

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SAFECAST LIMITED,

Plaintiff,

v.

GOOGLE, LLC.,

Defendant.

Civil Action No. 6:22-cv-00678

JURY TRIAL DEMANDED

PLAINTIFF'S PRELIMINARY INFRINGEMENT CONTENTIONS

Safecast Limited ("Safecast") hereby serves its Preliminary Infringement Contentions for this matter. Attached are charts setting forth where in the accused products each element of the asserted claims of the following asserted patent is found:

I. EARLIEST PRIORITY DATES

- U.S. Pat. No. 9,392,302 – at this time, Plaintiff asserts that December 1, 2010 is the earliest priority date. Plaintiff reserves the right to amend if discovery uncovers an earlier date.

II. DOCUMENTS EVIDENCING CONCEPTION AND REDUCTION TO PRACTICE

Currently Pedersen is relying on the patents-in-suit and their file histories to evidence conception and reduction to practice. Pedersen reserves the right to amend this statement should additional facts come to light in discovery.

III. FILE HISTORIES OF EACH PATENT-IN-SUIT

Pedersen is producing copies of the Patents-in-Suit and the file histories of the Patents-in-

Suit.

RameyLLP

/s/William P. Ramey
William P. Ramey, III
Texas Bar No. 24027643
5020 Montrose Blvd., Suite 800
Houston, Texas 77006
(713) 426-3923 (telephone)
(832) 900-4941 (fax)
wramey@rameyfirm.com

Attorneys for Safecast Limited

CERTIFICATE OF SERVICE

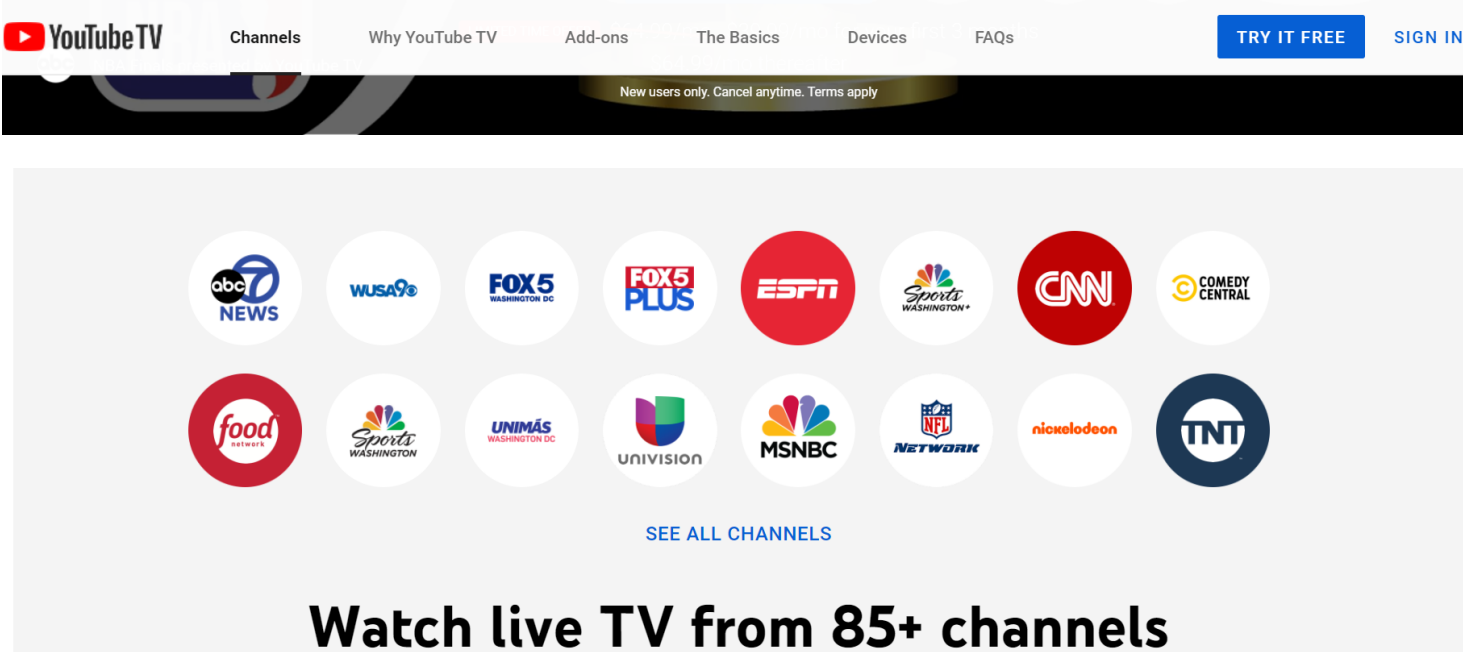
Pursuant to the Federal Rules of Civil Procedure, I hereby certify that all counsel of record who have appeared in this case are being served on this day of September 20, 2022, with a copy of the foregoing via e-mail.

