

Inter Partes Review U.S. Patent No. 9,510,040

LG Electronics, Inc. v. Multimedia Technologies PTE. Ltd., IPR2024-00351

Gregory P. Huh
Haynes and Boone, LLP



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

'040 Patent, Claim 1

1. A method of displaying content on a television, comprising:
receiving, by a processor, an indication associated with a selection by a user;
determining, by the processor, based on the received indication, a global panel to display via the television;
retrieving, by the processor, from memory, a first content information for display in the global panel; and
displaying, via the television, the retrieved content information in the global panel, wherein the global panel includes a list of sources of content for the intelligent television, wherein at least one of the sources is highlighted as being associated with the first content information, and wherein the sources include a live television source, a video on demand source, a media center source, an applications source, and an electrical input associated with the television.

Ex.1001, Claim 1.



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Key Points

1. Kim teaches “*one of the sources [of content] is highlighted as being associated with the first content information*” in claim 1.
2. Kim and Choi teach “*an electrical input associated with the television*” in claim 1.
3. Obviousness of dependent claim 2.
4. Obviousness of dependent claim 4.
5. Obviousness of dependent claim 6.



1. Kim teaches “*one of the sources [of content] is highlighted as being associated with the first content information*” in claim 1.



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'040 Patent, Claim 1, element [1.6]

television, wherein at least one of the sources is highlighted as being associated with the first content information, and wherein the sources include a live television source, a video on demand source, a media center source, an applications source, and an electrical input associated with the television.

Ex.1001, Claim 1.



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Kim teaches that “*one of the sources [of content] is highlighted...*”

Kim

in the card object area of the display 180. If the card object 1390 is already displayed on the display 180, it may be highlighted or otherwise distinguished from the other card objects.

Ex.1005, [0211]; Petition, 46-48.

[0228] The partially displayed card objects may be further distinguished from the active card objects by distinguishing a color, tint, brightness, shading, fading, or another appropriate characteristic to further distinguish the partially displayed card objects. For example, the image of the partially dis-

Ex.1005, [0228]; Petition, 49.

It would have been obvious to highlight an active card object so that it is distinguished and can be readily identified by the user

Petitioner's Dr. Lippman

135. Although Kim provides a highlighting example in the context of presently displayed card object 1390, it would have been understood by a POSITA that this teaching generally applies to Kim's other card objects. For example, in the circumstance where the APP STORE card object 1330 is already displayed on the display 180 (see Figure 21), it would have been obvious to a POSITA for the APP STORE card object 1330 to be highlighted so that it is distinguished from the other card objects and readily identified by the user. See, e.g., Ex.1010, 38:7-11 ("The home screen 2000 may include the [a] card object 2060...[that] may be highlighted...[so] the user can readily view the...card object 2060."), Fig. 33B. Kim's card object 1330 being highlighted associates the APP STORE ("*at least one of the sources*") with the respective application thumbnails and descriptive text (separately and together "*first content information*").

Ex.1003, ¶135; Petition, 46-47; *see also* Petition 49.



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Patent Owner's expert confirms that highlighting is helpful because it distinguishes and allows the user to identify an active content source

Patent Owner's Expert

19 Q Okay. So making something in focus distinguishes
20 an active content source from other content sources. Is
21 that what that means?
22 MR. SCHREINER: Objection; form.
23 THE WITNESS: I'm sorry. I think in this context, the
24 way we're using the words, I think that's fair.

Ex. 1015, 53:19-24; Reply, 10.

14 Q Why is it important for a user to identify what's
15 currently active?
16 MR. SCHREINER: Objection; form.
17 THE WITNESS: Well, it's helpful for them to
18 understand what's being displayed.

Ex. 1015, 54:14-18; Reply, 10.

