

**LG Electronics, Inc.**  
**v.**  
**Multimedia Technologies Pte. Ltd.**

**Patent Owner Demonstratives**  
**IPR 2024-00351**  
**U.S. Patent No. 9,510,040**  
**February 19, 2025**

James Carmichael  
Steve Schreiner  
Mitch Yang  
Steve McBride  
**Carmichael IP, PLLC**

Multimedia Exhibit 2017, Slide 1 of 61

**DEMONSTRATIVE EXHIBIT – NOT EVIDENCE**

# Background of '040 Patent

US00951040B2

(12) **United States Patent**  
**Selim et al.**

(10) **Patent No.:** **US 9,510,040 B2**  
(45) **Date of Patent:** **Nov. 29, 2016**

(54) **GLOBAL PANEL**  
(71) Applicant: **Electronics AP, LLC**, San Jose, CA (US)  
(72) Inventors: **Mohammed Selim**, Oakville (CA); **Sanjiv Sirpal**, Oakville (CA); **Feng Wu**, Burlington (CA); **Salvador Soto**, Toronto (CA)  
(73) Assignee: **Electronics AP, LLC**, San Jose, CA (US)

(\*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.

(21) Appl. No.: **14/834,316**  
(22) Filed: **Aug. 24, 2015**

(65) **Prior Publication Data**  
US 2016/0057480 A1 Feb. 25, 2016

**Related U.S. Application Data**  
(63) Continuation of application No. 13/970,374, filed on Aug. 19, 2013, now abandoned, and a continuation of application No. 13/908,665, filed on Aug. 16, 2013, now Pat. No. 9,247,174, and a continuation of application No. 13/969,179, filed on Aug. 16, 2013, (Continued)

(51) **Int. Cl.**  
**H04N 21/478** (2011.01)  
**H04N 21/411** (2011.01)  
(Continued)

(52) **U.S. Cl.**  
CPC — **H04N 21/4316** (2013.01); **G06F 3/017** (2013.01); **G06F 3/0481** (2013.01); **G06F 3/04817** (2013.01); **G06F 3/0482** (2013.01); **G06F 3/0483** (2013.01); **H04L 51/52** (2013.01); **H04N 1/00448** (2013.01); **H04N 5/44** (2013.01); **H04N 5/4401** (2013.01); **H04N 5/445** (2013.01); **H04N 5/44591** (2013.01); **H04N 5/45** (2013.01); **H04N 5/50** (2013.01); **H04N 17/04** (2013.01); **H04N 21/2187** (2013.01); **H04N 21/2543** (2013.01); **H04N 21/25808** (2013.01); **H04N 21/25891** (2013.01); **H04N 21/26291** (2013.01); **H04N 21/414** (2013.01); (Continued)

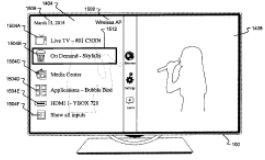
(58) **Field of Classification Search**  
USPC ..... 725/38, 46  
See application file for complete search history.

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EP 2487922 8/2012  
WO 99/21308 4/1999  
**OTHER PUBLICATIONS**  
U.S. Appl. No. 14/822,705, filed Aug. 10, 2015, Sirpal et al. (Continued)  
**Primary Examiner** — Kieu Oanh T Bui  
(74) **Attorney, Agent, or Firm** — Sheridan Ross PC.

(57) **ABSTRACT**  
The present disclosure is related to methods and systems of displaying content on a television, including: receiving an indication associated with a selection by a user, determining, based on the received indication, a global panel to display via the television; retrieving, from memory, a first content information for display in the global panel; and displaying, via the television, the retrieved content information in the specified global panel.

**22 Claims, 34 Drawing Sheets**

EX. 1001  
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- Issued: November 29, 2016
- Priority date: August 17, 2012

See Pet., 8-9; Ex. 1001 ('040 Patent).

# Grounds

## Independent claims: Claims 1, 11, 21

- **Ground 1 (§103): Claims 1-5, 11-15, 21 re Kim, Lee-1, and Choi**
- **Ground 2 (§103): Claims 2-3, 6, 12-13, 16, 22 re Kim, Lee-1, Choi, and Lee-2**

Pet., 10

| Grounds | Claims                    | Basis                                            |
|---------|---------------------------|--------------------------------------------------|
| #1      | 1-5, 11-15, and 21        | 35 U.S.C. § 103 over Kim, Lee-1, and Choi        |
| #2      | 2-3, 6, 12-13, 16, and 22 | 35 U.S.C. § 103 over Kim, Lee-1, Choi, and Lee-2 |

\* VIZIO, Inc. filed a petition in IPR2024-00694 and was joined as petitioner in this proceeding

# Definition of POSITA

## Parties agree on the Definition of POSITA as of August 2012:

A person of ordinary skill in the art as of the time of the invention “in August of 2012 would have had a bachelor’s degree in Electrical Engineering, Software Engineering, or Computer Engineering, or equivalent training, and approximately two years of experience working in the field of television systems and networking, human-computer interaction, or related technologies.” Pet, 8-9; Ex. 1003 [Dr. A. Lippman Decl.], ¶ 19 (“Lippman Decl.” or “Lippman declaration”). The Patent Owner and Dr. Surati find that definition to be reasonable. Surati Decl.], ¶¶ 43-44.

POR, 7.

# Claim Construction

**Parties agree that no formal claim construction is required:**

**Patent Owner:**

**“Patent Owner has applied the ordinary and customary meaning of the claim terms. . . . This includes the ordinary and customary meaning of ‘an electrical input associated with the television’ in limitation 1.7 and ‘settings associated with the identified user’ in limitation 2.2.”** POR, 8.

**Petitioner:**

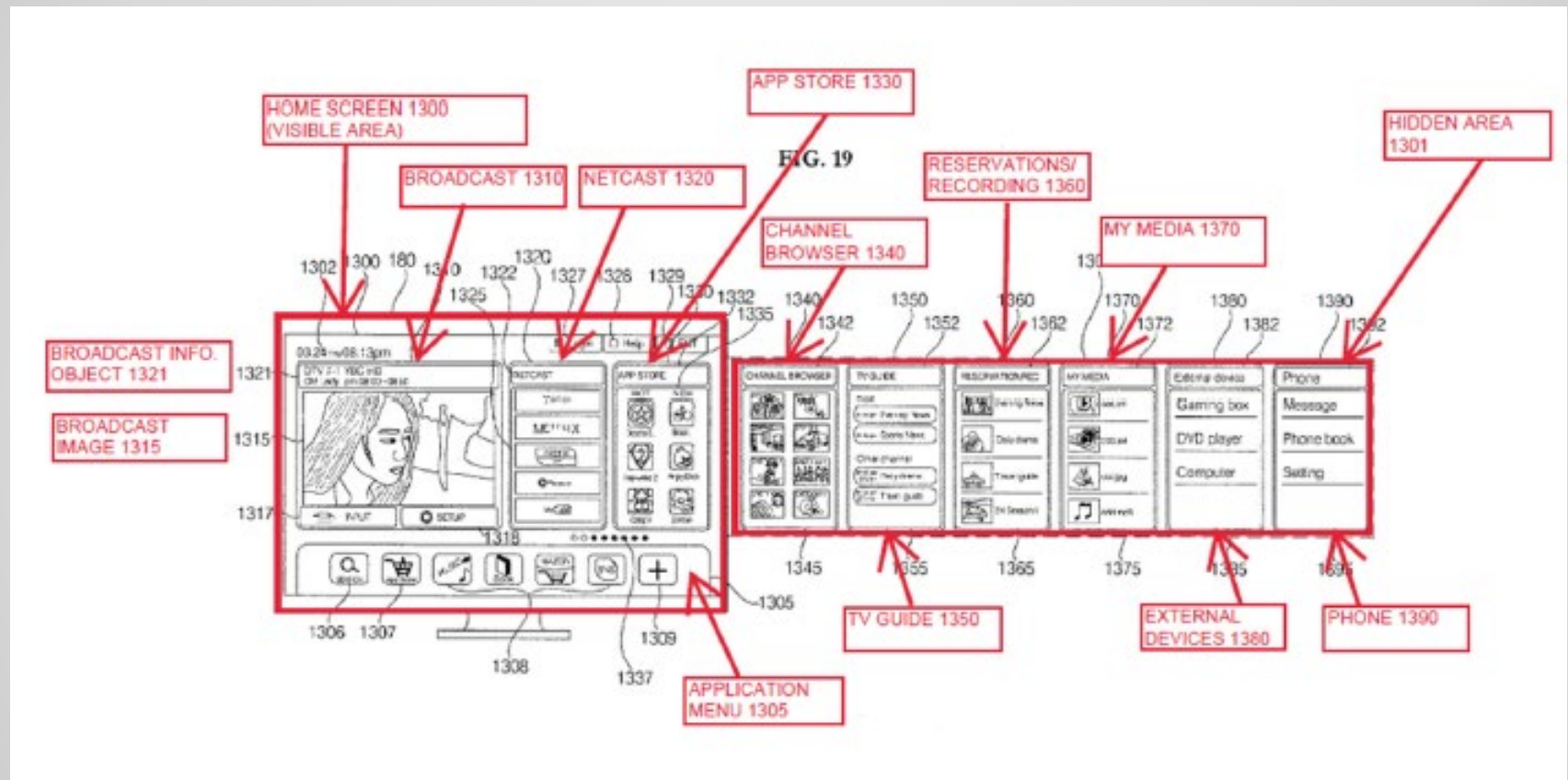
**Applies ordinary and customary meaning. “Petitioner submits that, for the purposes of this proceeding and the grounds presented herein, no claim term requires express construction.”** Pet, 9.

# '040 Patent: Claim 1

- [1.0] 1. A method of displaying content on a television, comprising:
  - [1.1] receiving, by a processor, an indication associated with a selection by a user;
  - [1.2] determining, by the processor, based on the received indication, a global panel to display via the television;
  - [1.3] retrieving, by the processor, from memory, a first content information for display in the global panel; and
  - [1.4] displaying, via the television, the retrieved content information in the global panel,
  - [1.5] wherein the global panel includes a list of sources of content for the intelligent television,
  - [1.6] wherein at least one of the sources is highlighted as being associated with the first content information, and
  - [1.7] 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.

