

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COMCAST CABLE COMMUNICATIONS, LLC,
Petitioner,

v.

TOUCHSTREAM TECHNOLOGIES, INC.,
Patent Owner.

Patent No. 11,048,751

Filing Date: August 25, 2017

Issue Date: June 29, 2021

Title: PLAY CONTROL OF CONTENT ON A DISPLAY DEVICE

Inter Partes Review No.: IPR2024-00323

**PETITION FOR *INTER PARTES* REVIEW
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 *et seq.***

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Ex. 1023-29:	Reserved
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Ex. 1035:	U.S. Pub. No. 2004/0172656 (“Kim”)

- Ex. 1036: Reserved
- Ex. 1037: U.S. Pat. No. 7,343,419 (“Robinson”)
- Ex. 1038-40: Reserved
- Ex. 1041: CODING OF MOVING PICTURES AND AUDIO, *MPEG-4 Overview* (Int’l Org. Standardisation 2002)
- Ex. 1042: ROBERT GODWIN-JONES, DIGITAL VIDEO UPDATE: YOUTUBE, FLASH, HIGH-DEFINITION, 11 LANGUAGE LEARNING & TECH. 16, 17 (2007)
- Ex. 1043: John C. Paolillo et al., *A Network View of Social Media Platform History: Social Structure, Dynamics and Content on YouTube*, PROC. 52ND HAWAII INT’L CONF. ON SYS. SCIS., 1, (2019)
- Ex. 1044: *YouTube Opens Internet Video to Masses; Serving 3 Million Videos Daily and Growing, YouTube Unveils a Fast, Fun, and Easy Service for Consumers to Broadcast Original Video*, MARKET WIRE, Dec. 15, 2005
- Ex. 1045: *Hulu Debuts via Private Beta and on Distribution Partners AOL, Comcast, MSN, MySpace and Yahoo!; Company Announces Major Licensing Deals with Metro-Goldwyn-Mayer Studios Inc. and Sony Pictures Television; Providence Equity Partners Makes Strategic Investment in News Corporation/NBC Universal Online Video Joint Venture*, BUS. WIRE, Oct. 29, 2007
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- Ex. 1047: *Adobe Delivers Flash Player 9 With H.264 Video Support; HD Quality Web Video and Audio Now Available With Adobe Flash Player Update*, BUS. WIRE, Dec. 4, 2007
- Ex. 1048: *Microsoft Unveils Silverlight to Power the Next Generation of Media Experiences on the Web; Leading Media Companies and Solution Providers Announce Support for New Solution for*

Video and Interactivity on Mac- and Windows-Based Web Browsers, PR NEWswire US, Apr. 16, 2007

- Ex. 1049: *Former Apple Multimedia Pioneers Unveil WebTV; New Company Brings Internet to Television Viewers*, PR NEWswire, Jun. 12, 1996
- Ex. 1050: *Netflix, TiVo Team Up After 4-Year Courtship*, ASSOCIATED PRESS, Oct. 30, 2008
- Ex. 1051: *TiVo and Amazon.com Announce New Service Enabling Amazon Unbox Video Download to TiVo; TiVo Subscribers Will Soon Be Able to Watch Amazon Unbox Movies and TV Shows on Their TVs*, BUS. WIRE, Feb. 7, 2007
- Ex. 1052: *Wall Crumbling Between Televisions and Computers*, AGENCE FRANCE PRESSE – ENGLISH, Jan. 8, 2009
- Ex. 1053: *Enhanced TV Binary Interchange Format 1.0, ETV (OpenCable Specifications)*, Nov. 25, 2009
- Ex. 1054: *Award-Winning Sonos™ Digital Music System Begins Shipping to Customers*, PR NEWswire US, Jan. 27, 2005
- Ex. 1055: *Sonos Introduces the Sonos™ ZonePlayer ZP80*, PR NEWswire, Jan. 4, 2006
- Ex. 1056: *Sonos Introduces the Sonos Controller for iPhone; Free Application Lets Music Lovers Control Leading Multi-Room Music System from Their iPhone*, PR NEWswire, Oct. 28, 2008
- Ex. 1057: *AT&T Opens R&D Lab in Cambridge, England*, BUS. WIRE, Feb. 10, 1999
- Ex. 1058: *Microsoft Releases Windows NT 4.0 Terminal Server Edition*, M2 PRESSWIRE, Jun 16, 1998
- Ex. 1059: *TeamViewer: TeamViewer 3.0 Beta Published; Next Generation of the Popular Remote Support Software*, M2 PRESSWIRE, Aug. 27, 2007

- Ex. 1060: *3am Labs Announces \$10 Million Series A Financing; McNamee Lawrence & Co. Acts as Exclusive Financial Advisor to 3am Labs*, BUS. WIRE, Nov. 16, 2004
- Ex. 1061: *Expertcity's GoToMyPC Product Wins A People's Choice Award At Upside Events' Showcase 2001*, INTERNET WIRE, Feb. 1, 2001
- Ex. 1062: *TV2Me(R) Goes Global By Partnering With Leading Asian Online Entertainment Company; Manila-Based ESL Adds Sales and Marketing Muscle to Bring Pioneering Place Shifting Technology to Wider Market*, PR NEWswire US, May 16, 2006
- Ex. 1063: *CES Innovations 2005 Award and Red Herring Finalist for 100 Most Innovative Companies are Latest Commendations for Sling Media*, BUS. WIRE, Nov. 11, 2004
- Ex. 1064: Final Written Decision, IPR2022-00795 (Sep. 27, 2023)
- Ex. 1065: Patent Owner Response, IPR2022-00795 (Jan. 13, 2023)
- Ex. 1066: Reserved
- Ex. 1067: *Progressive Networks Launches the First Commercial Audio-On-Demand System Over the Internet*, BUS. WIRE, Apr. 10, 1995
- Ex. 1068: *Progressive Networks' RealVideo Launched With Wide Industry Support*, PR NEWswire EUROPE, February 10, 1997
- Ex. 1069: Reserved
- Ex. 1070: U.S. Pat. Application No. 61/477,998
- Ex. 1071: U.S. Pat. No. 8,904,289 to Strober (“the ’289 Patent”)
- Ex. 1072: Certified Copy of Prosecution History of U.S. Pat No. 8,904,289
- Ex. 1073-81: Reserved
- Ex. 1082: Stipulation Regarding Invalidity Defenses

MANDATORY NOTICES

Real Parties in Interest (37 C.F.R. § 42.8(b)(1))

The real parties-in-interest for this petition are (i) Comcast Cable Communications, LLC and (ii) Comcast Corporation.

No unnamed entity is funding, controlling, or directing this Petition for *inter partes* review (IPR) of U.S. Patent No. 11,048,751 (“the ’751 Patent”), or otherwise has an opportunity to control or direct this Petition or Petitioner’s participation in any resulting IPR.

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

The ’751 Patent, along with related U.S. Patent Nos. 8,356,251 (“the ’251 Patent”) and 11,086,934 (“the ’934 Patent”), is being asserted against Comcast Cable Communications, LLC, d/b/a Xfinity, Comcast Cable Communications Management, LLC, and Comcast of Houston, LLC in the Eastern District of Texas in *Touchstream Technologies, Inc. v. Comcast Cable Communications, LLC d/b/a Xfinity et al.*, 2:23-cv-00062-JRG (“EDTX Litigation”). The earliest date of service on the Comcast entities named in the EDTX Litigation was March 1, 2023, however the ’751 and ’934 Patents were first asserted in a First Amended Complaint served on May 25, 2023.

The ’751, ’251, and ’934 Patents are also presently being asserted against Charter Communications, Inc., Charter Communications Operating, LLC, Spectrum

Management Holding Company, LLC, Time Warner Cable Enterprises, LLC, and Spectrum Gulf Coast, LLC in *Touchstream Technologies, Inc. v. Charter Communications, Inc. et al*, 2:23-cv-00059-JRG (EDTX); and against Altice USA, Inc., Cequel Communications, LLC, CSC Holdings, LLC, and Friendship Cable of Texas, Inc. in *Touchstream Technologies, Inc. v. Altice USA, Inc. et al*, 2:23-cv-00060-JRG (EDTX).

The '251 Patent is also presently being asserted against Google LLC in *Touchstream Technologies, Inc. v. Google LLC*, 6:21-cv-00569-ADA (WDTX) along with related U.S. Patent Nos. 8,782,528 (“the '528 Patent”) and 8,904,289 (“the '289 Patent”). The '251, '528, and '289 Patents were the subject of requests for *inter partes* review filed by Google LLC in IPR2022-00795, IPR2022-00793, and IPR2022-00794 (presently on appeal). The real parties-in-interest in this Petition are not involved in those IPRs. The '251, '528, and '289 Patents were previously asserted against Vizbee, Inc. in *Touchstream Technologies, Inc. v. Vizbee, Inc.*, 1:17-cv-06247-PGG-KNF (SDNY) which was terminated by stipulated dismissal on January 24, 2020.

According to the Office’s records, the '751 Patent is a continuation of U.S. Pat. App. No. 13/532,546, filed June 25, 2012 (issued as U.S. Pat. No. 9,767,195) which is a continuation-in-part of U.S. Pat. App. No. 13/157,821, filed June 10, 2011

(issued as the '289 Patent), which claims priority to Provisional App. No. 61/477,998, filed April 21, 2011.

No prior petitions for *inter partes* review, post-grant review, or covered business method review have been filed against the '751 Patent.

This is the first of two petitions for *inter partes* review filed by Petitioner against the '751 Patent. Petitioner is also filing petitions for *inter partes* review against the related '251 and '934 Patents.

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

Petitioner designates counsel listed below. A power of attorney for counsel is being concurrently filed.

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I. INTRODUCTION

Comcast Cable Communications, LLC (“Petitioner”) petitions for *inter partes* review and cancellation of claims 1-20 of U.S. Patent No. 11,048,751 (“the ’751 Patent”).

II. SUMMARY OF ARGUMENT

The ’751 Patent claims methods for translating commands among associated devices to control media. The methods use a display device for presenting video content using one of a plurality of media players controlled via messages transmitted from a computing device to a server, converted into commands appropriate for the selected media player to control playing of the video content, and then transmitted to the display device. The display device is associated with the computing device by a synchronization code and stored in the server.

These features and additional features of the ’751 Patent claims are disclosed or rendered obvious by the prior art, e.g., Ex. 1005, Redford, and other references relied on herein. Accordingly, as set forth below, claims 1-20 of the ’751 Patent are unpatentable and should be cancelled.

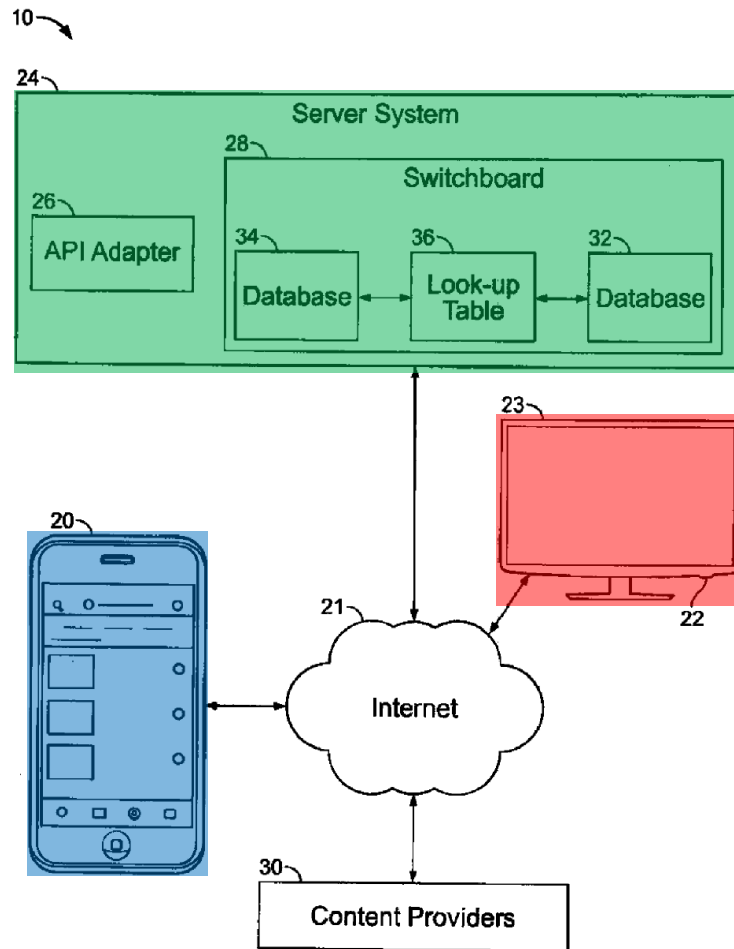
III. OVERVIEW OF THE ’751 PATENT

A. Brief Description

The ’751 Patent describes a system 10 for using a server system 24 (**green**) to facilitate a connection between a personal computing device 20 (**blue**) for selecting

content, and a television/display device 22 (**red**) for displaying the selected content.

