

# Potential Infringement Analysis: AI Vision Patent Portfolio

Prepared for Internal Discussion

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CONFIDENTIAL - ATTORNEY WORK PRODUCT

## Executive Summary

This document identifies companies likely infringing on the Carnegie Mellon AI Vision patent portfolio based on publicly available product information, technical documentation, and market positioning. These targets represent both **licensing revenue opportunities** and **leverage for defensive acquisition discussions**.

**Note:** Formal claim chart analysis required before any enforcement action. This is a preliminary identification based on product-market overlap.

## Confirmed Target: Experian

### Status: Evidence of Use Already Developed

Per the EoU documentation (USP 7,062,510), Experian's **Purchase-Based Data Solutions** have been mapped against patent claims.

Patent	Claim Elements Mapped	Evidence Source
US 7,062,510	Consumer profiling from purchase data, consumer characterization vectors	<a href="http://experian.com/marketing/consumer-view/transactional-data">experian.com/marketing/consumer-view/transactional-data</a>

### Products Implicated:

- ConsumerView Transactional Data
- Identity Resolution Services
- Marketing Attributes

**Estimated Licensing Value:** \$5M - \$15M annually (based on product revenue)

**Recommendation:** Use as template for additional EoU development; leverage in defensive acquisition discussions.

## Category 1: Retail Automation Infringers

### Amazon (Amazon Go / Just Walk Out)

Technology	Likely Infringing Patents	Evidence
Grab-and-go checkout	Shrinkage detection, multi-view product detection	<a href="http://amazon.com/b?ie=UTF8&amp;node;=16008589011">amazon.com/b?ie=UTF8&amp;node;=16008589011</a>
Product recognition	Smart bounding boxes, multi-scale detection	AWS "Just Walk Out" technology documentation
Shelf monitoring	Planogram compliance, false positive reduction	Amazon Fresh store deployments

#### Public Evidence:

- "Just Walk Out" uses computer vision to track products
- Multi-camera fusion for product identification
- Real-time inventory tracking

**Estimated Licensing Value:** \$50M - \$200M (based on deployment scale)

### Walmart (Sam's Club Scan & Go, Store Automation)

Technology	Likely Infringing Patents	Evidence
Scan & Go mobile checkout	Product recognition, feature extraction	<a href="http://corporate.walmart.com/tech">corporate.walmart.com/tech</a>
Inventory robots	Multi-view detection, shelf scanning	Bossa Nova partnership, Symbotic deployment
Self-checkout	Shrinkage detection, object recognition	In-store self-checkout systems

#### Public Evidence:

- Inventory scanning robots deployed in stores
- Computer vision for checkout verification
- Partnership with Symbotic for warehouse automation

**Estimated Licensing Value:** \$30M - \$100M

## NCR Voyix

Technology	Likely Infringing Patents	Evidence
Self-checkout systems	Shrinkage detection, product recognition	<a href="http://ncr.com/retail/self-checkout">ncr.com/retail/self-checkout</a>
Loss prevention	False positive reduction, object detection	NCR Vision portfolio
Product identification	Multi-scale detection, bounding boxes	POS/checkout documentation

### Public Evidence:

- Market leader in self-checkout hardware/software
- "NCR Vision" explicitly references AI-powered detection
- Loss prevention features in checkout systems

**Estimated Licensing Value:** \$10M - \$30M

## Zebra Technologies

Technology	Likely Infringing Patents	Evidence
Inventory management	Shelf scanning, planogram compliance	<a href="http://zebra.com/retail">zebra.com/retail</a>
SmartSight	Product detection, multi-view recognition	SmartSight platform documentation
Workforce solutions	Action recognition, pose estimation	Task management systems

**Estimated Licensing Value:** \$8M - \$20M

## Category 2: Security & Surveillance Infringers

### Verkada

Technology	Likely Infringing Patents	Evidence
AI-powered cameras	Face recognition, pose-invariant detection	<a href="http://verkada.com/products">verkada.com/products</a>
Person/vehicle detection	Efficient architectures, edge processing	On-camera AI documentation
Entrance security	Continuous authentication, biometrics	Access control products