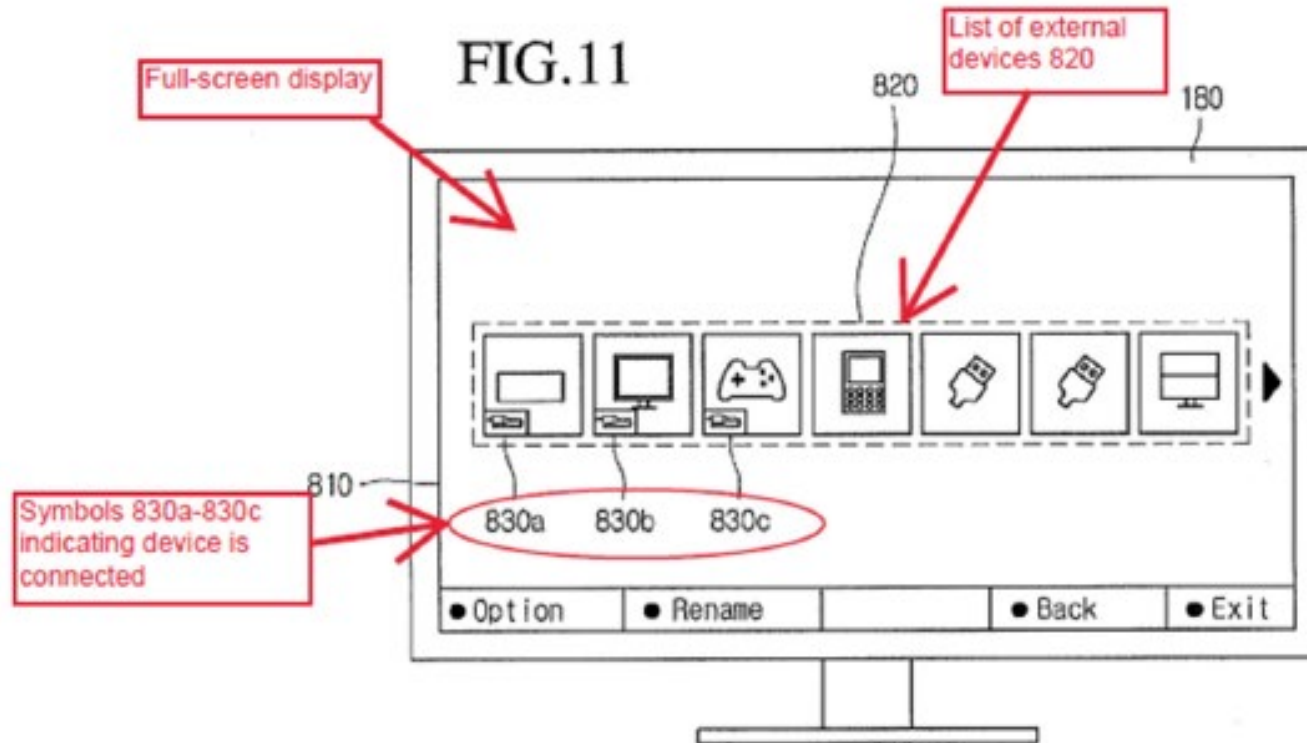
Ex. 1001 ('040 Patent), Claim 1.

# Kim – Fig. 19



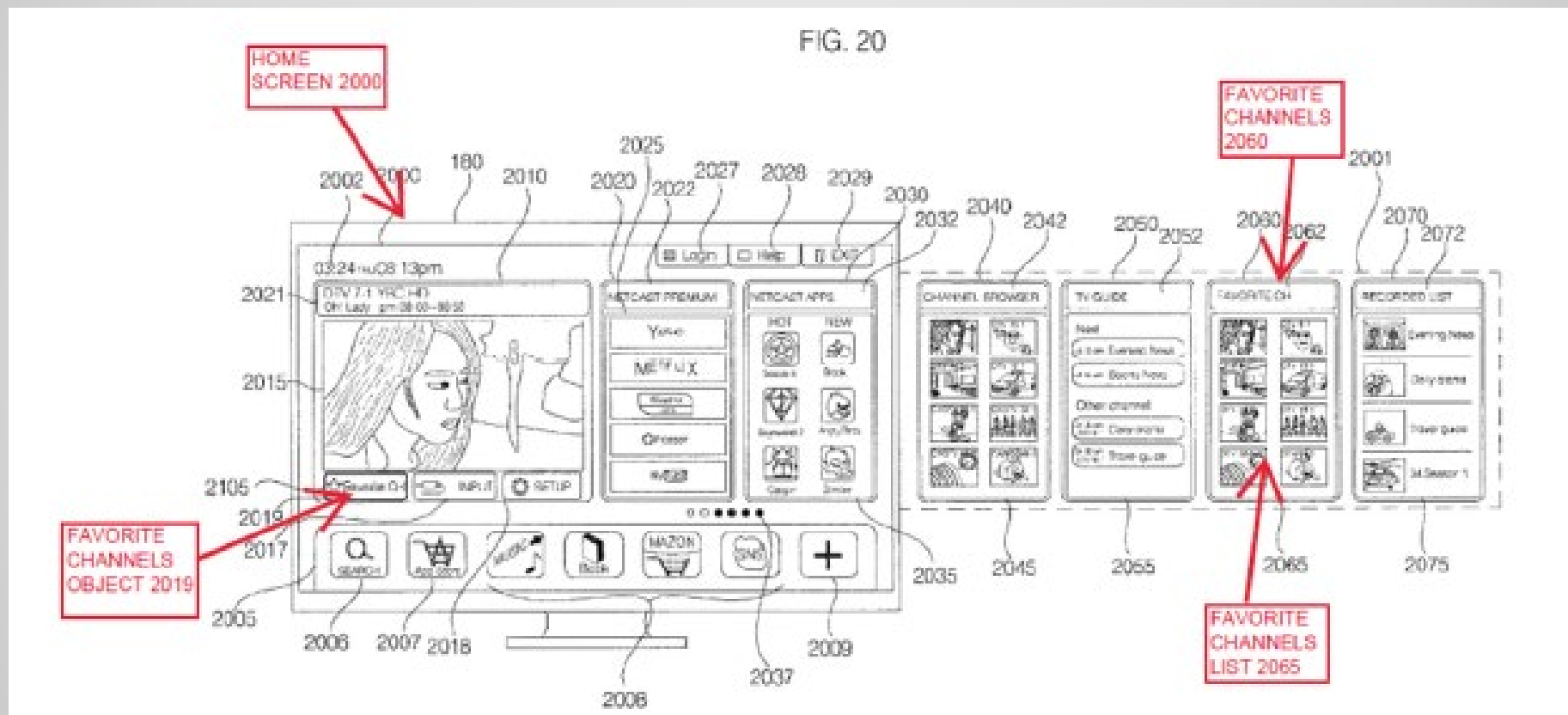
POR, 10, Kim, Fig. 19.

# Choi – Fig. 11



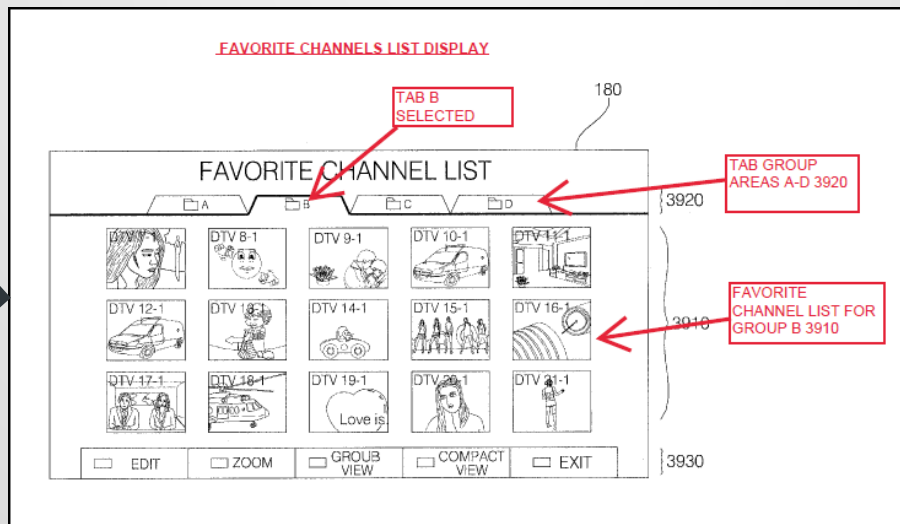
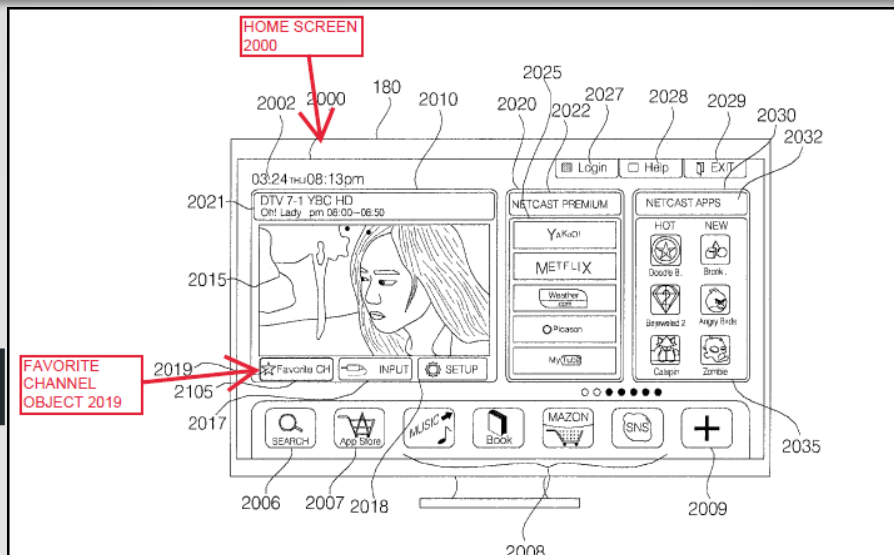
POR, 11; Choi, Fig. 11.

# Lee-2 – Fig. 20



POR, 12; Lee-2, Fig. 20.

# Lee-2 – Figs. 39A-39B



POR, 12-13; Lee-2, Figs. 39A-39B.

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# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5-1.6