Ex. 1001, 3:13-36; Ex. 1002, ¶ 41.



Ex. 1001, Fig. 1 (annotated)

The connection between the personal computing device (e.g., a mobile phone) and the display device may be established by the user selecting from a list of devices displayed on the mobile phone's screen or alternatively the user can enter a synchronization code on the mobile phone that is uniquely associated with the display device. Ex. 1001, 5:25-33. The synchronization code can be obtained from,

for example, a text displayed on the screen of the display device. *Id.*, 5:33-40. The server system may then store the association between the personal computing device and display device. *Id.*, 5:5-24, 5:47-58. Ex. 1002, ¶ 42.

When a user selects particular content on the mobile phone, a message is formatted and transmitted to the server which contains information identifying the user, the display device, the selected video content, the media player for the selected video, and the action to be taken (e.g., play, pause, rewind). *Id.*, 4:39-55. The message is received by the server and the information is stored in a database. *Id.*, 4:56-5:4. The server then confirms a connection between the personal computing device and display device, and copies the message information to a database associated with the display device. *Id.*, 5:59-6:4. The server also identifies the media player requested in the message and converts the commands from the personal computing device into the correct code for use on the display device to control the media player. *Id.*, 6:4-37. The information in the database associated with the display device is then transmitted to, or retrieved by, the display device. *Id.*, 6:38-48. The display device then acts on the message information by, for example, loading the requested media player, obtaining the selected video content file, and playing the video. *Id.*, 6:49-7:3. After the video is playing on the display device, the user may further control the playing by entering commands through the mobile

phone and transmitted through the server as described above. *Id.*, 7:4-15. Ex. 1002, ¶ 42.

B. Prosecution History

The application that led to the '751 Patent, U.S. Application No. 15/687,249, was filed on August 25, 2017 with 20 claims including independent claims 1, 12, and 17. Ex. 1004, p. 1-51.

All claims were rejected in an Office Action dated January 8, 2019 as anticipated by U.S. Published Application 2012/0130971 to Morris or as obvious over Morris in view of U.S. Published Application 2009/0248802 to Mahajan. *Id.*, p. 63-74. In a response dated May 9, 2019, Applicant argued that neither Morris nor Mahajan disclose “a first message that includes at least one command in a first format, wherein the first message is received based at least in part on a second message including at least one command in a second format.” *Id.*, p. 168-173. Ex. 1002, ¶ 56.

In a Final Office Action dated June 12, 2019, the rejections of all claims in view of Morris or Morris-Mahajan was maintained. *Id.*, pp. 176–190. An interview was held on June 25, 2019 but no agreement was reached. *Id.*, pp. 212–216. In an Amendment dated December 12, 2019, Applicant amended the claims to require, among other things, a synchronization code associating a first and second computing

devices, and that the media player be selected from a plurality of media players. *Id.*, pp. 234–241. Ex. 1002, ¶ 57.

A Notice of Allowance was issued on April 2, 2020. *Id.*, p. 493. The issue fee was paid on June 30, 2020. *Id.*, pp. 548-553. However, a Petition to Withdraw from Issue was filed July 22, 2020 along with an Information Disclosure Statement (IDS) containing additional prior art. *Id.*, pp. 555–565; Ex. 1002, ¶ 58. Another Notice of Allowance was issued September 3, 2020. *Id.*, p. 684. Another Petition to Withdraw from Issue with an IDS was filed on September 3, 2020. *Id.*, pp. 698–703; Ex. 1002, ¶ 59.

Claims 1, 12 and 17 were rejected in an Office Action dated February 2, 2021 as unpatentable for nonstatutory double patenting over co-pending application 16/917,095 (which eventually issued as the '934 Patent). Ex. 1004, pp. 744-752. Applicant filed a Terminal Disclaimer on March 31, 2021. *Id.*, p. 826. A Notice of Allowance was issued on May 26, 2021. *Id.*, p. 844. The '751 Patent issued on June 29, 2021. Ex. 1001, cover.

C. Earliest Priority Date for the Claims

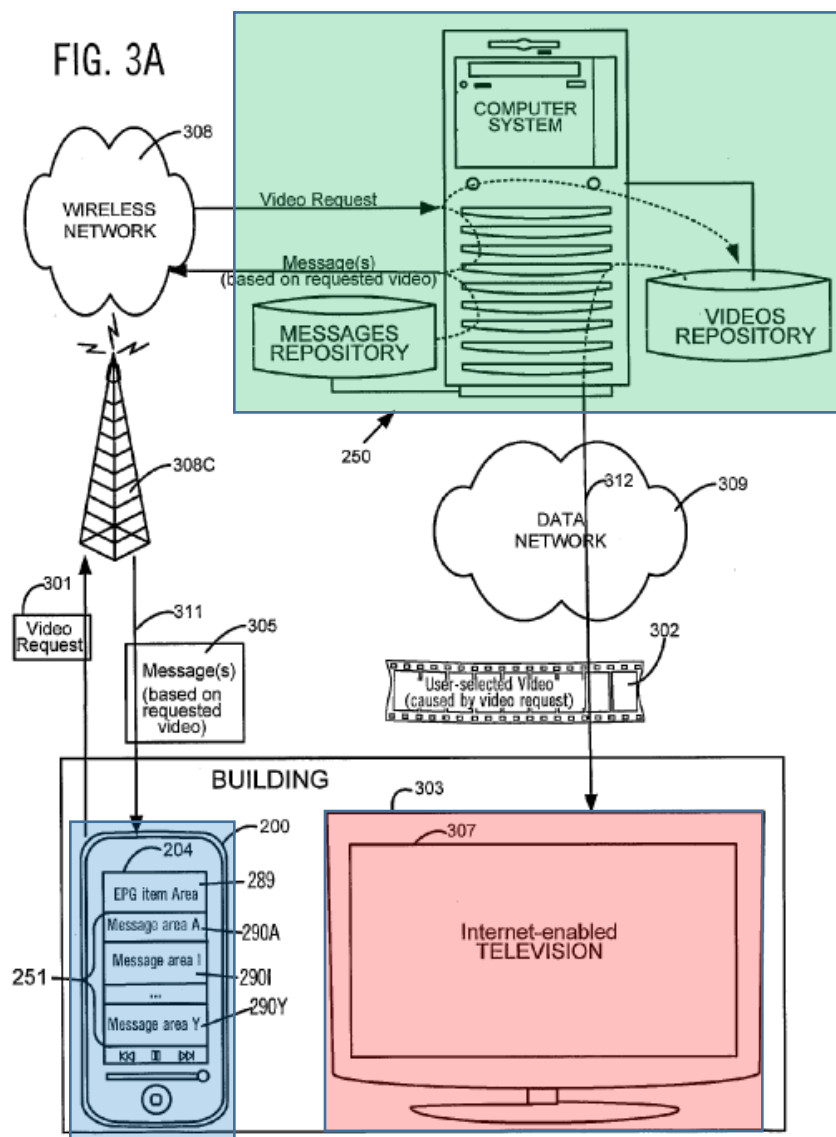
The earliest possible priority date for the claims of the '751 Patent is April 21, 2011, the filing date of U.S. Provisional Application No. 61/477,998 to which the '751 Patent claims priority. Ex. 1002, ¶ 34. Each of the references relied on herein is prior art to that date as explained below.

IV. OVERVIEW OF PRIOR ART

A. Redford

Redford, U.S. Patent No. 8,660,545 (Ex. 1005), issued on an application filed on January 6, 2010, and is prior art at least under 35 U.S.C. § 102(e). Ex. 1002, ¶ 79.

Redford discloses a computer system 250 (green) including various video content provider computers 281A-281N and a computer 282 that authorizes transfer of video based on a user's request. Ex. 1005, 2:59-67, Fig. 2B; Ex. 1002, ¶ 80. Computer system 250 responds to requests from a handheld device 200 (blue) by sending a signal carrying user-selected video, for presentation, to an internet-enabled television 303 (red). Ex. 1005, 6:40-52, 11:37-12:12, 21:20-30, 22:5-46, Figs. 2B, 3A-3C, 6A-6B, 8A-8B, 11A; see Ex. 1002, ¶¶ 80-97.



Ex. 1005, Fig. 3A (annotated)

B. Gonze

Gonze, U.S. Publication No. 2008/0235588 (Ex. 1006), published on September 25, 2008, and is prior art under 35 U.S.C. § 102(b). Ex. 1002, ¶ 98.

Gonze discloses a system for making content available from multiple providers such that a playback device can request, receive, and present the content

utilizing a playlist and a consistent user interface. Ex. 1006, Abstract, [0009]-[0010], [0034]-[0035], [0040], [0049], [0051], [0056], [0060]. Gonze describes that a browser and/or an operating system (OS) may use information from a file, for example, the file extension, to determine software to be loaded to play the file. *See* Ex. 1006, [0035]. The browser may determine whether the selected file can be played by any plug-ins. *Id.*; Ex. 1002, ¶¶ 99-106.

C. Bartfeld

Bartfeld, U.S. Pub. No. 2006/0107299 (Ex. 1018), published on May 18, 2006, and is prior art under 35 U.S.C. § 102(b). Ex. 1002, ¶ 107.

Bartfeld discloses a system for user-assisted association between a television and a telephony device. Ex. 1018, Abstract. A server generates a code, associates it with a set-top address, and transmits it back to the STB. *Id.* The STB displays the code on a television. *Id.*, [0007], [0025]-[0026]; Ex. 1002, ¶¶ 108-112.

V. IDENTIFICATION OF CHALLENGE PURSUANT TO 37 C.F.R. § 42.104(b)

A. Claims for Which Review is Requested and Grounds on Which Challenge Is Based

Petitioner requests review of claims 1–20 on the following grounds.

Ground	References	Basis	Claims Challenged
A	Redford-Bartfeld	§103	1-8, 11-20
B	Redford-Bartfeld-Gonze	§103	1-20

None of the prior art listed in the table above was before the examiner during prosecution of the '751 Patent.

B. 314(a) Discretion Does Not Apply

The Fintiv factors as set forth in the Director's June 21, 2022 Guidance Memorandum do not warrant discretionary denial.

Factor one appears neutral. Petitioner has filed IPR petitions challenging all three patents asserted in the District Court. If trial is instituted, Petitioner expects to request a stay, as decisions in Petitioner's favor would resolve the dispute in its entirety.

Factor two does not warrant denial. The District Court case against Petitioner is consolidated with the cases against Charter and Altice with the Altice case designated as the lead case. Trial in all three cases is set for October 28, 2024; Petitioner's trial will occur on or after that date. Furthermore, motions to transfer are awaiting ruling.

Factor three does not warrant denial. The District Court has not yet begun the claim construction process and fact discovery does not close until June 2024.

Factor four strongly favors institution. The petition challenges all claims in the '751 Patent while only claims 12-14 and 16 are asserted in the District Court. Furthermore, Petitioner stipulates not to pursue in the District Court any ground that

utilizes the same combination of prior art references relied upon in the instituted petition. Ex. 1082.

Factor five does not warrant denial as Petitioner is a defendant in the District Court case.

Factor six favors institution. Petitioner presents compelling unpatentability challenges that merit institution, relying on entirely different prior art than that of the previously-considered Google petition.

