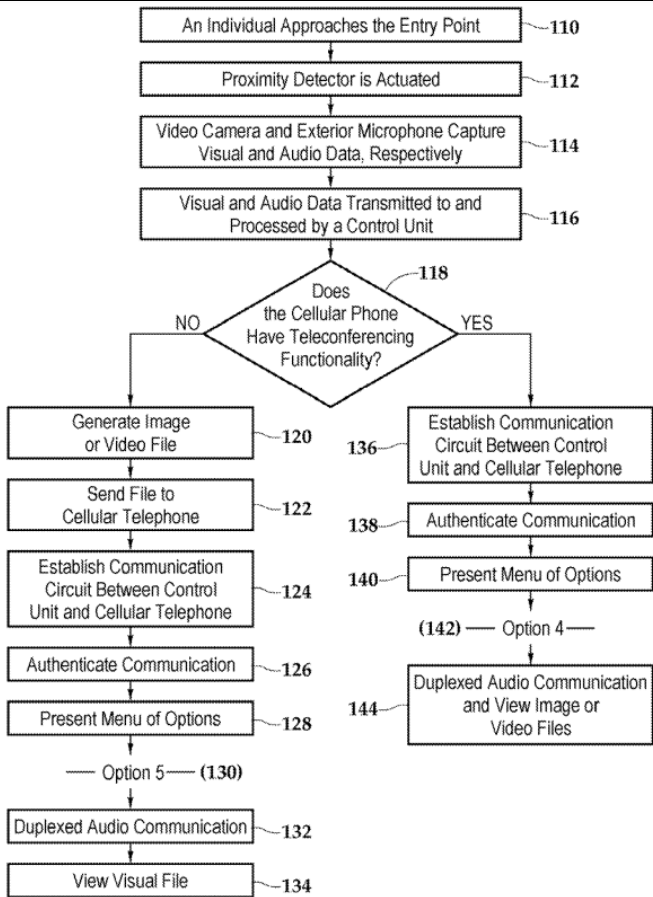
“FIG. 2 depicts one embodiment of the security system 10. A control unit portion 40, or control unit 40, controls a communication portion 42 and relays data and communications between the communication

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>																												
	portion 42 and the cellular telephone 30 via a cellular network 44. As illustrated, the communication portion 42 includes the video camera 22, the exterior microphone 24, the exterior speaker 28 and a doorbell 29, which may included as part of the communication portion 42 in particular embodiments. Preferably, the control unit 40 is located onsite with the components of the communication portion 42 and each of the components of the communication portion 42 may be connected to the control unit portion by a wired connection, such as a conventional circuit board or internal computer connection, a Category 5 (CAT 5) cable, or coaxial cable, for example, a wireless connection scheme, such as a network utilizing wireless local area technology or radio frequency technology, for example, or some combination thereof.” 3:9–6. TABLE 1 <u>Exemplary Cellular Telephone Systems</u> <table><tr><th>Cellular Telephone System</th><th>Generation</th><th>Channel Spacing</th><th>Access Method</th></tr><tr><td>CDMAONE</td><td>2 G</td><td>1.25 MHZ</td><td>CDMA</td></tr><tr><td>CDMA2000 1x</td><td>2.5 G</td><td>1.25 MHZ</td><td>CDMA</td></tr><tr><td>CDMA2000 1xEV-DO</td><td>3 G</td><td>1.25 MHZ</td><td>CDMA</td></tr><tr><td>CDMA2000 1xEV-DV</td><td>3 G</td><td>1.25 MHZ</td><td>CDMA</td></tr><tr><td>UMTS</td><td>3 G</td><td>5 MHZ</td><td>CDMA/TDMA</td></tr><tr><td>TD-SCDMA</td><td>3 G</td><td>1.6 MHZ</td><td>CDMA</td></tr></table> 3:39–47 (tbl. 1). “Before continuing with the discussion of FIG. 2 in paragraph 24, the cellular telephone systems of Table 1 will be briefly discussed. The CDMAONE cellular telephone system is the brand name for the standard reference IS95, which was the first CDMA system to gain widespread use. The initial specification for the system was IS95A, but its performance has since been upgraded under IS95B. Apart from voice, the CDMA cellular telephone system carries data at rates up to 14.4 kbps for IS95A and up to 115 kbps for IS95B.” 3:48–56.	Cellular Telephone System	Generation	Channel Spacing	Access Method	CDMAONE	2 G	1.25 MHZ	CDMA	CDMA2000 1x	2.5 G	1.25 MHZ	CDMA	CDMA2000 1xEV-DO	3 G	1.25 MHZ	CDMA	CDMA2000 1xEV-DV	3 G	1.25 MHZ	CDMA	UMTS	3 G	5 MHZ	CDMA/TDMA	TD-SCDMA	3 G	1.6 MHZ	CDMA
Cellular Telephone System	Generation	Channel Spacing	Access Method																										
CDMAONE	2 G	1.25 MHZ	CDMA																										
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UMTS	3 G	5 MHZ	CDMA/TDMA																										
TD-SCDMA	3 G	1.6 MHZ	CDMA																										

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	“Also, the cellular telephone networks described herein may include or employ the Internet, and associated protocols, which can be utilized by some models of cellular telephones to receive images as well as audio and visual data. In the instances when data is transferred to or from the cellular telephone via the Internet, the cellular network 44 may include onsite (or home) or offsite servers that are setup by a security company or the homeowner to facilitate the transfer of the data.” 4:18–26. <i>See also</i> cl. 5; 3:39–47 (Tbl. 1); 3:48–56; 7:66–8:7; 2:22–65; 5:49–65; 3:27–34; 3:57–4:17; 4:27–63; Fig. 4; 5:66–6:12; 7:1–14 (Tbl. 2); 7:36–48; 2:66–3:8. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Ramirez-Diaz, Naifeh, and Naidoo to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[9.4] wherein the exterior device is capable of wirelessly transmitting digital audio,	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents’ invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses wherein the exterior device is capable of wirelessly transmitting digital audio. For example, Zinser discloses: “In operation, an individual 34 approaches the doorway 18 and the proximity detector 26 is actuated. In turn, the video camera 22 and external microphone 24 capture visual and audio communications at the doorway 18. At least a portion of the data related to the captured doorway visual and audio communications is transmitted to the cellular telephone 30 of the homeowner 16 via a control unit that is

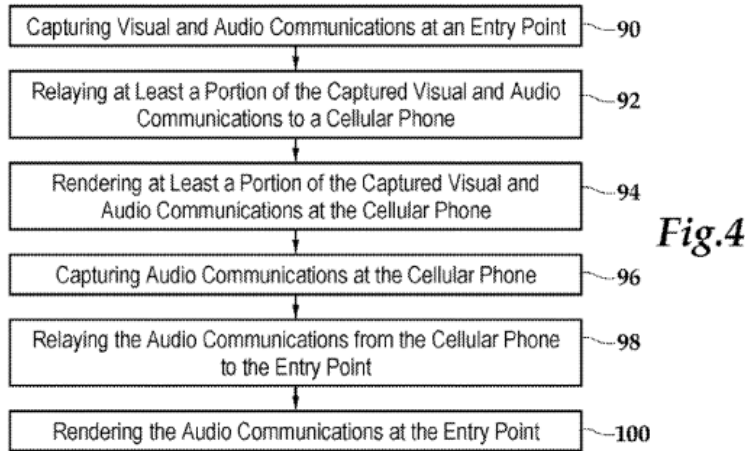
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	in communication with the video camera 22, external microphone 24, proximity detector 26, and exterior speaker 28 as well as a cellular network for communicating with the cellular telephone 30.” 2:35–44.  <i>Fig. 2</i> Fig. 2. “FIG. 2 depicts one embodiment of the security system 10. A control unit portion 40, or control unit 40, controls a communication portion 42 and relays data and communications between the communication portion 42 and the cellular telephone 30 via a cellular network 44. As illustrated, the communication portion 42 includes the video camera 22, the exterior microphone 24, the exterior speaker 28 and a doorbell 29, which may included as part of the communication portion 42 in particular embodiments. Preferably, the control unit 40 is located onsite with the components of the communication portion 42 and each of the components of the communication portion 42 may be connected to the control unit portion by a wired connection, such as a conventional circuit board or internal computer connection, a Category 5 (CAT 5) cable, or coaxial cable, for example, a wireless connection scheme, such as a network utilizing wireless local area technology or radio frequency technology, for example, or some combination thereof.” 3:9–26.

<u><i>Asserted Claims</i></u>	<u><i>Prior Art Disclosures</i></u>
	“The cellular telephone network or cellular network 44 is employed to relay visual and audio data from the control unit to the cellular telephone 30 and relay audio data and control signals from the cellular telephone 30 to the control unit 40. Several cellular telephone systems are available to provide the communication exchanges. By way of non-limiting examples, an exemplary list of cellular telephone systems is presented in Table 1.” 3:27–34.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	 <pre> graph TD 110[An Individual Approaches the Entry Point] --> 112[Proximity Detector is Actuated] 112 --> 114[Video Camera and Exterior Microphone Capture Visual and Audio Data, Respectively] 114 --> 116[Visual and Audio Data Transmitted to and Processed by a Control Unit] 116 --> 118{Does the Cellular Phone Have Teleconferencing Functionality?} 118 -- NO --> 120[Generate Image or Video File] 120 --> 122[Send File to Cellular Telephone] 122 --> 124[Establish Communication Circuit Between Control Unit and Cellular Telephone] 124 --> 126[Authenticate Communication] 126 --> 128[Present Menu of Options] 128 -- "Option 5 (130)" --> 132[Duplexed Audio Communication] 132 --> 134[View Visual File] 118 -- YES --> 136[Establish Communication Circuit Between Control Unit and Cellular Telephone] 136 --> 138[Authenticate Communication] 138 --> 140[Present Menu of Options] 140 -- "(142) — Option 4 —" --> 144[Duplexed Audio Communication and View Image or Video Files] </pre> Fig.5 Fig. 5. “FIG. 5 depicts a flow chart of another embodiment of a method for providing security. At block 110, an individual approaches the entry point. As a result, a proximity detector is actuated at block 112 and, in turn, as shown in block 114, the video camera and exterior microphone begin capturing visual and audio