## Kim, Choi & Lee-1 fail to teach Limitation 1.5/1.6:

***“wherein the global panel includes a list of sources of content for the intelligent television” (1.5)***

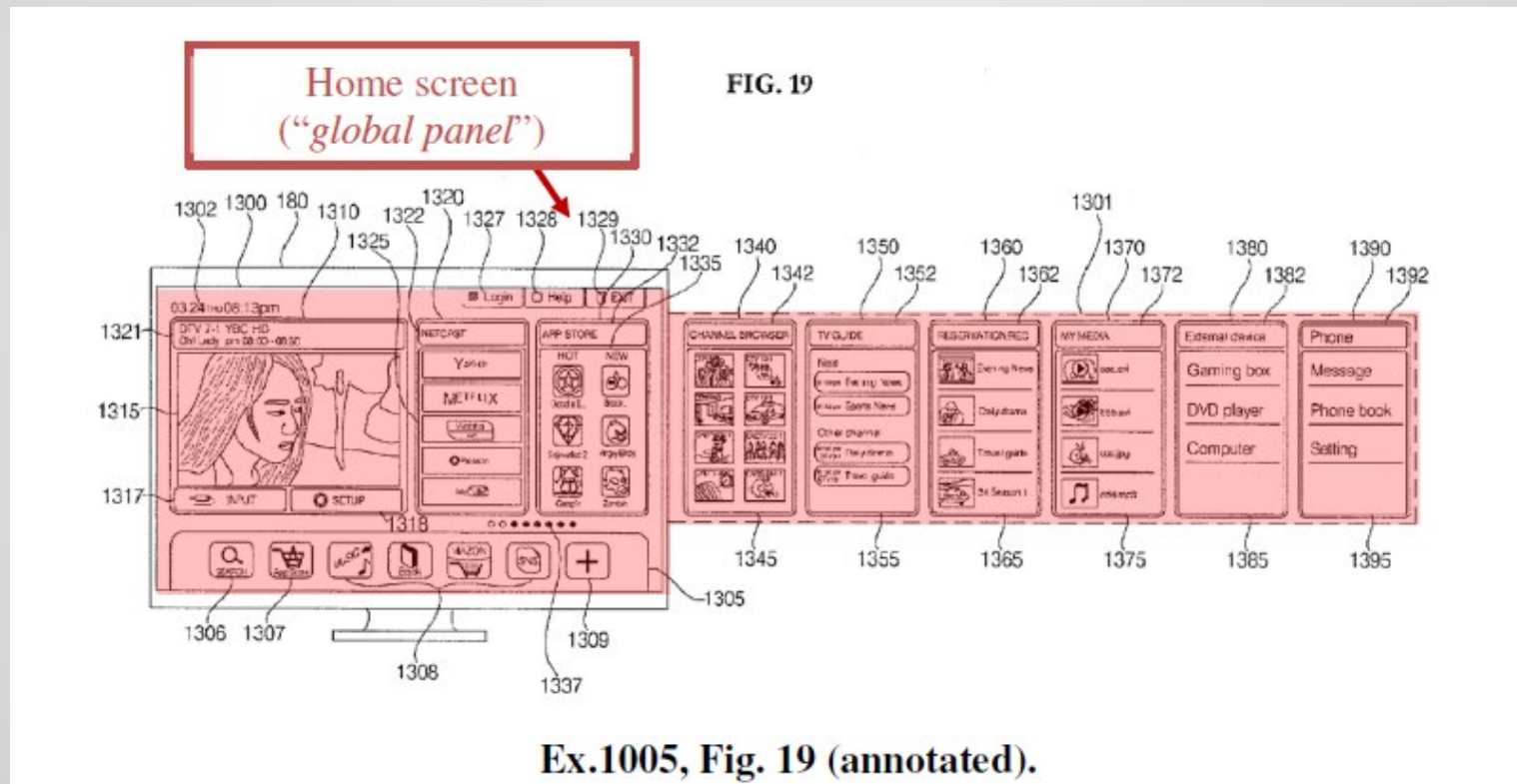
***“wherein at least one of the sources is highlighted as being associated with the first content information” (1.6) that is retrieved and displayed per 1.3-1.4***

POR, 15.

## Ground 1: Kim, Choi & Lee-1 – Limitations 1.5-1.6

**Petitioner's theory:** “*global panel*” is Kim’s home screen.

Pet., 25-26.



# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5-1.6

## Petitioner's theory:

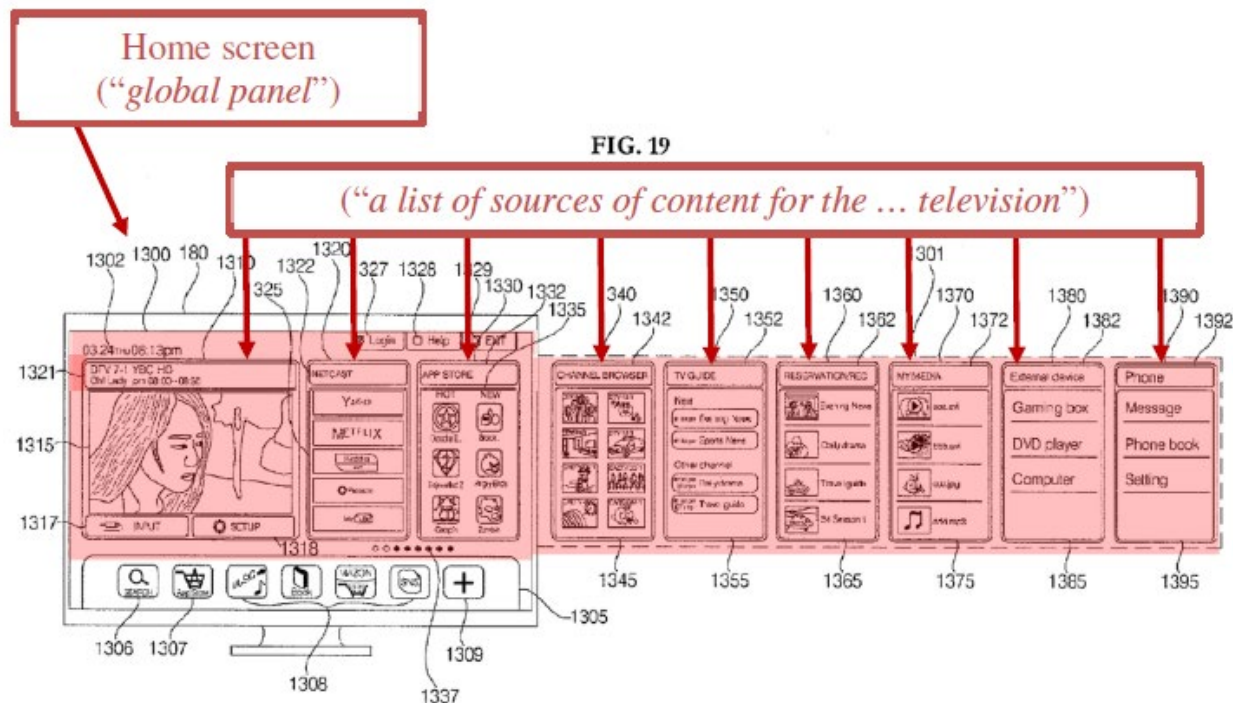
***“first content information”*** is descriptive text and/or thumbnails for card objects in Kim.

***“list of sources of content”*** are the card objects in Kim's home screen.

POR, 15; Sur-reply, 1-2.

# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5-1.6

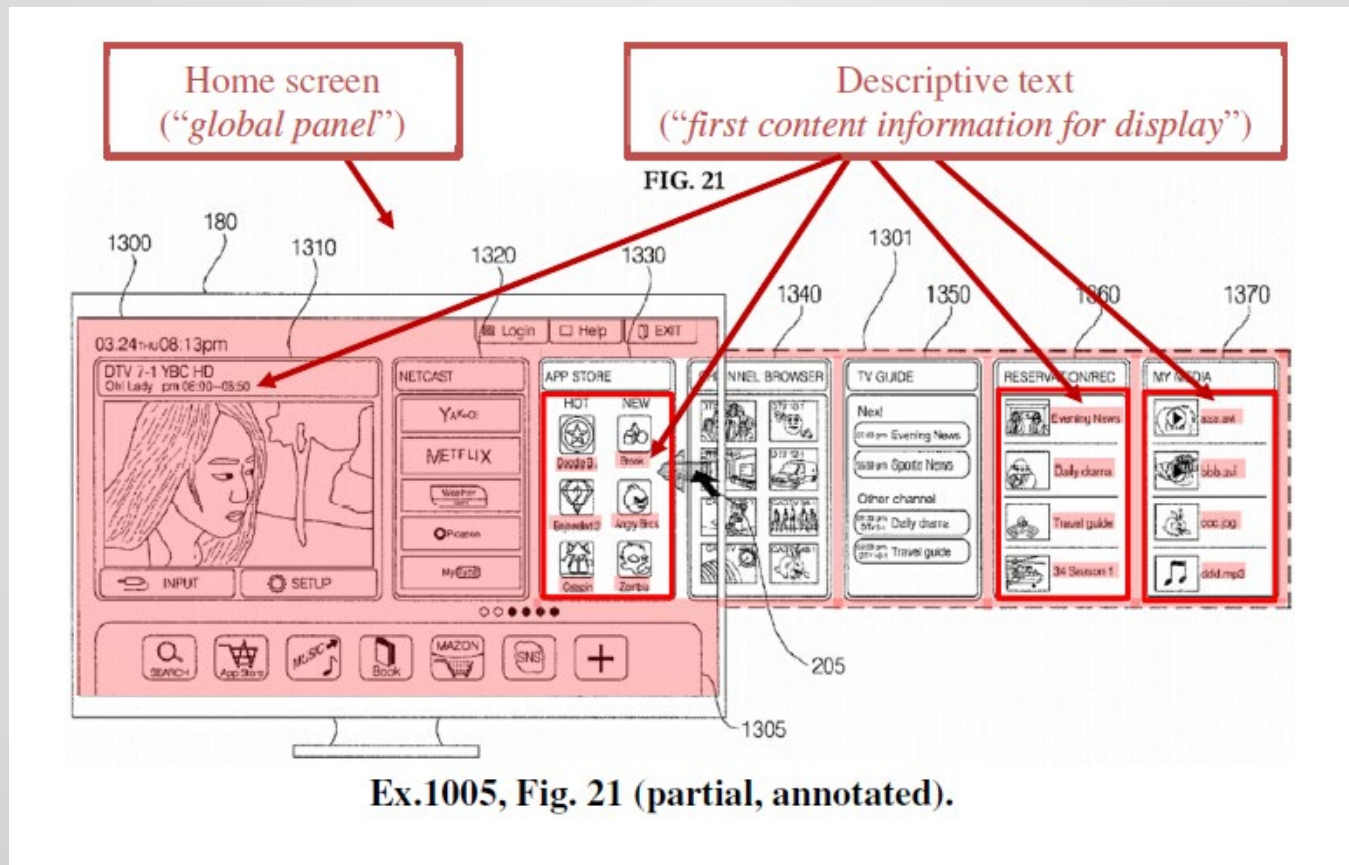
**Petitioner's theory:** “*list of sources of content*” are card objects 1300-1390 in Kim's home screen. Pet., 40.



Ex.1005, Fig. 19 (annotated).

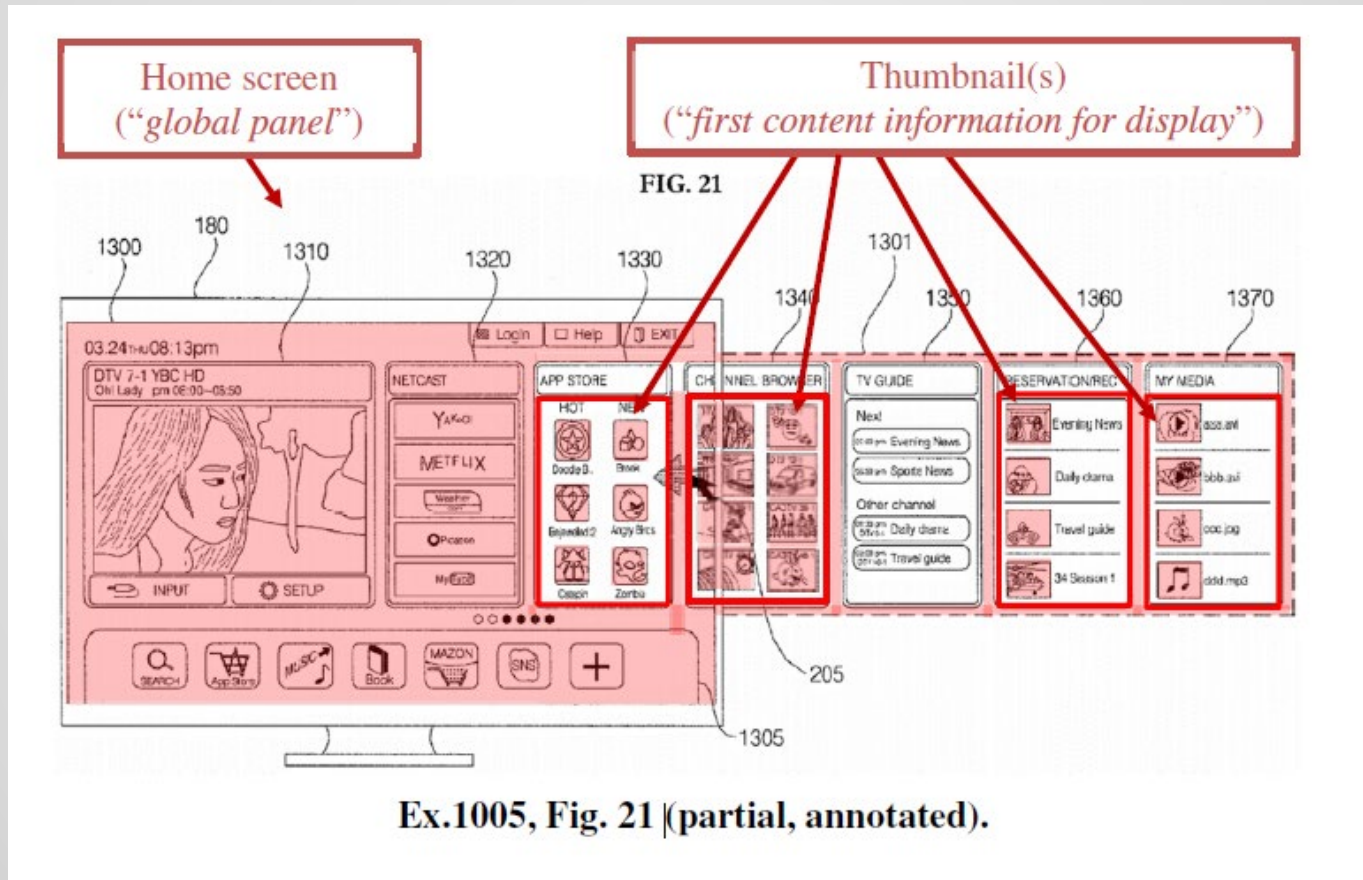
# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5-1.6