/s/ William P. Ramey, III
William P. Ramey, III

INFRINGEMENT CONTENTIONS

U.S. PATENT NO. 9,392,302 B2

Claim 1	Corresponding Structure in Accused Systems – Google LLC
[1a] A system for automating compliance with local broadcasting regulations laid down by a broadcasting authority and applicable to advertisements, said advertisements being provided during time-shifted viewing/listening comprises:	Google Inc. (Google), through its subsidiary YouTube, provides YouTube TV, which “lets you watch live TV, on demand video, and cloud-based DVR from major broadcast and popular cable networks.” <i>See</i> https://tv.youtube.com/welcome/?utm_servlet=prod. YouTube enforces local regulations that it refers to as “Community Guidelines” that “set the rules of the road for what we don’t allow on YouTube.” <i>See</i> https://transparencyreport.google.com/youtube-policy/removals?hl=en. YouTube enforces these regulations with a “combination of people and technology to flag inappropriate content and enforce these guidelines.” <i>Id.</i> YouTube relies on members of the “Trusted Flagger program (NGOs, government agencies, and individuals)” as well as YouTube-employed Policy Enforcement Specialists to enforce the policies. <i>Id.</i> Google’s Google Ads program provides advertisements for YouTube TV; its Display Network targeting allows advertisers to “set where or when ads are shown based on features of their ideal audience.” <i>See</i> https://ads.google.com/intl/en_id/home/resources/reach-larger-new-audiences/. Google’s Google Ads provides Ad Scheduling services, which allow advertisers to “specify certain hours or days of the week when [they] want [their] ads to show.” <i>See</i> https://support.google.com/google-ads/answer/2404244?hl=en. Google’s Google Ads provides advertisements that “are designed” to “abide by laws.” <i>See</i> https://support.google.com/adspolicy/answer/6008942. Additionally, Google attests that its ads will “comply with the local laws for any area [its] ads target.” <i>See</i> https://support.google.com/adspolicy/answer/6023676. Google Ads on YouTube are provided during time-shifted viewing, as the company has offered this service to advertisers since 2009. <i>See</i> https://web.archive.org/web/20090201032257/http://google-tmads.blogspot.com/2009/01/google-tv-ads-offers-time-shifted.html. It is important to note that YouTube TV is available on a wide range of Set Top Boxes (PVR machines): “YouTube TV works with streaming media players.” <i>See</i> https://tv.youtube.com/learn/devices/. Additionally, YouTube TV has an app specifically intended for use with Set Top Boxes. <i>See</i> https://mashable.com/article/youtube-tv-app-for-television.

	“Because infringement liability is not dependent on ownership, e.g., use of a system can infringe (35 U.S.C. § 271), infringement is not dependent on ownership of all limitations of a claim.”
[1b] programme supply means to supply broadcast digital video/audio programmes having therein periodic breaks for the insertion of advertisements;	Google Inc. (Google), provides Youtube TV an on-demand and live TV streaming service that supplies broadcast digital video programs with differing levels of access depending on the package that a user subscribes to, and “lets you watch live TV, on demand video, and cloud-based DVR from major broadcast and popular cable networks.” <i>See</i> https://tv.youtube.com/welcome/?utm_servlet=prod. The following exemplifies this limitation’s existence in Accused Systems:  Source: (https://tv.youtube.com/welcome/?utm_servlet=prod)

[1c] advertisement supply means to supply advertisements within the periodic breaks, each advertisement having associated therewith a header comprising a first field related to a local broadcasting time regulation laid down by the broadcasting authority, which local broadcasting time regulation restricts the time of day at which said advertisement may be shown, and a second field related to the number of times said advertisement has previously been shown during time-shifted viewing:

Google's YouTube TV includes advertisements that comply with local regulations as referenced above in limitation [1a]; this includes time-shifted programs that "have not recently aired live." *See* <https://support.google.com/youtubetv/answer/7126139>.