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>																		
	data, respectively. This visual and audio data is rendered on the video monitor for individuals including the homeowner (if home) inside the home to digest. At block 116, the data is transferred to the control unit. This operation may occur substantially simultaneously with or even prior to the operations of block 114. At the control unit, in one implementation, the data is stored in the data storage.” 6:13–24. TABLE 2 <table> <tr> <th colspan="2">Options for Cellular Telephones without Teleconferencing Functionality</th></tr> <tr> <th>Option Number</th><th>Option</th></tr> <tr> <td>1</td><td>No Action</td></tr> <tr> <td>2</td><td>Play a Pre-Recorded Greeting</td></tr> <tr> <td>3</td><td>Request Further Image or Video Data</td></tr> <tr> <td>4</td><td>Hear Audio Only</td></tr> <tr> <td>5</td><td>Duplexed Audio Communication</td></tr> <tr> <td>6</td><td>Notify Alarm Company</td></tr> <tr> <td>7</td><td>Conference Call</td></tr> </table> 7:1–14 (Tbl. 2). “When Option 4: Hear Audio Only is selected by the homeowner, the homeowner chooses only to observe the visitor before taking further action, such as selecting a further option. Option 5: Duplexed Audio Communication permits the homeowner to have a verbal conversation with the visitor in the same manner as if the homeowner was present at the home and using the internal microphone. Option 6: Notify Alarm Company allows the homeowner to notify the alarm company or alternatively the police department of a potential or actual problem. This option is particularly important when the visitor is a perpetrator in the act of a crime such as breaking into the home. With respect to Option 7: Conference Call, the homeowner may conference call a third-party, such as a trusted neighbor that is home, into the conversation with the visitor. As alluded to, these options are exemplary of the robustness of the security system and these options may be original equipment manufacture (OEM) or programmed by the homeowner.” 7:49–65.	Options for Cellular Telephones without Teleconferencing Functionality		Option Number	Option	1	No Action	2	Play a Pre-Recorded Greeting	3	Request Further Image or Video Data	4	Hear Audio Only	5	Duplexed Audio Communication	6	Notify Alarm Company	7	Conference Call
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	“Returning now to decision block 118, for cellular telephones that have teleconferencing functionality or an equivalent thereof, at block 136, a communication circuit is established between the control unit and cellular telephone. As previously alluded to, by way of example, some cellular telephones provide for the simultaneous or near simultaneous transfer of voice and data by utilizing the cellular network in conjunction with the Internet. At block 138, similar to block 126, the identify of the homeowner is authenticated. Continuing to block 140, a menu of options, such as the exemplary menu of Table 3, is available to the homeowner.” 8:8–19. TABLE 3 Options for Cellular Telephones with <u>Teleconferencing or Equivalent Functionality</u> <table> <tr> <th>Option Number</th><th>Option</th></tr> <tr> <td>1</td><td>No Action</td></tr> <tr> <td>2</td><td>Play a Pre-Recorded Greeting</td></tr> <tr> <td>3</td><td>Observe Only</td></tr> <tr> <td>4</td><td>Duplexed Communication</td></tr> <tr> <td>5</td><td>Notify Alarm Company</td></tr> <tr> <td>6</td><td>Conference Call</td></tr> </table> 8:20–30 (Tbl. 3). “These available options, where serve as non-limiting examples, are substantially equivalent to the options discussed at block 128. As indicated in FIG. 5, Option 4: Duplexed Communication is selected. Since the telephone has the ability to simultaneously receive data and voice communications, this option permits the cellular telephone to render a video file with substantially real time video visual and audio captured at the doorway of the home. Alternatively, streaming audio and video may be delivered. The homeowner is therefore allowed to see and hear the visitor while communicating with the visitor orally.” 8:32–42.	Option Number	Option	1	No Action	2	Play a Pre-Recorded Greeting	3	Observe Only	4	Duplexed Communication	5	Notify Alarm Company	6	Conference Call
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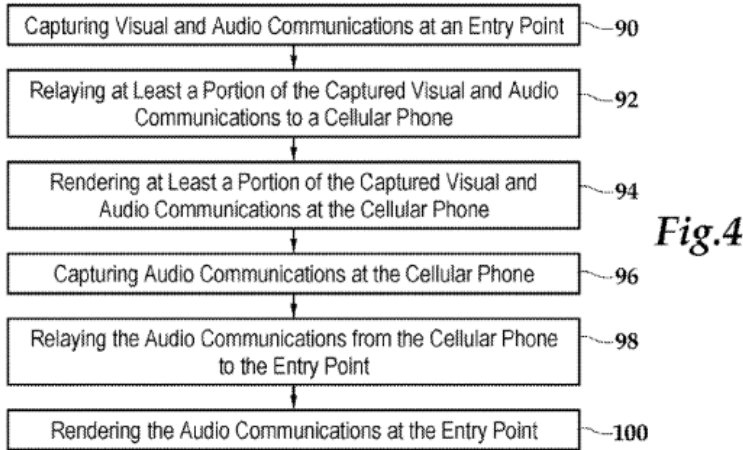
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	 Fig. 4. “FIG. 4 depicts a flow chart of one embodiment of a method for providing security. At block 90, visual and audio communications are captured at an entry point. At block 92, at least a portion of the captured visual and audio communications are relayed to a cellular telephone. At block 94, the at least a portion of the captured visual and audio communications are rendered at the cellular telephone. At block 96, audio communications are captured at the cellular phone. The audio communications are relayed from the cellular phone to the entry point at block 98. At block 100, the audio communications are rendered at the entry point, thereby providing for duplexed audio communications and one-way visual observation in order to achieve an improvement over the traditional video monitor and intercom system.” 5:66–6:12. See also Fig. 1; 2:11–44; 3:35–47 (tbl. 1). A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Ramirez-Diaz, Naifeh, and Naidoo to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings

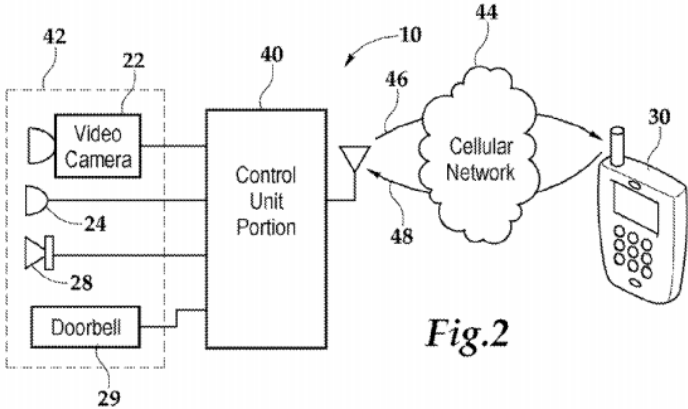
<u><i>Asserted Claims</i></u>	<u><i>Prior Art Disclosures</i></u>
	could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[9.5] wherein the exterior device is capable of receiving the digital audio from a peripheral device after a person associated with the entrance has been detected,	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses wherein the exterior device is capable of receiving the digital audio from a peripheral device after a person associated with the entrance has been detected. For example, Zinser discloses: "Further, in another embodiment, the security system 10 includes a plurality of video cameras 22 positioned around the perimeter of the property. The video cameras 22 may be each be motion activated and begin recording video in response to actuation at any type of entryway to any time of property or structure. In this implementation, a triggering event such as the ringing of a doorbell, initiates the contact of the control unit to the homeowner 16; however, the plurality of video cameras 22 collect video for the homeowner's review irrespective of the occurrence of the triggering event." 2:66–3:8.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	<pre> graph TD 110[An Individual Approaches the Entry Point] --> 112[Proximity Detector is Actuated] 112 --> 114[Video Camera and Exterior Microphone Capture Visual and Audio Data, Respectively] 114 --> 116[Visual and Audio Data Transmitted to and Processed by a Control Unit] 116 --> 118{Does the Cellular Phone Have Teleconferencing Functionality?} 118 -- NO --> 120[Generate Image or Video File] 120 --> 122[Send File to Cellular Telephone] 122 --> 124[Establish Communication Circuit Between Control Unit and Cellular Telephone] 124 --> 126[Authenticate Communication] 126 --> 128[Present Menu of Options] 128 -- "Option 5 (130)" --> 132[Duplexed Audio Communication] 132 --> 134[View Visual File] 118 -- YES --> 136[Establish Communication Circuit Between Control Unit and Cellular Telephone] 136 --> 138[Authenticate Communication] 138 --> 140[Present Menu of Options] 140 -- "(142) — Option 4 —" --> 144[Duplexed Audio Communication and View Image or Video Files] </pre> Fig.5 Fig. 5. “FIG. 5 depicts a flow chart of another embodiment of a method for providing security. At block 110, an individual approaches the entry point. As a result, a proximity detector is actuated at block 112 and, in turn, as shown in block 114, the video camera and exterior microphone begin capturing visual and audio

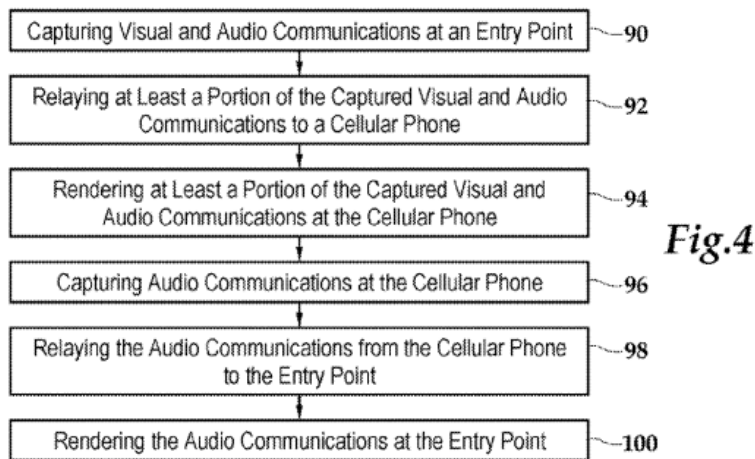
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>																
	data, respectively. This visual and audio data is rendered on the video monitor for individuals including the homeowner (if home) inside the home to digest. At block 116, the data is transferred to the control unit. This operation may occur substantially simultaneously with or even prior to the operations of block 114. At the control unit, in one implementation, the data is stored in the data storage.” 6:13–24. TABLE 2 <table> <tr> <th data-bbox="659 607 821 634">Option Number</th><th data-bbox="905 607 974 634">Option</th></tr> <tr> <td data-bbox="730 662 743 683">1</td><td data-bbox="905 662 1010 683">No Action</td></tr> <tr> <td data-bbox="730 691 743 712">2</td><td data-bbox="905 691 1205 712">Play a Pre-Recorded Greeting</td></tr> <tr> <td data-bbox="730 721 743 742">3</td><td data-bbox="905 721 1283 742">Request Further Image or Video Data</td></tr> <tr> <td data-bbox="730 750 743 771">4</td><td data-bbox="905 750 1079 771">Hear Audio Only</td></tr> <tr> <td data-bbox="730 779 743 800">5</td><td data-bbox="905 779 1241 800">Duplexed Audio Communication</td></tr> <tr> <td data-bbox="730 808 743 829">6</td><td data-bbox="905 808 1142 829">Notify Alarm Company</td></tr> <tr> <td data-bbox="730 837 743 859">7</td><td data-bbox="905 837 1066 859">Conference Call</td></tr> </table> 7:1–14 (Tbl. 2). “When Option 4: Hear Audio Only is selected by the homeowner, the homeowner chooses only to observe the visitor before taking further action, such as selecting a further option. Option 5: Duplexed Audio Communication permits the homeowner to have a verbal conversation with the visitor in the same manner as if the homeowner was present at the home and using the internal microphone. Option 6: Notify Alarm Company allows the homeowner to notify the alarm company or alternatively the police department of a potential or actual problem. This option is particularly important when the visitor is a perpetrator in the act of a crime such as breaking into the home. With respect to Option 7: Conference Call, the homeowner may conference call a third-party, such as a trusted neighbor that is home, into the conversation with the visitor. As alluded to, these options are exemplary of the robustness of the security system and these options may be original equipment manufacture (OEM) or programmed by the homeowner.” 7:49–65.	Option Number	Option	1	No Action	2	Play a Pre-Recorded Greeting	3	Request Further Image or Video Data	4	Hear Audio Only	5	Duplexed Audio Communication	6	Notify Alarm Company	7	Conference Call
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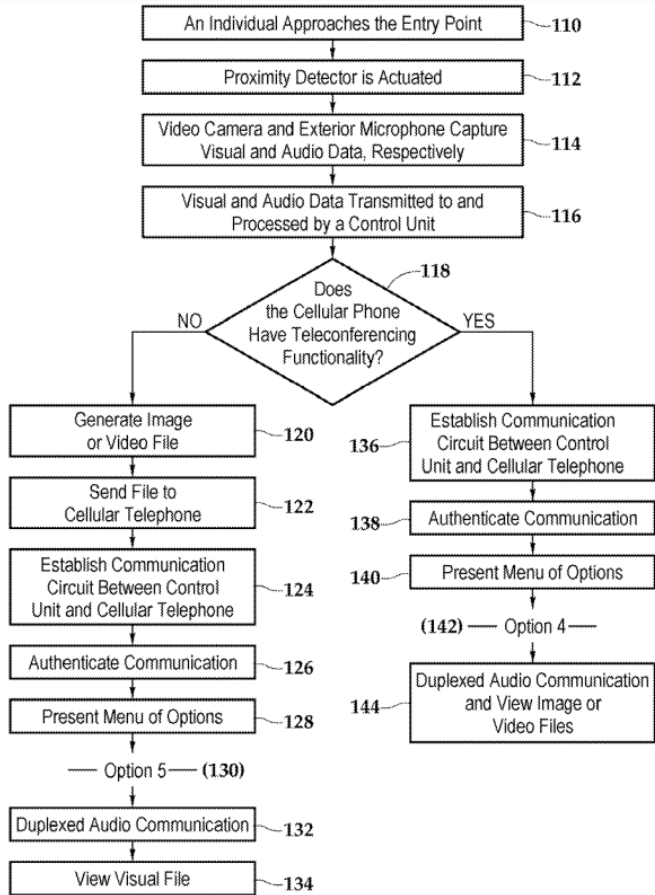
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	 Fig. 4. “FIG. 4 depicts a flow chart of one embodiment of a method for providing security. At block 90, visual and audio communications are captured at an entry point. At block 92, at least a portion of the captured visual and audio communications are relayed to a cellular telephone. At block 94, the at least a portion of the captured visual and audio communications are rendered at the cellular telephone. At block 96, audio communications are captured at the cellular phone. The audio communications are relayed from the cellular phone to the entry point at block 98. At block 100, the audio communications are rendered at the entry point, thereby providing for duplexed audio communications and one-way visual observation in order to achieve an improvement over the traditional video monitor and intercom system.”