Petitioner's theory: “*first content information*” is descriptive text and/or thumbnails for card objects in Kim. Pet., 27-28.



# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5-1.6

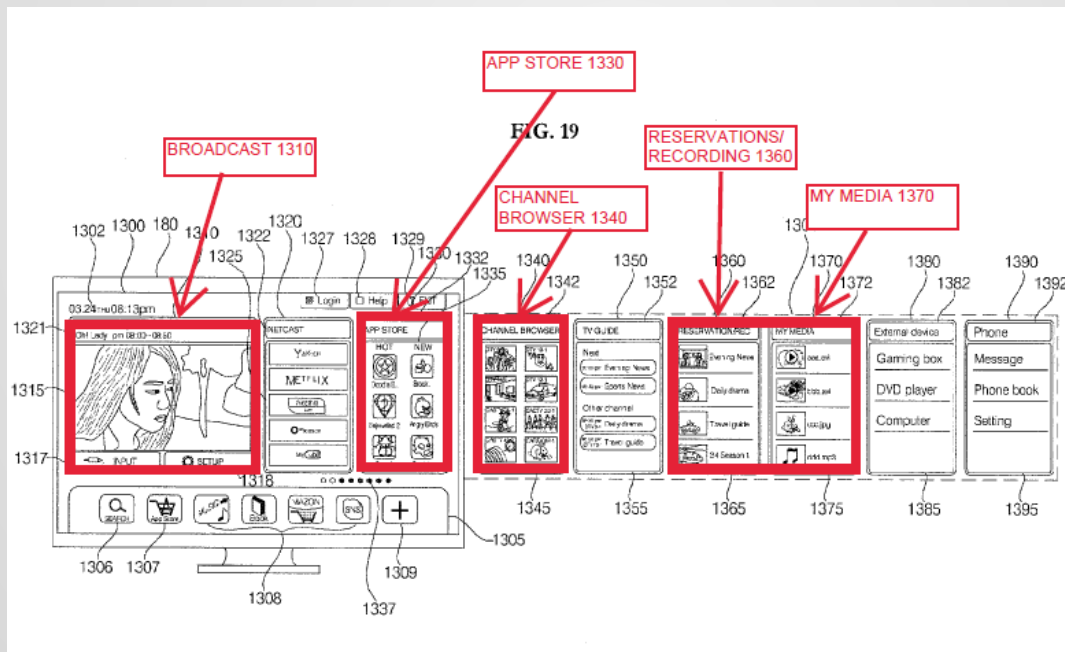
**Petitioner's theory:** “***first content information***” is descriptive text and/or **thumbnails** for card objects in Kim. Pet., 29-31.



# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5-1.6

**Petitioner's theory:** “*first content information*” is descriptive text and/or thumbnails in five card objects in Kim

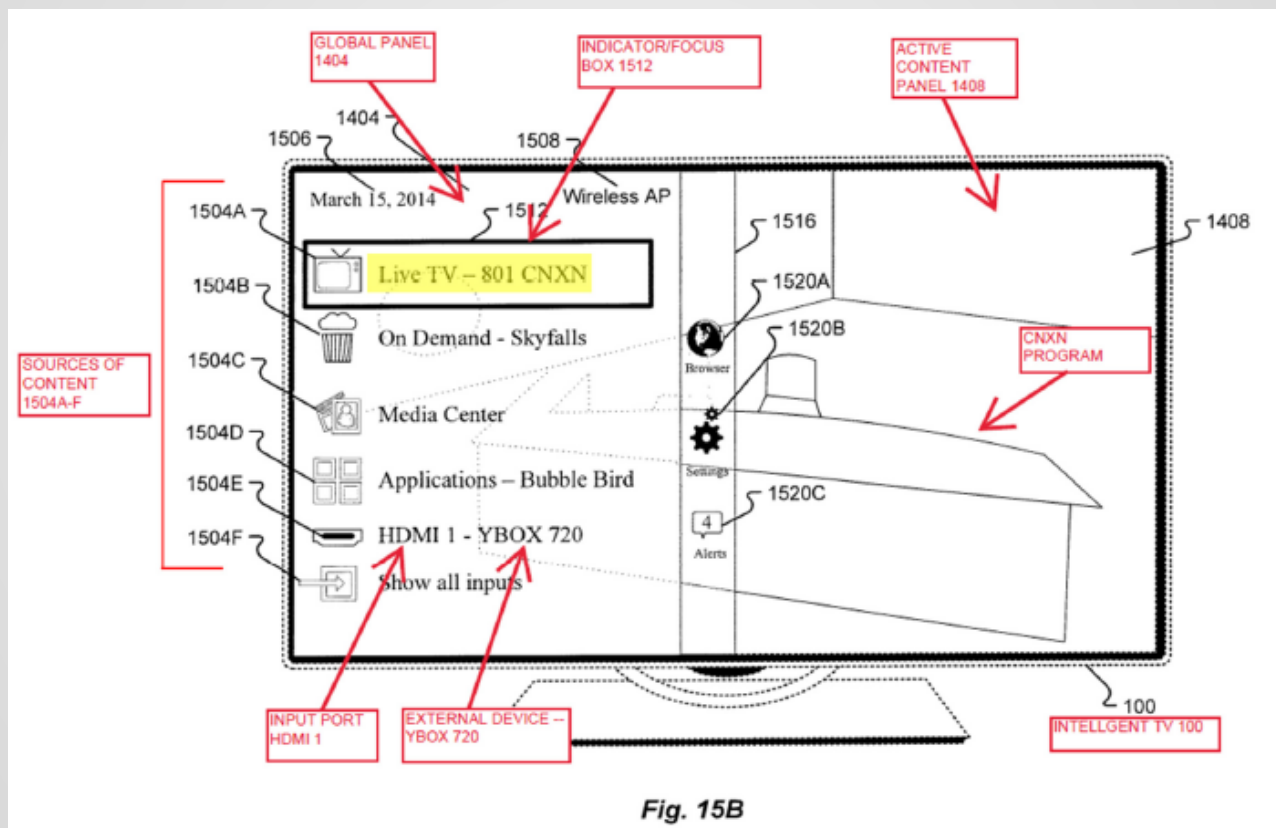
(1) App Store 1330, (2) Reserve/recordings 1360, (3) My Media 1370, (4) Channel browser 1340, and (5) Broadcast 1310. POR, 16-17.



POR, 16-17; Kim, Fig. 19.

# '040 Patent – Fig. 15B

**'286 Patent:** Live TV-801 CNXN (“*content source*”) highlighted re display of CNXN program (“*first content information*”) POR, 17-18.



POR, 3; '040 Patent, Fig. 15B; Sur-reply, 2.

# '040 Patent – Fig. 15C

**'286 Patent:** On Demand - Skyfalls (*“content source”*) highlighted re display of Skyfalls program (*“first content information”*)

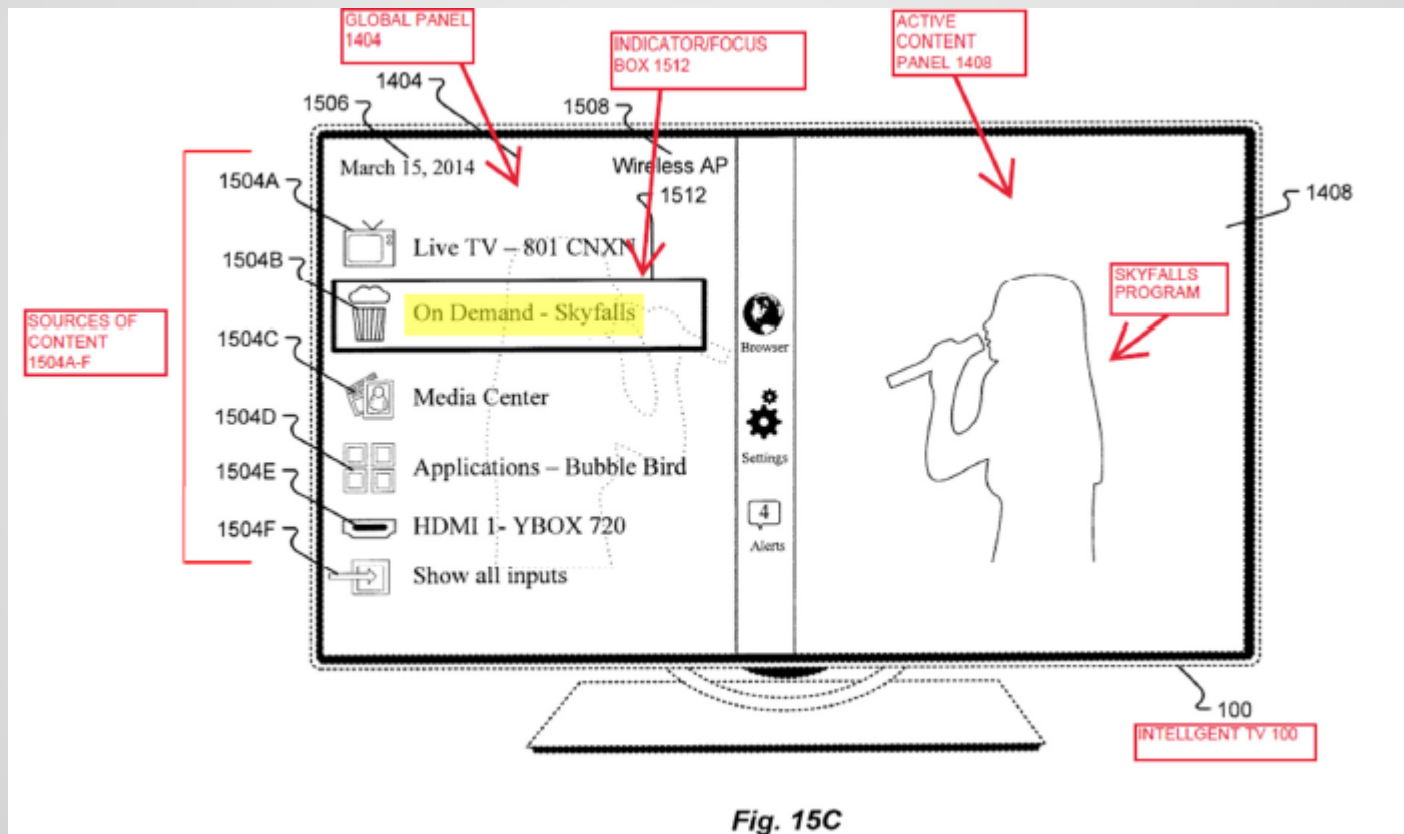


Fig. 15C

POR, 3, 18- 19; '040 Patent, Fig. 15C; Sur-reply, 2.