C. 325(d) Discretion Does Not Apply

The Board should not exercise its 35 U.S.C. § 325(d) discretion to deny institution. The grounds raised herein are not the same or substantially the same as the art and arguments raised during prosecution, and if they are, Examiner erred in a manner material to the patentability of the challenged claims.

D. Level of Ordinary Skill

A person of ordinary skill in the art (a “POSITA”) at the time of the alleged invention would have had a degree in computer or electrical engineering, computer science, information systems, or a similar discipline, along with three-to-four years of experience with the design and/or implementation of network-based content delivery systems, such as video-on-demand cable systems and Internet video streaming. Ex. 1002, ¶¶ 30-32.

E. Claim Construction

For purposes of this petition only, all claim terms herein are given their ordinary and customary meaning to a POSITA. 37 C.F.R. § 42.100(b). Petitioner does not contend that the claims include any means-plus-function limitations. No terms need be specifically construed in order to resolve any controversy in the instant Petition. *See Vivid Techs., Inc. v. Am. Sci. & Eng'g, Inc.*, 200 F.3d 795, 803 (Fed. Cir. 1999) (“[O]nly those terms need be construed that are in controversy, and only to the extent necessary to resolve the controversy.”). Petitioner does not contend that the claims include any means-plus-function limitations.

In the Touchstream-Google case involving the '251 Patent, Patent Owner advocated that plain and ordinary meaning applies for all claim terms¹, and the Court agreed. Ex. 1020, pp. 2-4; Ex. 1022, p. 22. In the earlier Touchstream-Vizbee case involving the same patents, Patent Owner advocated that plain and ordinary meaning applies for certain claim terms but for other terms proposed constructions which it seems to have now abandoned. Ex. 1021, pp. 1-14.

In IPR2022-00795, involving the related '251 Patent, the Board noted that “the parties agree that the term ‘media player’ refers to software and not to a

¹ For some terms, Patent Owner provided its view as to what that meaning is.

hardware device.” *See* Ex. 1064, 13. The prior art relied on herein includes software media players.

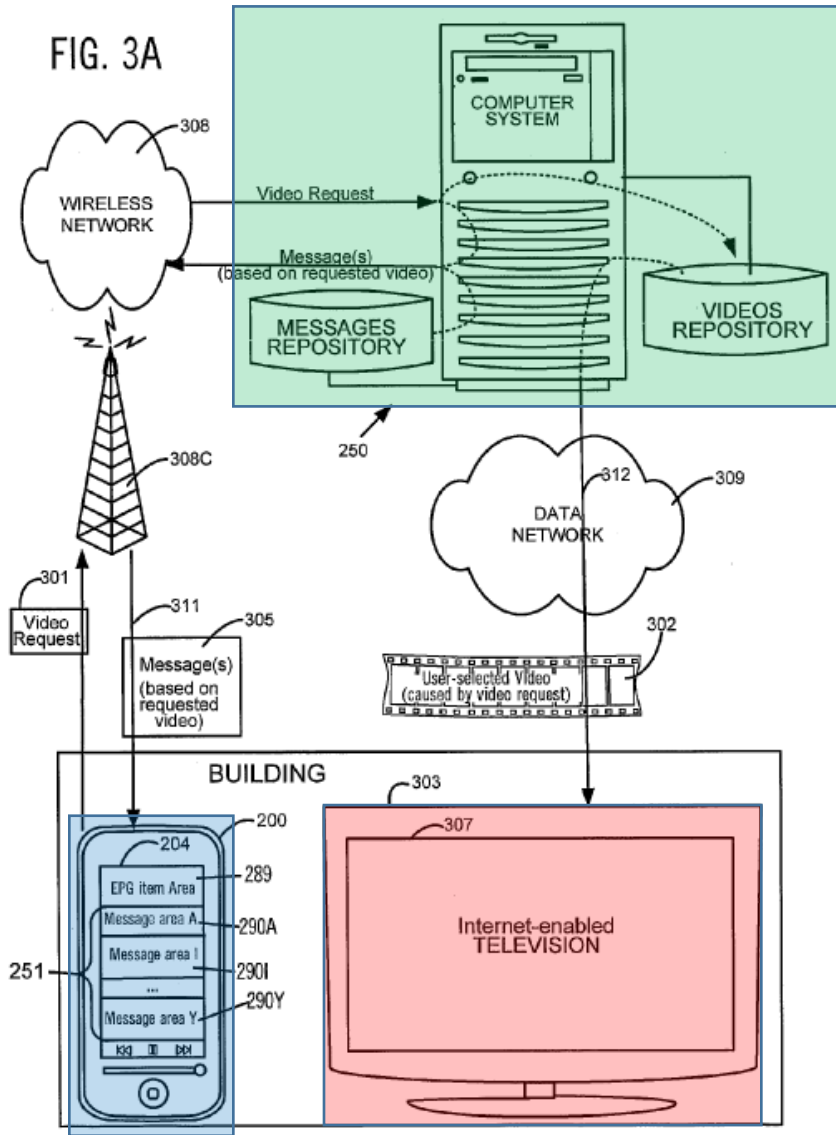
VI. SPECIFIC GROUNDS FOR UNPATENTABILITY

A. Grounds A and B: Redford-Bartfeld and Redford-Bartfeld-Gonze Render Claims 1-20 Obvious

1. Independent Claim 1

- a. [1A]: “A non-transitory computer storage medium storing computer-useable instructions that, when used by a first computing device, cause the first computing device to perform operations comprising:”**

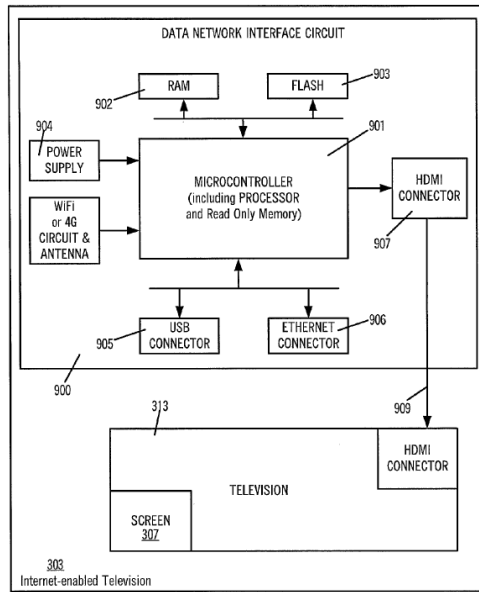
If limiting, Redford discloses it. Redford discloses a computer system 250 (green) including various video content provider computers 281A-281N and a computer 282 that authorizes transfer of video. Ex. 1005, 2:59-67, 5:28-41, Fig. 2B; Ex. 1002, ¶ 120. Computer system 250 responds to requests 301 from a handheld device 200 (blue) by sending a signal carrying user-selected video 302, for presentation, to an internet-enabled television 303 (red) (e.g., “first computing device”). Ex. 1005, 6:40-52, 7:27-51, 11:37-12:12, 21:20-30, 22:5-46, Figs. 2B, 3A-3C, 6A-6B, 8A-8B, 11A; Ex. 1002, ¶ 121.



Ex. 1005, Fig. 3A (annotated)

Television 303 is a computing device that includes a microcontroller 901 and processor 911 for executing program instructions stored on a non-transitory storage medium (e.g., ROM, RAM 902 or flash 903) to perform operations. Ex. 1005, 12:5-12, 30:23-61, FIGs. 9A-9B; Ex. 1002, ¶¶ 122-123.

FIG. 9A (PRIOR ART)



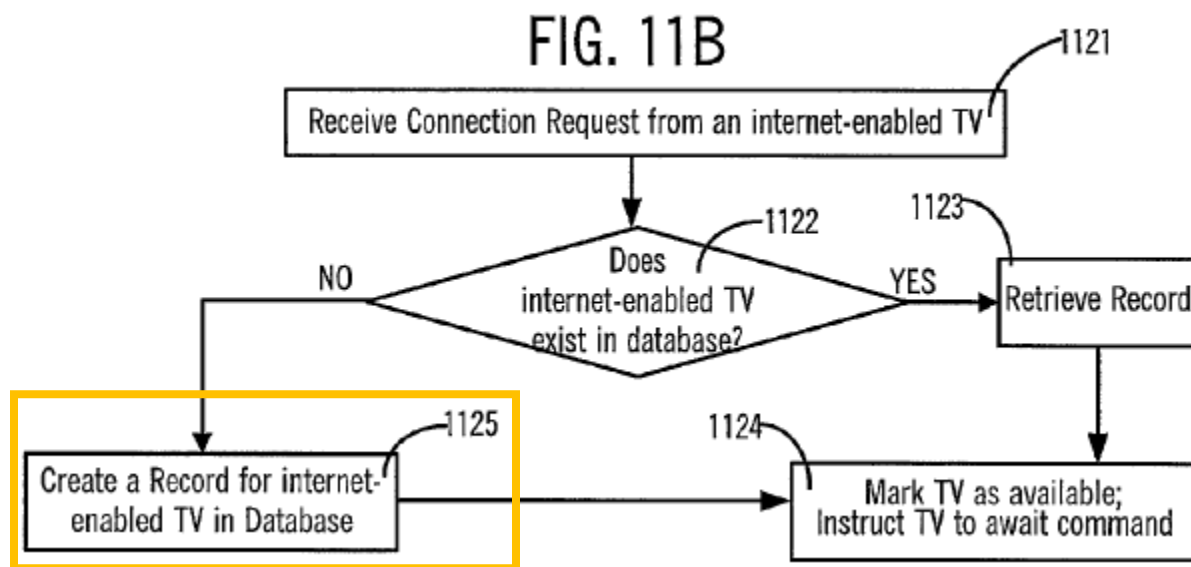
Ex. 1005, FIG. 9A

Redford discloses limitation [1A].

- b. **[1B] “obtaining a synchronization code associated with the first computing device, wherein the associated synchronization code is stored on a remote server device;”**

Redford discloses that server 282 of computer system 250 (“remote server device”) receives, from a television 303, registration information including an IP address, TV-name, and TV-password (each a “synchronization code”). Ex. 1005, 31:7-14, 44:44-48. The registration process is illustrated in Fig. 11B. Ex. 1002, ¶ 126. Server 282 receives a connection request from television 303, checks if a record exists in a database for television 303, and if not, creates a new record in the database using the registration information, shown in annotated Fig. 11B below. Server 282

marks television 303 as being available. Ex. 1005., 35:25-36, Fig. 11B; Ex. 1002, ¶ 127.



Ex. 1005, Fig. 11B (annotated)

It would have been obvious to modify Redford's television 303 to include the claimed capability that television 303 obtain a synchronization code from computer system 250 as would have been understood by a POSITA as demonstrated by Bartfeld. Ex. 1002, ¶ 128.

Bartfeld discloses a system for user assisted association between a television and a telephony device. Ex. 1018, Abstract. Bartfeld describes that a server generates a code, associates the code with a set-top address, and transmits the code back to the set-top box. *Id.* The set-top box displays the code on a television. *Id.*, [0007], [0025]-[0026]. Using a personal computing device having an address associated therewith,

the code is transmitted by a user, to the server. *Id.* The server identifies the personal computing device address, and using the code, associates the device with the set-top box. *Id.* Bartfeld discloses that a synchronization code “may be selected by any convenient manner such as random number generation, selection from a list, hashing the STB number, using a counter, and the like ... Clearly, a never repeating [synchronization code] may be used.” Ex. 1018, [0025]. Accordingly, Bartfeld’s set-top box “obtains” “a synchronization code associated with the first computing device.” Ex. 1002, ¶ 129.

Using Bartfeld, a POSITA would have understood that a server system, such as computer system 250 of Redford, would beneficially assign a synchronization code to a first computing device, such as Redford’s television 303 because Bartfeld describes that a set-top box, to be associated with a handheld computing device, may be embedded within a device capable of displaying video signals, *e.g.*, Redford’s television 303. Ex. 1018, [0005], [0030]. Ex. 1002, ¶ 130. A POSITA would further have understood that Redford-Bartfeld’s computer system 250 generates a synchronization code that is obtained by and displayed on television 303. Ex. 1018, Abstract, [0007], [0025]-[0026], Figs. 1, 2, 4; Ex. 1002, ¶ 130. A POSITA would have looked to supplement the association in Redford with the server generated code for obtaining by and display on a television and entry by a user on a handheld device as taught by Bartfeld in order to ensure that the user is easily and accurately

associating the handheld device with a desired television, e.g., basement television. Ex. 1002, ¶ 130.