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	 <i>Fig. 2</i> Fig. 2. “FIG. 2 depicts one embodiment of the security system 10. A control unit portion 40, or control unit 40, controls a communication portion 42 and relays data and communications between the communication portion 42 and the cellular telephone 30 via a cellular network 44. As illustrated, the communication portion 42 includes the video camera 22, the exterior microphone 24, the exterior speaker 28 and a doorbell 29, which may included as part of the communication portion 42 in particular embodiments. Preferably, the control unit 40 is located onsite with the components of the communication portion 42 and each of the components of the communication portion 42 may be connected to the control unit portion by a wired connection, such as a conventional circuit board or internal computer connection, a Category 5 (CAT 5) cable, or coaxial cable, for example, a wireless connection scheme, such as a network utilizing wireless local area technology or radio frequency technology, for example, or some combination thereof.” 3:9–26. “The cellular telephone network or cellular network 44 is employed to relay visual and audio data from the control unit to the cellular telephone 30 and relay audio data and control signals from the cellular telephone 30 to the control unit 40. Several cellular telephone systems are available to provide the

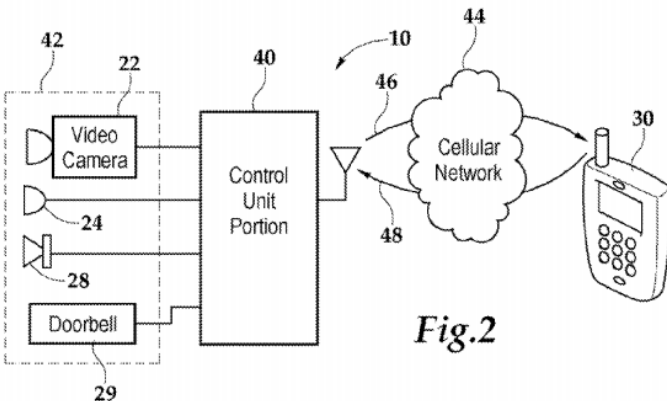
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	communication exchanges. By way of non-limiting examples, an exemplary list of cellular telephone systems is presented in Table 1.” 3:27–34. “The cellular telephone 30 may comprise any long-range, portable electronic device that provides for peer-to-peer telecommunications over a long distance. The cellular telephone 30 may comprise a personal digital assistant (PDA) or other electronic communication device. As illustrated, the cellular telephone 30 receives signals 46 and sends signals 48. The signals 46 from the control unit 40 to the cellular telephone 30 may include voice, images, and video signals. The signals 48 to the control unit 40 may comprise voice and control signals. In addition to the voice function of the cellular telephone 30, the image, video, and data services of the cellular phone may be provided by a short message service (SMS) which utilizes text messaging, email, packet switching for access to the Internet to provide the content. Other suitable services for providing the content needed by the cellular telephone 30 include a multimedia message service (MMS) for sending and receiving photos and video. It should be appreciated, however, that the data and content received by the cellular telephone 30 is not limited to these services.” 4:27–45. <i>See also</i> Tbl. 1. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Ramirez-Diaz, Naifeh, and Naidoo to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
[9.6] wherein the exterior device is capable of playing the digital audio received from the peripheral device through the speaker of the exterior device,	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses wherein the exterior device is capable of playing the digital audio received from the peripheral device through the speaker of the exterior device. For example, Zinser discloses: "Similarly, the control unit relays captured cellular audio communications from the homeowner 16 to the external speaker 28. In this manner, the homeowner is permitted to monitor the home in substantially realtime while away and, further, the homeowner 16 and individual 34 are able to communicate as if the homeowner 14 was at home. In particular, the individual 34 will be believe that the homeowner 16 is home." 2:45-52.  Fig. 4. "FIG. 4 depicts a flow chart of one embodiment of a method for providing security. At block 90, visual and audio communications are captured at an entry point. At block 92, at least a portion of the captured visual and audio communications are relayed to a cellular telephone. At block 94, the at least a portion of

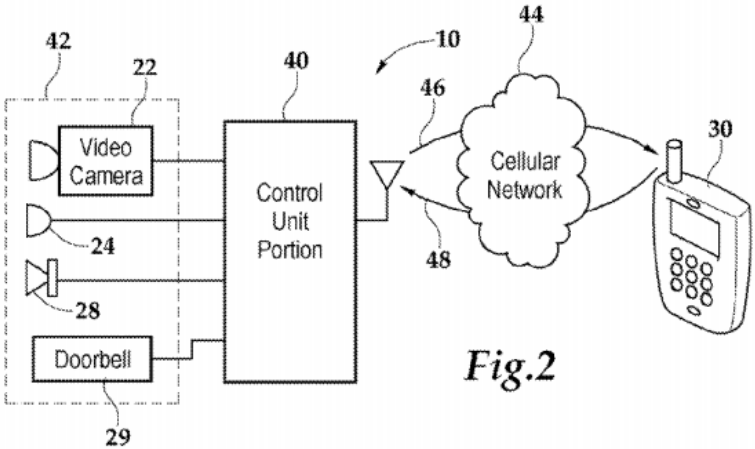
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	the captured visual and audio communications are rendered at the cellular telephone. At block 96, audio communications are captured at the cellular phone. The audio communications are relayed from the cellular phone to the entry point at block 98. At block 100, the audio communications are rendered at the entry point, thereby providing for duplexed audio communications and one-way visual observation in order to achieve an improvement over the traditional video monitor and intercom system.”

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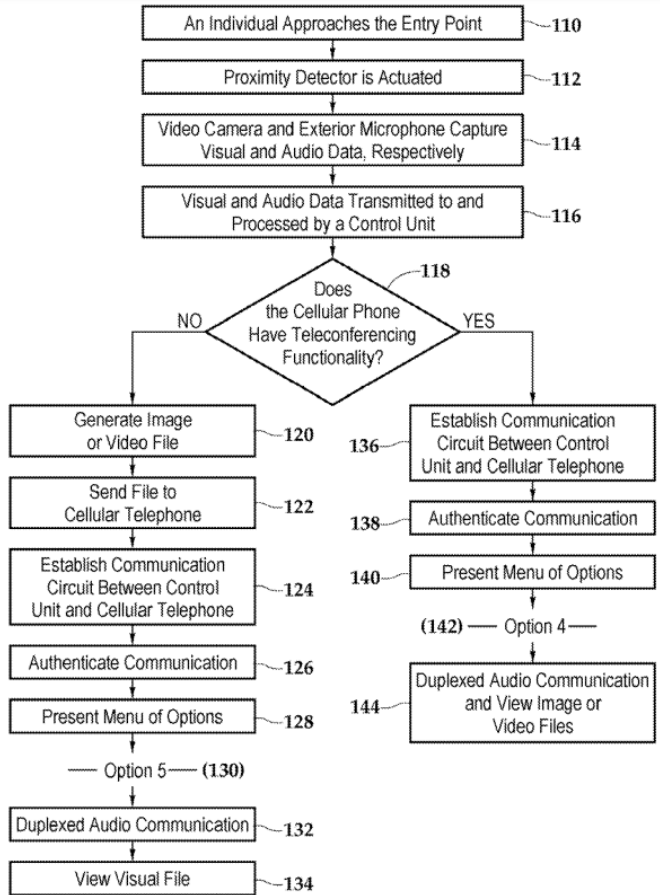
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>																
	“FIG. 5 depicts a flow chart of another embodiment of a method for providing security. At block 110, an individual approaches the entry point. As a result, a proximity detector is actuated at block 112 and, in turn, as shown in block 114, the video camera and exterior microphone begin capturing visual and audio data, respectively. This visual and audio data is rendered on the video monitor for individuals including the homeowner (if home) inside the home to digest. At block 116, the data is transferred to the control unit. This operation may occur substantially simultaneously with or even prior to the operations of block 114. At the control unit, in one implementation, the data is stored in the data storage.” 6:13–24. TABLE 3 <table> <tr> <th colspan="2">Options for Cellular Telephones with <u>Teleconferencing or Equivalent Functionality</u></th></tr> <tr> <th>Option Number</th><th>Option</th></tr> <tr> <td>1</td><td>No Action</td></tr> <tr> <td>2</td><td>Play a Pre-Recorded Greeting</td></tr> <tr> <td>3</td><td>Observe Only</td></tr> <tr> <td>4</td><td>Duplexed Communication</td></tr> <tr> <td>5</td><td>Notify Alarm Company</td></tr> <tr> <td>6</td><td>Conference Call</td></tr> </table> 8:20–30 (Tbl. 3). “These available options, where serve as non-limiting examples, are substantially equivalent to the options discussed at block 128. As indicated in FIG. 5, Option 4: Duplexed Communication is selected. Since the telephone has the ability to simultaneously receive data and voice communications, this option permits the cellular telephone to render a video file with substantially real time video visual and audio captured at the doorway of the home. Alternatively, streaming audio and video may be delivered. The homeowner is therefore allowed to see and hear the visitor while communicating with the visitor orally.” 7:48–65.	Options for Cellular Telephones with <u>Teleconferencing or Equivalent Functionality</u>		Option Number	Option	1	No Action	2	Play a Pre-Recorded Greeting	3	Observe Only	4	Duplexed Communication	5	Notify Alarm Company	6	Conference Call
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	“Returning now to decision block 118, for cellular telephones that have teleconferencing functionality or an equivalent thereof, at block 136, a communication circuit is established between the control unit and cellular telephone. As previously alluded to, by way of example, some cellular telephones provide for the simultaneous or near simultaneous transfer of voice and data by utilizing the cellular network in conjunction with the Internet. At block 138, similar to block 126, the identify of the homeowner is authenticated. Continuing to block 140, a menu of options, such as the exemplary menu of Table 3, is available to the homeowner.” 7:66–8:8.  Fig. 2.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	“FIG. 2 depicts one embodiment of the security system 10. A control unit portion 40, or control unit 40, controls a communication portion 42 and relays data and communications between the communication portion 42 and the cellular telephone 30 via a cellular network 44. As illustrated, the communication portion 42 includes the video camera 22, the exterior microphone 24, the exterior speaker 28 and a doorbell 29, which may included as part of the communication portion 42 in particular embodiments. Preferably, the control unit 40 is located onsite with the components of the communication portion 42 and each of the components of the communication portion 42 may be connected to the control unit portion by a wired connection, such as a conventional circuit board or internal computer connection, a Category 5 (CAT 5) cable, or coaxial cable, for example, a wireless connection scheme, such as a network utilizing wireless local area technology or radio frequency technology, for example, or some combination thereof.” 3:9–26. “The cellular telephone network or cellular network 44 is employed to relay visual and audio data from the control unit to the cellular telephone 30 and relay audio data and control signals from the cellular telephone 30 to the control unit 40. Several cellular telephone systems are available to provide the communication exchanges. By way of non-limiting examples, an exemplary list of cellular telephone systems is presented in Table 1.” 3:27–35. <i>See also</i> 2:53–65; 3:35–47 (Tbl. 1); 3:47–4:45. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Ramirez-Diaz, Naifeh, and Naidoo to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
[9.7] wherein the exterior device is capable of operating in at least one low light condition,	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses wherein the exterior device is capable of operating in at least one low light condition. For example, Zinser discloses: "Accordingly, the security system 10 and accompanying method presented herein permit the homeowner 16 or designated entity or individual, who may be onsite or at a remote location, to view and talk to a visitor (or perpetrator) in realtime or substantially realtime, without the homeowner's location being disclosed. The visitor (or perpetrator) can hear the homeowner's voice but cannot see the homeowner, since the video is communicated one-way from the doorway 18 to the cellular telephone 30 of the homeowner 16. In application, an honest visitor with good intentions will assume that the homeowner 16 is on premises. Similarly, a perpetrator will assume that the homeowner 16 is at home and the perpetrator can be expected to move on if his motives are unlawful." 2:53-65.  Fig. 2.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	“FIG. 2 depicts one embodiment of the security system 10. A control unit portion 40, or control unit 40, controls a communication portion 42 and relays data and communications between the communication portion 42 and the cellular telephone 30 via a cellular network 44. As illustrated, the communication portion 42 includes the video camera 22, the exterior microphone 24, the exterior speaker 28 and a doorbell 29, which may included as part of the communication portion 42 in particular embodiments. Preferably, the control unit 40 is located onsite with the components of the communication portion 42 and each of the components of the communication portion 42 may be connected to the control unit portion by a wired connection, such as a conventional circuit board or internal computer connection, a Category 5 (CAT 5) cable, or coaxial cable, for example, a wireless connection scheme, such as a network utilizing wireless local area technology or radio frequency technology, for example, or some combination thereof.” 3:9–26. “The cellular telephone network or cellular network 44 is employed to relay visual and audio data from the control unit to the cellular telephone 30 and relay audio data and control signals from the cellular telephone 30 to the control unit 40. Several cellular telephone systems are available to provide the communication exchanges. By way of non-limiting examples, an exemplary list of cellular telephone systems is presented in Table 1.” 3:27–34. “In an alternate embodiment, the video camera 22 may be integrated into the doorbell 29 and the integrated components disposed in communication with the control unit portion 40 such that the actuation of the doorbell establishes communication from the control unit portion 40 to the cellular telephone 30. The initial communication from the control unit portion 40 to the cellular telephone 30 may be considered a notification and it may take the form of a page, email, text message, instant message, phone call or any other type messaging and it may be achieved through any type of network including the illustrated cellular network 44. In response to the notification, the homeowner 16 may send a signal to the control unit portion 40 to either ignore the notification and event or accept more information including images or video about the notification and event. It should be appreciated that the instant security system provides flexibility and selectability in the manner in which the homeowner 16 receives notifications and alerts.” 4:46–63.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	 <pre> graph TD 110[An Individual Approaches the Entry Point] --> 112[Proximity Detector is Actuated] 112 --> 114[Video Camera and Exterior Microphone Capture Visual and Audio Data, Respectively] 114 --> 116[Visual and Audio Data Transmitted to and Processed by a Control Unit] 116 --> 118{Does the Cellular Phone Have Teleconferencing Functionality?} 118 -- YES --> 136[Establish Communication Circuit Between Control Unit and Cellular Telephone] 136 --> 138[Authenticate Communication] 138 --> 140[Present Menu of Options] 140 -- "(142) — Option 4 —" --> 144[Duplexed Audio Communication and View Image or Video Files] 118 -- NO --> 120[Generate Image or Video File] 120 --> 122[Send File to Cellular Telephone] 122 --> 124[Establish Communication Circuit Between Control Unit and Cellular Telephone] 124 --> 126[Authenticate Communication] 126 --> 128[Present Menu of Options] 128 -- "— Option 5 — (130)" --> 132[Duplexed Audio Communication] 132 --> 134[View Visual File] </pre> Fig.5 Fig. 5. “FIG. 5 is a flow chart depicting another embodiment of a method for providing security.” 1:66–67.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>																		
	“FIG. 5 depicts a flow chart of another embodiment of a method for providing security. At block 110, an individual approaches the entry point. As a result, a proximity detector is actuated at block 112 and, in turn, as shown in block 114, the video camera and exterior microphone begin capturing visual and audio data, respectively. This visual and audio data is rendered on the video monitor for individuals including the homeowner (if home) inside the home to digest. At block 116, the data is transferred to the control unit. This operation may occur substantially simultaneously with or even prior to the operations of block 114. At the control unit, in one implementation, the data is stored in the data storage.” 6:13–24. TABLE 2 <table> <tr> <th colspan="2">Options for Cellular Telephones without Teleconferencing Functionality</th></tr> <tr> <th>Option Number</th><th>Option</th></tr> <tr> <td>1</td><td>No Action</td></tr> <tr> <td>2</td><td>Play a Pre-Recorded Greeting</td></tr> <tr> <td>3</td><td>Request Further Image or Video Data</td></tr> <tr> <td>4</td><td>Hear Audio Only</td></tr> <tr> <td>5</td><td>Duplexed Audio Communication</td></tr> <tr> <td>6</td><td>Notify Alarm Company</td></tr> <tr> <td>7</td><td>Conference Call</td></tr> </table> 7:1–14 (Tbl. 2). “With respect to Option 3: Request Further Image or Video Data, the initial file received by the homeowner at the cellular telephone may be blurred or the visitor in the doorway may not be clearly identifiable from the image or video. With this option, the homeowner requests an additional image or video. When this option is selected, since the cellular telephone does not have teleconferencing functionality or the ability to simultaneously receive both voice and data, the control unit temporarily disconnects from the cellular telephone, sends the second image or video file, and then reestablishes	Options for Cellular Telephones without Teleconferencing Functionality		Option Number	Option	1	No Action	2	Play a Pre-Recorded Greeting	3	Request Further Image or Video Data	4	Hear Audio Only	5	Duplexed Audio Communication	6	Notify Alarm Company	7	Conference Call
Options for Cellular Telephones without Teleconferencing Functionality																			
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6	Notify Alarm Company																		
7	Conference Call																		