#### Public Evidence:

- Cloud-managed cameras with on-device AI
- Facial recognition and person detection features
- Edge processing for real-time alerts

**Estimated Licensing Value:** \$5M - \$15M

## Axon (Taser)

Technology	Likely Infringing Patents	Evidence
Body camera AI	Action recognition, efficient architectures	<a href="http://axon.com/products/axon-body">axon.com/products/axon-body</a>
Evidence.com analytics	Face recognition, pose estimation	Cloud evidence platform
Real-time crime centers	Weapon detection, scene analysis	Axon Fusus acquisition

#### Public Evidence:

- AI-powered evidence analysis
- Body camera footage processing
- Real-time alerting systems

**Estimated Licensing Value:** \$10M - \$25M

## Motorola Solutions

Technology	Likely Infringing Patents	Evidence
Video security	Face recognition, continuous authentication	<a href="http://motorolasolutions.com/video-security">motorolasolutions.com/video-security</a>

Technology	Likely Infringing Patents	Evidence
Avigilon (acquisition)	Pose-invariant recognition, action detection	Avigilon AI capabilities
Command centers	Multi-camera analysis, scene rectification	Public safety solutions

**Public Evidence:**

- Avigilon acquisition brought extensive AI video analytics
- Appearance search and unusual motion detection
- Self-learning video analytics

**Estimated Licensing Value:** \$15M - \$40M

### Category 3: Consumer Electronics / AR/VR Infringers

#### Apple

Technology	Likely Infringing Patents	Evidence
Face ID	3D face reconstruction, pose-invariant recognition	Apple Face ID documentation
Vision Pro	Efficient architectures, on-device processing	visionOS developer documentation
Photos app	Face recognition, feature extraction	On-device ML features

**Public Evidence:**

- Face ID uses 3D facial mapping for authentication
- Vision Pro runs spatial computing on-device
- Neural Engine optimizations for vision AI

**Note:** Apple has strong patent portfolio for cross-licensing; may be better as buyer than litigation target.

**Estimated Licensing Value:** \$25M - \$75M (if enforceable)

#### Meta

Technology	Likely Infringing Patents	Evidence
Quest hand/face tracking	3D reconstruction, pose estimation	Meta Quest documentation
Avatars	Face synthesis, generative vision	Horizon Worlds, Codec Avatars
Ray-Ban smart glasses	Efficient architectures, edge AI	Meta AI glasses features

#### **Public Evidence:**

- Quest headsets use facial expression tracking
- Codec Avatars research uses single-image 3D reconstruction
- Smart glasses run AI models on-device

**Estimated Licensing Value:** \$30M - \$100M

#### **Snap**

Technology	Likely Infringing Patents	Evidence
AR Lenses	3D face reconstruction, pose estimation	Snap AR documentation
Spectacles	Efficient architectures, on-device AI	Spectacles 4 features
ML Kit	Lightweight models, feature extraction	Snap developer tools

**Estimated Licensing Value:** \$10M - \$25M

### **Category 4: Identity & Biometrics Infringers**

#### **Clear Secure**

Technology	Likely Infringing Patents	Evidence
Biometric identity	Iris recognition at distance, face recognition	clearme.com
Airport/venue entry	Continuous authentication, pose-invariant	Clear lane deployments

Technology	Likely Infringing Patents	Evidence
Health Pass	Compact enrollment, feature extraction	Clear Health Pass product

#### **Public Evidence:**

- Uses iris and facial recognition for identity verification
- Claims fast enrollment with minimal images
- Real-time matching at entry points

**Estimated Licensing Value:** \$8M - \$20M

#### **Jumio**

Technology	Likely Infringing Patents	Evidence
Identity verification	Face recognition, age estimation	jumio.com/products
Document + selfie match	Pose-invariant recognition, partial face	KYX Platform documentation
Liveness detection	3D face analysis, scene rectification	Anti-spoofing features