A POSITA would have been motivated to do so to easily provide more display options for playing back content to Redford's users. Ex. 1002, ¶ 131. Redford already uniquely identifies displays, and lets a user play content from a phone on a display via a server, thus recognizing the desirability to users of watching content of their choosing via devices of their choosing. Ex. 1005, 4:57-5:4, 5:34-36, 7:22-26, 7:33-35, 11:37-42, 12:8-12, 27:4-16; Ex. 1002, ¶ 131. Redford also provides the capability of receiving a synchronization code assigned to a television from a user's handheld device. Ex. 1005, 41:56-67; Ex. 1002, ¶ 131. The assisted association teachings of Bartfeld would have provided a POSITA with motivation to employ a computer system generated synchronization code that is obtained by the television in the system of Redford. Ex. 1002, ¶ 131. The synchronization code in Bartfeld would have been combined with the system in Redford "because it allows the system to synchronize (e.g., pair) a mobile device to a particular display device for ease of use." Ex. 1005, 43:15-20; Ex. 1002, ¶ 131.

Combining Bartfeld with Redford would be merely using known techniques (association between a television and a personal computing device) to improve similar devices (the server-based video streaming systems taught in Redford and Bartfeld) in the same way (obtaining a synchronization code associated with a

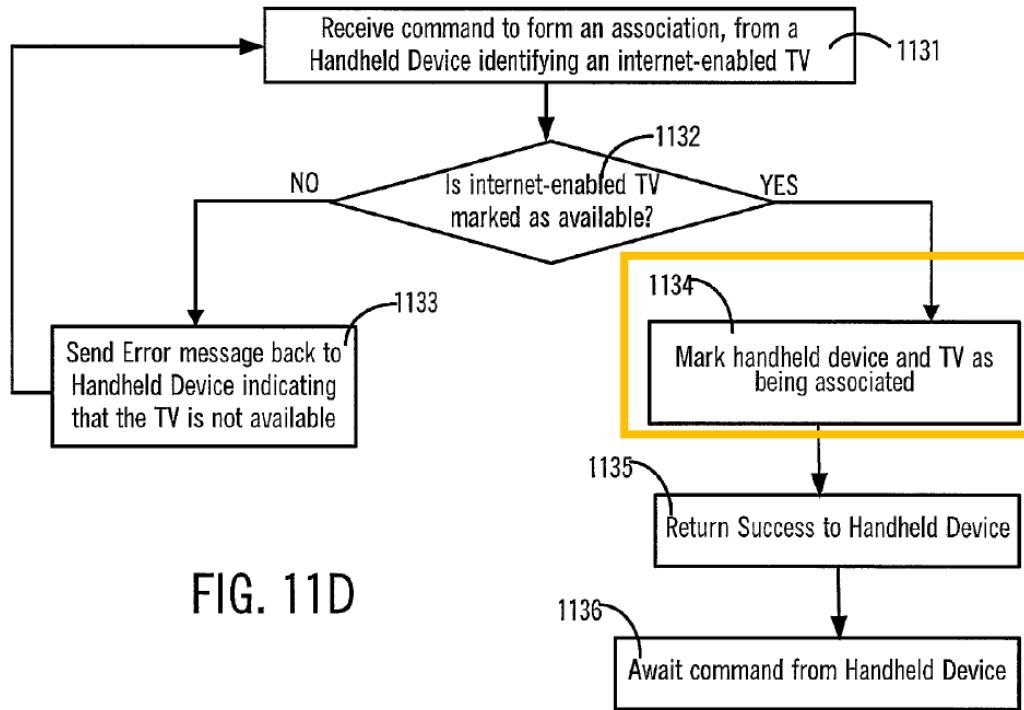
display device). Ex. 1002, ¶ 132. Bartfeld teaches a system similar to Redford where a synchronization code, of an association between a television and a handheld device, is obtained by a television, a user on the handheld device selects content for display on the television, and a server provides information to the television associated with the handheld device regarding how to access and output the content. *Id.*

Additionally, a POSITA would have had the skills and knowledge to implement the generating and assigning a synchronization code that is obtained by a television in Redford's system, as taught by Bartfeld, by incorporating into Redford's television 303 the ability to obtain a generated and assigned synchronization code. Ex. 1002, ¶ 133. Thus, a POSITA would have expected success in applying Bartfeld's teaching for associating the two as needed to the similar Redford system that associates the two because it would have required just minor hardware, software, and/or firmware modifications, which would have been well within the skill set of a POSITA. *Id.*

- c. **[1C]: “providing the synchronization code to a second computing device in communication with the remote server device, wherein the provided synchronization code causes the remote server device to store an association between the first computing device and the second computing device;”**

Redford discloses that server 282 of computer system 250 (“remote server device”), after receiving the command to form an association from handheld device

200 (“second computing device”), marks handheld device 200 as being associated with television 303 (“first computing device”) as association information in a database. Ex. 1005, 36:2-3, 43:15-20. The storage of association information is illustrated at 1134 in Fig. 11D. Ex. 1002, ¶¶ 136-137.



Ex. 1005, Fig. 11D (annotated)

Redford describes that server 282 “maintains in its database” “[a]ssociation information (also called ‘pairing’)” including “identifier of the handheld device, ... IP address, TV-name and TV-password.” Ex. 1005, 43:15-20; Ex. 1002, ¶¶ 138-139. The record for the television 303, created in Fig. 11B as described in Section VI.A.1.b, *supra*, and/or the record for the handheld device 200, created in Fig. 11D as described above in Section VI.A.1.c, *supra*, is marked to associate, or pair, the

two in one or both records. As Redford describes, by maintaining the association information in its database, subsequent commands, received by the server, to play a video cause the server to retrieve, from a record in its database, an identifier of the television 303 associated with the handheld device 200. Ex. 1005, 36:41-45. A POSITA would have understood that Redford's description of "mark"ing the handheld device 200 and television 303 as being associated is an update to the record for the television 303, created in step 1125 in Fig. 11B and described in Section VI.A.1.b, *supra*, maintained in the computer system 250 database. Ex. 1002, ¶¶ 140-144.

Bartfeld also teaches computer systems with the capability to create and display an assigned synchronization code on a television for use by a telephone device of a user as demonstrated by Bartfeld and discussed above in Section VI.A.1.b, *supra*. Ex. 1002, ¶ 145. Using a personal computing device ("second computing device") having an address associated therewith, the code is transmitted by a user, to the server ("remote server device") ("providing the synchronization code to a second computing device in communication with the remote server device"). *Id.*, ¶¶ 146-147. The server identifies the personal computing device address, and using the code, associates the device with the set-top box. *Id.* A POSITA would have understood that in the combined Redford-Bartfeld system, server 282 of computer system 250 ("remote server device") receives a code, which

was displayed on television 303 and subsequently entered by a user onto a telephone device, as taught by Bartfeld. Ex. 1005, 31:7-14, 44:44-48; Ex. 1002, ¶¶ 148-152. Redford-Bartfeld teaches limitation [1C].

- d. **[1D]: “receiving, from the remote server device, a first message that includes at least one command in a first format, the first message being received based at least in part on the stored association and on a second message including at least one command in a second format having been sent from the associated second computing device;”**

Redford discloses that, in embodiments that support multiple content providers, such as Netflix 281A and YouTube 281B in Fig. 2B, server 282 receives “an identifier of the content provider that maintains a repository 834I (FIG. 8B) in which a file containing video 302 is available.” Ex. 1005, 26:64-27:3, see also, 36:18-43, 43:36-53, 44:6-18, Figs. 8A-8B; Ex. 1002, ¶ 154.

Television 303 receives and executes commands (such as those described above) from computer system 250. Ex. 1005, 31:16-18, 44:48-52. Handheld device 200 sends a playback control command, such as play, pause, rewind, or fast forward, to computer system 250, which thereafter sends a corresponding command (“at least one command in a first format”) to television 303. *Id.*, 8:5-12; Ex. 1002, ¶ 155.

The illustrative commands from the handheld device uses authority-compatible handheld interface software. On an iPhone, the implementation library for the software is built on top of iPhone SDK which Redford calls the iLook iPhone

SDK. Ex. 1005, 38:50-63. The library includes a SetVideoRate command to fast forward and rewind, a PlayVideo command to play video, and a PauseStream and ResumeStream commands to pause and resume video. *Id.*, 39:2-54, 40:56-41:45. A POSITA would have understood any of these commands sent from the handheld device 200 to computer system 250 as “the at least one command in a second format.” Ex. 1002, ¶ 156.

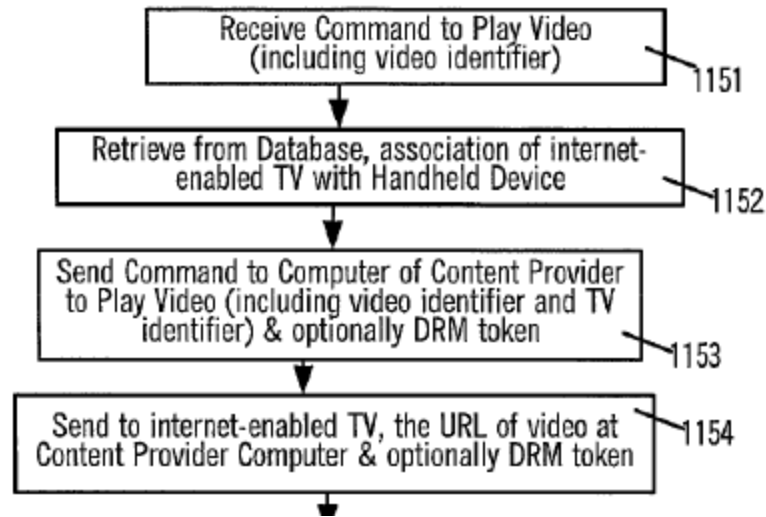
Redford describes, in a set-top SDK API, a function, VideoPlay (“at least one command in a first format”), that allows video content to be played using protocols such as Real Time Streaming Protocol (RTSP), User Datagram Protocol (UDP), and Hypertext Transfer Protocol (HTTP), including media player codecs needed for decoding the content for display. Ex. 1005, 40:24-29, 40:56-58, 40:66-41:2, 41:53-54. Redford teaches that RTSP has varying implementations depending on the content provider and service; therefore, several implementations of VideoPlay may exist to support various RTSP players. *Id.*, 40:56-41:2; Ex. 1002, ¶ 157. Since different RTSP players are supported, a POSITA would have understood that Redford teaches that television 303 was configured to load any of the plurality of different RTSP application software for playing back the video content for a particular VideoPlay implementation. *Id.*

Thus, e.g., Redford teaches a “PlayVideo” command (“at least one command in a second format”), sent from handheld device 200 to computer system 250, to play

video on television 303 (Ex. 1005, 39:22-24) and a “VideoPlay” command (“at least one command in a first format”) sent from computer system 250 and received by television 303 that allows video content to be played using protocols such as Real Time Streaming Protocol (RTSP), User Datagram Protocol (UDP) and Hypertext Transfer Protocol (HTTP), *Id.*, 40:56-58, including several implementations of VideoPlay existing to support various RTSP players. *Id.*, 40:56- 41:2. A POSITA would have known that Redford’s “PlayVideo” command (“first message”) is received based at least in part on the association between the handheld device 200, indicating the desired video file, and the television 303 as well as “VideoPlay” command (“a second message”). Ex. 1002, ¶¶ 158-159.

Figure 11H shows the response of computer system 250 to a request to play, pause, rewind, etc., a video. Ex. 1005, 36:41-37:40. Upon receipt of a command to play video, computer system 250 retrieves association information, sends a corresponding play command to the content provider specified in the user request, and sends a URL to the television that can fetch and play the requested content from the content provider. Ex. 1005, 29:4-20, 36:41-52, Figs. 8A-8B, 11H; Ex. 1002, ¶¶ 160-161.

FIG. 11H



Ex. 1005, portion of Fig. 11H

Redford discloses limitation [1D].