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	audio communication with the cellular telephone. After the audio circuit is reestablished and optionally re-authenticated, the menu may be represented to the homeowner.” 7:36–48. <i>See also</i> 1:11–45; 4:27–35. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Ramirez-Diaz, Naifeh, and Naidoo to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[9.8] wherein the exterior device comprises an antenna for transmission of the digital streaming video,	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents’ invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses wherein the exterior device comprises an antenna for transmission of the digital streaming video. For example, Zinser discloses: “As previously discussed, the cellular network interface 70 and antenna 72 connect the security system 10 with the cellular network 44. The data storage unit 74 comprises a recordable medium for storing data relevant to the security system 10. For example, the video and audio data gathered by the video camera 22 and the exterior microphone 24, respectively, may be stored at the data storage unit 74. Moreover, data stored in the data storage unit 74 may be transferred to a different medium or played on the video monitor 76. The video monitor 76 is preferably located onsite at the home and renders in substantially realtime the visual and audio data collected by the video camera 22 and external microphone 24. The internal microphone 80 with the push-to-talk circuit 82 allows an onsite homeowner or, as previously

Asserted ClaimsPrior Art Disclosures

discussed, another individual, to talk to a visitor. The video monitor 76 and interior microphone 80, when used together, provide a traditional monitor with intercom system for the homeowner.” 5:49–65.

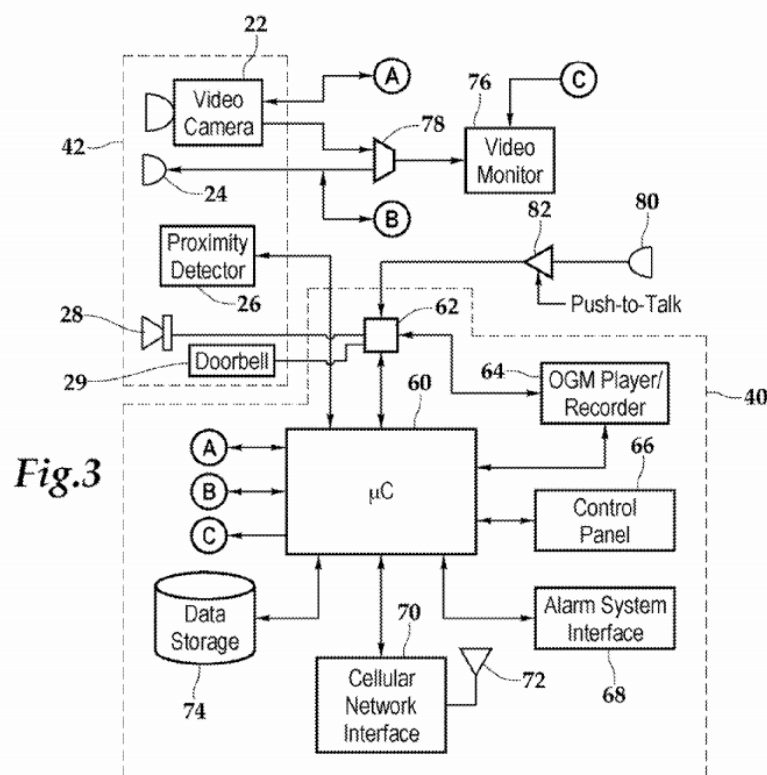
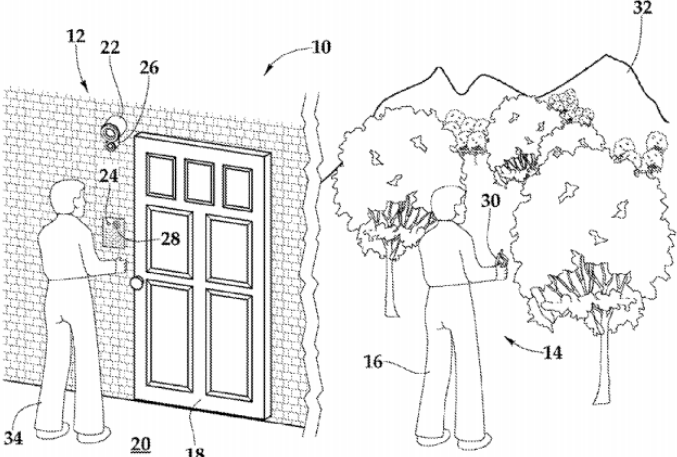


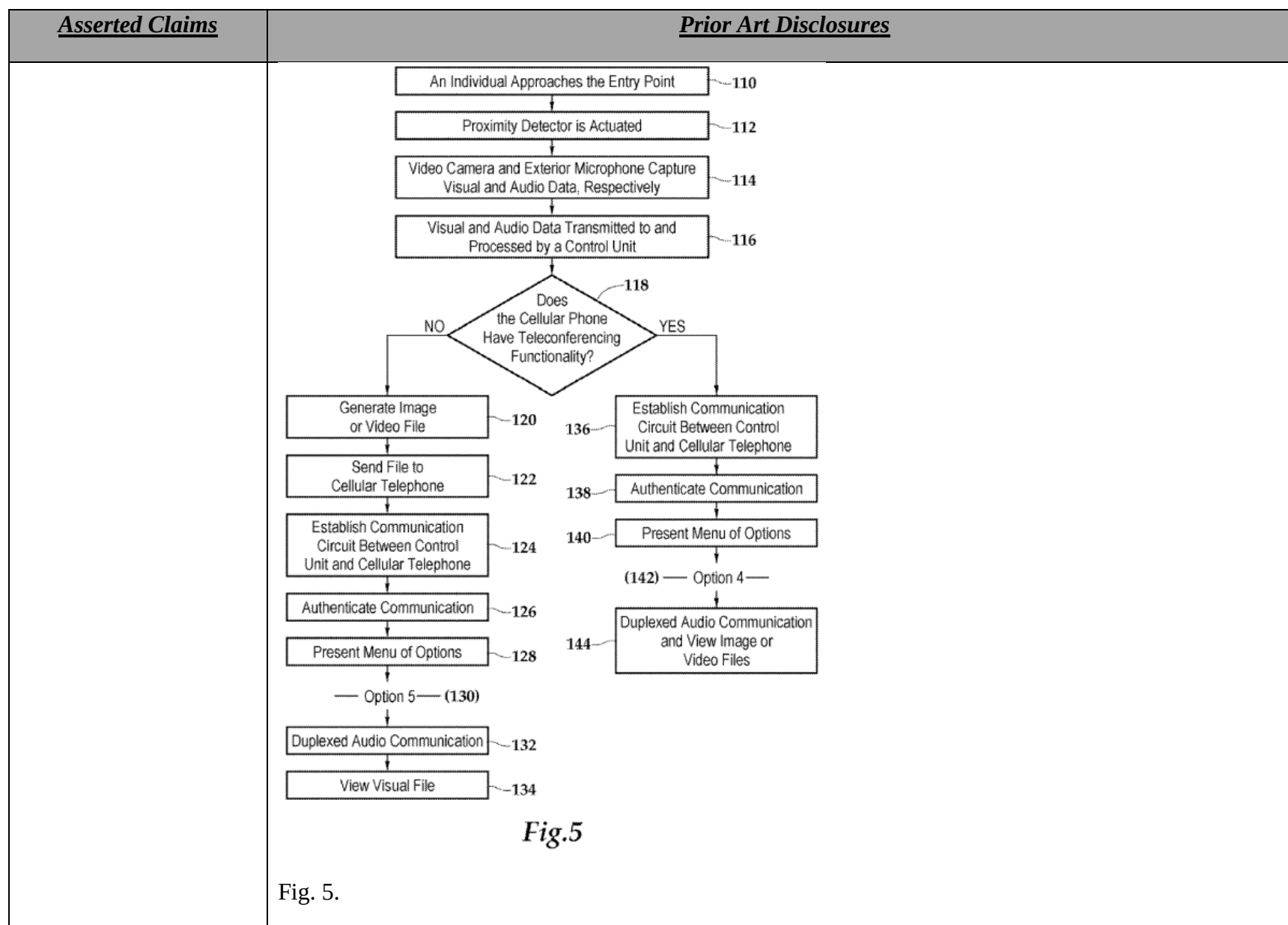
Fig. 3.