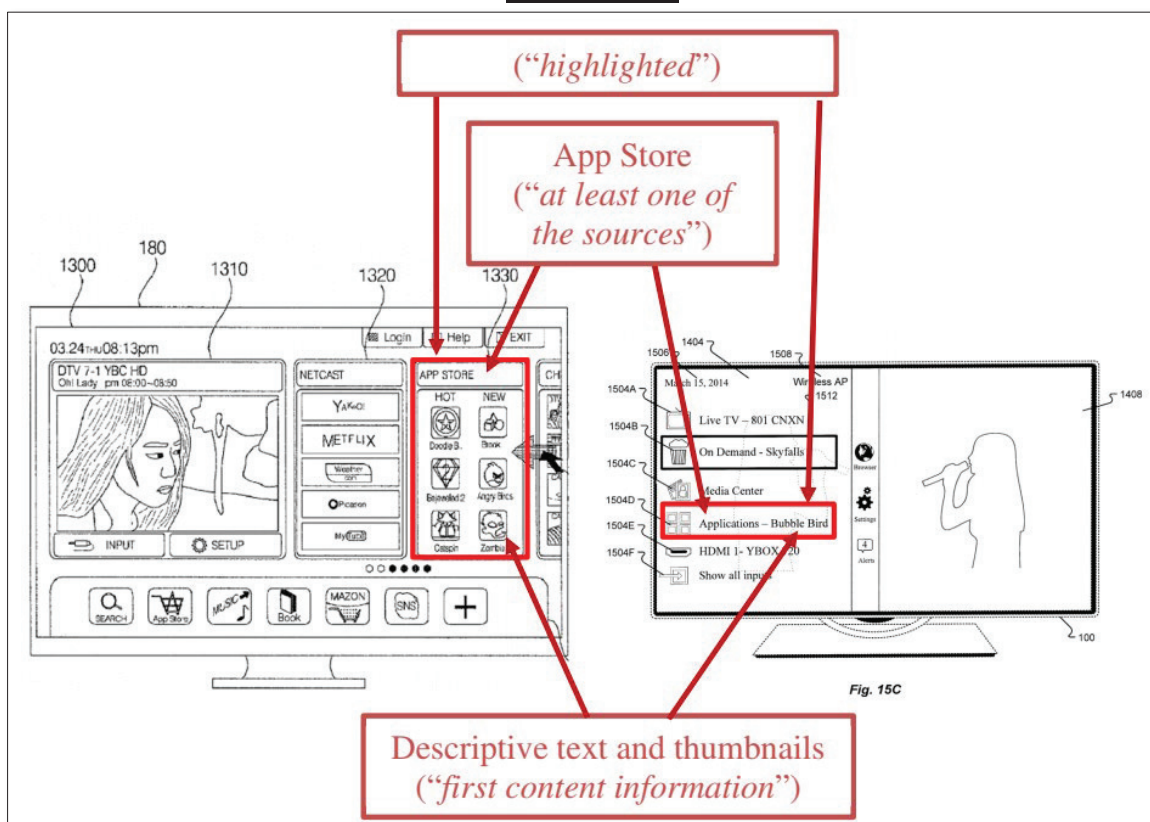


DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Highlighting Kim's App Store card object is consistent with how the '040 patent would highlight the Applications object

Petition



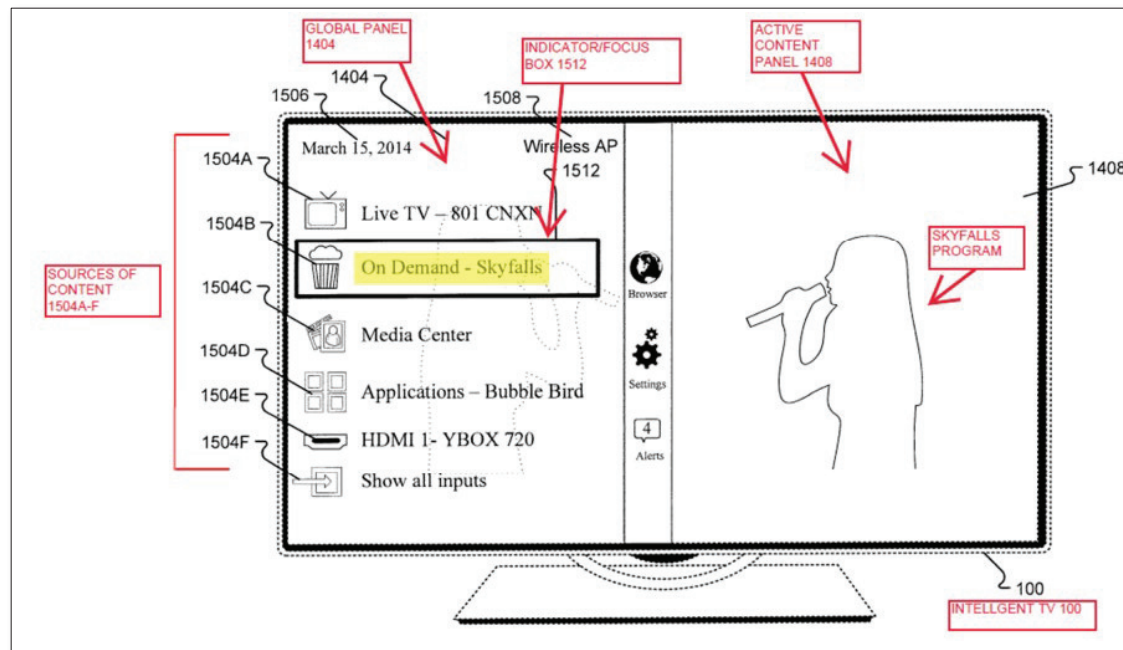
Petition, 48 (comparing annotated Fig. 21 of Kim and Fig. 15C of the '040 patent).

Patent Owner's arguments, which rely on unrecited limitations, are meritless

Patent Owner Response

In yet another example, Figure 15C illustrates that the “On Demand-Skyfalls” content source 1504B on the left hand side is highlighted because it corresponds to the program “Skyfalls” being displayed on the right hand side:

Patent Owner Response, 18.



Ex.1001, Fig. 15C; Patent Owner Response, 19.

In the '040 patent, a content source is highlighted because the user moves the focus box and not because it corresponds to the program shown on the display

Patent Owner Response

In Figure 15B above, the content source “Live TV – 801 CNXN” 1504A on the left hand side is highlighted because it corresponds to the currently-displayed content of CNXN on the right hand side. Surati Decl., ¶ 67. In Figure 15C, the highlighted source changes to “On Demand – Skyfalls” 1504B because it corresponds to the new currently-displayed image of the program Skyfalls. '040 Patent, 30:65-67, 32:9-14 (“as the indicator 1512 is moved to a different source, the content or a preview of the content may be displayed in active content area 1408”); Surati Decl., ¶ 68. FIG. 15C illustrates an image or video associated with Skyfalls being displayed on the right hand side and the highlighted source “On Demand – Skyfalls” content source 1504B presented on the left hand side. Fig. 15B, 15C; Surati Decl., ¶¶ 63, 68.

Patent Owner Response, 4.

Patent Owner's Expert

Q So the triggering of the highlighting is based on the user pressing up or down to move the focus box to a specific content source; is that right?

MR. SCHREINER: Objection; form.

THE WITNESS: Yeah, so I think it depends on the situation, but in the situation you're talking about, the global screen is up, and if they press the up or down key, then it's going to display what's on the screen and highlight what's being displayed on the screen. So in that scenario, that's what I would presume it to do.

Ex.1015, 55:10-19; Reply, 8-9.



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In the '040 patent, a content source is highlighted because the user moves the focus box and not because it corresponds to the program shown on the display

'040 Patent

An additional illustrative configuration of the global panel is shown in a television interface 1600 in FIG. 16. In this

...

the silo, in the information line. For example, the information line 1608 shows that the Live TV application is currently displaying channel 30, CNN news. Further, a selection line 1628 can provide for other inputs, which may include the other input sources not currently shown in the global panel display 1636. The user may move the focus box 1632 onto one of the lines 1608 through 1628. Upon moving the focus and either selecting another button or user interface selection device or loitering the focus box 1632 for a predetermined amount of time over the silo information line, the user can select that silo from the global panel 1636.

