

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NETFLIX, INC.,
Petitioner,

v.

VL COLLECTIVE IP LLC,
Patent Owner.

Case IPR2023-00891
Patent No. 8,605,794

PETITIONER'S UPDATED EXHIBIT LIST

EXHIBIT LIST

Exhibit Number	Description
1001	Patent-at-Issue: U.S. Patent No. 8,605,794 to Hellwagner, “Method for Synchronizing Content-dependent Data Segments of Files,” filed on March 16, 2006 (“the ’794 patent”).
1002	File History of the ’794 patent (Application No. 11/918,276 (“’794 patent FH”)).
1003	Declaration of Benjamin B. Bederson, Ph.D.
1004	U.S. Patent No. 7,386,782 to Comps, “Method for Synchronizing a Multimedia File,” filed on September 13, 2001 (“Comps”).
1005	U.S. Patent Application Publication No. 2004/0024898 to Wan, “Delivering Multimedia Descriptions,” filed on July 5, 2001 (“Wan”).
1006	U.S. Patent Application Publication No. 2004/0098398 to Ahn, “Method and Apparatus for Delivery of Metadata Synchronized to Multimedia Contents,” filed on January 30, 2002 (“Ahn”).
1007	U.S. Patent Application Publication No. 2003/0101364 to Kim, “Method of Ensuring Synchronous Presentation of Additional Data with Audio Data Recorded on a Rewriteable Recording Medium,” filed on November 27, 2002 (“Kim”).
1008	EP 1051008A2 to Jones, “Method and Apparatus for Media Data Transmission” filed on January 13, 1999 (“Jones”).
1009	U.S. Patent No. 7,827,297 to Kristjansson, “Multimedia Linking and Synchronization Method, Presentation and Editing Apparatus,” filed on January 18, 2003 (“Kristjansson”).
1010	U.S. Patent Application Publication No. 2005/0190872 to Seong, “Transcoding System and Method for Maintaining Timing Parameters before and after Performing Transcoding Process,” filed on February 10, 2005 (“Seong”).

1011	U.S. Patent No. 7,627,811 to Thong, “Content-based Synchronization Method and System for Data Streams,” filed on March 4, 2005 (“Thong”).
1012	U.S. Patent Application Publication No. 2003/0061369 to Aksu, “Processing of Multimedia Data,” filed on September 20, 2002 (“Aksu”).
1013	U.S. Patent Application Publication No. 2005/0165941 to Eytchison, “Methods and Apparatuses for Streaming Content,” filed on January 22, 2004 (“Eytchison”).
1014	U.S. Patent No. 5,724,605 to Wissner, “Method and Apparatus for Representing and Editing Multimedia Compositions Using a Tree Structure,” filed on March 31, 1995 (“Wissner”).
1015	U.S. Patent No. 5,515,490 to Buchanan, “Method and System for Temporally Formatting Data Presentation in Time-dependent Documents,” filed on November 5, 1993 (“Buchanan”).
1016	U.S. Patent Application Publication No. 2004/0064831 to Abbott, “System and Method for Media Stream Indexing and Synchronization,” filed on October 1, 2003 (“Abbott”).
1017	<i>Starz Entm’t, LLC v. VL Collective IP, LLC</i> , Amended Joint Claim Construction Chart, pages 1-16 (Dkt. 80).
1018	<i>Starz Entm’t, LLC v. VL Collective IP, LLC</i> , Joint Claim Construction Brief filed by Plaintiffs, pages 1-73 (Dkt. 78).
1019	<i>Starz Entm’t, LLC v. VL Collective IP, LLC</i> , Claim Construction Order (Dkt. 88)
1020	Declaration of Stephen A. Marshall in Support of Petitioner’s Unopposed Motion for Admission <i>Pro Hac Vice</i>
1021	Email from Aliza George Carrano to Naveed Hasan, et al. re IPR2023-00891: Netflix, Inc. v. VL Collective, LLC – Meet and Confer dated February 9, 2024
1022	<i>VideoLabs, et al. v. Netflix, Inc.</i> , Civ. A. No. 22-cv-229-CFC, Compl.

	(D. Del. Feb. 23, 2022)
1023	<i>VideoLabs, et al. v. Netflix, Inc.</i> , Civ. A. No. 22-cv-229-CFC, First Am. Compl. (D. Del. May 6, 2022)
1024	Deposition Transcript of Dr. Michael T. Goodrich
1025	<i>Data</i> , Merriam-Webster's Collegiate Dictionary (11th ed. 2012)
1026	<i>Data</i> , Merriam-Webster's Collegiate Dictionary (11th ed. 2006)
1027	Gaurav Bhatnagar et al., <i>Introduction to Multimedia Systems</i> (2002)
1028	Redacted Order Denying Patent Owner's Motion to Terminate
1029	Petitioner's Demonstratives

Respectfully submitted,

Dated: October 7, 2024

By: // Aliza George Carrano //
Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on October 7, 2024, a copy of the foregoing document was served by email directed to the following counsel of record and distribution list:

Christine E. Lehman
clehman@reichmanjorgensen.com

Michael Matulewicz-Crowley
mmatulewicz-crowley@reichmanjorgensen.com

Jaime F. Cardenas-Navia
jcardenas-navia@reichmanjorgensen.com

Naveed S. Hasan
nhasan@reichmanjorgensen.com

RJ_VideoLabs-Netflix@reichmanjorgensen.com

// Aliza George Carrano //
Lead Counsel for Petitioner