“FIG. 3 depicts one embodiment of control and communication units 40 and 42 which form portions of the security system 10. A microcontroller 60 controls the communication unit 42 and interfaces with the cellular network 44. More specifically, the microcontroller 60 contains all the processing, memory, and interfaces needed for supporting the functionalities of the control unit 40 and communications unit 42.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	Numerous components are connected to the microcontroller 60; namely, the video camera 22, the exterior microphone 24, and the proximity detector 26 of the communication unit 42.” 4:64–5:6. “Further, the components of the control unit 40 which are connected to the microcontroller 60 include a switch 62, an outgoing message (OGM) player/recorder 64, a control panel 66, an alarm system interface 68, a cellular network interface 70 having an antenna 72, and a data storage unit 74. Additionally, components, which are not illustrated as part of the communications unit 42, are connected to the microcontroller 60. A video monitor 76 is coupled to the microcontroller 60 as well as to the video camera 22 and the exterior microphone 24 through a multiplexer 78. It should be appreciated that these components described in FIG. 3 may be connected to the microcontroller 60 and interconnected by wired connections, wireless connections, or a combination thereof.” 5:7–19. “The switch 62, which is under the control of the microcontroller 60, administers access to the exterior speaker 28 and determines which input device drives a signal to the exterior speaker 28. In the illustrated implementation, the possible input devices include the OGM player/recorder 64, an interior microphone 80 having a push-to-talk circuit 82, and the cellular telephone 30 via the cellular network interface 70 and the antenna 72. The OGM player/recorder 64 is a device for presenting pre-recorded messages to visitors at the homeowner's local or remote instructions. For example, the homeowner may have a pre-recorded greeting giving specific instructions on where to leave a package. The homeowner may utilize the control panel 66, which may be positioned proximate to the interior microphone 80, to send a signal to the OGM player/recorder 64 to tell a visitor from an overnight delivery service where to leave a package. Alternatively, the homeowner may send a signal to the OGM player/recorder with the cellular telephone 30 as will be discussed in further detail hereinbelow.” 5:20–38. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Ramirez-Diaz, Naifeh, and Naidoo to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable

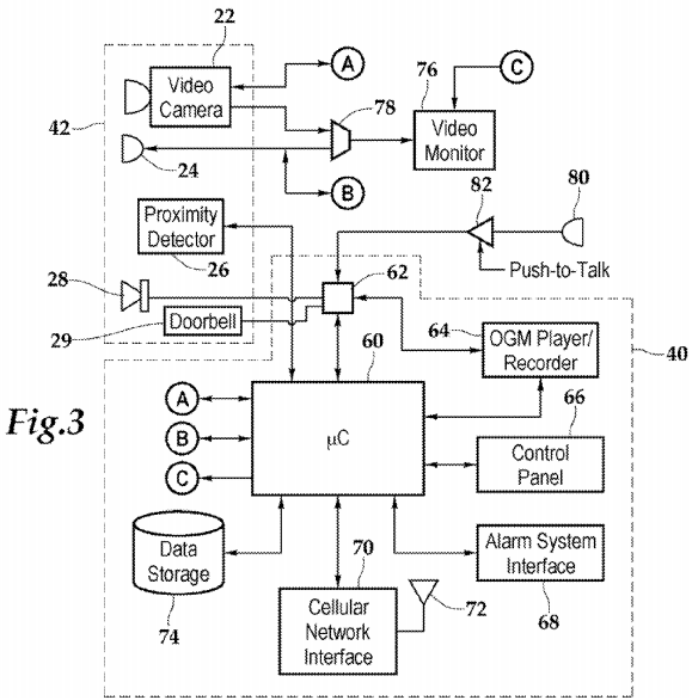
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[9.9] wherein the exterior device is capable of encrypting the digital streaming video or the digital audio during or before the transmission of the digital streaming video or the digital audio,	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses wherein the exterior device is capable of encrypting the digital streaming video or the digital audio during or before the transmission of the digital streaming video or the digital audio. For example, Zinser discloses: "Accordingly, the security system 10 and accompanying method presented herein permit the homeowner 16 or designated entity or individual, who may be onsite or at a remote location, to view and talk to a visitor (or perpetrator) in realtime or substantially realtime, without the homeowner's location being disclosed. The visitor (or perpetrator) can hear the homeowner's voice but cannot see the homeowner, since the video is communicated one-way from the doorway 18 to the cellular telephone 30 of the homeowner 16. In application, an honest visitor with good intentions will assume that the homeowner 16 is on premises. Similarly, a perpetrator will assume that the homeowner 16 is at home and the perpetrator can be expected to move on if his motives are unlawful." 2:53-65.

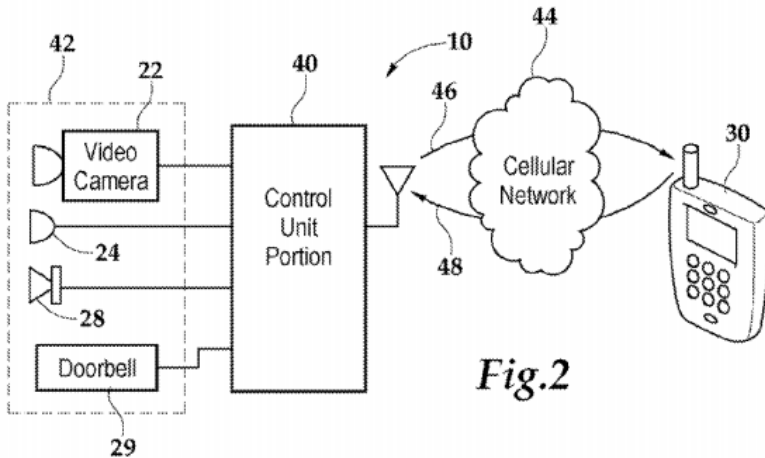
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	 <i>Fig.1</i> Fig. 1. “Referring initially to FIG. 1, therein is depicted an illustration of one embodiment of the security system 10 described herein being utilized at an entry point 12. Further, a remote location 14 is depicted wherein an individual 16 is utilizing the security system 10 to monitor the entry point 12 which includes a doorway 18 to a home having an environment 20. It should be appreciated that the security system 10 described herein may be utilized with any type of structure and entry point 12. In particular, the security system 10 presented herein is well suited for doorways at houses, apartments, lofts, condominiums, and townhouses, for example.” 2:11–21.



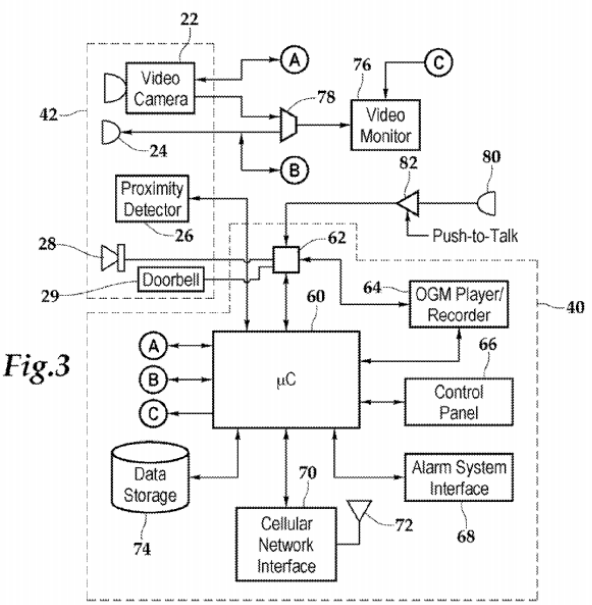
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	“At block 122, the file is sent from the control unit to the cellular telephone via the cellular network. At block 124, an audio communication circuit between the control unit and the cellular telephone is completed. At block 126, the identity of the homeowner is authenticated. By way of example, in one implementation, the homeowner may be required to enter a passcode to authenticate the identity of the homeowner. If the homeowner does not enter the passcode, then the call is disconnected. As a further benefit, this type of call authentication or a similar system prevents the control unit from connecting the visitor with the homeowner's voicemail. Accordingly, the homeowner and security system do not provide an unintentional indication to the visitor that the homeowner is not home. Additionally, the homeowner may preprogram the control unit to play a pre-recorded message from the OGM player/recorder for the visitor if the call is disconnected or not answered and authenticated.” 6:39–55. “Returning now to the description of FIG. 5, as indicated by numeral 130, the homeowner selects Option 5: Duplexed Audio Communication to have a two-way conversation with the visitor. At block 134, the homeowner views the visual file. This operation may occur at any time or simultaneously with the operations described in blocks 124 through 132. The operations of blocks 132 and 134 permit the homeowner who may be onsite or at a remote location, to view and talk to a visitor (or perpetrator) in real time or substantially realtime, without the homeowner's location being disclosed.” 7:67–8:8. <i>See also</i> 4:18–26; 5:39–48; 7:37–48; 8:8–18. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Ramirez-Diaz, Naifeh, and Naidoo to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.

<u><i>Asserted Claims</i></u>	<u><i>Prior Art Disclosures</i></u>
[9.10] wherein the exterior device is capable of receiving a request to change a sensitivity of the motion detector, and	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses wherein the exterior device is capable of receiving a request to change a sensitivity of the motion detector. For example, Zinser discloses: "In operation, an individual 34 approaches the doorway 18 and the proximity detector 26 is actuated. In turn, the video camera 22 and external microphone 24 capture visual and audio communications at the doorway 18. At least a portion of the data related to the captured doorway visual and audio communications is transmitted to the cellular telephone 30 of the homeowner 16 via a control unit that is in communication with the video camera 22, external microphone 24, proximity detector 26, and exterior speaker 28 as well as a cellular network for communicating with the cellular telephone 30." 2:35–44.

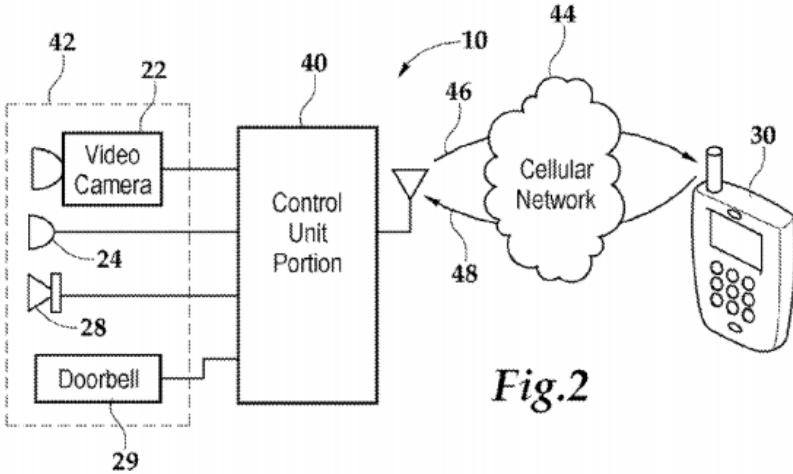
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	 Fig. 3. “FIG. 3 depicts one embodiment of control and communication units 40 and 42 which form portions of the security system 10. A microcontroller 60 controls the communication unit 42 and interfaces with the cellular network 44. More specifically, the microcontroller 60 contains all the processing, memory, and interfaces needed for supporting the functionalities of the control unit 40 and communications unit 42. Numerous components are connected to the microcontroller 60; namely, the video camera 22, the exterior microphone 24, and the proximity detector 26 of the communication unit 42.” 4:64–5:6. “Further, the components of the control unit 40 which are connected to the microcontroller 60 include a switch 62, an outgoing message (OGM) player/recorder 64, a control panel 66, an alarm system interface

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	68, a cellular network interface 70 having an antenna 72, and a data storage unit 74. Additionally, components, which are not illustrated as part of the communications unit 42, are connected to the microcontroller 60. A video monitor 76 is coupled to the microcontroller 60 as well as to the video camera 22 and the exterior microphone 24 through a multiplexer 78. It should be appreciated that these components described in FIG. 3 may be connected to the microcontroller 60 and interconnected by wired connections, wireless connections, or a combination thereof.” 5:7–19. “In general, the control panel 66 permits the homeowner or other individual to manage the security system 10. In one implementation, the control panel 66 is onsite as well as accessible through the cellular telephone 30. The alarm system interface 68 interfaces the security system 10 described herein with the homeowner's existing home security system. By way of example, this feature permits the homeowner to utilize the cellular telephone 30 to notify a home security company or the police department in the instance of a break-in or other crime.” 5:39–48.  Fig.2 Fig. 2. “FIG. 2 depicts one embodiment of the security system 10. A control unit portion 40, or control unit 40, controls a communication portion 42 and relays data and communications between the communication

<u><i>Asserted Claims</i></u>	<u><i>Prior Art Disclosures</i></u>
	portion 42 and the cellular telephone 30 via a cellular network 44. As illustrated, the communication portion 42 includes the video camera 22, the exterior microphone 24, the exterior speaker 28 and a doorbell 29, which may included as part of the communication portion 42 in particular embodiments. Preferably, the control unit 40 is located onsite with the components of the communication portion 42 and each of the components of the communication portion 42 may be connected to the control unit portion by a wired connection, such as a conventional circuit board or internal computer connection, a Category 5 (CAT 5) cable, or coaxial cable, for example, a wireless connection scheme, such as a network utilizing wireless local area technology or radio frequency technology, for example, or some combination thereof.” 3:9–26. “The cellular telephone network or cellular network 44 is employed to relay visual and audio data from the control unit to the cellular telephone 30 and relay audio data and control signals from the cellular telephone 30 to the control unit 40. Several cellular telephone systems are available to provide the communication exchanges. By way of non-limiting examples, an exemplary list of cellular telephone systems is presented in Table 1.” 3:27–34. <i>See also</i> 3:9–26, 2:66–3:8; 4:27–63; 5:20–48; Fig. 5; 6:13–55; 7:1–14 (Tbl. 2); 7:36–65; Fig. 5; 6:13–24; 8:8–14. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Ramirez-Diaz, Naifeh, and Naidoo to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
[9.11] wherein the exterior device is capable of modifying the sensitivity of the motion detector upon receiving a request to do so.	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses wherein the exterior device is capable of modifying the sensitivity of the motion detector upon receiving a request to do so. For example, Zinser discloses: "In operation, an individual 34 approaches the doorway 18 and the proximity detector 26 is actuated. In turn, the video camera 22 and external microphone 24 capture visual and audio communications at the doorway 18. At least a portion of the data related to the captured doorway visual and audio communications is transmitted to the cellular telephone 30 of the homeowner 16 via a control unit that is in communication with the video camera 22, external microphone 24, proximity detector 26, and exterior speaker 28 as well as a cellular network for communicating with the cellular telephone 30." 2:35-44.  <i>Fig.3</i>