Ex.1001, 32:35-43, Fig. 16; Reply, 8.

Patent Owner's Expert

23 Q Right. So moving is done first, and then you
24 have to do one of two things, either use another button to
25 select or loiter there for a specific amount of time in
1 order to select, correct?

2 A I think that's fair.

...

15 Q So it's fair to say that in the '040 patent,
16 there are embodiments where the highlighted content source
17 does not match the content being displayed to the right,
18 correct?

19 MR. SCHREINER: Objection; form, scope.

20 THE WITNESS: So I think it's possible that there are
21 embodiments described in the way you suggested.

Ex.1015, 61:23-62:21; Reply, 8-9.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Patent Owner's expert failed to consider the '040 patent's embodiments

Patent Owner's Expert

16 Q Do you see anything in the claims that would
17 exclude that embodiment?
18 MR. SCHREINER: Objection; form, scope.
19 THE WITNESS: I'd have to spend some time thinking
20 about that. I didn't think about that with regard to this
21 report.

Ex. 1015, 66:16-21; Reply, 8-9.

19 THE WITNESS: Yeah, I have an understanding of the
20 claims where I've made an opinion, but you're asking me to
21 create -- to give it an initial opinion about a new, a
22 new -- an embodiment that I haven't considered. So it's
23 not something I can just do on the fly.

Ex.1015, 67:19-23; Reply, 8-9.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Patent Owner's unsupported attorney arguments are meritless

Patent Owner Sur-Reply

The claim should not be redrafted to encompass Figure 16. See Reply, 8-9.

Sur-Reply, 8.

“[A] claim interpretation that excludes a preferred embodiment from the scope of the claim is rarely, if ever, correct.”

MBO Labs., Inc. v. Becton, Dickinson & Co., 474 F.3d 1323, 1333 (Fed. Cir. 2007); Reply, 9.

“Such an interpretation is rarely, if ever, correct and would require highly persuasive evidentiary support, which is wholly absent in this case.”

Vitronics Corporation v. Conceptronic, Inc., 90 F.3d 1576, 1583 (Fed. Cir. 1996); Reply, 9.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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2. Kim and Choi teach “*an electrical input associated with the television*” in claim 1.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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'040 Patent, Claim 1, element [1.7]

television, wherein at least one of the sources is highlighted as being associated with the first content information, and wherein the sources include a live television source, a video on demand source, a media center source, an applications source, and an electrical input associated with the television.

Ex.1001, Claim 1.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

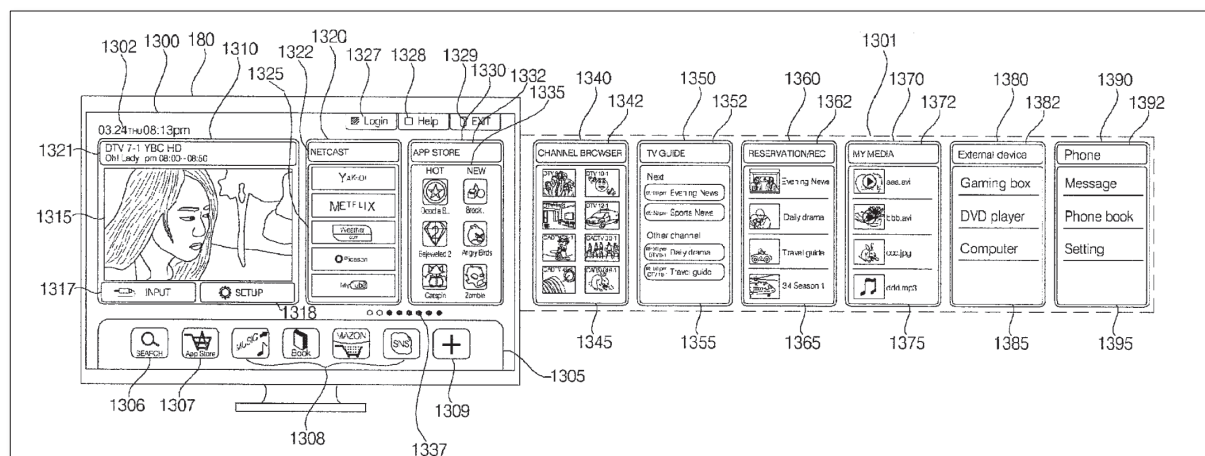
16

Kim teaches that many types of external devices can be connected to the TV

Kim

FIG. 19, may include a CHANNEL BROWSER card object 1340 which may provide a thumbnail list of broadcast channels, a TV GUIDE card object 1350 which may provide a program list, a RESERVATION/REC card object 1360 which may provide a reserved or recorded program list, a MY MEDIA card object 1370 which may provide a list of multimedia files which are available on the image display apparatus 100 or on a device connected to the image display apparatus 100, an EXTERNAL DEVICE card object 1380 which may provide a list of external devices which may be connected to the image display apparatus 100, and a PHONE card object 1390 which may provide a list of call-related items.

Ex.1005, [0210]; Petition, 40-41, 54.



Ex.1005, Fig. 19, Petition, 40.