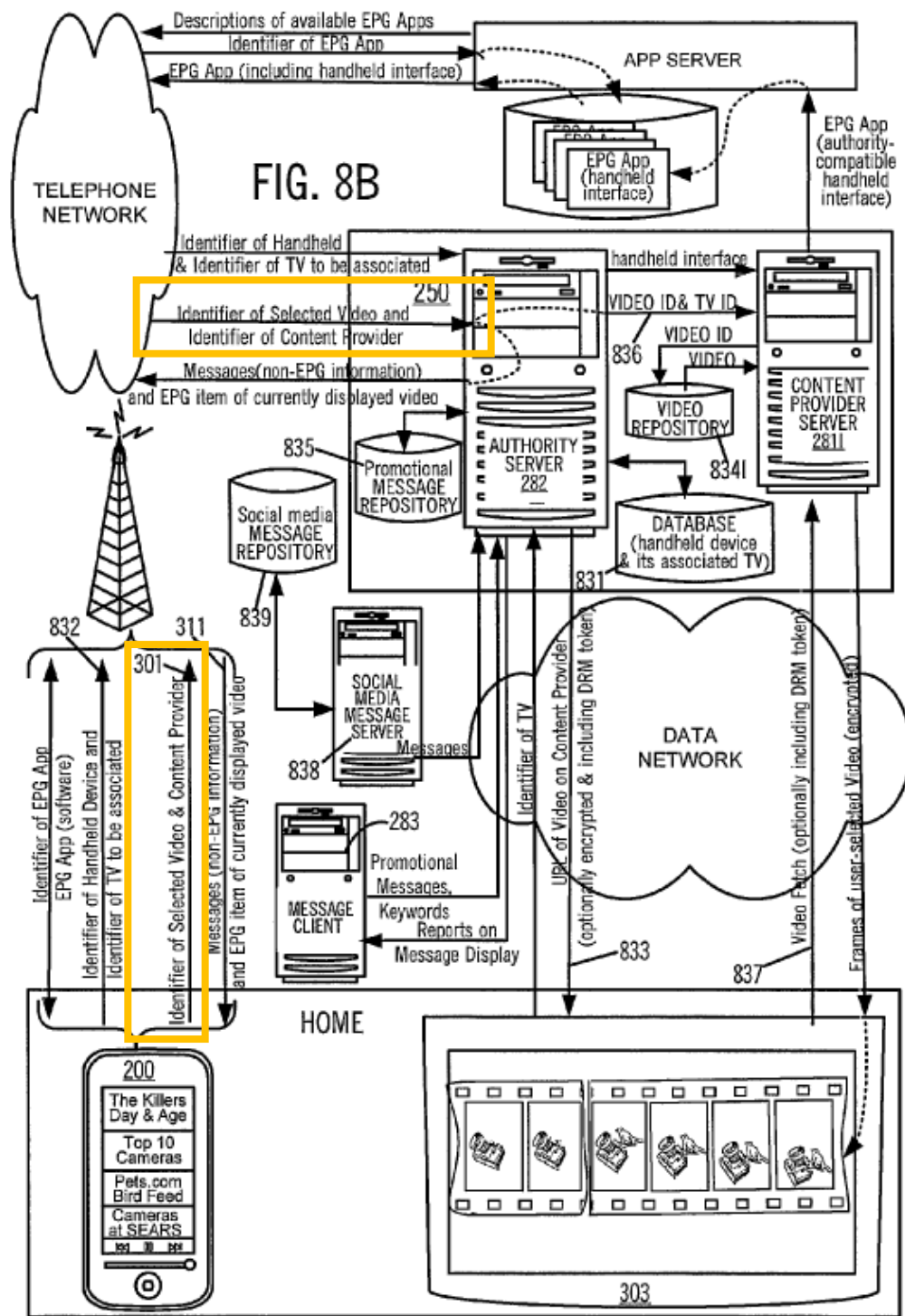
- e. **[1E]: “selecting a first media player application from a plurality of media player applications based at least in part on the first format of the first message, the first media player application being selected to play a first piece of content referenced in the received first message; and”²**

Redford’s server 282 of computer system 250 receives, from handheld device 200, “an identifier of a video 302 in a video request 301”. Ex. 1005, 26:62-64, Fig. 8B; Ex. 1002, ¶ 164. In embodiments that support multiple content providers, such as Netflix 281A and YouTube 281B in Fig. 2B, server 282 also receives “an identifier of the content provider that maintains a repository 834I (FIG. 8B) in which

² Petitioner does not concede that this limitation (e.g., “the first format of the first message”) is definite.

a file containing video 302 is available” (“a first piece of content referenced in the received first message”). Ex. 1005, 26:64-27:3, see also, 36:18-43, 43:36-53, 44:6-18, Figs. 8A-8B; Ex. 1002, ¶ 165. In particular, Redford describes that “a specific video can be made available to a user for selection by more than one content provider (i.e. by multiple content providers)” (Ex. 1005., 7:4-6), and “a user can obtain a video 208Z (or a copy thereof) for viewing on demand (VOD) from either one of two different content providers I and N, via their respective apps 202I, 202N (accessible in handheld device 200 by touching corresponding representations 203I, 203N).” *Id.*, 7:22-26; Ex. 1002, ¶ 166.

Redford describes that “a specific video can be made available to a user for selection by more than one content provider” Ex. 1005, 7:4-6, 7:22-26. Redford also discloses the need for video codecs (decoding video for example) to play streaming video content. *Id.*, 40:66-41:2, 41:53-54. A POSITA would understand that different video codecs are needed for the identified particular media player to play the video content. Thus, Redford teaches that an identifier of the content provider identifies a particular media player for playing the video 302. Ex. 1002, ¶ 167.

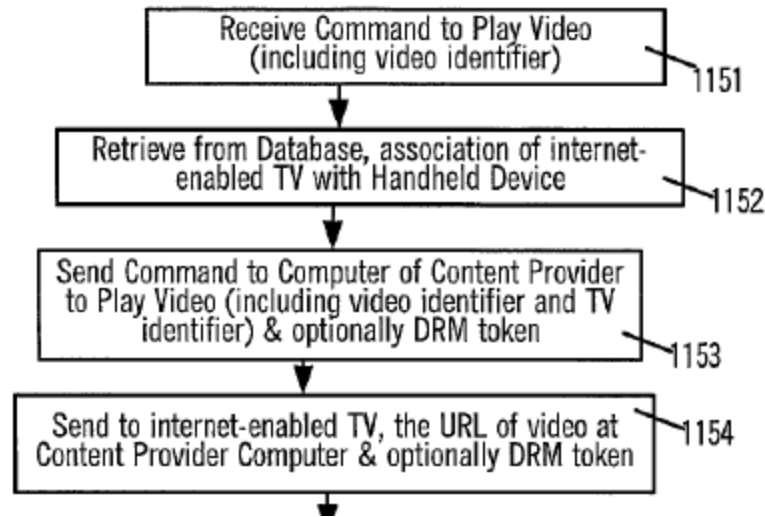


Ex. 1005, Fig. 8B (annotated)

As another example, Redford describes that “an identifier of each content provider computer 281I and an identifier of each video 208J available therefrom (see FIG. 2B) are combined into (e.g. by concatenation to form) a single globally unique identifier (GUID) in computer system 250.” Ex. 1005, 27:4-8. Redford teaches that selection of a particular GUID by a user causes handheld device 200 to send the particular GUID in video request 301 which is received in step 801 by the computer system 250. *Id.*, 27:8-16, see also, 36:18-27, 43:36-52, 44:6-18, Figs. 8A-8B; Ex. 1002, ¶ 168.

Figure 11H shows the response of computer system 250 to a request to play, pause, rewind, etc., a video. Ex. 1005, 36:41-37:40. Upon receipt of a command to play video, computer system 250 retrieves association information, sends a corresponding play command to the content provider specified in the user request, and sends a URL (“a first piece of content referenced in the received first message”) to the television that can fetch and play the requested content from the content provider. Ex. 1005, 29:4-20, 36:41-52, Figs. 8A-8B, 11H; Ex. 1002, ¶¶ 179-170.

FIG. 11H



Ex. 1005, Fig. 11H (cropped)

Redford describes, in a set-top SDK API, a function, VideoPlay, that allows video content to be played using protocols such as Real Time Streaming Protocol (RTSP), User Datagram Protocol (UDP), and Hypertext Transfer Protocol (HTTP), including media player codecs needed for decoding the content for display. Ex. 1005, 40:24-29, 40:56-58, 40:66-41:2, 41:53-54. Redford teaches that RTSP has varying implementations depending on the content provider and service; therefore, several implementations of VideoPlay may exist to support various RTSP players. *Id.*, 40:56-41:2; Ex. 1002, ¶ 171. Since different RTSP players are supported, a POSITA would have understood that Redford teaches that television 303 was configured to load any of the plurality of different RTSP application software for playing back the video content for a particular VideoPlay implementation. *Id.*

Thus, e.g., Redford teaches a “PlayVideo” command, sent from handheld device 200 to computer system 250, to play video on television 303 (Ex. 1005, 39:22-24) and a “VideoPlay” command (“first format of the first message”), sent from computer system 250 and received by television 303 that allows video content to be played using protocols such as Real Time Streaming Protocol (RTSP), User Datagram Protocol (UDP) and Hypertext Transfer Protocol (HTTP), *Id.*, 40:56-66, including several implementations of VideoPlay existing to support various RTSP players. *Id.*, 40:56-41:2. A “VideoPlay” command is a function that allows video content to be played by a specific player. *Id.* Accordingly, a POSITA would have known from reading Redford that computer system 250 converts the “PlayVideo” command, sent from handheld device 200, to a particular “VideoPlay” command, since RTSP has varying implementations depending on the content provider and service and since several implementations of VideoPlay exist to support various these various RTSP players by selecting the applicable “VideoPlay” command for the applicable implementation. Redford teaches that video plays on screen 307. A POSITA would understand that different media players would be selected to support the media player format for different streaming video providers providing specifically requested content, “respective content providers A-N”, as shown by example in Figure 2A, Netflix, YouTube, ZillionTV, and Paramount Pictures. *Id.*; Ex. 1002, ¶¶ 172-173. The applicable “VideoPlay” command for the applicable

implementation is sent to television 303 as part of the URL that references the requested video content (“a first piece of content referenced in the received first message”). *Id.*

Therefore, Redford discloses limitation [1E].

Further, if it is determined that Redford does not expressly disclose that television 303 may load any of a plurality of different media players based at least in part on the first format of the first message, it would have been obvious to implement television 303 to include the claimed capability given Redford’s teaching of multiple, different RTSP players being supported in Internet-enabled television 303, which was well-known in the art, and the general knowledge of the POSITA that different content providers would use different players. Ex. 1005, 4:18-20, 30:23-61, Fig. 9A; Ex. 1002, ¶ 174. A POSITA would have understood that the function of presenting video content from Netflix (*e.g.*, content provider A, 281A) as opposed to YouTube (content provider B, 281B), ZillionTV (content provider I, 281I), or Paramount Pictures (content provider N, 281N), would be accomplished by a different RTSP player (“a first media player application from a plurality of media player applications”) to be selected onto the television and it would have been an obvious design choice to do so based upon the specifically requested content (“a first piece of content referenced in the received first message”) from a specific content provider (“selecting a first media player application ... based at least in part

on the first format of the first message”). Ex. 1005, Figs. 2B, 9A; Ex. 1002, ¶¶ 174-175.

Therefore, Redford renders obvious limitation [1E].

It was generally known before the priority date of the ’751 Patent that display devices were enabled with the capability to load (“select”) any one of a plurality of media player applications as shown by Gonze. Ex. 1002, ¶ 177.

Gonze discloses a system for making content available from multiple providers such that a playback device can request, receive, and present the content by utilizing a playlist by causing one of various media players to load: “The operating system...determines an appropriate application, such as a media player, that should be loaded to handle the file based on information from the file.... [and the] operating system can cause a locally-installed media player to load.” Ex. 1006, Abstract, [0010], [0034], [0035], [0040], [0049], [0051]. *See* Section IV.B, *supra*. Gonze discloses various media formats (*e.g.*, RealMedia, QuickTime, Windows Media) requiring different media player applications (*e.g.*, RealPlayer, QuickTime player, Microsoft Media Player) to properly output the content. Ex. 1006, [0006], [0060]; Ex. 1002, ¶ 178.