Google, via its advertising subsidiary Google Ads, provides customizable advertising through which advertisements may be tailored based on the appropriateness of content for different age ranges and/or timing rules.

For example, YouTube TV content can be filtered to only show content or movies "with a rating of G and PG." *See* <https://support.google.com/youtubetv/answer/7454855?hl=en>. Additionally, YouTube can ensure that advertisements are only run "on family-oriented content." *See* <https://support.google.com/google-ads/answer/6030919>.

Targeting ads

Here are the content and audience targeting options for reservation ads that you can buy:

- **YouTube Select:** YouTube Select Lineups are reservation products for eligible clients to target among the top 5% of popular channels on YouTube with the most passionate audiences in a given market. Lineups include only channels. [Learn more about YouTube Select](#) 
- **Topics:** Advertisers can choose among YouTube video topics. For example, you can run reservation in-stream ads on family-oriented content. Topics targeting is not supported for Masthead ads.
- **Interests:** Advertisers can target viewers interested in particular things, like sports and hobbies, as evidenced by their browsing patterns and watched content.
- **Affinity audiences:** You can reach people who've demonstrated interest in subjects and who are likely to view related content again. This type of targeting also facilitates connection with audiences that are similar to those targeted by offline campaigns.
- **Demographics:** You can reach customers who are likely to be within the demographic groups you choose. These groups include age and gender.

Source (<https://support.google.com/google-ads/answer/6030919>)

Furthermore, YouTube allows for "day and time targeting" of advertisements. *See* <https://support.google.com/displayvideo/answer/2697407>.

Thus, in at least one example of an infringing use, Google's YouTube TV has regulations laid down by the broadcasting authority as outlined in [1a] and provides a customizable advertisement system that allows for

	complying with rules related to family-oriented content and provides time-restriction tools so that advertisements may be inserted that are both appropriate for the age group of the viewer and shown at acceptable times. On information and belief, for each advertisement, Google provides a header to be associated with each advertisement so as to identify the advertisement. The header can include a first field relating to the above-noted regulations regarding the age-appropriateness of the advertisement and the designated day and time restrictions which Google refers to as “daypart targeting.” Additionally, Google utilizes proprietary algorithms and machine learning to “manage ad frequency,” demonstrating that Google provides a second field related to the number of times a particular advertisement has previously been shown. <i>See</i> https://www.blog.google/products/marketingplatform/360/privacy-safe-approach-managing-ad-frequency/. SafeCast’s investigation is ongoing. SafeCast cannot provide complete and final its contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google’s source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
[1d] rules database means containing rules relating to said local broadcasting time regulation;	Google’s YouTube TV provides ads that “abide by laws” as referenced above in limitation [1a]. <i>See</i> https://support.google.com/adspolicy/answer/6008942. Google admits that it regularly reviews “changes in online trends and practices, industry norms, and regulations.” <i>Id.</i>, emphasis added. Furthermore, Google admits that it has “created a set of policies that apply to all promotions on the Google Network.” <i>Id.</i> Therefore, in order to comply with the above-mentioned rules, regulations, and policies, Google must provide a rules database to track such rules for ensuring compliance. For example, to organize and retrieve advertisements for display, Google must confirm that a particular advertisement is compliant with the rules laid down as described with reference to [1a] and [1c]. To confirm compliance, Google can compare the data associated with the advertisement to the requisite broadcasting time regulations stored in a Google-owned database. SafeCast’s investigation is ongoing. SafeCast cannot provide complete and final its contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google’s source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.

[1e] clock means to Supply a real-time clock signal; and control means arranged to read said first field and said clock signal and said rules database and to apply said local broadcasting time regulation to each advertisement before said advertisement is shown;	Google provides a clock means and control means because, as referenced above in limitations [1a] and [1c], Google's Ad Scheduling service allows advertisers to "specify certain hours or days of the week when [they] want [their] ads to show." <i>See</i> https://support.google.com/google-ads/answer/2404244?hl=en. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final its contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
[1f] wherein the control means is further arranged to update the second field in the header of said advertisement when said advertisement is again shown during time-shifted viewing.	Google's control means counts the number of times an advertisement is viewed. As stated by Google, its proprietary algorithms and machine learning "manage ad frequency," demonstrating that Google provides a second field related to the number of times a particular advertisement has previously been shown. <i>See</i> https://www.blog.google/products/marketingplatform/360/privacy-safe-approach-managing-ad-frequency/. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
Claim 2	Corresponding Structure in Accused Systems
[2a] The system according to claim 1	<i>See</i> claim 1, above.