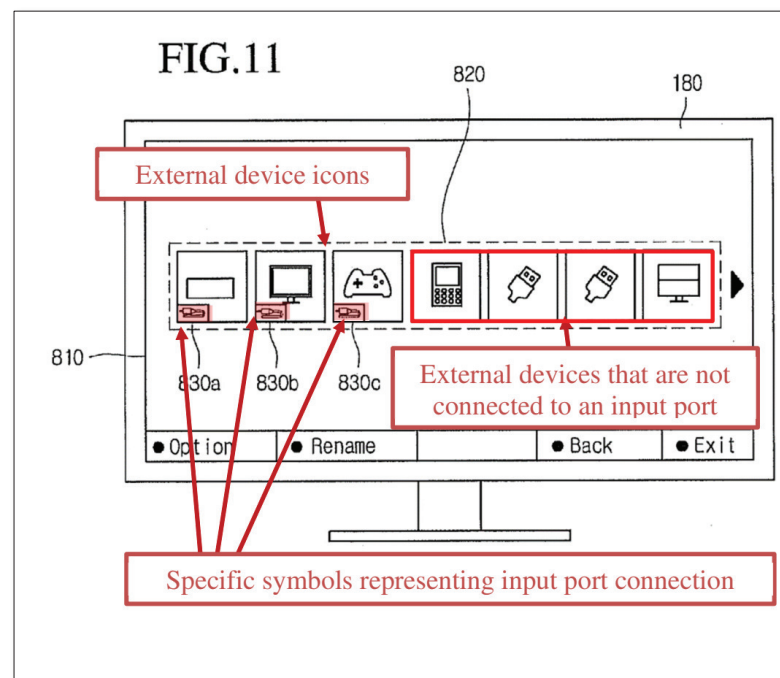
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Choi teaches displaying (1) **symbols** and (2) **letters** to distinguish if an external device is connected to an input port

Choi

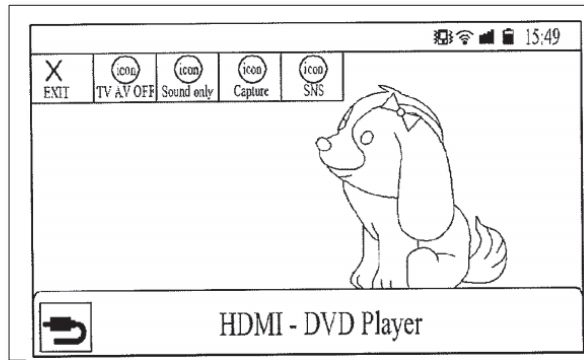
[0250] As shown in FIG. 11, a plurality of external device icons 820 representing a plurality of external devices are displayed on the full screen 810 of the display unit 180. Moreover, the control unit 170 determines which external device icons 820 are connected to the image display device 100 in order to display specific symbols 830a, 830b, and 830c on the external device icons that are being connected to the image display device 100. Therefore, external device icons that are not being connected to the image display device 100 are distinguished. Here, displaying a specific symbol on an external device icon is used as one example of a method of distinguishing icons from each other, but the present invention is not limited thereto. That is, any one of letters, symbols, colors, and flashing lights may be used for distinction.

Ex.1007, [0250]; Petition, 42-45.

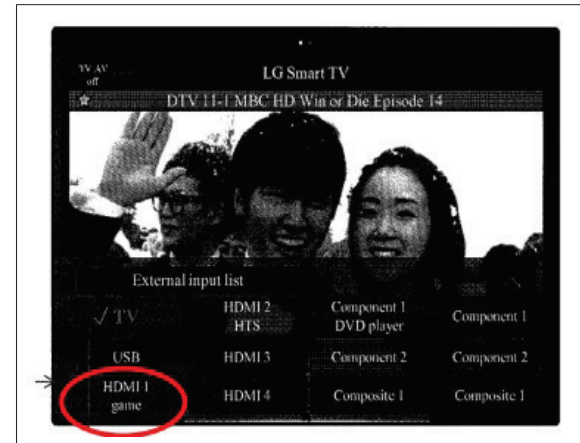


Ex.1007, Fig. 11 (annotated); Petition, 42.

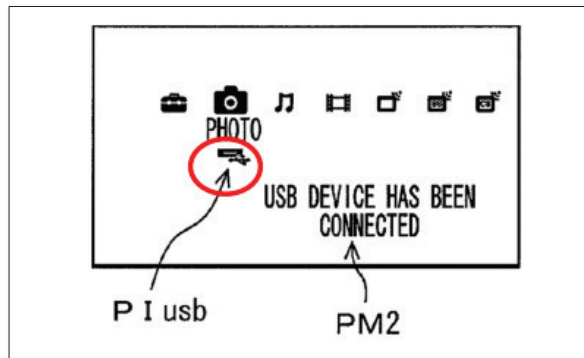
It was well known to display symbols and letters that specifically identify an input port



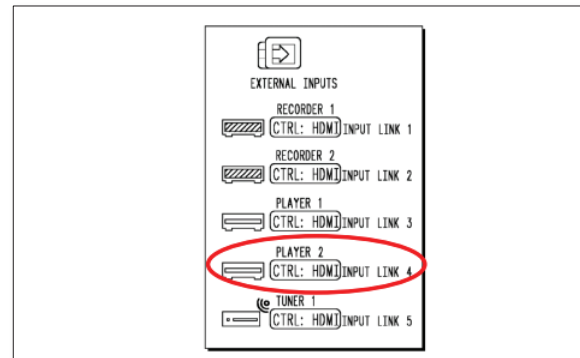
Ex.1011, Fig. 17 (d); Petition, 45.



Ex.1026, p. 12 (annotated); Reply, 15.



Ex.1016, Fig. 3C (annotated); Reply 16.



Ex.1017, Fig. 10 (annotated); Reply 16.

Reasons a POSITA would have combined Kim's teachings with the techniques of Choi

Petitioner's Dr. Lippman

58. It would have been obvious to a POSITA to implement Kim's EXTERNAL DEVICE card object 1380, which provides a list of external devices which may be connected to the image display apparatus 100, to include icons representing external devices and specific symbols representing an input port connection. This would inform the user as to which external device is connected to an input port of the display apparatus 100 and which external device is not connected. The information would also be beneficial because it would allow the user, in certain instances, to determine if there is a problem with a connected external device. For example, in an instance where an external device has a specific symbol indicating an input port connection, but the external device is not providing an input signal, the user would understand that the port connection is not the problem. On the other hand, if the external device has no specific symbol, then the user would understand that it needs to be plugged in.