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	Fig. 3. “FIG. 3 depicts one embodiment of control and communication units 40 and 42 which form portions of the security system 10. A microcontroller 60 controls the communication unit 42 and interfaces with the cellular network 44. More specifically, the microcontroller 60 contains all the processing, memory, and interfaces needed for supporting the functionalities of the control unit 40 and communications unit 42. Numerous components are connected to the microcontroller 60; namely, the video camera 22, the exterior microphone 24, and the proximity detector 26 of the communication unit 42.” 4:64–5:6. “Further, the components of the control unit 40 which are connected to the microcontroller 60 include a switch 62, an outgoing message (OGM) player/recorder 64, a control panel 66, an alarm system interface 68, a cellular network interface 70 having an antenna 72, and a data storage unit 74. Additionally, components, which are not illustrated as part of the communications unit 42, are connected to the microcontroller 60. A video monitor 76 is coupled to the microcontroller 60 as well as to the video camera 22 and the exterior microphone 24 through a multiplexer 78. It should be appreciated that these components described in FIG. 3 may be connected to the microcontroller 60 and interconnected by wired connections, wireless connections, or a combination thereof.” 5:7–19. “In general, the control panel 66 permits the homeowner or other individual to manage the security system 10. In one implementation, the control panel 66 is onsite as well as accessible through the cellular telephone 30. The alarm system interface 68 interfaces the security system 10 described herein with the homeowner's existing home security system. By way of example, this feature permits the homeowner to utilize the cellular telephone 30 to notify a home security company or the police department in the instance of a break-in or other crime.” 5:39–48.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	 Fig. 2. “FIG. 2 depicts one embodiment of the security system 10. A control unit portion 40, or control unit 40, controls a communication portion 42 and relays data and communications between the communication portion 42 and the cellular telephone 30 via a cellular network 44. As illustrated, the communication portion 42 includes the video camera 22, the exterior microphone 24, the exterior speaker 28 and a doorbell 29, which may included as part of the communication portion 42 in particular embodiments. Preferably, the control unit 40 is located onsite with the components of the communication portion 42 and each of the components of the communication portion 42 may be connected to the control unit portion by a wired connection, such as a conventional circuit board or internal computer connection, a Category 5 (CAT 5) cable, or coaxial cable, for example, a wireless connection scheme, such as a network utilizing wireless local area technology or radio frequency technology, for example, or some combination thereof.” 3:9–26. “The cellular telephone network or cellular network 44 is employed to relay visual and audio data from the control unit to the cellular telephone 30 and relay audio data and control signals from the cellular telephone 30 to the control unit 40. Several cellular telephone systems are available to provide the

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	communication exchanges. By way of non-limiting examples, an exemplary list of cellular telephone systems is presented in Table 1.” 3:27–34. <i>See also</i> 2:66–3:8; 4:27–63; 5:20–48; Fig. 5; 6:13–55; Tbl. 3; 8:32–42, 7:36–65. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Ramirez-Diaz, Naifeh, and Naidoo to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
Claim 13	
[13.1] A method for using a detection and viewing system comprising:	To the extent the preamble is limiting, Zinser, alone or in combination with ordinary skill in the art, or in combination with other references identified in this chart or elsewhere in Respondents’ invalidity contentions discloses a method for using a detection and viewing system. <i>See supra</i> claim 9 at element 9.1.
[13.2] wirelessly transmitting streaming video from an interior device upon detection of a person,	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents’ invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses wirelessly transmitting streaming video from an interior device upon detection of a person. <i>See supra</i> claim 9 at element 9.3; <i>see also supra</i> at elements 9.5, 9.8. In addition, by way of example, Zinser discloses:

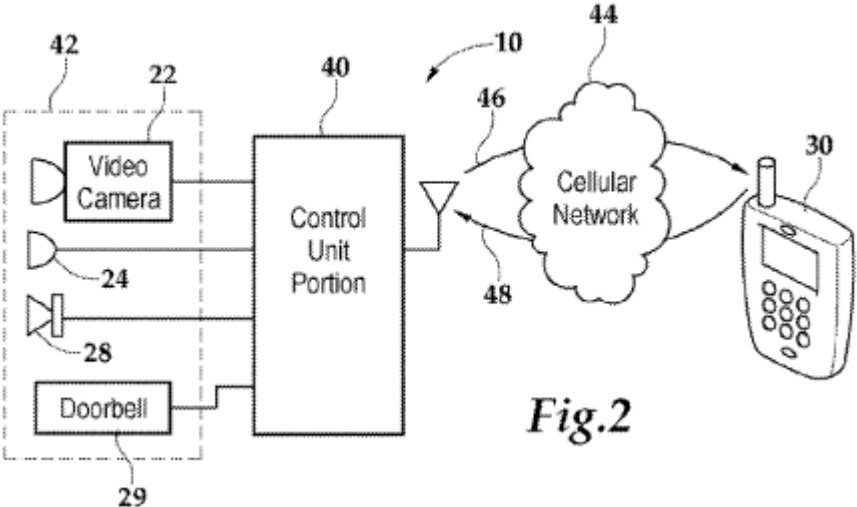
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	“In operation, an individual 34 approaches the doorway 18 and the proximity detector 26 is actuated. In turn, the video camera 22 and external microphone 24 capture visual and audio communications at the doorway 18. At least a portion of the data related to the captured doorway visual and audio communications is transmitted to the cellular telephone 30 of the homeowner 16 via a control unit that is in communication with the video camera 22, external microphone 24, proximity detector 26, and exterior speaker 28 as well as a cellular network for communicating with the cellular telephone 30.” 2:35–44. <i>Fig.3</i> Fig. 3. “FIG. 3 depicts one embodiment of control and communication units 40 and 42 which form portions of the security system 10. A microcontroller 60 controls the communication unit 42 and interfaces with the cellular network 44. More specifically, the microcontroller 60 contains all the processing, memory, and interfaces needed for supporting the functionalities of the control unit 40 and communications unit 42.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	Numerous components are connected to the microcontroller 60; namely, the video camera 22, the exterior microphone 24, and the proximity detector 26 of the communication unit 42.” 4:64–5:6. “Further, the components of the control unit 40 which are connected to the microcontroller 60 include a switch 62, an outgoing message (OGM) player/recorder 64, a control panel 66, an alarm system interface 68, a cellular network interface 70 having an antenna 72, and a data storage unit 74. Additionally, components, which are not illustrated as part of the communications unit 42, are connected to the microcontroller 60. A video monitor 76 is coupled to the microcontroller 60 as well as to the video camera 22 and the exterior microphone 24 through a multiplexer 78. It should be appreciated that these components described in FIG. 3 may be connected to the microcontroller 60 and interconnected by wired connections, wireless connections, or a combination thereof.” 5:7–19. <i>See also</i> Fig. 1. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Klein, Matsukawa, Ramirez-Diaz, and Naifeh to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[13.3] wherein the interior device comprises a camera, a microphone, a speaker, a transceiver, and a motion sensor;	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents’ invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses wherein the interior device comprises a camera, a microphone, a speaker, a transceiver, and a motion sensor. <i>See supra</i> claim 9 at elements 9.2, 9.3, and 9.4; <i>see also supra</i> at elements 9.5, 9.6, 9.8.

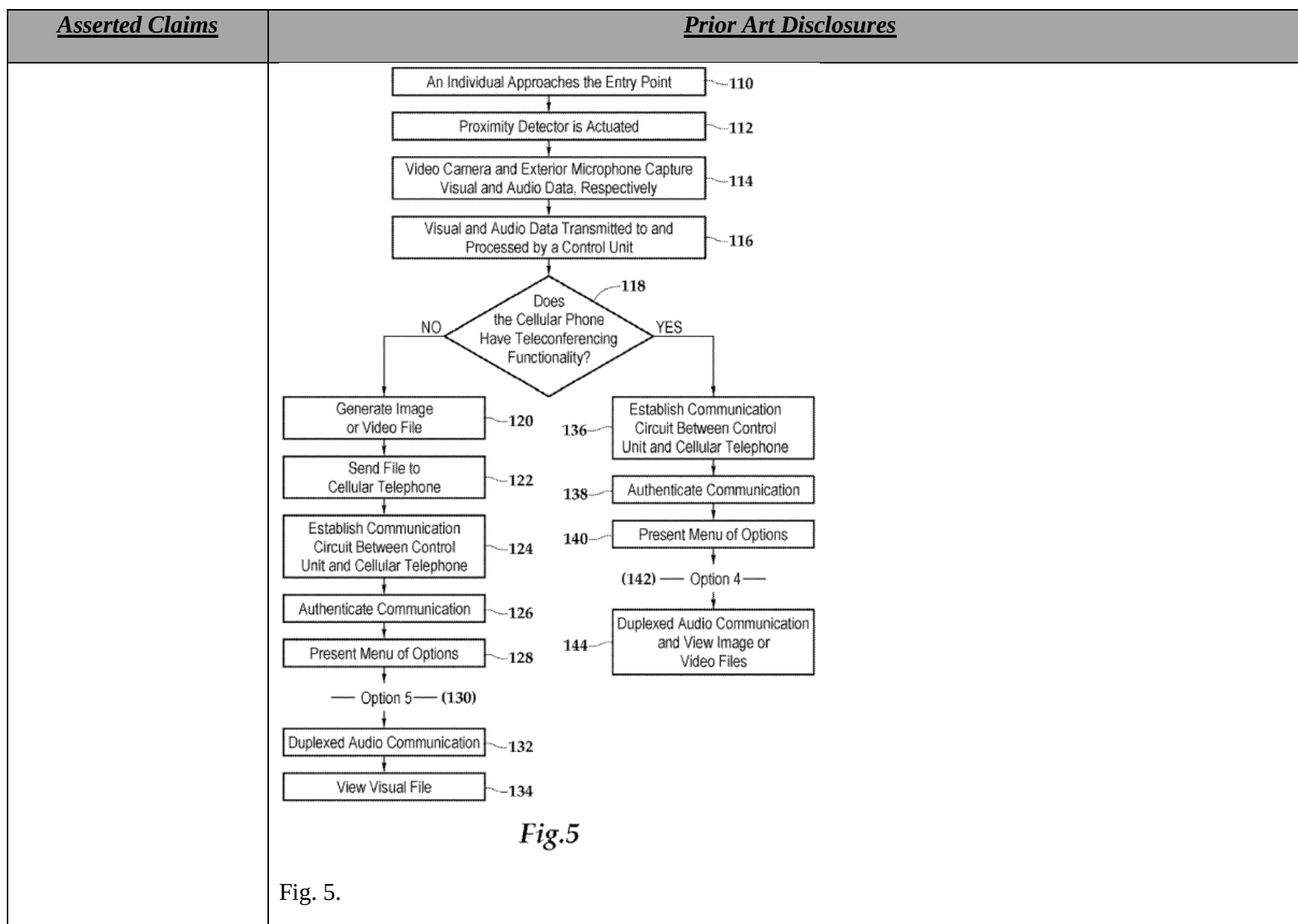
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	In addition, by way of example, Zinser discloses: “In general, the control panel 66 permits the homeowner or other individual to manage the security system 10. In one implementation, the control panel 66 is onsite as well as accessible through the cellular telephone 30. The alarm system interface 68 interfaces the security system 10 described herein with the homeowner's existing home security system. By way of example, this feature permits the homeowner to utilize the cellular telephone 30 to notify a home security company or the police department in the instance of a break in or other crime.” 5:39–48. <i>See also</i> Tbl. 2, 7:48–8:8, tbl. 3. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Klein, Matsukawa, Ramirez-Diaz, and Naifeh to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
[13.4] transmitting digital audio using the interior device;	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses transmitting digital audio using the interior device. <i>See supra</i> claim 9 at element 9.4; <i>see also supra</i> at element 9.8. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Klein, Matsukawa, Ramirez-Diaz, and Naifeh to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[13.5] receiving audio at the interior device that was captured by a peripheral device, which is a cell phone, after the person has been detected by the interior device;	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses receiving audio at the interior device that was captured by a peripheral device, which is a cell phone, after the person has been detected by the interior device. <i>See supra</i> claim 9 at element 9.5; <i>see also supra</i> at element 9.6. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Klein, Matsukawa, Ramirez-Diaz, and Naifeh to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[13.6] displaying an icon and the streaming video at the same time on the peripheral device;	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses displaying an icon and the streaming video at the same time on the peripheral device. <i>See supra</i> claim 9 at elements 9.3, 9.8; <i>see also supra</i> at elements 9.7, 9.9, 9.10, 9.11. In addition, by way of example, Zinser discloses: “In an alternate embodiment, the video camera 22 may be integrated into the doorbell 29 and the integrated components disposed in communication with the control unit portion 40 such that the actuation of the doorbell establishes communication from the control unit portion 40 to the cellular telephone 30. The initial communication from the control unit portion 40 to the cellular telephone 30 may be considered a notification and it may take the form of a page, email, text message, instant message, phone call or any other type messaging and it may be achieved through any type of network including the illustrated cellular network 44. In response to the notification, the homeowner 16 may send a signal to the control unit portion 40 to either ignore the notification and event or accept more information including images or video about the notification and event. It should be appreciated that the instant security system provides flexibility and selectability in the manner in which the homeowner 16 receives notifications and alerts.” 4:46–63.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	 <i>Fig. 2</i> Fig. 2. “FIG. 2 depicts one embodiment of the security system 10. A control unit portion 40, or control unit 40, controls a communication portion 42 and relays data and communications between the communication portion 42 and the cellular telephone 30 via a cellular network 44. As illustrated, the communication portion 42 includes the video camera 22, the exterior microphone 24, the exterior speaker 28 and a doorbell 29, which may be included as part of the communication portion 42 in particular embodiments. Preferably, the control unit 40 is located onsite with the components of the communication portion 42 and each of the components of the communication portion 42 may be connected to the control unit portion by a wired connection, such as a conventional circuit board or internal computer connection, a Category 5 (CAT5) cable, or coaxial cable, for example, a wireless connection scheme. Such as a network utilizing wireless local area technology or radio frequency technology, for example, or some combination thereof.” 3:9–26. “The cellular telephone 30 may comprise any long-range, portable electronic device that provides for peer-to-peer telecommunications over a long distance. The cellular telephone 30 may comprise a personal digital assistant (PDA) or other electronic communication device. As illustrated, the cellular