# Limitations 1.5-1.6

**Kim does not teach highlighting a “source” because the “*first content information*” is displayed**

- No card object is highlighted because descriptive text/thumbnail is displayed. POR, 19-20.
- Card objects and descriptive text/thumbnails are **automatically displayed together** when home screen is invoked. POR, 19-20; Sur-reply, 4.

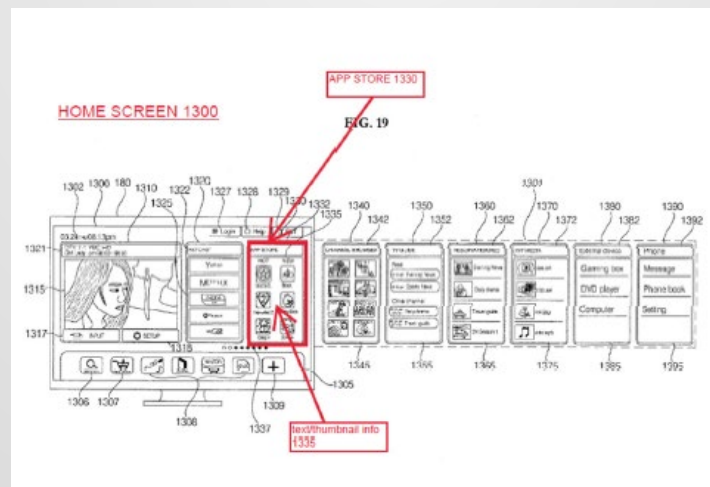
|    |                                                    |
|----|----------------------------------------------------|
| 10 | Is it correct that in Figure 19, none of the       |
| 11 | five card objects that allegedly contain the first |
| 12 | content information are highlighted?               |
| 13 | A. The cards in Figure 19 are not highlighted.     |

Ex. 2015 (Dep. Trans. Lippman), 190:10-13.

# Limitations 1.5-1.6

## Kim does not teach highlighting a “source” because the “first content information” is displayed

The fundamental problem with the Petitioner’s theory is that neither Kim nor Lee-2, alone or in combination, provides for highlighting a card object because the text/thumbnail information within it has been displayed. For example, the App Store card object 1330 (alleged “source of content”) is not highlighted because the text/thumbnail information 1335 (alleged “first content information”) is presented within it, as depicted below:



Sur-reply, 3.

# Limitations 1.5-1.6

**Kim does not teach highlighting a “source” because the “*first content information*” is displayed**

- **Color/tint applied to partially-displayed card objects because they are partially-displayed, not because their text/thumbnail is displayed.**
- **Serves to distinguish partially-displayed card objects from fully-displayed card objects, not to highlight because text/thumbnail is displayed.**
- **Color/tint when card object is partially-displayed does not meet 1.5-1.6.**

POR, 21, Kim, [0228]; Sur-reply, 5-6.

# Limitations 1.5-1.6

## Proposed modification to Kim's Other Card Objects based on Incoming Call to Phone Card Object:

- Phone card object highlighted upon detection of incoming call event.
- Proposal to modify: App Store card object etc. to highlight upon detection of incoming call.
- Combination does not meet limitation 1.6 because App Store card object ("*source of information*") is highlighted due to incoming call, not because its text/thumbnail ("*first content information*") is displayed.
- POSITA would not make the modification because would confuse the user.

POR, 21-.24; Sur-reply, 5.

# Limitations 1.5-1.6

## Proposed modification to Kim's Other Card Objects based on Incoming Call to Phone Card Object:

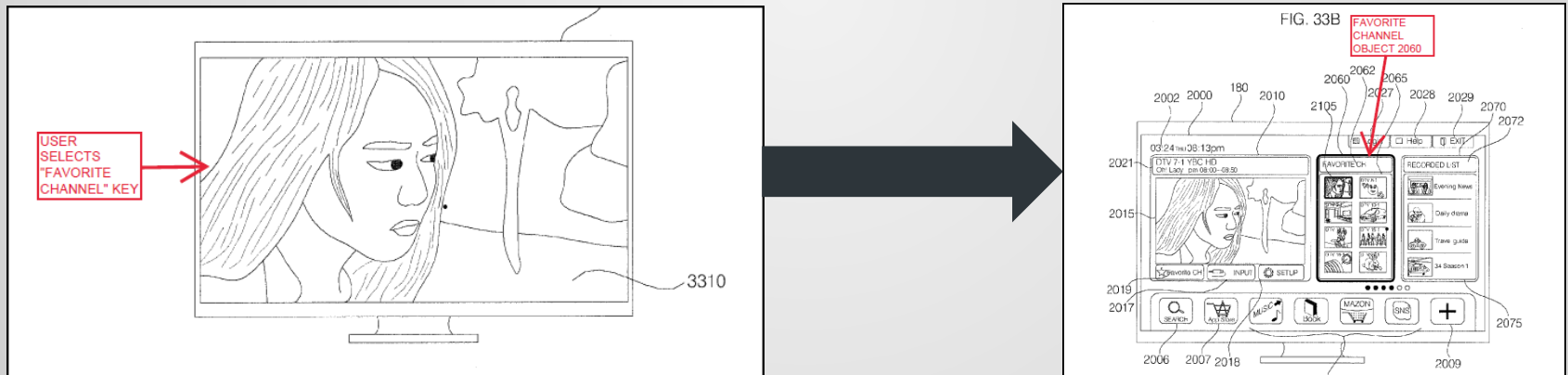
- No explanation why teaching of highlighting to indicate incoming call for Phone object would be applied to App Store object, etc.
- Generic reasoning to highlight App Store card object to “distinguish” from other card objects not tied to limitation 1.6
  - Claim recites highlight because first information content is retrieved and displayed per 1.3-1.4.
- Alleged common knowledge that software object can be highlighted does not meet limitation 1.6 to highlight “*as being associated with [retrieved/displayed] first content information*”

POR, 21-.25; Sur-reply, 6-7.

# Limitations 1.5-1.6

## Proposed modification to Kim based on Lee-2:

- Lee-2 not in Ground 1. Alleged background knowledge.
- Lee-2: highlight Favorite card object in Fig. 33B in response to user selecting favorite button in Fig. 33A



POR, 21-.25; Sur-reply, 6-7.

# Limitations 1.5-1.6

## Proposed modification to Kim based on Lee-2:

- **Lee-2: highlight Favorite card object in Fig. 33B in response to user selecting favorite button in Fig. 33A**

Referring to FIG. 33A, an image 3310 is displayed fullscreen on the display 180. Upon input of a local key (not shown) or a favorite channel key (not shown) of the remote controller, the home screen 2000 may be displayed as illustrated in FIG. 33B. The home screen 2000 may include the FAVORITE CH card object 2060. Particularly, the FAVORITE CH card object 2060 may be highlighted. Therefore, the user can readily view the FAVORITE CH card object 2060 including the favorite channel list 2065.

- **Lee-2: Favorite card object not highlighted because its text/thumbail info 2065 is displayed. Highlighted due to user selection of button.**

POR, 26-27; Lee-2, 38:3-11; Sur-reply, 6-7.

# Limitations 1.5-1.6

## Proposed modification to Kim based on Lee-2:

Thus, as described and claimed in the '040 Patent, a source of content is highlighted because it is related to information content (“*first content information*”) from the source that is displayed, and the highlighted source of content will change when information content from a different source is displayed. This is in stark contrast to Kim, where the card object is not highlighted because information content inside the card object is displayed. See Surati Decl., ¶ 146.

POR, 30.

# Limitations 1.5-1.6

## Proposed modification to Kim based on Lee-2:

The fundamental problem with the Petitioner's various arguments is that they are not tied to the language of limitations 1.6 and 1.3-1.4. The issue is not whether it was generically known to highlight a card object. The issue is whether there is a teaching of highlighting a card object (alleged "*source[] of content*") because its text/thumbnail information (alleged "*first content information*") has been displayed, per limitation 1.6. The Petitioner's arguments consistently fail to conform to the claim language.

Sur-reply, 7.

# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5/1.7

## Kim, Choi & Lee1 fail to teach Limitation 1.5/1.7:

***“wherein the global panel includes a list of sources of content for the intelligent television” (1.5)***

***“wherein the sources include a [1] live television source, [2] a video on demand source, [3] a media center source, [4] an applications source, and [5] an electrical input associated with the television.”***

POR, 31, et seq.

# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5, 1.7

**Ordinary & Customary meaning of “source of content” that is “an electrical input associated with the television”**

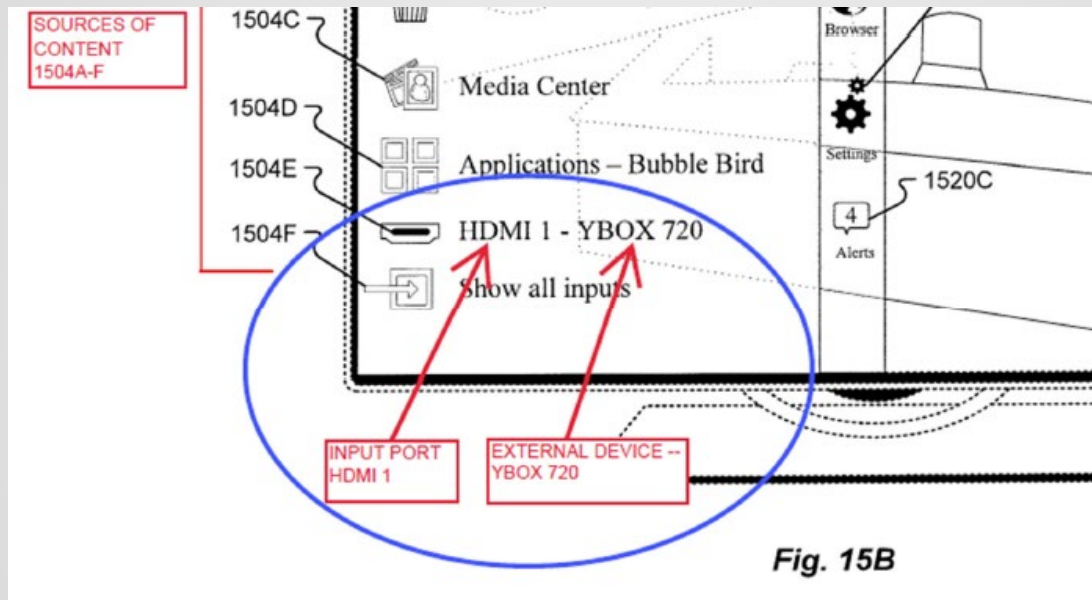
**A specific input port (e.g., HDMI, USB, DVI, etc.) electrically coupled to the television that connects a device (e.g., DVD, VCR, etc.).**

- **'040 Patent: connecting devices (e.g., DVD, VCR, etc.) via input ports (HDMI, USB, Ethernet, A/V, IEEE 1394). '040 Patent, 6:16-19, 23:58-63, 25:19-31, 17:51-58).**

POR, 31-32.

# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5, 1.7

**Ordinary & Customary meaning of “source of content” that is “an electrical input associated with the television”**



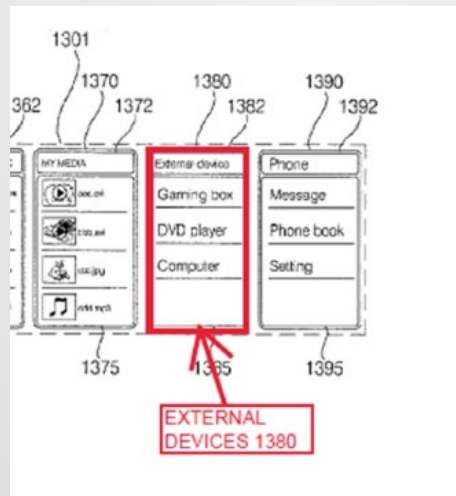
- Specific input port HDMI 1 connected to YBOX 720 device.

POR, 31-33.

# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5, 1.7

## Petitioner's theory:

- Kim's External devices card object would be modified by Choi to include an input port icon.
- Kim's Phone object displays devices that are connected (DVD, Computer, etc.). Kim, [0094], [0210]. No input port indicia. POR, 33-34.

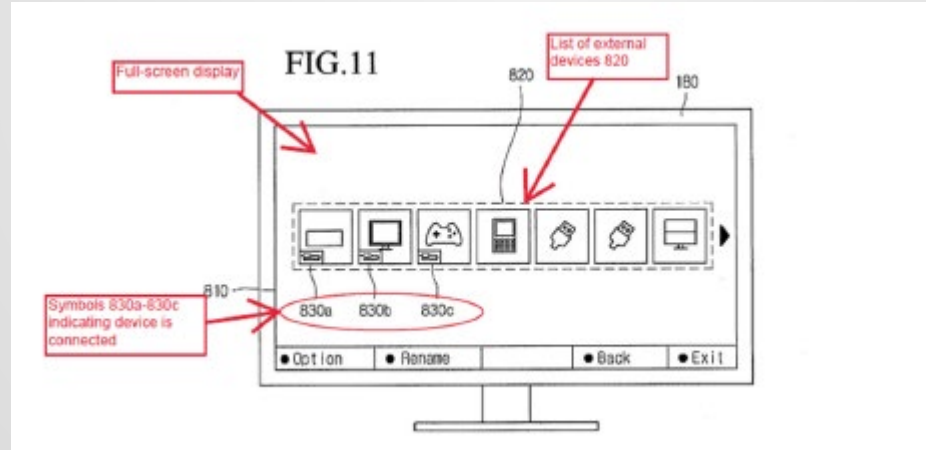


Kim, Fig. 19.

# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5, 1.7

## Petitioner's theory: Kim modified by Choi

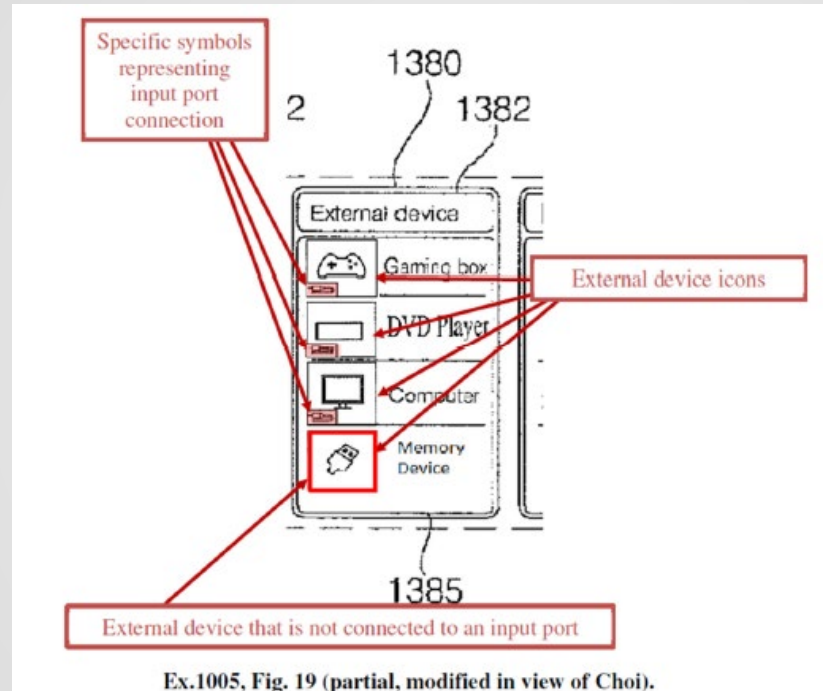
- Choi displays connected status of device, does not identify input port. Choi, [0250].
- GUI can “display specific symbols 830a, 830b, and 830c on the external device[s] ... that are being connected.” Choi, [0250] POR, 35-36.



Choi, Fig. 11.

# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5, 1.7

## Petitioner's theory: Proposed combination of Kim and Choi:



- **Generic connected-status icons. No indicator of input port.**

Pet., 55; POR, 36-37; Sur-reply, 11.

# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5, 1.7

**Petitioner's back-up theory:** Obvious to add input port identifier. Pet., 55-56.

- No evidence for back-up theory.
- Lippman decl. references limitation 1.5 but no evidence for specific input port identifier

160. Additionally, to the extent argued that the claim requires the specific  
¶  
input port be referenced by name, e.g., “HDMI,” such would have been obvious as  
analyzed in connection with element [1.5].

- Ex. 1003 (Lippman Decl.), ¶ 129 relies on Ex. 1011 (U.S. Pub. No. 2013/0176415) to Kim (“Kim Publication”) to fill missing limitation of displaying input port (e.g., HDMI 1, USB 2).

Pet., 55; POR, 36-37.

# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5, 1.7

**Petitioner's back-up theory:** Obvious to add input port identifier. Pet., 55-56.

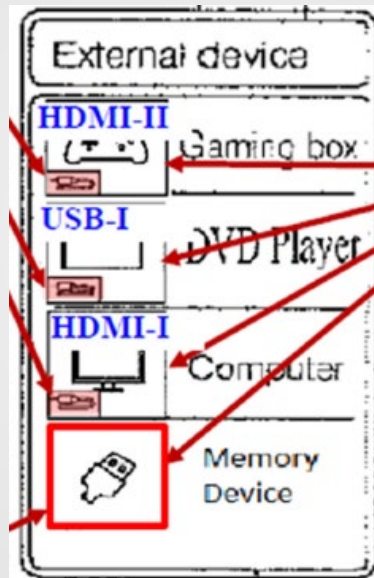
- **Ex. 1011 (Kim Publication) filed 1/4/2013 is not prior art.**
- **Kim Publication not entitled to priority date of 1/6/2012 Prov. App. No. 61/683,609.**
- **Kim Publication alleged background knowledge permitted as evidence of motivation to combine, but not to fill missing limitation.**
- **Further modification not feasible. Kim controller 170 can detect which devices are connected, not detect specific input ports. Kim, [0094], [0210]. Choi controller 170 also only detects which devices are connected. Choi, [0250].**
- **Petitioner does not establish that either Kim or Choi processor can detect specific input ports. Combination would not work.**

POR, 40-41, 43-45.

# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5, 1.7

**Petitioner's back-up theory:** Obvious to add input port identifier. Pet., 55-56.

- Kim/Choi further modified by Kim Publication produces result:



- POSITA would not consider proposed combination to be acceptable, counter to Kim's objective of providing user-friendly interface.

POR, 41-43; Sur-reply, 12.

# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5, 1.7

**Petitioner's back-up theory: Obvious to add input port identifier.** Pet., 55-56.

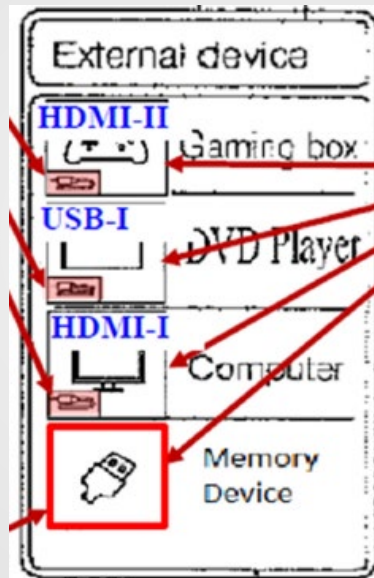
- No motivation to combine Kim with Choi.
- Stated MtC to include icons that “distinguish connected devices from devices that are not connected.”  
Pet., 54-55.
- Kim already identifies which devices are connected.
- MtC does not provide reason to add identifier specifying input port (e.g., HDMI 1, USB 2, etc.).
- Thus, stated MtC does not correspond to proposed modification of Kim's External devices card object.

POR, 46-47.

# Ground 1: Kim, Choi & Lee-1 – Limitations 1.5, 1.7

Petitioner's back-up theory: Obvious to add input port identifier. Pet., 55-56.

- Petitioner makes no showing combination would have a REOS.



- No REOS because result is contrary to design principle of Kim to provide user-friendly GUI to navigate content.

POR, 43.

# Ground 1: Kim, Choi & Lee-1 – Claim 2

## Kim, Choi & Lee-1 fail to teach Claim 2

***“identifying a user associated with the received indication” (2.1)***

***“retrieving one or more settings associated with the identified user” (2.2)***

***“retrieving, from memory, content information associated with the identified user” (2.3)***

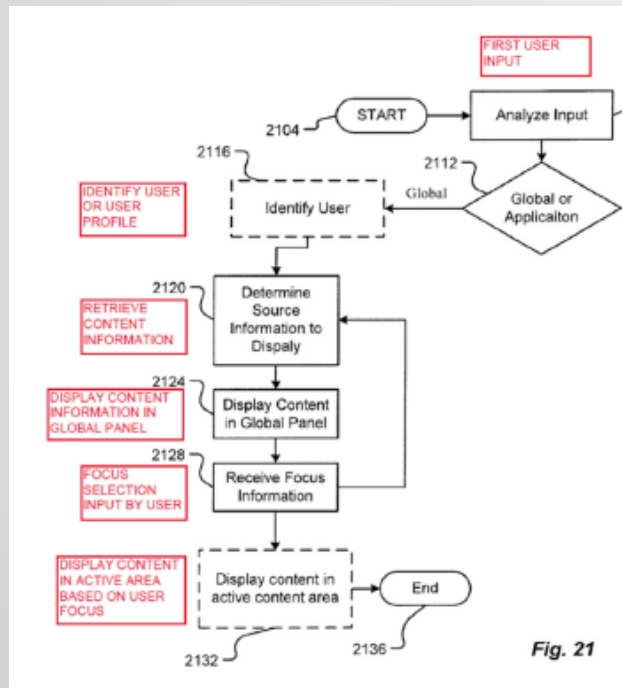
***“displaying . . . the retrieved content information in the global panel” (2.4)***

POR, 47.