Ex.1003, ¶58; Petition, 14.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Reasons that a POSITA would have combined Kim's teachings with the techniques of Choi

Petitioner's Dr. Lippman

can be shown on the EXTERNAL DEVICE card object 1380. It further would have been obvious to utilize only letters to identify input port connected devices. *See, e.g.,* Ex.1007, [0250] (“Here, displaying a specific symbol on an external device icon is used as one example of a method of distinguishing icons from each other, but the present invention is not limited thereto. That is, **any one of letters**, symbols, colors, and flashing lights may be used for distinction.”). For example, when using letters, it was known in the art to present a specific input port description next to an external device connected thereto, e.g., “**HDMI-DVD Player**.” *See, Ex.1011, Fig. 17(d).* In an implementation with letters, therefore, it would have been obvious to a POSITA to distinguish input port connected devices shown on the EXTERNAL DEVICE card object 1380 by identifying a corresponding input port, e.g., HDMI port, USB port, a CVBS port, etc., **so that the user has an understanding of which device is connected to which port.**

Ex.1003, ¶129; Petition, 45.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Patent Owner's arguments, which rely on unrecited limitations, are meritless

Patent Owner Response

Figure 15B supports the claimed “*electrical input associated with the television*” by providing a display including a specific input port (HDMI 1) source that is an electrical input to the television. A POSITA would readily appreciate that

Patent Owner Response, 33.

11. Accordingly, Choi does not teach symbols that identify an input port to meet limitation 1.7, and it is not even capable of providing symbols identifying specific input ports. Surati Decl., ¶ 158.

Patent Owner Response, 33.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Patent Owner's added limitations exclude the '040 patent's embodiments

'040 Patent

sensation of an input, source, or application. An input can be a device or devices (e.g., DVD, VCR, etc.) electrically connected to the television through a port (e.g., HDMI, video/audio inputs, etc.) or through a network (e.g., LAN WAN, etc.). Rather than a device or devices, the input could be configured as an electrical or physical connection to one or more devices. A source, particularly a content source, can

Ex.1001, 6:16-20; Reply, 12.

Patent Owner's Expert

9	Q	So like in this example, <u>the externally connected</u>
10		<u>YBOX...</u>
11	A	Sorry.
12	Q	<u>Provides electrical input to a television and</u>
13		<u>that's a content source</u> , correct?
14	A	<u>I think that's fair.</u>

Ex.1015, 25:9-14; Reply, 12.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

23

Patent Owner's added limitations exclude the '040 patent's embodiments

'040 Patent

sensation of an input, source, or application. An input can be a device or devices (e.g., DVD, VCR, etc.) electrically connected to the television through a port (e.g., HDMI, video/audio inputs, etc.) or through a network (e.g., LAN WAN, etc.). Rather than a device or devices, the input could be configured as an electrical or physical connection to one or more devices. A source, particularly a content source, can

Ex.1001, 6:16-20; Reply, 12.

A port interface 352 may be included. The port interface 352 may include proprietary or universal ports to support the interconnection of the device 100 to other devices or components, such as a dock, which may or may not include additional or different capabilities from those integral to the device 100. In addition to supporting an exchange of communication signals between the device 100 and another device or component, the docking port 136 and/or port interface 352 can support the supply of power to or from the device 100. The port interface 352 also comprises an intel-

Ex.1001, 18:3-13; Reply, 12.

Patent Owner's Expert

7 Q Right. So the port interface allows external
8 devices to be connected to it, and then it sends
9 corresponding electrical inputs to device 100, correct?
10 A I think so.

Ex.1015, 84:7-10; Reply, 12.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Patent Owner's expert failed to properly consider the '040 patent's embodiment

Patent Owner's Expert

THE WITNESS: Yeah, I don't -- I mean, I didn't focus on that paragraph when I was interpreting the claims. My report was about whether the -- whether the case that was made that there was prior art that made the claim, obvious, okay, so that -- I don't know that interpreting the claim with respect to a particular embodiment that you're discussing -- I didn't spend a lot of time thinking about that.

Ex. 1015, 85:9-16; Reply, 13.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Patent Owner's arguments about a reasonable expectation of success are contradicted by its own expert

Patent Owner's Expert

5 Q I mean, it was known in the art to identify a
6 specific port that is connected to a device, correct?

7 MR. SCHREINER: Objection; scope.

8 THE WITNESS: I mean, I'm not sure. I mean, I didn't
9 spend a lot of time opining about that, but I would say
10 that I think it's fair to say that there are pro AV
11 technologies that would identify what port something's
12 connected to.

Ex. 1015, 92:5-12; Reply, 17.

8 Q Did you have products available whereby if a
9 specific device was connected to a specific port, you
10 would be able to associate that device to that port to the
11 user?

12 MR. SCHREINER: Objection; form.

13 THE WITNESS: I mean, sure.

Ex. 1015, 93:8-13; Reply, 18.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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3. Obviousness of dependent claim 2.

Ground 1: Kim, Lee-1, and Choi

Ground 2: Kim, Lee-1, Choi, and Lee-2



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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'040 Patent, Claim 2

2. The method of claim 1, further comprising:
identifying a user associated with the received indication;
retrieving one or more settings associated with the identified user;
retrieving, from memory, content information associated with the identified user; and
displaying, via the television, the retrieved content information in the global panel.

Ex.1001, Claim 2.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Ground 1: Kim teaches element [2.1]
“identifying a user associated with the received indication”

Kim

[0081] The network interface **130** may transmit data to or receive data from another user or electronic device over a connected network or another network linked to the connected network. For example, the network interface **130** may transmit data stored in the image display apparatus **100** to a user or electronic device selected from among users or electronic devices pre-registered with the image display apparatus **100**.