<u><i>Asserted Claims</i></u>	<u><i>Prior Art Disclosures</i></u>
	telephone 30 receives signals 46 and sends signals 48. The signals 46 from the control unit 40 to the cellular telephone 30 may include Voice, images, and video signals. The signals 48 to the control unit 40 may comprise Voice and control signals. In addition to the voice function of the cellular telephone 30, the image, video, and data services of the cellular phone may be provided by a short message service (SMS) which utilizes text messaging, email, packet Switching for access to the Internet to provide the content. Other suitable services for providing the content needed by the cellular telephone 30 include a multimedia message service (MMS) for sending and receiving photos and video. It should be appreciated, however, that the data and content received by the cellular telephone 30 is not limited to these services.” 4:27–45.



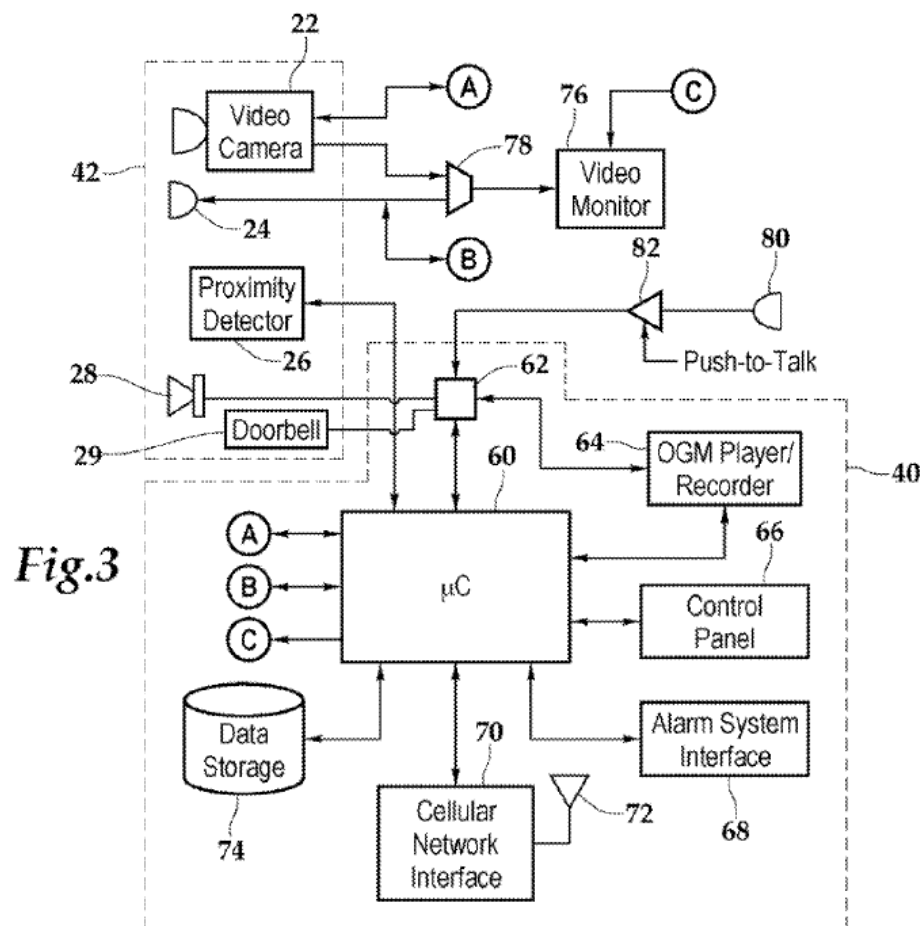
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>																
	“At block 128, the homeowner is presented with a menu of options that give the homeowner choices in how to handle the visitor's arrival to the home. The homeowner may select an option in a conventional manner Such as by pressing a number on the cellular telephone corresponding to the number of the option. Alternatively, for example, a Voice activated system may be utilized. By way of example and not by way of limitation, Table 2 presents a matrix that illustrates a portion of the options that the security system of the present invention can make available to the homeowner. Each of these options will be briefly described before returning to the description of FIG. 5 in paragraph 40.” 6:56–67. TABLE 2 Options for Cellular Telephones without Teleconferencing Functionality <table> <tr> <th>Option Number</th><th>Option</th></tr> <tr> <td>1</td><td>No Action</td></tr> <tr> <td>2</td><td>Play a Pre-Recorded Greeting</td></tr> <tr> <td>3</td><td>Request Further Image or Video Data</td></tr> <tr> <td>4</td><td>Hear Audio Only</td></tr> <tr> <td>5</td><td>Duplexed Audio Communication</td></tr> <tr> <td>6</td><td>Notify Alarm Company</td></tr> <tr> <td>7</td><td>Conference Call</td></tr> </table> Tbl. 2. “With respect to Option 3: Request Further Image or Video Data, the initial file received by the homeowner at the cellular telephone may be blurred or the visitor in the doorway may not be clearly identifiable from the image or video. With this option, the homeowner requests an additional image or video. When this option is selected, since the cellular telephone does not have teleconferencing functionality or the ability to simultaneously receive both Voice and data, the control unit temporarily disconnects from the cellular telephone, sends the second image or video file, and then reestablishes	Option Number	Option	1	No Action	2	Play a Pre-Recorded Greeting	3	Request Further Image or Video Data	4	Hear Audio Only	5	Duplexed Audio Communication	6	Notify Alarm Company	7	Conference Call
Option Number	Option																
1	No Action																
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7	Conference Call																

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>														
	audio communication with the cellular telephone. After the audio circuit is reestablished and optionally re-authenticated, the menu may be represented to the homeowner.” 7:36–49. “Returning now to the description of FIG. 5, as indicated by numeral 130, the homeowner selects Option 5: Duplexed Audio Communication to have a two-way conversation with the visitor. At block 134, the homeowner views the visual file. This operation may occur at any time or simultaneously with the operations described in blocks 124 through 132. The operations of blocks 132 and 134 permit the homeowner who may be onsite or at a remote location, to view and talk to a visitor (or perpetrator) in real time or substantially realtime, without the homeowner's location being disclosed.” 7:66–8:8. TABLE 3 Options for Cellular Telephones with <u>Teleconferencing or Equivalent Functionality</u> <table> <tr> <th>Option Number</th><th>Option</th></tr> <tr> <td>1</td><td>No Action</td></tr> <tr> <td>2</td><td>Play a Pre-Recorded Greeting</td></tr> <tr> <td>3</td><td>Observe Only</td></tr> <tr> <td>4</td><td>Duplexed Communication</td></tr> <tr> <td>5</td><td>Notify Alarm Company</td></tr> <tr> <td>6</td><td>Conference Call</td></tr> </table> Tbl. 3. “These available options, where serve as non-limiting examples, are substantially equivalent to the options discussed at block 128. As indicated in FIG. 5, Option 4: Duplexed Communication is selected. Since the telephone has the ability to simultaneously receive data and Voice communications, this option permits the cellular telephone to render a video file with substantially real time video visual and audio captured at the doorway of the home. Alternatively, streaming audio and video may be delivered.	Option Number	Option	1	No Action	2	Play a Pre-Recorded Greeting	3	Observe Only	4	Duplexed Communication	5	Notify Alarm Company	6	Conference Call
Option Number	Option														
1	No Action														
2	Play a Pre-Recorded Greeting														
3	Observe Only														
4	Duplexed Communication														
5	Notify Alarm Company														
6	Conference Call														

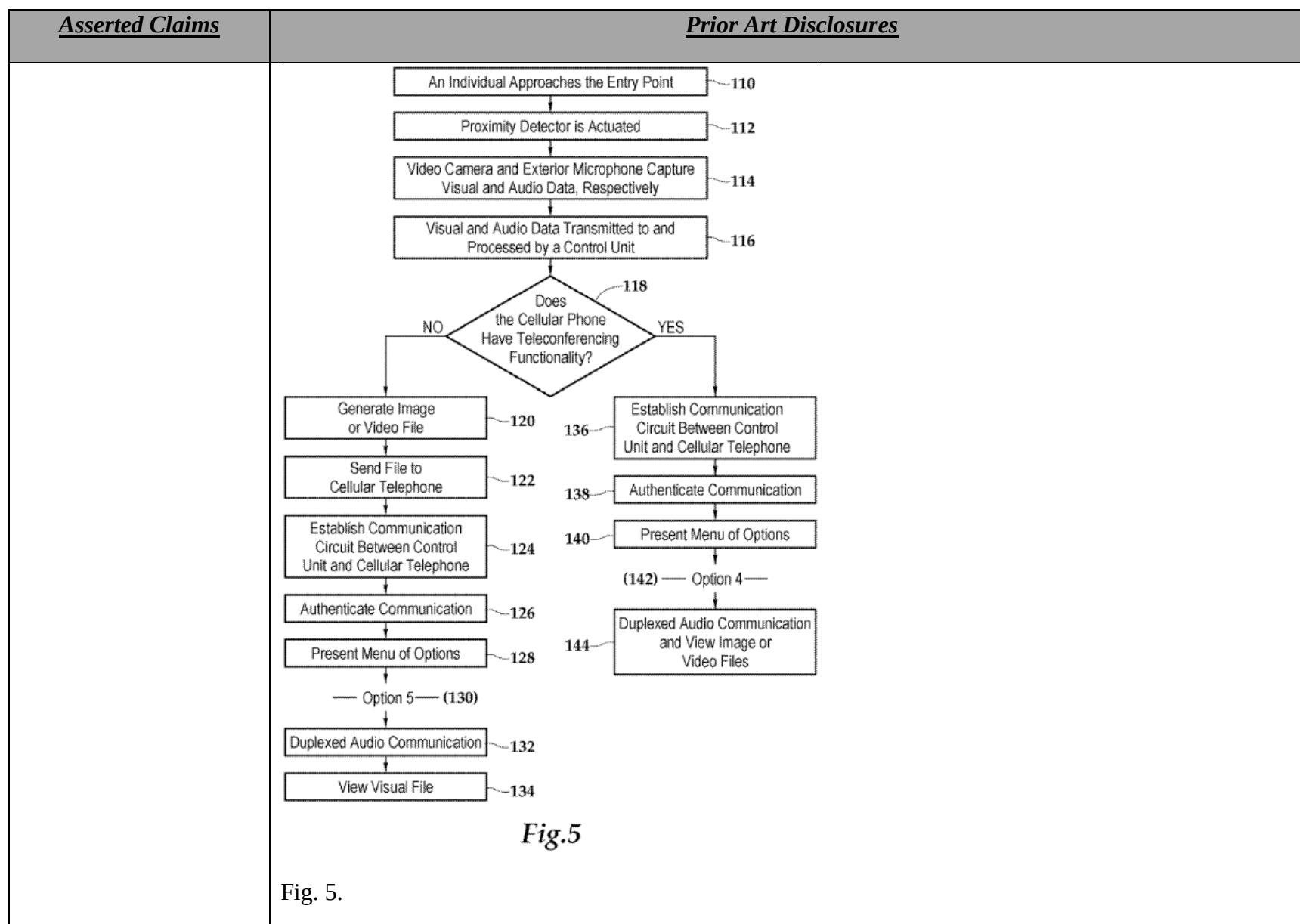
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	The homeowner is therefore allowed to see and hear the visitor while communicating with the visitor orally.” 8:32–42. <i>See also</i> Fig. 4. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Klein, Matsukawa, Ramirez-Diaz, and Naifeh to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[13.7] storing the streaming video and digital audio in a database and associating the interior device with the stored streaming video and digital audio;	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents’ invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses storing the streaming video and digital audio in a database and associating the interior device with the stored streaming video and digital audio. <i>See supra</i> claim 9 at elements 9.3, 9.4; <i>see also supra</i> at element 9.9. In addition, by way of example, Zinser discloses: “As previously discussed, the cellular network interface 70 and antenna 72 connect the security system 10 with the cellular network 44. The data storage unit 74 comprises a recordable medium for storing data relevant to the security system 10. For example, the video and audio data gathered by the Video camera 22 and the exterior microphone 24, respectively, may be stored at the data storage unit 74. Moreover, data stored in the data storage unit 74 may be transferred to a different medium or played on the video monitor 76. The video monitor 76 is preferably located onsite at the home and renders in Substantially realtime the visual and audio data collected by the video camera 22 and external

Asserted ClaimsPrior Art Disclosures

microphone 24. The internal microphone 80 with the push-to-talk circuit 82 allows an onsite homeowner or, as previously discussed, another individual, to talk to a visitor. The video monitor 76 and interior microphone 80, when used together, provide a traditional monitor with intercom system for the homeowner.” 5:49–65.