The appropriate media player is selected based on information in a browser-interpretable document playlist. Ex. 1006, [0034]. Gonze describes determining “whether a media player capable of playing a media file in the playlist has been

installed on the computing device on which the instant method is implemented,” and, “[i]f no such media player has been installed, the device may be provided with a link through which an appropriate media player can be obtained.” *Id.*, [0058], Fig. 1. “Once an appropriate media player has been identified and its installation status confirmed, the browser in which the instant method is implemented can cause **the computing device to load the appropriate media player.**” *Id.*, [0059] (emphasis added), Fig. 1. Gonze’s playback device performs “selecting a first media player application from a plurality of media player applications.” Ex. 1002, ¶ 179.

Gonze further describes an example in which a playback device may look at a content file’s extension to determine an appropriate application to be loaded. Ex. 1006, [0035]. For instance, the file name “example.mp3” is identified as a media file, thus allowing the operating system of the playback device to cause a locally-installed media player to load, and send instructions to the locally-installed media player to play the file. *Id.*; Ex. 1002, ¶ 180.

Based on Gonze, a POSITA would have understood that a media playback device, such as television 303 of Redford, would include multiple, different media players. The appropriate media player for a particular content can be determined based on information in a browser-interpretable document playlist, *e.g.*, a content file’s extension, as taught by Gonze. Ex. 1002, ¶ 181. A POSITA would further have understood that information on what media player application corresponds to

a particular piece of content could beneficially be supplied to handheld device 200 before a user selects the piece of content, and information on the corresponding media player application would be included in messages from handheld device 200 to computer system 250 and subsequently in the message from computer system 250 to television 303. Ex. 1005, 2:59-67, 5:42-58, Figs. 2B, 10A-10C; Ex. 1002, ¶ 182.

Since Redford already provides the capability of executing additional applications, (Ex. 1005, 41:56-67), a POSITA would have been motivated to apply Gonze's teaching of loading uninstalled media players to a playback device to supplement Redford's system in order to enable the easy loading and selection of various media players to Redford's system. Ex. 1002, ¶¶ 183-185. A POSITA would have appreciated that content from different providers, especially proprietary providers, would require proprietary media formats (*e.g.*, RealMedia, QuickTime, Windows Media) requiring proprietary media player applications (*e.g.*, RealPlayer, QuickTime player, Microsoft Media Player) to properly output the content. Ex. 1006, [0006], [0060]. A POSITA would have sought to combine Redford and Gonze to better support multiple proprietary players to easily play content from different providers. Ex. 1002, ¶ 185.

Combining Gonze with Redford would be merely using known techniques (supporting multiple media player applications for presenting content) to improve similar devices (the server-based video streaming systems taught in Redford and

Gonze) in the same way (selecting between the multiple player applications based on the format of the message). Gonze teaches a system similar to Redford where information is received indicating what content is available, a user selects from that content, and a server provides information to the playback device regarding how to access and output the content. Ex. 1002, ¶ 186.

Additionally, a POSITA would have had the skill to implement support for multiple media player applications in Redford's system, as taught by Gonze, by programming Redford's Internet-enabled television to select between multiple media player applications, e.g., based on information received in messages from the server. Ex. 1002, ¶ 187. The combination requires only minor hardware, software, and/or firmware modifications, leading to an expectation of success. *Id.*

Redford-Bartfeld-Gonze teaches limitation [1E].

- f. **[1F]: “controlling how the selected first media player application plays the referenced first piece of content based on a first command of the at least one command in the first format having been included in the received first message.”**

Figure 11H shows the response of computer system 250 to a request to play, pause, rewind, etc., a video. Ex. 1005, 36:41-37:40. Upon receipt of a command to play video, computer system 250 retrieves association information, sends a corresponding play command to the content provider specified in the user request, and sends a URL to the television that can fetch and play the requested content from

the content provider. Ex. 1005, 29:4-20, 36:41-52, Figs. 8A-8B, 11H; Ex. 1002, ¶¶ 190-196. Following conversion of the “PlayVideo” command by the computer system 250 to a “VideoPlay” command for use by the television 303, a POSITA would have understood that computer system 250 stores information for transmission to or retrieval by the television 303 where the information specifies the video file to be acted upon, identifies the particular media player for playing the video content, and includes the corresponding programming code command to control playing of the video content on the display device by the particular media player in accordance with the playback control command as a URL. Ex. 1005, 27:60-28:3, 29:4-20, 36:41-53, 38:50-56, 43:63-64, Figs. 8A-8B, 11H. Ex. 1002, ¶¶ 197-198. A POSITA would have understood that the stored information, when received by television 303, controls “how the selected first media player application plays the referenced first piece of content” 302 in the video request 301 “based on a first command of the at least one command in the first format” (Redford’s “PlayVideo”) “having been included in the received first message.” Ex. 1002, ¶ 199.

Therefore, Redford discloses limitation [1F].

In the proposed combination with Gonze, as stated in Section VI.A.1.e, interactions with the general user interface elements (*e.g.*, “<--”, “<-”, “Stop”, “Play”, “||”, “->”, “-->.”), Ex. 1006, [0053]) may be monitored and associated converted commands may be sent to the selected media player application (“controlling...”).

Ex. 1006, [0059], see also, [0006], [0010], [0034]-[0035], [0040], [0049], [0051], [0058]-[0060]. Ex. 1002, ¶ 200.

2. Dependent Claim 2

- a. “The non-transitory computer storage medium of claim 1, wherein each command of the at least one command in the second format is a universal command.”**

Claim 2 depends from claim 1. See Section VI.A.1; Ex. 1002, ¶ 201.

As discussed above in Section VI.A.1.d, Redford describes that the application on handheld device 200 may include commands such as play, fast forward, rewind, and pause which are sent to the computer system 250 (“each command of the at least one command in the second format is a universal command”). Ex. 1005, 8:3-17, 11:37-48, 26:35-27:3, 31:16-23, 36:18-27, 38:50-63, 39:2-54, 40:21-41:45, 43:36-53, 44:6-18, 44:48-52, Figs. 2F-2G, 8A-8B, 11H. Ex. 1002, ¶¶ 202-203.

Redford discloses claim 2.

3. Dependent Claim 3

- a. “The non-transitory computer storage medium of claim 2, wherein the first format is different than the second format.”**

Claim 3 depends from claim 2. See Section VI.A.2; Ex. 1002, ¶ 204.

As discussed above in Section VI.A.1.d, Redford teaches that the command in the first message and the command in the second message are in different formats.

See Section V.A.1.d. In particular, Redford states that upon receipt of a command to play video (in the “second format”), computer system 250 sends a URL (in the “first format”) to the television to allow for fetching and playing of the requested content, from a specific content provider, by the television. Ex. 1005, 29:4-20, 36:41-53, Figs. 8A-8B, 11H. Ex. 1002, ¶¶ 205-211.

Redford discloses claim 3.

4. Dependent Claim 4

- a. “The non-transitory computer storage medium of claim 1, wherein the second message is sent from the associated second computing device to the remote server device.”**

Claim 4 depends from claim 1. See Section VI.A.1; Ex. 1002, ¶ 212.

As discussed above in Section VI.A.1.d, Redford describes how computer system 250 receives, from handheld device 200 (“second computing device”), a second message including a command to play a video to be displayed on the television 303 associated with the handheld device 200. See Section VI.A.1.d; Ex. 1005, 8:1-2, 26:62-27:3, 36:18-27, 43:36-53, 44:6-18, Figs. 2F, 8A-8B, 11H. Ex. 1002, ¶¶ 213-215.

Redford discloses claim 4.

5. Dependent Claim 5

- a. **“The non-transitory computer storage medium of claim 1, wherein the remote server device is configured to convert the at least one command in the second format into the at least one command in the first format based at least in part on the second message including therein a reference to the first piece of content.”**

Claim 5 depends from claim 1. See Section VI.A.1; Ex. 1002, ¶ 216.

Redford’s handheld device sends commands utilizing, e.g., the iLook iPhone SDK, including play, pause, rewind, and fast forward. Ex. 1005, 8:1-12, 26:62-27:3, 31:18-23, 36:18-27, 38:50-63, 39:3-54, 40:56-41:45, 43:36-53, 44:6-18, 44:48-52, Figs. 2F, 8A-8B, 11H; Ex. 1002, ¶¶ 217-218.

Figure 11H shows the response of computer system 250 to a request to play, pause, rewind, etc., a video. Ex. 1005, 36:41-37:40. Upon receipt of a command to play video, computer system 250 retrieves association information, sends a corresponding play command to the content provider specified in the user request, and sends a URL to the television that can fetch and play the requested content from the content provider. Ex. 1005, 29:4-20, 36:41-52, Figs. 8A-8B, 11H; Ex. 1002, ¶¶ 217-218.

Redford describes, in a set-top SDK API, a function, VideoPlay, that allows video content to be played using protocols such as Real Time Streaming Protocol (RTSP), User Datagram Protocol (UDP), and Hypertext Transfer Protocol (HTTP),

including media player codecs needed for decoding the content for display. Ex. 1005, 40:24-29, 40:56-58, 40:66-41:2, 41:53-54. Redford teaches that RTSP has varying implementations depending on the content provider and service; therefore, several implementations of VideoPlay may exist to support various RTSP players. *Id.*, 40:56-41:2; Ex. 1002, ¶ 219. Since different RTSP players are supported, a POSITA would have understood that Redford teaches that television 303 was configured to load any of the plurality of different RTSP application software for playing back the video content for a particular VideoPlay implementation. *Id.*

Thus, e.g., Redford teaches a “PlayVideo” command (“at least one command in the second format”), sent from handheld device 200 to computer system 250, to play video on television 303 (Ex. 1005, 39:22-24) and a “VideoPlay” command (“at least one command in the first format”) sent from computer system 250 and received by television 303 that allows video content to be played using protocols such as Real Time Streaming Protocol (RTSP), User Datagram Protocol (UDP) and Hypertext Transfer Protocol (HTTP), *Id.*, 40:56-58, including several implementations of VideoPlay existing to support various RTSP players. *Id.*, 40:56- 41:2. Ex. 1002, ¶ 220. A POSITA would have known from reading Redford that computer system 250 converts the “PlayVideo” command, sent from handheld device 200, to a particular “VideoPlay” command based at least in part on the second message including a reference to the first piece of content (Redford’s video 302 in video request 301),

since RTSP has varying implementations depending on the content provider and service and since several implementations of VideoPlay exist to support various these various RTSP players. *Id.*, Ex. 1002, ¶ 221.

Redford discloses claim 5.

6. Dependent Claim 6

- a. “The non-transitory computer storage medium of claim 1, wherein the remote server device is configured to convert the at least one command in the second format into the at least one command in the first format based at least in part on a reference to the first media player application having been included in the second message.”**

Claim 6 depends from claim 1. See Section VI.A.1; Ex. 1002, ¶ 223.

Redford discloses that server 282 of computer system 250 (“remote server device”) receives, from handheld device 200, “an identifier of a video 302 in a video request 301” (“second message”). Ex. 1005, 26:62-64, Fig. 8B. Redford further discloses that, in embodiments that support multiple content providers, such as Netflix 281A and YouTube 281B in Fig. 2B, server 282 also receives “an identifier of the content provider that maintains a repository 834I (FIG. 8B) in which a file containing video 302 is available” (“a reference to the first media player application having been included in the second message”). *Id.*, 26:64-27:3, see also, 36:18-43, 43:36-53, 44:6-18, Figs. 8A-8B. In particular, Redford describes that “a specific video can be made available to a user for selection by more than one content provider

(i.e. by multiple content providers)” (*Id.*, 7:4-6), and “a user can obtain a video 208Z (or a copy thereof) for viewing on demand (VOD) from either one of two different content providers I and N, via their respective apps 202I, 202N (accessible in handheld device 200 by touching corresponding representations 203I, 203N).” *Id.*, 7:22-26. Redford discloses the need for video codecs (decoding video for example) to play streaming video content. *Id.*, 41:1-2, 41:53-54. A POSITA would understand that different video codecs are needed for the identified particular media player application to play the video content. Thus, a POSITA would understand that Redford teaches that an identifier of the content provider, referenced in the message (“a reference to the first media player application having been included in the second message”) from handheld device 200 to server 282, identifies a particular media player application for playing the video 302. Ex. 1002, ¶¶ 224-236.