# Ground 1: Kim, Choi & Lee-1 – Limitation 2.1

## Kim, Choi & Lee-1 fail to teach Claim 2:

***“identifying a user associated with the received indication” (2.1)***



changer input, the step 2104 may flow to step 2108, where the input received is analyzed. At step 2312, if it is determined that the analyzed communication is associated with displaying a global panel, such as panel 1404, then method 2100 proceeds to step 2116 where the user, or a user profile associated with the user is identified. Because the content information is not specific to the content displayed in the active content area 1408, once the user or user profile associated with a user has been identified, the method then proceeds to step 2120 to retrieve content information to

POR, 48-49; '040 Patent, Fig. 21; 36:48-52.

# Ground 1: Kim, Choi & Lee-1 – Limitation 2.1

**Petitioner's theory:** User first selects “home key,” then log-in to App Store

- But log-in is separate operation. Not identifying user based on “*received indication*” (selection of home key).
- Kim's log-in is separate operation by selecting log-in object 1327:

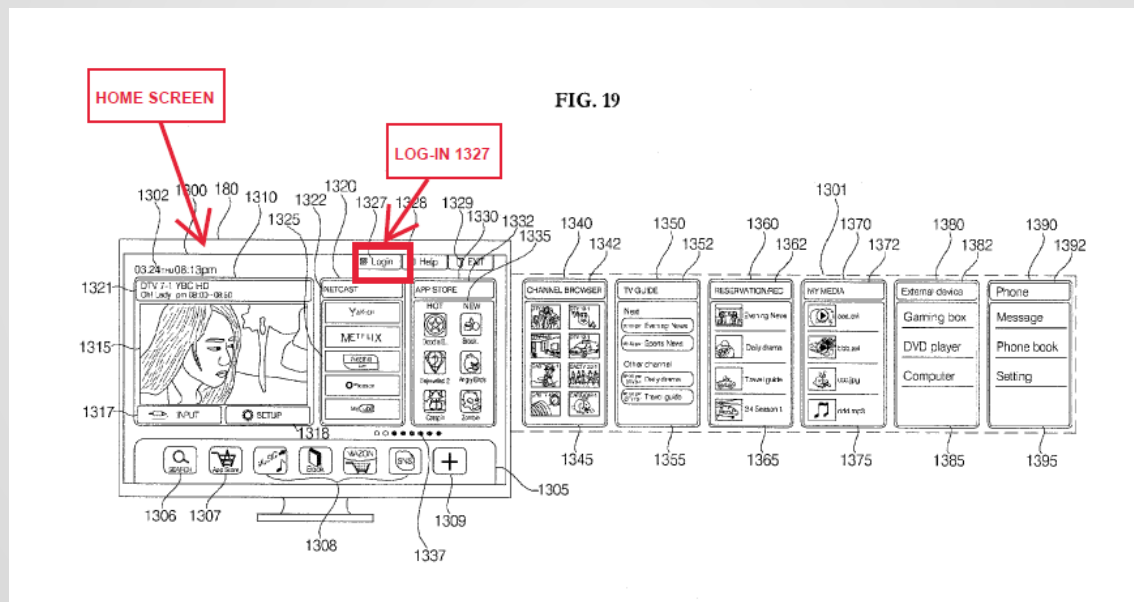
[0203] A Login menu item 1327, a Help menu item 1328, and an Exit menu item 1329 may be displayed above the card objects 1320 and 1330. The user may login to the APP STORE or a network connected to the image display apparatus 100 using the Login menu item 1327. The Help menu item 1328 may provide guidance regarding operation of the image display apparatus 100. The Exit menu item 1329 may be used

Pet., 56-57, POR, 49-50; Kim, [0203]; Sur-reply, 13-14.

# Ground 1: Kim, Choi & Lee-1 – Limitation 2.1

**Petitioner's theory:** User first selects “home key,” then log-in to App Store

- User is already at the home screen when log-in menu 1327 is selected.



Pet., 56-57, POR, 49-50; Kim, [0203], Fig. 19.

# Ground 1: Kim, Choi & Lee-1 – Limitation 2.1

**Petitioner's back-up theory:** “[N]etwork interface 130 may transmit data [to] electronic devices pre-registered with the image display apparatus 100.” Kim, [0081].

- **User device can be “registered” without identifying user per limitation 2.1.**
- **Pre-registering device is not identifying user based on received indication (selection of home screen key).**
- **Sending data to registered devices is not identifying user based on selection of home screen.**

**Limitation 2.1 not met.**

Pet., 57, POR, 49.

# Ground 1: Kim, Choi & Lee-1 – Limitation 2.1

**Petitioner's improper new theory on reply: Happenstance theory that user could already be logged-in and then could invoke home screen.**

- **No evidence presented from Kim or Dr. Lippman for new “login-then-home screen” argument.**
- **Still does not meet limitation 2.1 providing for identifying user based on received indication (selection of home screen).**
- **User identification is based on log-in, not based on selecting home screen per 2.1 and 1.1.**

**Limitation 2.1 not met.**

Reply, 20; Sur-reply, 14.

# Ground 1: Kim, Choi & Lee-1 – Limitation 2.1

**Another improper new theory on reply: Already logged-in user could invoke home screen leading to display of optional menu items 1308.**

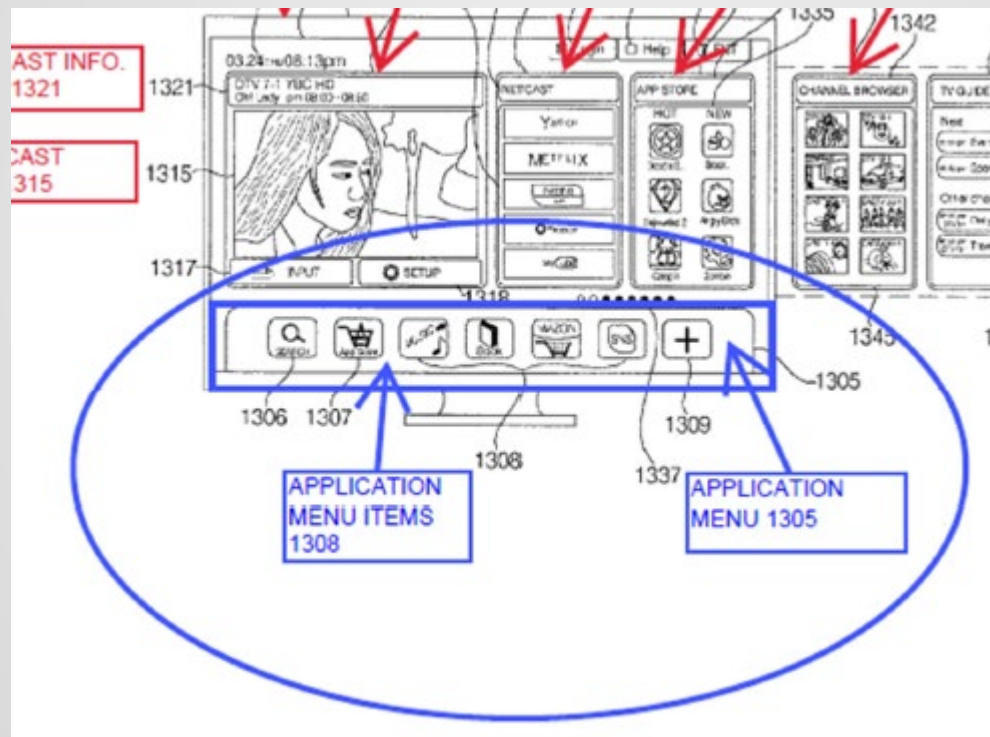
- **Theory fails because optional menu items 1308 in Kim are not different for different users.**
- **Kim does not teach identification of user to retrieve optional menu items 1308 to meet limitation 2.1.**
- **Optional menu items 1308 not tied to specific user in Kim.**

**Limitation 2.1 not met.**

Reply, 20; Sur-reply, 14-15.

# Ground 1: Kim, Choi & Lee-1 – Limitation 2.2

**Petitioner's theory:** Optional app menu items 1308 (MAZON, Book, etc.) are retrieved user “*settings.*”



Pet., 58, POR, 53-54; Kim, Fig. 19, [0215].

# Ground 1: Kim, Choi & Lee-1 – Limitation 2.2

**Petitioner's theory:** Optional app menu items 1308 (MAZON, Book, etc.) are user “*settings*.”

- Optional app menu 1308 items are same for all users
- Alleged user settings are not based on “*identified user*.”

[0215] An application menu 1305 may include a plurality of application menu items. The plurality of application menu items may include predetermined menu items 1306 to 1309 which may be selected from all application menu items available on the display 180. Thus, the application menu 1305 may be referred to as an application compact-view menu. The application menu items 1306 to 1309 may be divided into mandatory application menu items 1306, 1307, and 1309 (Search, App Store, and ‘+’) and optional application menu items 1308 (e.g., Music, Book, MAZON, and SNS).

**Limitation 2.2 not met.**

Pet., 58, POR, 53-54; Kim, [0215].

# Ground 1: Kim, Choi & Lee-1 – Limitation 2.2

**Petitioner's theory:** Optional app menu items 1308 (MAZON, Book, etc.) are “*user settings*” (2.2). Thumbnails for 1308 are retrieved “[*second*] *information content*” (2.3).

- **Petitioner's expert evidence does not make sense.**

content stored in memory 140. *See also*, Ex.1005, [0065], [0089]. It would have been obvious to a POSITA, for controller 170 to “*retrieve[]*” from memory 140 the user's settings for the application menu item 1308 (e.g., which applications the user has elected to include in the menu) so that the corresponding application thumbnails would be retrieved from memory 140 and displayed on the home screen. *See infra*, [2.3]-[2.4].

**No explanation of “user's settings for the application menu item 1308.” Not disclosed in Kim. Analysis confuses user “*settings*” (2.2) and “*content information*” (2.3).**

**Limitation 2.2 not met.**

# Ground 1: Kim, Choi & Lee-1 – Limitation 2.2

**Petitioner's theory:** Reply still fails to explain what are “*settings*” retrieved based on identification of user per limitation 2.2.

The Reply, like the Petition, does not clearly identify what in Kim meets the claimed retrieved user settings of 2.2: (1) the displayed **thumbnails 1308** representing the optional applications, (2) the optional **applications themselves** stored in memory, or (3) some **unspecified settings data** stored in memory identifying (1) or (2). POR, 54-55. Reply, 21-23. On Reply, the Petitioner again fails to identify the claimed user settings: “The Petition explained that the ‘**the user’s settings**’ for the application menu item 1308’ correspond to the **claimed ‘settings’**”. Reply, 22-23.<sup>4</sup> The Reply does not identify “the user’s settings.”