Ex.1005, [0081]; Petition, 56-58; Reply, 19.

[0203] A Login menu item **1327**, a Help menu item **1328**, and an Exit menu item **1329** may be displayed above the card objects **1320** and **1330**. The user may login to the APP STORE or a network connected to the image display apparatus **100** using the Login menu item **1327**. The Help menu item **1328** may provide guidance regarding operation of the image display apparatus **100**. The Exit menu item **1329** may be used to exit the home screen **1300**. When the Exit menu item **1329** is selected, a full screen image of the received broadcast image may be displayed on the display **180**.

Ex.1005, [0203]; Petition, 56-58; Reply, 19.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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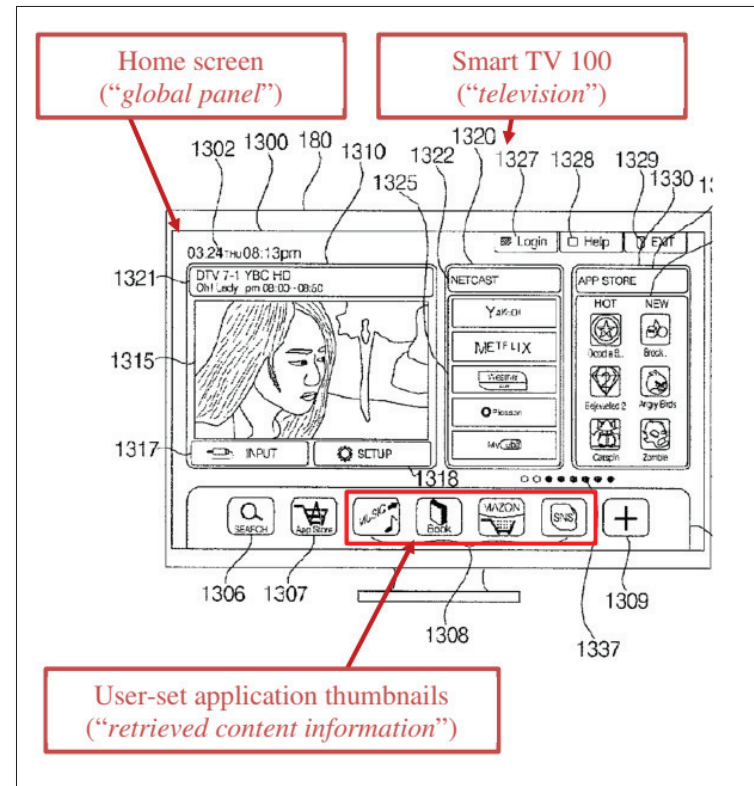
Ground 1: Kim teaches element [2.2]

“retrieving one or more settings associated with the identified user”

Kim

[0217] In certain embodiments, an Internet application menu item and a mail application menu item may be added as mandatory application menu items in the application menu 1305. The user-set application menu items 1308 may be changed to display applications menu items for applications which are frequently accessed. It should be appreciated that, while the application menu 1305 is disclosed herein as having a predetermined specific set of mandatory application menu items and user-set application menu items, the present disclosure is not limited thereto, and any number or types of application menu items may be designated as being mandatory or optional.

Ex.1005, [0215]; Petition, 58; Reply, 21.



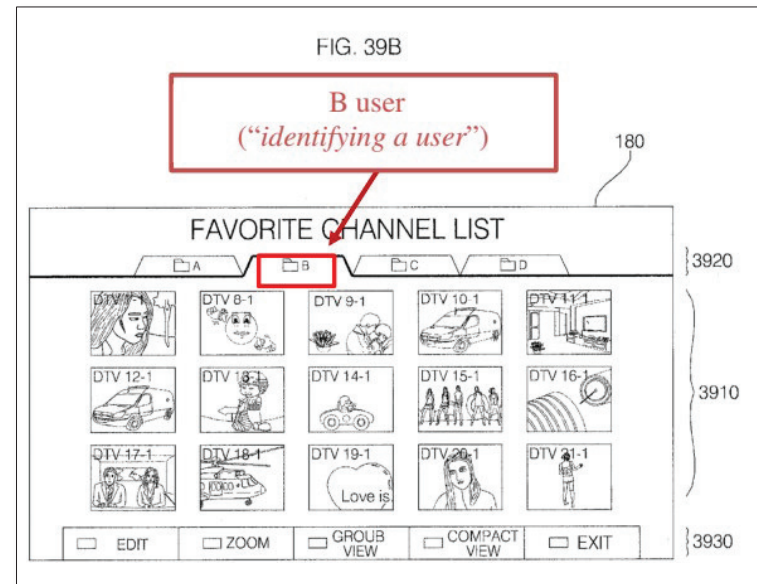
Ex.1005, Fig. 19 (annotated); Petition, 60.

Ground 2: Kim teaches element [2.1]
“identifying a user associated with the received indication”

Lee-2

Since the channel list screen is displayed upon selection of the favorite channel object **2019** in the BROADCAST card object **2010** by a B user, the B group tabbed menu may be selected by default. The selected B group tabbed menu may be focused on or highlighted, as illustrated in FIG. 39B.

Ex.1010, 41:47-55; Petition, 78-79; Reply, 26-27.



Ex.1010, Fig. 39B (annotated); Petition, 79.