Redford discloses claim 6.

7. Dependent Claim 7

- a. “The non-transitory computer storage medium of claim 1, wherein the first media player application is selected based at least in part on the received first message including therein a reference to the first media player application.”**

Claim 7 depends from claim 1. See Section VI.A.1; Ex. 1002, ¶ 237.

Upon receipt of a command to play video, Redford’s computer system 250 retrieves association information, sends a corresponding play command to the

content provider specified in the user request, and sends a URL to the television to allow for fetching and playing of the requested content, from a specific content provider, by the television. Ex. 1005, 29:4-20, 36:41-52, Figs. 8A-8B, 11H. Following conversion of the “PlayVideo” command by the computer system 250 with server 282 to a “VideoPlay” command (“first message”) for use by the television 303, a POSITA would have understood that computer system 250 stores information for transmission to or retrieval by the television 303 where the information identifies the particular media player application for playing the video content as a URL. Ex. 1005, 27:60-28:3, 29:4-20, 36:41-52, 38:50-57, 43:63, Figs. 8A-8B, 11H. Ex. 1002, ¶¶ 238-242. Thus, a POSITA would understand that Redford teaches that an identifier of the content provider, referenced in the message (“first message”) from computer system 250 including server 282 to television 303, identifies a particular media player application to be loaded (“selected”).

Redford discloses claim 7.

8. Dependent Claim 8

- a. “The non-transitory computer storage medium of claim 1, wherein controlling how the selected first media player application plays the referenced first piece of content includes an execution of the first command.”**

Claim 8 depends from claim 1. See Section VI.A.1; Ex. 1002, ¶ 243.

Television 303 is a computing device that includes a microcontroller 901 and processor 911 for executing program instructions stored on a non-transitory storage medium (e.g., ROM, RAM 902 or flash 903) to perform operations including to play (“an execution of the first command”) video 302 that is retrieved from a specific service provider, via the Internet, in response to user request 301. Ex. 1005, 12:5-12, 30:23-61, FIGs. 9A-9B; Ex. 1002, ¶¶ 244-245.

Redford discloses claim 8.

9. Dependent Claim 9

- a. “The non-transitory computer storage medium of claim 1, the operations further comprising: retrieving the first media player application from a remote content provider based on a determination that the first media player application is not already selected.”**

Claim 9 depends from claim 1. See Section VI.A.1; Ex. 1002, ¶ 246.

As discussed in Section VI.A.1.e, *supra*, Gonze describes selecting from a plurality of media players based on information in a browser interpretable document playlist. Ex. 1006, [0034]. In particular, Gonze describes determining “whether a media player capable of playing a media file in the playlist has been installed on the computing device on which the instant method is implemented,” and, if the media player has been installed (Yes output from block 140), the process proceeds to block 160 without, and before, obtaining a copy of the media player over the Internet.” *Id.*, [0058], Fig. 1. Ex. 1002, ¶¶ 247-248.

Redford-Bartfeld-Gonze teaches claim 9.

10. Dependent Claim 10

- a. “The non-transitory computer storage medium of claim 9, wherein the remote content provider is associated with the referenced first piece of content.”**

Claim 10 depends from claim 9. See Section VI.A.9; Ex. 1002, ¶ 249.

As discussed above in Section VI.A.9, Gonze discloses retrieving a new media player application. Gonze discloses that the (“remote”) content provider uses a new multimedia player application (from the content provider) to play back available media services (“referenced first piece of content”) and playing a media service from content aggregator (“associated with the referenced first piece of content”). Ex. 1006. [0034], [0058]. Also, it would have been obvious to a POSITA that the new media player application would be retrieved from the provider of the content. Ex. 1002, ¶¶ 250-251. For example, it was well known that providers of media players frequently provide sample content to test or demonstrate the capabilities of their media player applications. *Id.*

Redford-Bartfeld-Gonze teaches claim 10.

11. Dependent Claim 11

- a. [11A]: “The non-transitory computer storage medium of claim 1, the operations further comprising:”**

As discussed above in Section VI.A.1, Redford-Bartfeld and Redford-Bartfeld-Gonze teach the limitations of claim 1. Ex. 1002, ¶ 252.

- b. **[11B]: “based on the stored association and while the first media player application is selected, receiving, from the remote server device, a third message that includes at least one command in a third format, wherein the third message is received based at least in part on a fourth message including at least one other command in the second format having been sent from the associated second computing device; and”**

Limitation [11B] is no different from limitation [1D] but for at least one command in a third format, wherein the third message is received based at least in part on a fourth message including at least one other command in the second format having been sent from the associated second computing device. Ex. 1001, claim 11. Accordingly, television 303 and computer system 250 operate in the same manner as described in Section VI.A.1.d for a subsequent command entered by a user of handheld device to computer system 250 and converted to a second playback control command. See Section VI.A.1.d, *supra*. Ex. 1002, ¶ 253.

In describing Fig. 9C, Redford discloses that television 303 plays a user requested video without interruption in act 925 (Ex. 1005, 31:24-35) and thereafter the process returns back to act 922 to wait for a command (*Id.*, 31:41-42), which includes a command, among others, for pause, rewind, fast forward, or playing a new video file. Ex. 1005, 8:3-5, 39:22-24. A POSITA would have understood that Redford describes a system that allows a user to request and play first and second video files, utilizing different media player applications, and respective first and

second playback control commands. *Id.*, 30:23-61, 40:24-29, 40:56-41:2; Ex. 1002, ¶ 254.

Redford discloses limitation [11B].

- c. **[11C]: “selecting a second media player application from the plurality of media player applications based at least in part on the third format of the third message, the second media player application being selected to play a second piece of content referenced in the third message.”**

Limitation [11C] is no different from limitation [1E] but for a second media player application being selected to play a second piece of content referenced in the third message. Ex. 1001, claim 11. Ex. 1002, ¶ 256.

As discussed above in Section VI.A.1.e, Redford-Bartfeld and Redford-Bartfeld-Gonze describe selecting a media player application from a plurality of media player applications. A POSITA would have understood that a “second media player application” could be selected based on the command and information in the “third message” just as the first media player application was selected based on information in the first message. Ex. 1005, 7:27-43, 40:24-29, 40:56-41:2, 41:53-54; Ex. 1006, Abstract, [0006], [0010], [0034]-[0035], [0040], [0049], [0051], [0058]-[0060]. Ex. 1002, ¶ 257.

Redford-Bartfeld and Redford-Bartfeld-Gonze teach limitation [11C].

12. Independent Claim 12

- a. **[12A]: “A computer-implemented method for remotely presenting various types of content, comprising:”**

As discussed above in Sections VI.A.1.a and IV.A, to the extent the preamble is limiting, Redford discloses limitation [12A]. Ex. 1002, ¶¶ 259-264.

- b. **[12B]: “obtaining, by a content presentation device, a synchronization code associated with the content presentation device, wherein the associated synchronization code is stored on a remote server device;”**

As discussed above in Section VI.A.1.b, Redford-Bartfeld teaches limitation [12B]. Ex. 1002, ¶¶ 265-274.

- c. **[12C]: “providing, by the content presentation device, the synchronization code to a remote computing device in communication with the remote server device, wherein the provided synchronization code causes the remote server device to store an association between the content presentation device and the remote computing device;”**

As discussed above in Section VI.A.1.c, Redford-Bartfeld teaches limitation [12C]. Ex. 1002, ¶¶ 275-292.

- d. **[12D]: “receiving, by the content presentation device and from the remote server device, a first message that includes at least one command in a first format, the first message being received based at least in part on the stored association and on a second message including at least one command in a second format having been sent from the associated remote computing device;”**

As discussed above in Section VI.A.1.d, Redford discloses limitation [12D].

Ex. 1002, ¶¶ 293-306.

- e. **[12E]: “selecting, by the content presentation device while a connection between the content presentation device and the remote server device is maintained, a first media player application from a plurality of media player applications based at least in part on the first format of the first message, the first media player application being selected to play a first piece of content referenced in the received first message; and”**

As discussed above in Sections VI.A.1.d-e, Redford-Bartfeld and Redford-Bartfeld-Gonze teaches limitation [12E] and each of the proposed combinations teaches such as a connection between the television 303 and computer system 250 is maintained. Ex. 1002, ¶¶ 307-324.

- f. **[12F]: “controlling, by the content presentation device, how the selected first media player application plays the referenced first piece of content based on a first command of the at least one command in the first format having been included in the received first message.”**

As discussed above in Section VI.A.1.f, Redford-Bartfeld and Redford-Bartfeld-Gonze teaches limitation [12F]. Ex. 1002, ¶¶ 325-336.

13. Dependent Claim 13

- a. “The computer-implemented method of claim 12, wherein the first media player application is selected based further in part on the received first message including therein a reference to the first media player application.”**

Claim 13 is rendered obvious by the proposed combinations for at least the reasons discussed above regarding claims 12 and claim 7. See Sections VI.A.12 and VI.A.7. Ex. 1002, ¶¶ 337-342.

14. Dependent Claim 14

- a. “The computer-implemented method of claim 12, the operations further comprising: selecting the first media player application based on a determination that a second media player application is currently selected.”**

Claim 14 is rendered obvious by the proposed combinations for at least the reasons discussed above regarding claims 12 and claim 9. See Sections VI.A.12 and VI.A.9. Ex. 1002, ¶ 343.

Further, as discussed above in Section VI.A.11.b, Redford describes how additional commands may be sent to and acted upon by television 303 after it has already received and executed a previous command (e.g., a previous command to play video content). Ex. 1005, 30:23-61, 40:24-29, 40:56-41:2; Ex. 1002, ¶ 344. As discussed above in Section VI.A.11.c, the proposed combinations describe selecting a media player application from a plurality of media player applications. Ex. 1005,

7:27-43, 40:24-29, 40:56-41:2, 41:53-54; Ex. 1006, Abstract, [0006], [0010], [0034]-[0035], [0040], [0049], [0051], [0058]-[0060]; Ex. 1002, ¶ 345.

A POSITA would have recognized that if a command was received to play content using the media player application that was already in use by television 303, selecting a new media player application would not be necessary. Ex. 1002, ¶ 346. Similarly, a POSITA would have recognized that if a different media player application (“second media player application”) was currently in use (“currently selected”) by television 303 than what was needed to play the newly requested content, then another media player application (“first media player application”) would need to be selected. *Id.* Thus, selection of the first media player application would be “based on a determination that a second media player application is currently selected.”

The proposed combinations teach claim 14.

15. Dependent Claim 15

- a. “The computer-implemented method of claim 12, further comprising: retrieving, by the content presentation device, the selected first media player application from a remote content provider based on the first format of the first message.”**

Claim 15 is rendered obvious by the proposed combinations for at least the reasons discussed above regarding claims 12 and claim 7. See Sections VI.A.12 and VI.A.9; Ex. 1002, ¶ 348. As discussed in Section VI.A.1.e, *supra*, Gonze describes

determining “whether a media player capable of playing a media file in the playlist has been installed on the computing device on which the instant method is implemented,” and, if the media player has been installed (Yes output from block 140), the process proceeds to block 160 without, and before, obtaining a copy of the media player over the Internet.” *Id.*, [0058], Fig. 1. Thus, television 303 retrieve the selected first media player application from a content provider of the first media player based on, e.g., a content file’s extension (“based on the first format of the first message”). Ex. 1006, [0035]; Ex. 1002, ¶ 349. See Section VI.A.1.e.

16. Dependent Claim 16

- a. “The computer-implemented method of claim 12, wherein the remote server device is configured to convert the at least one command in the second format into the at least one command in the first format based at least in part on a reference to the first media player application having been included in the second message, and wherein the first media player application is selected based further on the at least one command in the first format having been converted from the second format.”**

Claim 16 is rendered obvious by the proposed combinations for at least the reasons discussed above regarding claims 12, 6, and 7. See Sections VI.A.12 and VI.A.6-VI.A.7; Ex. 1002, ¶¶ 351-364.

17. Independent Claim 17

a. [17A]: “A content presentation device comprising:”

Limitation [17A] is obvious for at least the same reasons as discussed above regarding limitation [1A]. *See* VI.A.1.a; Ex. 1002, ¶¶ 365-370.

Television 303 is a content presentation device. Ex. 1005, 12:5-12, 30:23-61, FIGs. 9A-9B; Ex. 1002, ¶¶ 368-369.

Redford discloses limitation [17A].

b. [17B] “a display;”

Redford’s system includes television 303 which has a display. Ex. 1005, 12:5-12, 30:23-61, FIGs. 9A-9B; Ex. 1002, ¶¶ 371-373.

Redford discloses limitation [17B].

c. [17C]: “at least one processor; and”

d. [17D]: “at least one computer storage media storing computer-usable instructions that, when used by the at least one processor, cause the at least one processor to:”

Television 303 is a computing device that includes a microcontroller 901 and processor 911 for executing program instructions stored on a non-transitory storage medium (e.g., ROM, RAM 902 or flash 903) to perform operations. Ex. 1005, 12:5-12, 30:23-61, FIGs. 9A-9B; Ex. 1002, ¶¶ 374-376.

Redford discloses limitations [17C] and [17D].

- e. **[17E]: “obtain a synchronization code associated with the content presentation device, wherein the associated synchronization code is stored on a remote server device;”**

As discussed above in Section VI.A.1.b, the proposed combinations teach limitation [17E]. Ex. 1002, ¶¶ 377-386.

- f. **[17F]: “provide the synchronization code to a remote computing device in communication with the remote server device, wherein the provided synchronization code causes the remote server device to store an association between the content presentation device and the remote computing device;”**

As discussed above in Section VI.A.1.c, the proposed combinations teach limitation [17F]. Ex. 1002, ¶¶ 387-404.

- g. **[17G]: “receive, from the remote server device, a first message that includes at least one command in a first format, the first message being received based on the stored association and on a second message in the second format sent from the associated remote computing device;”**

As discussed above in Section VI.A.1.d, the proposed combinations teach limitation [17G]. Ex. 1002, ¶¶ 405-418.

- h. **[17H]: “select a first media player application from a plurality of media player applications based on the first format of the first message, the first media player application being selected to play a first piece of content referenced in the received first message; and”**

As discussed above in Sections VI.A.1.d-e, the proposed combinations teach limitation [17H]. Ex. 1002, ¶¶ 419-436.

- i. **[17I]: “control how the selected first media player application plays the referenced first piece of content based on a first command of the at least one command in the first format having been included in the received first message.”**

As discussed above in Section VI.A.1.f, the proposed combinations teach limitation [17I]. Ex. 1002, ¶¶ 437-448.

18. Dependent Claim 18

- a. **“The content presentation device of claim 17, wherein the first media player application is configured to recognize each command of the at least one command in the first format.”**

Claim 18 depends from claim 17. See Section VI.A.17; Ex. 1002, ¶ 449.

Redford teaches that commands received by the television and implemented by a selected media player application are understood by the selected media player application to take appropriate action, such as to “play” or “stop” the content. Ex. 1005, 29:4-20, 36:41-53, Figs. 8A-8B, 11H. Ex. 1002, ¶¶ 450-452.

Following conversion of the “PlayVideo” command by the computer system 250 to a “VideoPlay” command for use by the television 303 and selected media player application, a POSITA would have understood that the media player application would recognize the command to play, pause, etc., the content. Ex. 1005, 29:4-20, 36:41-53, Figs. 8A-8B, 11H; Ex. 1002, ¶¶ 453-455.

Redford discloses claim 18.

19. Dependent Claim 19

- a. “The content presentation device of claim 17, wherein the second message is sent from the associated second computing device to the remote server device.”**

Claim 19 is rendered obvious by the proposed combinations for at least the reasons discussed above regarding claims 17 and 4. See Sections VI.A.17 and VI.A.4; Ex. 1002, ¶¶ 456-459.

20. Dependent Claim 20

- a. “The content presentation device of claim 18, wherein the first media player application is selected based further on the received first message including therein a reference to the first media player application.”**

Claim 20 is rendered obvious by the proposed combinations for at least the reasons discussed above regarding claims 17 and 7. See Sections VI.A.17 and VI.A.7; Ex. 1002, ¶¶ 460-465.

VII. GROUNDS FOR STANDING & FEE PAYMENT

Petitioner hereby certifies that the '751 Patent is available for, and Petitioner is not barred or estopped from requesting, *inter partes* review challenging claims 1-20.

Pursuant to 37 C.F.R. § 42.103, the undersigned authorizes the charge of any required fees to Deposit Account No. 19-0733.

VIII. CONCLUSION

Inter partes review should be instituted and claims 1-20 canceled.

Dated: December 27, 2023

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CERTIFICATION UNDER 37 CFR § 42.24(d)

Under the provisions of 37 CFR § 42.24(d), the undersigned hereby certifies that the word count for the foregoing Petition for Inter Partes Review totals 10,707, which is less than the 14,000 allowed under 37 CFR § 42.24(a)(1)(i). This total includes 10,707 words as counted by the Word Count feature of Microsoft Word and 0 words used in annotations.

Pursuant to 37 C.F.R. § 42.24(a)(1), this count does not include the table of contents, the table of authorities, mandatory notices under § 42.8, the certificate of service, this certification of word count, the claims listing appendix, or appendix of exhibits.

BANNER & WITCOFF, LTD

Dated: December 27, 2023

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.105, I hereby certify that I caused a true and correct copy of this Petition for *Inter Partes* Review in connection with U.S. Patent No. 11,048,751 and supporting evidence to be served via FedEx Priority Overnight on December 27, 2023, on the following:

SHOOK, HARDY & BACON LLP
Touchstream Technologies (149550)
INTELLECTUAL PROPERTY DEPARTMENT
2555 Grand Blvd.
Kansas City, MO 64108

Dated: December 27, 2023

By: /Frederic M. Meeker/

Frederic M. Meeker
Reg. No. 35,282

CLAIM LISTING APPENDIX

U.S. Pat. No. 11,048,751

Designation	Claim Language
Claim 1	
[1A]	1. A non-transitory computer storage medium storing computer-useable instructions that, when used by a first computing device, cause the first computing device to perform operations comprising:
[1B]	obtaining a synchronization code associated with the first computing device, wherein the associated synchronization code is stored on a remote server device;
[1C]	providing the synchronization code to a second computing device in communication with the remote server device, wherein the provided synchronization code causes the remote server device to store an association between the first computing device and the second computing device;
[1D]	receiving, from the remote server device, a first message that includes at least one command in a first format, the first message being received based at least in part on the stored association and on a second message including at least one command in a second format having been sent from the associated second computing device;
[1E]	selecting a first media player application from a plurality of media player applications based at least in part on the first format of the first message, the first media player application being selected to play a first piece of content referenced in the received first message; and
[1F]	controlling how the selected first media player application plays the referenced first piece of content based on a first command of the at least one command in the first format having been included in the received first message.
Claim 2	
2	2. The non-transitory computer storage medium of claim 1, wherein each command of the at least one command in the second format is a universal command.
Claim 3	
3	3. The non-transitory computer storage medium of claim 2, wherein the first format is different than the second format.

Designation	Claim Language
Claim 4	
4	4. The non-transitory computer storage medium of claim 1, wherein the second message is sent from the associated second computing device to the remote server device.
Claim 5	
5	5. The non-transitory computer storage medium of claim 1, wherein the remote server device is configured to convert the at least one command in the second format into the at least one command in the first format based at least in part on the second message including therein a reference to the first piece of content.
Claim 6	
6	6. The non-transitory computer storage medium of claim 1, wherein the remote server device is configured to convert the at least one command in the second format into the at least one command in the first format based at least in part on a reference to the first media player application having been included in the second message.
Claim 7	
7	7. The non-transitory computer storage medium of claim 1, wherein the first media player application is selected based at least in part on the received first message including therein a reference to the first media player application.
Claim 8	
8	8. The non-transitory computer storage medium of claim 1, wherein controlling how the selected first media player application plays the referenced first piece of content includes an execution of the first command.
Claim 9	
9	The non-transitory computer storage medium of claim 1, the operations further comprising: retrieving the first media player application from a remote content provider based on a determination that the first media player application is not already selected.
Claim 10	
10	10. The non-transitory computer storage medium of claim 9, wherein the remote content provider is associated with the referenced first piece of content.

Designation	Claim Language
Claim 11	
[11A]	11. The non-transitory computer storage medium of claim 1, the operations further comprising:
[11B]	based on the stored association and while the first media player application is selected, receiving, from the remote server device, a third message that includes at least one command in a third format, wherein the third message is received based at least in part on a fourth message including at least one other command in the second format having been sent from the associated second computing device; and
[11C]	selecting a second media player application from the plurality of media player applications based at least in part on the third format of the third message, the second media player application being selected to play a second piece of content referenced in the third message.
Claim 12	
[12A]	12. A computer-implemented method for remotely presenting various types of content, comprising:
[12B]	obtaining, by a content presentation device, a synchronization code associated with the content presentation device, wherein the associated synchronization code is stored on a remote server device;
[12C]	providing, by the content presentation device, the synchronization code to a remote computing device in communication with the remote server device, wherein the provided synchronization code causes the remote server device to store an association between the content presentation device and the remote computing device;
[12D]	receiving, by the content presentation device and from the remote server device, a first message that includes at least one command in a first format, the first message being received based at least in part on the stored association and on a second message including at least one command in a second format having been sent from the associated remote computing device;
[12E]	selecting, by the content presentation device while a connection between the content presentation device and the remote server device is maintained, a first media player

Designation	Claim Language
	application from a plurality of media player applications based at least in part on the first format of the first message, the first media player application being selected to play a first piece of content referenced in the received first message; and
[12F]	controlling, by the content presentation device, how the selected first media player application plays the referenced first piece of content based on a first command of the at least one command in the first format having been included in the received first message.
Claim 13	
13	13. The computer-implemented method of claim 12, wherein the first media player application is selected based further in part on the received first message including therein a reference to the first media player application.
Claim 14	
14	14. The computer-implemented method of claim 12, the operations further comprising: selecting the first media player application based on a determination that a second media player application is currently selected.
Claim 15	
15	15. The computer-implemented method of claim 12, further comprising: retrieving, by the content presentation device, the selected first media player application from a remote content provider based on the first format of the first message.
Claim 16	
16	16. The computer-implemented method of claim 12, wherein the remote server device is configured to convert the at least one command in the second format into the at least one command in the first format based at least in part on a reference to the first media player application having been included in the second message, and wherein the first media player application is selected based further on the at least one command in the first format having been converted from the second format.
Claim 17	
[17A]	17. A content presentation device comprising:
[17B]	a display;

Designation	Claim Language
[17C]	at least one processor; and
[17D]	at least one computer storage media storing computer-usable instructions that, when used by the at least one processor, cause the at least one processor to:
[17E]	obtain a synchronization code associated with the content presentation device, wherein the associated synchronization code is stored on a remote server device;
[17F]	provide the synchronization code to a remote computing device in communication with the remote server device, wherein the provided synchronization code causes the remote server device to store an association between the content presentation device and the remote computing device;
[17G]	receive, from the remote server device, a first message that includes at least one command in a first format, the first message being received based on the stored association and on a second message in the second format sent from the associated remote computing device;
[17H]	select a first media player application from a plurality of media player applications based on the first format of the first message, the first media player application being selected to play a first piece of content referenced in the received first message; and
[17I]	control how the selected first media player application plays the referenced first piece of content based on a first command of the at least one command in the first format having been included in the received first message.
Claim 18	
18	18. The content presentation device of claim 17, wherein the first media player application is configured to recognize each command of the at least one command in the first format.
Claim 19	
19	19. The content presentation device of claim 17, wherein the second message is sent from the associated second computing device to the remote server device.
Claim 20	
20	20. The content presentation device of claim 18, wherein the first media player application is selected based further on the

Designation	Claim Language
	received first message including therein a reference to the first media player application.