[2b] in which each header includes a keyword, and the control means checks the keyword against the rules database during application of said local broadcasting time regulation to said advertisement.	As referenced above with limitations [1a] and [1c], Google provides advertisements in compliance with local advertising practices, internal regulations, and privacy regulations. To organize and retrieve advertisements for display, Google can confirm that a particular advertisement is compliant with local broadcasting regulations. To confirm compliance, Google can compare the data associated with the advertisement to the requisite broadcasting time regulations stored in a Google database. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
Claim 3	Corresponding Structure In Accused Systems
[3a] The system according to claim 2	See claim 2, above.
[3b] in which a further local broadcasting regulation forbids the provision of certain types of advertisement on certain days of the week and each header further indicates a day of the week validity.	As referenced above with limitation [1a] and [1c], Google provides advertisements in compliance with local advertising practices, internal regulations, and privacy regulations, which can relate to the day of the week. To organize and retrieve advertisements for display, Google can confirm that a particular advertisement is compliant with local broadcasting regulations. To confirm compliance, Google can compare the data associated with the advertisement to the requisite broadcasting time regulations stored in a Google database. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
Claim 4	Corresponding Structure In Accused Systems
[4a] The system according to claim 1	See claim 1, above.

[4b] in which the advertisements include interactive advertisements to which a response by a consumer is requested	On information and belief, Google provides the system as described by limitation [4a], because YouTube supports advertisements with “interactive features to drive more engagement.” <i>See</i> https://support.google.com/youtube/answer/150471?hl=en SafeCast’s investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google’s source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
Claim 6	Corresponding Structure In Accused Systems
[6a] The system according to claim 1	<i>See</i> claim 1, above.
[6b] in which the broadcast video/audio programme is arranged to contain information including the duration of each segment of programme between periodic breaks and the duration of the next periodic break.	Google provides YouTube TV as an on-demand and live TV streaming service that supplies broadcast digital video programs with differing levels of access depending on the package that a user subscribes to. On information and belief, Google offers various programs having periodic breaks for the insertion of advertisements, necessitating the inclusion of information related to segment duration. SafeCast’s investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google’s source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
Claim 7	Corresponding Structure In Accused Systems
[7a] The system according to claim 1,	<i>See</i> claim 1, above.

[7b] wherein the system is a personal video recorder (PVR), and wherein the rules database means is a rules database stored locally in the PVR.	On information and belief, Google utilizes a PVR system, because “YouTube TV works with streaming media players.” <i>See</i> https://tv.youtube.com/learn/devices/. Additionally, YouTube TV has an app specifically intended for use with Set Top Boxes. <i>See</i> https://mashable.com/article/youtube-tv-app-for-television. SafeCast’s investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google’s source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
Claim 8	Corresponding Structure In Accused Systems
[8a] The system according to claim 1,	<i>See</i> claim 1, above.
[8b] wherein the control means is further arranged to, when the application of said local broadcasting time regulation to a particular advertisement indicates that showing the particular advertisement would violate the local broadcasting time regulation,	As referenced above with limitations [1a] and [1c], Google provides advertisements in compliance with local advertising practices, internal regulations, and privacy regulations. To organize and retrieve advertisements for display, Google can confirm that a particular advertisement is compliant with local broadcasting regulations relating to time. To confirm compliance, Google can compare the data associated with the advertisement to the requisite broadcasting time regulations stored in a Google database. SafeCast’s investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google’s source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
[8c] search the advertisements stored in the advertisement supply means	In order to provide advertisements in compliance with local time regulations, as referenced in limitation [8b], Google’s control means can search, or otherwise analyze, the available advertisements stored in the advertisement supply means as described in limitation [1c]. SafeCast’s investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google’s source code for its system

	and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
[8d] until either an advertisement is found that does not violate the local broadcasting time regulation or it is determined that no advertisement stored in the advertisement supply means is suitable for showing under the local broadcasting time regulation.	In order to provide advertisements in compliance with local time regulations, as referenced in limitation [8b], Google's control means can search, or otherwise analyze, the available advertisements stored in the advertisement supply means as described in limitation [1c]. This search by definition results either in success, and the finding of an advertisement that "does not violate the local broadcasting time regulation," or in failure, and the determination that no advertisement stored in the advertisement supply means is suitable for showing under the local broadcasting time regulation." SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
Claim 9	Corresponding Structure In Accused Systems
[9a] The system according to claim 8,	<i>See claim 8, above.</i>
[9b] wherein the advertisements stored in the advertisement supply means include advertisements that were broadcast live with a programme being shown during time-shifted viewing	On information and belief, PVR systems utilized by Google include an advertisement supply means as described in limitation [1c], which is configured to provide advertisements both broadcasted live and later supplied during time-shifted viewing. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.

[9c] and also include advertisements that were received by the system other than in the live broadcast of the programme being shown in time-shifted viewing,	As referenced with limitation [1c], Google's Google Ads program provides customizable advertising. This necessitates the inclusion of advertisements that were not aired live, but added ex post facto by the control means of this system. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
[9d] and wherein the control means is further arranged to show during time-shifted viewing of the programme a mix of advertisements that were received during the live broadcast of the programme and advertisements that were received other than in the live broadcast of the programme being shown during time-shifted viewing.	On information and belief, Google-supported PVR systems include an advertisement supply means as described in limitation [1c], which is configured to provide advertisements both broadcasted live and later supplied during time-shifted viewing. Google customers are shown this "mix of advertisements" during time-shifted viewing. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
Claim 12	Corresponding Structure In Accused Systems
[12a] A Personal Video Recorder (PVR) for use in a system for automating compliance with local broadcasting regulations laid down by a broadcasting authority and applicable to advertisements, said advertisements being provided during time-shifted viewing/listening, the PVR comprising:	Google, via its ChromeCast and Smart TV products, provides a PVR system as described by the claim. <i>See</i> https://tv.google/. These PVR machines, like other Google products, utilize advertisements that "are designed" to "abide by laws" as referenced above with limitation [1a]. <i>See</i> https://support.google.com/adspolicy/answer/6008942. Additionally, Google attests that its ads will "comply with the local laws for any area [its] ads target." <i>See</i> https://support.google.com/adspolicy/answer/6023676. Google Ads on YouTube are provided during time-shifted viewing, as referenced above with limitation [1a]; the company has offered this service to advertisers since 2009. <i>See</i> https://web.archive.org/web/20090201032257/http://google-tmads.blogspot.com/2009/01/google-tv-ads-offers-time-shifted.html.

[12b] data storage means storing a programme episode database, an advertisement database, and a rules database,	On information and belief, Google-provided PVR machines, as described above with limitation [7b], utilize data storage means including an episode database, advertisement database, and rules database. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
[12c] each stored advertisement having associated therewith a header comprising a first field related to a local broadcasting time regulation laid down by the broadcasting authority, which local broadcasting time regulation restricts the time of day at which said advertisement may be shown,	As referenced above in limitations [1a] and [1c], Google provides customizable ads that comply with local broadcasting regulations laid down by the internal broadcasting authority. For example, if YouTube's advertising algorithm were to determine an optimal time window to display a certain class of advertisement during a certain "day and time targeting" window, then that advertisement would be displayed only during that time according to the restrictions laid out by the broadcast authority. <i>See</i> https://support.google.com/displayvideo/answer/2697407. For each advertisement, Google would provide a header or synonymous element to be associated with each advertisement so as to identify the advertisement. The header can include a first field relating to the above-noted FCC time regulations. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
[12d] and a second field related to the number of times said advertisement has previously been shown during time-shifted viewing, wherein the rules database contains rules relating to said local broadcasting time regulation, and wherein the stored programme episodes have periodic breaks for the insertion of advertisements;	Google's control means counts the number of times an advertisement is viewed. As stated by Google, its proprietary algorithms and machine learning "manage ad frequency," demonstrating that Google provides a second field related to the number of times a particular advertisement has previously been shown. <i>See</i> https://www.blog.google/products/marketingplatform/360/privacy-safe-approach-managing-ad-frequency/. Google Inc. (Google), provides Youtube TV an on-demand and live TV streaming service that supplies broadcast digital video programs with differing levels of access depending on the package that a user subscribes to, and "lets you watch live TV, on demand video, and cloud-based DVR from major broadcast and popular cable networks." <i>See</i> https://tv.youtube.com/welcome/?utm_servlet=prod. On information and belief, Google offers various programs having periodic breaks for the insertion of advertisements. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system

	and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
[12e] input connection means for connection to a source of video/audio signals and a real-time clock signal;	Google-provided PVR machines, as described with limitations [1b] and [7b], supply broadcast digital video programs to consumers. On information and belief, this product necessitates inclusion of a connection to a source to provide these video and audio signals. Google provides a clock means because, as referenced above in limitations [1a] and [1c], Google's Ad Scheduling service allows advertisers to "specify certain hours or days of the week when [they] want [their] ads to show." <i>See</i> https://support.google.com/google-ads/answer/2404244?hl=en. On information and belief, this necessitates inclusion of a connection to a source of a real-time clock signal. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
[12f] output means for connection to a consumer's viewing/listening unit;	Google-provided PVR machines, as described with limitations [1b] and [7b], supply broadcast digital video programs to consumers. These programs are viewed on consumers' viewing/listening units, necessitating inclusion of a connection between the Google-provided PVR machines and these devices (upon which the programs are viewed). SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.

[12g] and control means arranged to read said first field and said clock signal and said rules database and to apply said local broadcasting time regulation to each advertisement before said advertisement is shown during one of the periodic breaks;	Google provides a clock means and a control means because, as referenced above in limitations [1a] and [1c], Google's Ad Scheduling service allows advertisers to "specify certain hours or days of the week when [they] want [their] ads to show." <i>See</i> https://support.google.com/google-ads/answer/2404244?hl=en. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
[12h] wherein the control means is further arranged to update the second field in the header of said advertisement when said advertisement is again shown during time-shifted viewing.	As referenced above in limitation [1c], Google's control means counts the number of times an advertisement is viewed. As stated by Google, its proprietary algorithms and machine learning "manage ad frequency," demonstrating that Google provides a second field related to the number of times a particular advertisement has previously been shown. <i>See</i> https://www.blog.google/products/marketingplatform/360/privacy-safe-approach-managing-ad-frequency/. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
Claim 13	Corresponding Structure In Accused Systems
[13a] The PVR according to claim 12	<i>See</i> claim 12, above.

[13b] arranged to read the real-time clock, to read the first field in the header of an advertisement, to read the rules database, and to provide that advertisement to a consumer's viewing/listening unit only when its header and the rules database do not indicate that the advertisement may not be viewed at the real time of day indicated by the clock signal.	Google's product necessitates inclusion of a control means that reads and interprets the clock input because, as referenced above with limitations [1a] and [1c], Google's Ad Scheduling service allows advertisers to "specify certain hours or days of the week when [they] want [their] ads to show." <i>See</i> https://support.google.com/google-ads/answer/2404244?hl=en. Additionally, Google's product necessitates inclusion of a control means that reads and interprets the first field in the header of an advertisement and compare it to the rules database; as referenced above in limitation [1a], Google provides customizable ads that comply with local broadcasting regulations laid down by the broadcasting authority.
Claim 14	Corresponding Structure In Accused Systems
[14a] The PVR according to claim 13	<i>See</i> claim 13, above.
[14b] further arranged to supply to the viewing unit interactive advertisements which request a response from the viewer, and to record such a response.	On information and belief, Google provides the system as described and as referenced above with limitation [4a], because YouTube supports with "interactive features to drive more engagement." <i>See</i> https://support.google.com/youtube/answer/150471?hl=en. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
Claim 15	Corresponding Structure In Accused Systems
[15a] The PVR according to claim 13,	<i>See</i> claim 12, above.

[15b] further arranged to update the second field in the header when said advertisement is provided to the consumer's viewing/listening unit.	Google's control means counts the number of times an advertisement is viewed, because, as referenced above in limitations [1c] and [1f], its proprietary algorithms and machine learning "manage ad frequency," demonstrating that Google provides a second field related to the number of times a particular advertisement has previously been shown. <i>See</i> https://www.blog.google/products/marketingplatform/360/privacy-safe-approach-managing-ad-frequency/. SafeCast's investigation is ongoing. SafeCast cannot provide complete and final contentions as to this limitation until the claims have been construed and/or until discovery and inspection as to Google's source code for its system and/or technical information regarding its YouTube TV and Google Ads back-end system architecture and/or certain source code occurs.
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