**Estimated Licensing Value:** \$5M - \$12M

#### **Onfido**

Technology	Likely Infringing Patents	Evidence
Identity verification	Face matching, feature extraction	onfido.com
Biometric verification	Pose handling, age estimation	Real Identity Platform

**Estimated Licensing Value:** \$4M - \$10M

### **Category 5: Chip/Edge AI Infringers**

#### **Qualcomm**

Technology	Likely Infringing Patents	Evidence
Snapdragon AI Engine	Efficient architectures, binary networks	<a href="http://qualcomm.com/snapdragon">qualcomm.com/snapdragon</a>
AI Model Efficiency Toolkit	Pruning, compression frameworks	Developer documentation
Hexagon DSP	Lightweight model optimization	Hexagon SDK

#### Public Evidence:

- AI Engine includes neural network optimization
- Quantization and pruning tools in SDK
- On-device inference optimization

**Note:** Strong cross-licensing candidate; may prefer partnership.

**Estimated Licensing Value:** \$20M - \$50M

## NVIDIA

Technology	Likely Infringing Patents	Evidence
Jetson	Edge AI deployment, efficient inference	<a href="http://nvidia.com/jetson">nvidia.com/jetson</a>
TensorRT	Network optimization, pruning	TensorRT documentation
DeepStream	Multi-camera vision, action recognition	DeepStream SDK

**Note:** NVIDIA has extensive AI patent portfolio; cross-licensing likely.

**Estimated Licensing Value:** \$15M - \$40M

## Prioritized Target List

### Tier 1: High Value, Clear Infringement

Company	Est. Annual Licensing	Enforcement Complexity
Amazon	\$50M - \$200M	High (resources to fight)
Meta	\$30M - \$100M	Medium

Company	Est. Annual Licensing	Enforcement Complexity
Apple	\$25M - \$75M	High (cross-license likely)
Walmart	\$30M - \$100M	Medium

## Tier 2: Medium Value, Strong Evidence

Company	Est. Annual Licensing	Enforcement Complexity
Motorola Solutions	\$15M - \$40M	Medium
NCR Voyix	\$10M - \$30M	Low (smaller resources)
Qualcomm	\$20M - \$50M	Medium (cross-license)
Axon	\$10M - \$25M	Medium

## Tier 3: Accessible Targets, Faster Resolution

Company	Est. Annual Licensing	Enforcement Complexity
Experian	\$5M - \$15M	Low (EoU exists)
Verkada	\$5M - \$15M	Low
Clear	\$8M - \$20M	Low
Zebra	\$8M - \$20M	Low
Snap	\$10M - \$25M	Medium

## Recommended Enforcement Strategy

### Phase 1: Build Evidence (Current)

- Complete Experian claim charts (already started)
- Develop 2-3 additional EoUs from Tier 3 targets (Verkada, Clear, NCR)
- Document public evidence from company websites, developer docs, marketing materials

### Phase 2: Initial Outreach

- Send licensing inquiry letters to Tier 3 targets
- Use early licenses to establish royalty benchmarks
- Build war chest for larger enforcement

### Phase 3: Major Target Engagement

Approach Tier 1/2 with established licensing rate  
Offer portfolio acquisition as alternative to licensing  
Use litigation threat only after negotiation fails

## Alternative: Defensive Sale

- Present infringement analysis to potential acquirers
- Companies on this list may prefer to **buy the portfolio** rather than face enforcement
- Experian, Amazon, Meta most likely defensive buyers

## Evidence Collection Checklist

For each target, collect:

- [ ] Product marketing pages (screenshots with dates)
- [ ] Technical documentation / white papers
- [ ] Developer SDK documentation
- [ ] Patent filings by target (shows awareness of field)
- [ ] Press releases about AI/vision capabilities
- [ ] YouTube product demos
- [ ] Job postings mentioning relevant technologies
- [ ] Academic papers by company researchers

*Document prepared for internal strategy discussion. Formal infringement opinions require detailed claim chart analysis by patent counsel.*