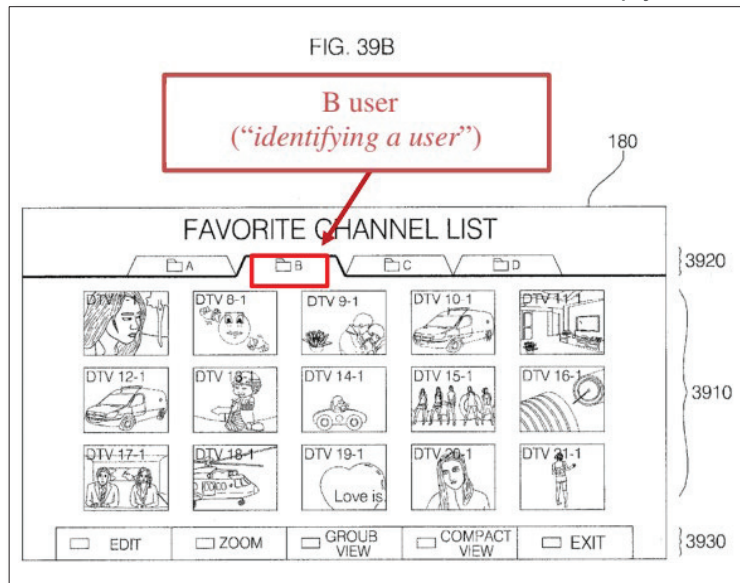
Ground 2: Kim teaches element [2.2]

“retrieving one or more settings associated with the identified user”

Lee-2

The favorite channel list screen may further include a channel setup menu 3930. For example, the channel setup menu 3930 may include menu items, EDIT for editing channels, ZOOM for changing the number of displayed thumbnail images, GROUP VIEW for viewing thumbnail images by group, COMPACT VIEW for displaying a broadcast image in a part and a channel list in another part, and EXIT.

Ex.1010, 41:61-67; Petition, 80-81; Reply, 26-27.



Ex.1010, Fig. 39B (annotated); Petition, 79.

Petitioner's Dr. Lippman

291. It would have been obvious to a POSITA to store favorite channel list setup data (i.e., data input by the user using setup menu 3930, such as which channels to include in the favorite list and the number of displayed thumbnails) in view of Lee-2's disclosure that "memory 140 may store user-specific information" and also "may store setup data for the system." Ex.1010, 8:29, 11:3; see also Ex.1005, [0206] ("...pre-stored user channels (e.g., favorite list)..."). Because the setup data would be stored in memory 140, when the user selects to view the FAVORITE CHANNEL LIST (see Ex.1010, 41:36-44), the setup data would be retrieved from memory 140 and used to determine the user's specific favorite channel list and the number of thumbnail images to be displayed. See also *infra*, [1.3].

Ex.1003, ¶291; Petition, 80-81.

Patent Owner's arguments, which rely on unrecited limitations, are meritless

Patent Owner Response

“go-to-home screen” button in Kim. Pet., 20, 22. Accordingly, limitation 2.1 is only met if Kim identifies a user based on the input of the home key/go-to-home screen button to invoke the home screen. Surati Decl., ¶ 177.

Patent Owner Response, 49; see also *id.* 64-65.

171. But limitation 2.2 requires retrieving user settings for the identified user based on the “received indication,” which according to the Petitioner’s theory on

Patent Owner Response, 52; see also *id.* 67.

Patent Owner's Expert

2 Q Now, if I press the home screen again, I'm
3 already logged in, correct?
4 MR. SCHREINER: Objection; scope.
5 THE WITNESS: After you logged in, sure.

Ex. 1015, 92:5-12; Reply, 20.

7 Q After a point in time, the user again selects the
8 home screen button on the remote?
9 A Right.
10 Q And the home screen with -- after log in -- with
11 the downloaded user set application menu items, is
12 presented to the user, correct?
13 A Right. I said right, sorry.

Ex. 1015, 93:8-13; Reply, 20.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Patent Owner's arguments, which rely on unrecited limitations, are meritless

Patent Owner Response

Further, a POSITA would not consider user applications or application thumbnails to be user settings within the ambit of limitation 2.2. A POSITA would understand that applications and application thumbnails are not operational settings for an enhanced television, such as audio settings, picture/video settings, language/geography settings, and network settings, as contemplated by limitation 2.2. Surati Decl., ¶ 189.

Patent Owner Response, 54; *see also id.* 67.

Kim

[0200] A current time object 1302 that includes a date (03. 24), a day (THU), and a current time (8:13 PM) may be displayed above the card object 1310. Thus, the user may readily identify current time information through the current time object 1302. The device object 1317 may represent an external device connected to the image display apparatus 100. For example, if the object 1317 is selected, a list of external devices connected to the image display apparatus 100 may be displayed. The setup object 1318 may be used to set various settings of the image display apparatus 100, such as video settings, audio settings, screen settings, reservation settings, setting of the pointer 205 of the remote controller 200, network settings, or another appropriate setting for the image display apparatus 100.

Ex.1005, [0200]; Reply, 22.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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4. Obviousness of dependent claim 4.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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'040 Patent, Claim 4

4. The method of claim 1, further comprising:
receiving a second indication associated with a selection
by a user;
determining, based on the second indication, a source of
content information to be displayed in the global panel
based;
retrieving at least a portion of content information from
the determined source; and
displaying, via the television, the content information
associated with the determined source.

Ex.1001, Claim 4.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Kim teaches element [4.2] “*determining, based on the second indication, a source of content information to be displayed in the global panel based*”

Kim

[0289] A method of controlling a display on a multifunctional display device, as embodied and broadly described herein, may include displaying a first card object in a first area of the display, the first card object configured to display a video image; displaying a second card object in a second area of the display, the second card object having at least one link for connecting to a content provider or to a storage device; displaying a third card object in a third area of the display such that the third card object is partially displayed on the display; receiving a request to change the displayed card objects; and displaying, in response to the request, the third card object in the second area of the display and partially displaying a fourth card object in the third area of the display.

Ex.1005, [0289]; Petition, 62.

[0292] The at least one link may include a URL configured to retrieve a multimedia content stored on the content server.

Ex.1005, [0292]; Petition, 62.

[0205] The card object 1340 may represent a list of broadcast channels. This card object 1340 may include a card object name 1342 (CHANNEL BROWSER) and a thumbnail list of broadcast channels 1345. A plurality of broadcast channels may be represented as thumbnail images, as shown in FIG. 19. The thumbnail images may include still images or moving pictures. The thumbnail list 1345 may include information related to the channels as well as the thumbnail images for the channels such that the broadcast programs of the channels may be readily identified.