Sur-reply, 16.

# Ground 1: Kim, Choi & Lee-1 – Limitation 2.2

## Petitioner's theory: Petitioner does not refute the evidence from Dr. Surati:

188. Furthermore, a POSITA would not consider user applications or application thumbnails to be user settings associated with an “*identified user*.” Kim refers to these applications as “user-set” applications because they are optional and a user can set them, not because they are associated with a specifically identified user. Kim, [0217]. The Petitioner and its expert make no showing that Kim’s user-set applications or thumbnails are associated with an “*identified user*” per limitation 2.2. Kim does not teach or suggest that the user applications or thumbnails are

Ex. 2011 (Dr. Surati Decl.), 188; Sur-reply, 17.  
See Reply, 21-23.

# Ground 1: Kim, Choi & Lee-1 – Limitation 2.3

**Petitioner's theory:** Retrieved thumbnails for optional applications 1308 are the “[*second*] content information associated with the identified user” that is retrieved.

- See limitation 2.2. Optional applications are not associated with specific users. They are same for all users.

**Limitation 2.3 not met.**

Sur-reply, 19.

# Ground 2: Kim, Choi, Lee-1/Lee-2: Claim 2

Kim, Choi, Lee-1, and Lee-2 fail to teach Claim 2

***“identifying a user associated with the received indication” (2.1)***

***“retrieving one or more settings associated with the identified user” (2.2)***

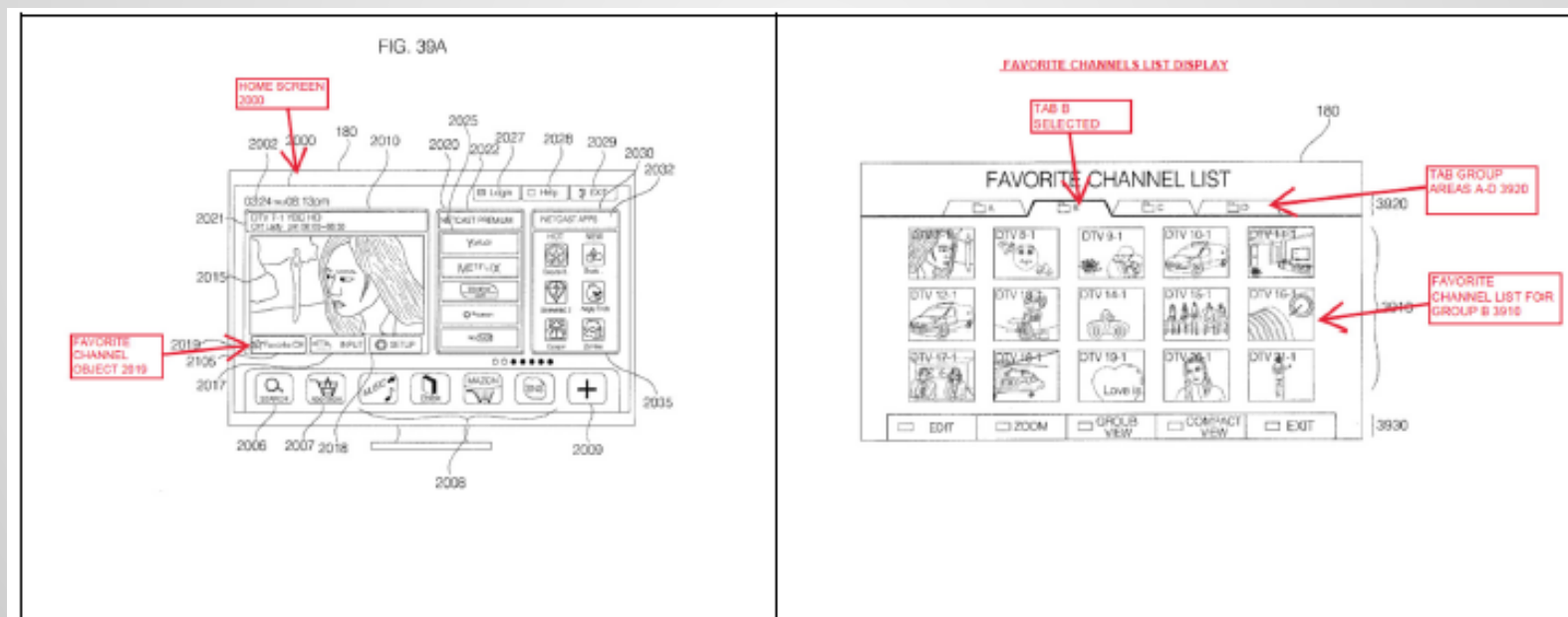
***[“retrieving, from memory, content information associated with the identified user” (2.3)]***

***[“displaying . . . the retrieved content information in the global panel” (2.4)]***

# Ground 2: Kim, Choi, Lee-1/Lee-2 – Limitation 2.1

**Petitioner's theory:** “Received indication” is selection of home screen key (1.1).

- Pet relies on Lee-2 selection of favorite channel object 2019 in Fig. 39A to display Favorite Channel List in Fig. 39B.



POR, 63-64.

# Ground 2: Kim, Choi, Lee-1/Lee-2 – Limitation 2.1

**Petitioner's theory:** “Received indication” is selection of home screen key (1.1). For 2.1, Pet relies on Lee-2 selection of favorite channel object 2019 in Fig. 39A to display Favorite Channel List in Fig. 39B.

- Allegedly, display of Favorite Channel List with B Group is “*identifying a user*” per 2.1
- But display of B group is in response to user selecting fav channel object 2019, not based on “*received indication*” (selection of home screen key) per 2.1/1.1.
- No showing user identified based on selection of home screen key.

**Limitation 2.1 not met.**

POR, 63-66; Sur-reply, 21.

# Ground 2: Kim, Choi, Lee-1/Lee-2: Claim 6

Kim, Choi, Lee-1, and Lee-2 fail to teach Claim 6

***“identifying at least at least one of [a] a content source and [b] a content information currently being displayed via a television” (6.1)***

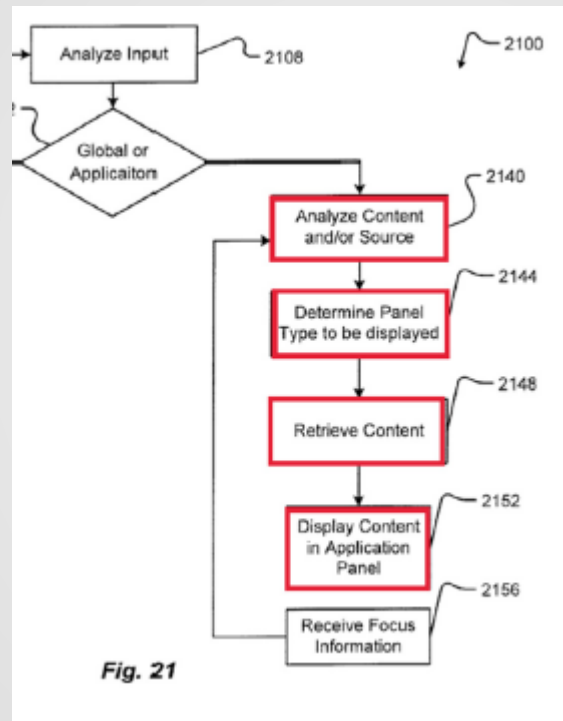
***“selecting a panel type based on the identified . . . content source and content information currently displayed” (6.2)***

***“retrieving . . . [second] content information based on the selected panel type” (6.3)***

***“displaying . . . the retrieved [second] content information in the global panel” (6.4)***

# Ground 2: Kim, Choi, Lee-1/Lee-2: Claim 6

## Claim 6 in '040 Patent:



POR, 68-69; '040 Patent, Fig. 21.

# Ground 2: Kim, Choi, Lee-1/Lee-2 – Limitation 6.1

**Petitioner's theory:** Fig. 32B of Lee-2 allegedly depicts highlighted thumbnail corresponding to displayed program.

- No disclosure in Lee-2 that thumbnail is highlighted.
- Even if highlighted, no disclosure in Lee-2 that thumbnail is highlighted because content source/content information is identified.
- Thumbnail is highlighted because user selected thumbnail to get info, not because content source/content information is identified. Surati Decl., ¶ 232.

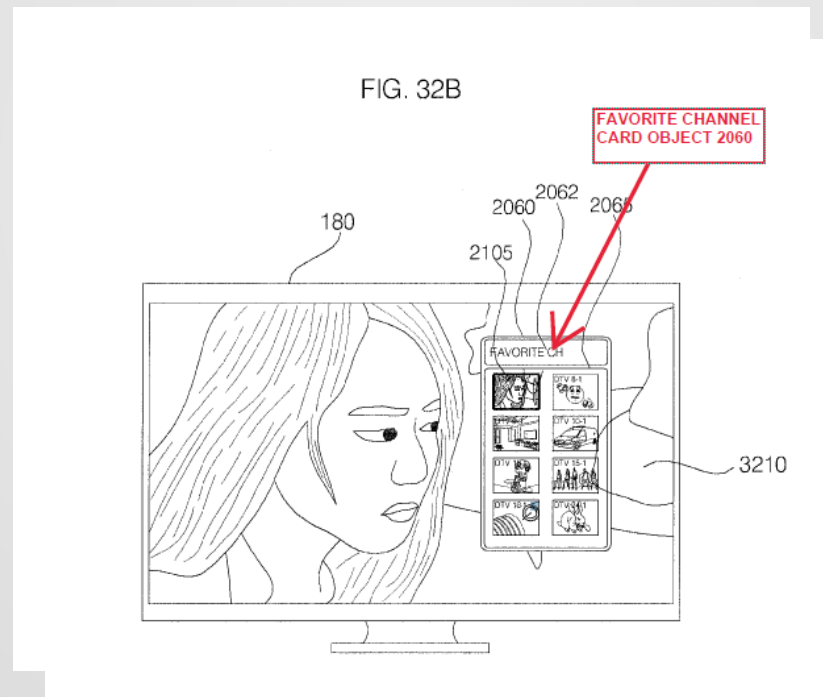
**Limitation 6.1 not met.**

POR, 70-71.

# Ground 2: Kim, Choi, Lee-1/Lee-2 – Limitation 6.2

**Petitioner's theory:** Display of Fav Channel object 2060 is “*selecting a panel type based on the identified . . . content source and content information currently being displayed.*”

Pet., 86.



POR, 71-72.

# Ground 2: Kim, Choi, Lee-1/Lee-2 – Limitation 6.2

**Petitioner's theory:** Display of Fav Channel object 2060 is “*selecting a panel type based on the identified . . . content source and content information currently being displayed.*”

Pet., 86.

- Fav Ch object 2060 displayed in response to user selecting Fav Ch key, not based on currently displayed image. 6.2 not met.

The Petitioner argues that the display of the Favorite Channel object 2060 meets this limitation. Pet., 86. However, the Favorite Channel object 2060 (alleged “panel type”) is selected based on the user selecting a favorite channel key or similar button. Lee-2, 37:62-67. Lee-2 does not teach or suggest that the Favorite Channel object is selected based on identifying a content source or content information for a currently-displayed program, as would be required for limitation 6.2. The figures

POR, 72; Sur-reply, 24.

# Questions

**Further Questions?**