<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	Fig. 3. “FIG. 3 depicts one embodiment of control and communication units 40 and 42 which form portions of the security system 10. A microcontroller 60 controls the communication unit 42 and interfaces with the cellular network 44. More specifically, the microcontroller 60 contains all the processing, memory, and interfaces needed for Supporting the functionalities of the control unit 40 and communications unit 42. Numerous components are connected to the microcontroller 60; namely, the video camera 22, the exterior microphone 24, and the proximity detector 26 of the communication unit 42.” 4:64–5:6. “Further, the components of the control unit 40 which are connected to the microcontroller 60 include a switch 62, an outgoing message (OGM) player/recorder 64, a control panel 66, an alarm system interface 68, a cellular network interface 70 having an antenna 72, and a data storage unit 74. Additionally, components, which are not illustrated as part of the communications unit 42, are connected to the microcontroller 60. A video monitor 76 is coupled to the microcontroller 60 as well as to the video camera 22 and the exterior microphone 24 through a multiplexer 78. It should be appreciated that these components described in FIG. 3 may be connected to the microcontroller 60 and interconnected by wired connections, wireless connections, or a combination thereof.” 5:7–19. “These available options, where serve as non-limiting examples, are substantially equivalent to the options discussed at block 128. As indicated in FIG. 5, Option 4: Duplexed Communication is selected. Since the telephone has the ability to simultaneously receive data and Voice communications, this option permits the cellular telephone to render a video file with substantially real time video visual and audio captured at the doorway of the home. Alternatively, streaming audio and video may be delivered. The homeowner is therefore allowed to see and hear the visitor while communicating with the visitor orally.” 8:33–42.

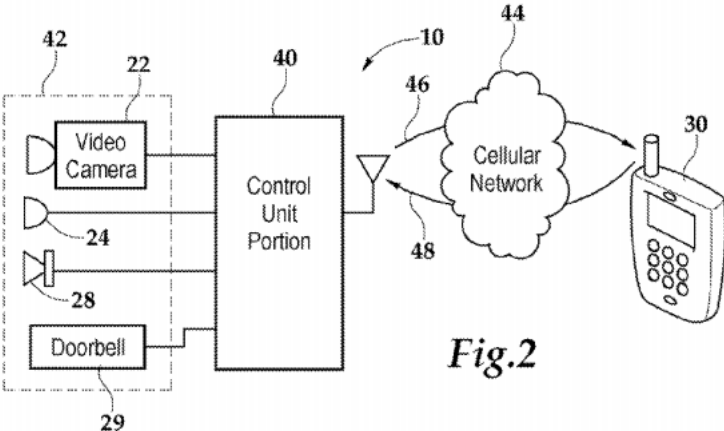


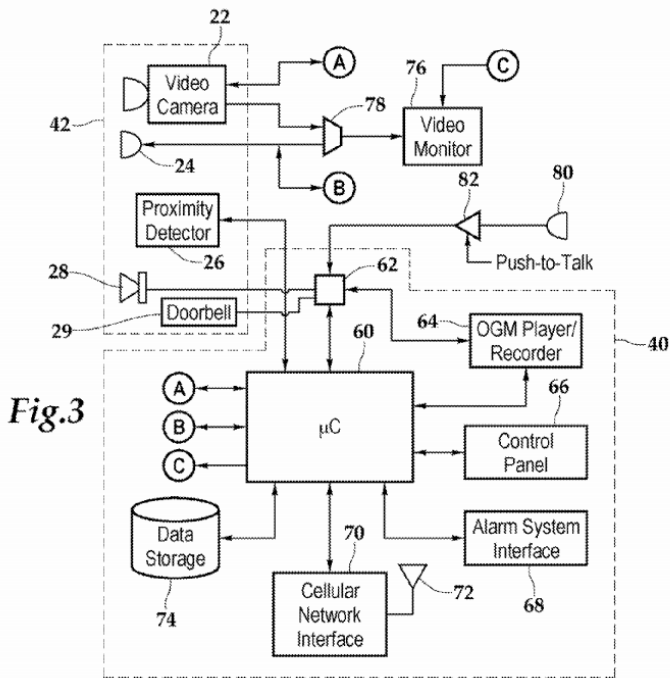
<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	“At block 118, if the cellular telephone has teleconferencing functionality or the ability to simultaneously receive both data and voice, then the method advances to block 136 (see paragraph 41). On the other hand, if this functionality is not present in the cellular telephone or if the cellular telephone network being utilized does not support this type of functionality, then the method advances to block 120 wherein the control unit generates an image or video file that includes at least a portion of the visual or audio/visual data collected by the video camera and the exterior microphone. Whether an image file or video file is generated depends on the preferences programmed into the instant security system as well as the capabilities of the cellular network and the cellular telephone.” 6:25–38. <i>See also</i> Fig. 4, 5:66–6:12, 6:13–24, 6:39–55, tbls. 2 & 3, 7:66–8:8. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Klein, Matsukawa, Ramirez-Diaz, and Naifeh to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[13.8] replicating at least a portion of the database on one or more computers; and	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents’ invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses replicating at least a portion of the database on one or more computers. For example, Zinser discloses: <i>See supra</i> claim 9 at elements 9.3, 9.4; <i>see also supra</i> at element 9.9, 13.7.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Klein, Matsukawa, Ramirez-Diaz, and Naifeh to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[13.9] providing a storage hierarchy for the streaming video and digital audio stored in the database.	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses providing a storage hierarchy for the streaming video and digital audio stored in the database. For example, Zinser discloses: <i>See supra</i> claim 9 at elements 9.3, 9.4; <i>see also supra</i> at element 9.9, 13.7. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Klein, Matsukawa, Ramirez-Diaz, and Naifeh to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
Claim 14	
[14.1] The method of claim 13, further comprising: encrypting the streaming video and the digital audio, and	Zinser, alone or in combination with ordinary skill in the art, or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions discloses the method of claim 13, further comprising: encrypting the streaming video and the digital audio. <i>See supra</i> claim 9 at element 9.9. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Klein, Howarter, Ramirez-Diaz, and Naifeh to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[14.2] receiving one or more instructions, at the interior device, to modify two or more control settings for operation of the camera,	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses receiving one or more instructions, at the interior device, to modify two or more control settings for operation of the camera. <i>See supra</i> claim 9 at elements 9.10, 9.11; <i>see also supra</i> at element 9.7. In addition, by way of example, Zinser discloses: A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Klein, Howarter, Ramirez-Diaz, and Naifeh to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[14.3] wherein the icon, when selected, allows a user to speak to the person.	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses wherein the icon, when selected, allows a user to speak to the person. In addition, by way of example, Zinser discloses: <i>See supra</i> claim 9 at elements 9.4, 9.5, 9.6; <i>see also supra</i> at element 9.9, 13.6. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Klein, Howarter, Ramirez-Diaz, and Naifeh to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
Claim 16	
[16.1] The method of claim 13, further comprising: providing a MAC address, via the interior	Zinser, alone or in combination with ordinary skill in the art, or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions discloses the method of claim 13, further comprising: providing a MAC address, via the interior device, upon receiving a request for the MAC address at the interior device.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
device, upon receiving a request for the MAC address at the interior device,	For example, Zinser discloses:  <i>Fig. 2</i> Fig. 2. “FIG. 2 depicts one embodiment of the security system 10. A control unit portion 40, or control unit 40, controls a communication portion 42 and relays data and communications between the communication portion 42 and the cellular telephone 30 via a cellular network 44. As illustrated, the communication portion 42 includes the video camera 22, the exterior microphone 24, the exterior speaker 28 and a doorbell 29, which may included as part of the communication portion 42 in particular embodiments. Preferably, the control unit 40 is located onsite with the components of the communication portion 42 and each of the components of the communication portion 42 may be connected to the control unit portion by a wired connection, such as a conventional circuit board or internal computer connection, a Category 5 (CAT 5) cable, or coaxial cable, for example, a wireless connection scheme, such as a network utilizing wireless local area technology or radio frequency technology, for example, or some combination thereof.” 3:9–26.

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	 Fig. 3 Fig. 3. “FIG. 3 depicts one embodiment of control and communication units 40 and 42 which form portions of the security system 10. A microcontroller 60 controls the communication unit 42 and interfaces with the cellular network 44. More specifically, the microcontroller 60 contains all the processing, memory, and interfaces needed for supporting the functionalities of the control unit 40 and communications unit 42. Numerous components are connected to the microcontroller 60; namely, the video camera 22, the exterior microphone 24, and the proximity detector 26 of the communication unit 42.” 4:64–5:6. “As previously discussed, the cellular network interface 70 and antenna 72 connect the security system 10 with the cellular network 44. The data storage unit 74 comprises a recordable medium for storing data relevant to the security system 10. For example, the video and audio data gathered by the video camera

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	22 and the exterior microphone 24, respectively, may be stored at the data storage unit 74. Moreover, data stored in the data storage unit 74 may be transferred to a different medium or played on the video monitor 76. The video monitor 76 is preferably located onsite at the home and renders in substantially realtime the visual and audio data collected by the video camera 22 and external microphone 24. The internal microphone 80 with the push-to-talk circuit 82 allows an onsite homeowner or, as previously discussed, another individual, to talk to a visitor. The video monitor 76 and interior microphone 80, when used together, provide a traditional monitor with intercom system for the homeowner.” 5:49–6:12. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Klein, Ramirez-Diaz, Naidoo, and Okayama to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[16.2] receiving one or more instructions to modify two or more control settings for operation of the camera, and	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents’ invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses receiving one or more instructions, at the interior device, to modify two or more control settings for operation of the camera. <i>See supra</i> claim 9 at elements 9.10, 9.11; <i>see also supra</i> at element 9.7. <i>See supra</i> claim 14 at element 14.2. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Klein, Ramirez-Diaz, Naidoo, and Okayama to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that

<u>Asserted Claims</u>	<u>Prior Art Disclosures</u>
	the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
[16.3] receiving an instruction to modify a sensitivity of the motion sensor.	Zinser, alone or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions, and further in light of the knowledge of a person of ordinary skill in the art, discloses receiving an instruction to modify a sensitivity of the motion sensor. <i>See supra</i> claim 9 at element 9.10; <i>see also supra</i> at element 9.11. A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Klein, Ramirez-Diaz, Naidoo, and Okayama to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.
Claim 18	
[18] The method of claim 13, further comprising: storing the streaming video and digital audio in memory that is part of the interior device.	Zinser, alone or in combination with ordinary skill in the art, or in combination with other references identified in this chart or elsewhere in Respondents' invalidity contentions discloses the method of claim 13, further comprising: storing the streaming video and digital audio in memory that is part of the interior device. <i>See supra</i> claim 13 at element 13.7; <i>see also supra</i> at elements 13.8 and 13.9.

<u><i>Asserted Claims</i></u>	<u><i>Prior Art Disclosures</i></u>
	A POSITA would have been motivated to combine the teachings of this reference with the knowledge of a person of ordinary skill in the art, and/or this reference combined with any one of Menard, Von Bauer, Panasonic, Axis 2100, Howarter, Ramirez-Diaz, and Naifeh to achieve this element. For example, one of skill in the art would find the combination obvious to try, due at least to the similarity of the technical teachings of the art. As another example, one of skill in the art would find that the teachings could be predictably interchanged by, for example, simple substitution, at least because of the predictability of the art and the known interchangeability of the various elements. As another example, one of skill in the art would be motivated to combine the references, and would have a reasonable expectation of success in doing so, at least because the references use known variations of existing technology to solve routine and well understood problems in predictable ways.