Ex.1005, [0205]; Petition, 62.

thumbnail list 1345. Upon selection of a thumbnail image from the thumbnail list 1345, a broadcast program from the selected channel may be displayed on the display 180.

Ex.1005, [0206]; Petition, 62.

Kim teaches element [4.2] “*determining, based on the second indication, a source of content information to be displayed in the global panel based*”

Petitioner’s Dr. Lippman

198. It would have been obvious to a POSITA for the CHANNEL BROWSER card object 1340, to include a “link for connecting to a content provider” with “a URL configured to retrieve a multimedia content stored on the content server” so that the smart TV 100 would be able to determine the content source for receiving content (e.g., a selected channel) and related content information (e.g., program title) to display in the home screen. See Ex.1005,

[0090] (“The controller 170 may output the processed video or audio signal **along with information about the user-selected channel.**”), [0097] (“The controller 170 may control display of an input broadcast image and an object representing **information about the broadcast image** in a card object representing broadcast images.”). As shown at Kim’s Figure 19, the home screen includes card object 1310 that displays video content (1315) as well as related content information, such as a title in an information object (1321).

Ex.1003, ¶198; Petition, 65.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

38

Utilizing links to request a digital channel is consistent with Kim's digital broadcast teachings, as Patent Owner's expert concedes

Patent Owner's Expert

10 Q And you would agree that according to this
11 figure, content from broadcasters that are
12 terrestrial/live TV is transmitted over the Internet,
13 right?
14 A In this diagram, that appears to be the case.
15 Q So a client can say, hey, I want to get this
16 channel. The SP would then pair that up with the
17 corresponding terrestrial broadcaster and package it up
18 and send it, right?
19 A In this particular diagram, sure. What's a

Ex.1015, 126:10-19; Reply, 24.

8 In the unicast example, upon the request from a
9 client, television 100, the service provider obtains the
10 requested content from whatever provider the content is
11 provided by, packages that requested content, and sends it
12 to the receiver, which is the television 100, correct?

...
18 A It appears to.
19 Q And that content provided by the service provider
20 can be from a content server, correct?
21 MR. SCHREINER: Objection; scope.
22 THE WITNESS: Yeah, I mean, I -- it's talking over the
23 Internet, so presumably.

Ex.1015, 127:8-23; Reply, 24.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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5. Obviousness of dependent claim 6.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

40

'040 Patent, Claim 6

6. The method of claim 1, further comprising:
identifying at least one of a content source and a content
information currently being displayed via a television;
selecting a panel type based on the identified at least one
of content source and content information currently
being displayed via the television;
retrieving, from memory, content information based on
the selected panel type; and
displaying, via the television, the retrieved content infor-
mation in the global panel based on the selected panel
type.

Ex.1001, Claim 6.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

41

Kim teaches element [6.1] “*identifying at least one of a content source and a content information currently being displayed via a television*”

Lee-2

As described before, the card object generator 345 may generate the FAVORITE CH card object using a list of favorite channels pre-stored in the memory 140. A channel that the user is watching may be included in the FAVORITE CH card object.

Ex.1010, 33:63-67; Petition, 62.

listed in the favorite channel list 2110. The channel item indicating channel 7-1 that the user is watching may be indicated by a cursor 2105 or highlighted. As illustrated in FIGS.

Ex.1010, 31:14-20; Reply, 30.

object 2060. Herein, the cursor 2105 of the remote controller 2100 may automatically be positioned on the thumbnail image of channel 7-1 that the user is watching.

Ex.1010, 37:6-8; Reply, 30.

Petitioner’s Dr. Lippman

309. It would have been obvious to a POSITA that the currently watched channel (e.g., DTV 7-1) is “*identified*” so that it may be included in the FAVORITE CH card object 2060 as a corresponding highlighted thumbnail.

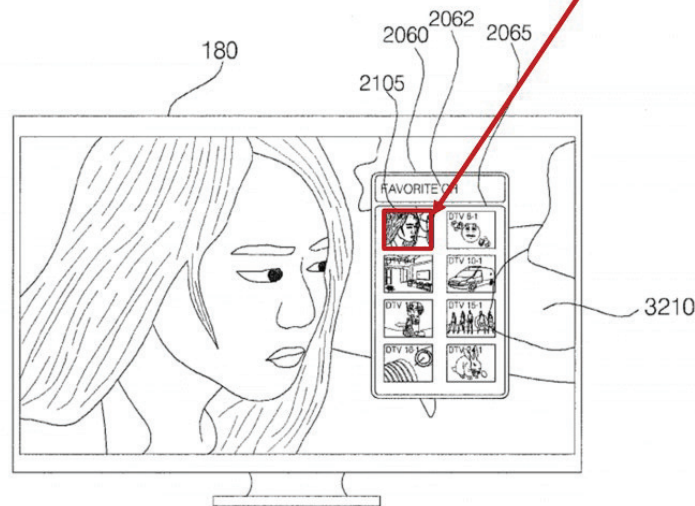
Ex.1003, ¶309; Petition, 85.

Kim teaches element [6.2] “selecting a panel type based on the identified at least one of content source and content information currently being displayed via the television”

Petitioner’s Dr. Lippman

314. As shown below, the FAVORITE CH card object 2060 is selected to include a highlighted thumbnail of the currently watched channel (e.g., DTV 7-1):

FAVORITE CH card object 2060 is selected to include a highlighted thumbnail of the currently watched favorite channel (e.g., DTV 7-1)



Ex.1010, Figs. 32B (annotated).

Ex.1003, ¶314; Petition, 86-87.

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LG Electronics, Inc. v. Multimedia Technologies PTE. Ltd., IPR2024-00351

Gregory P. Huh,
Haynes and Boone, LLP



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE