**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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VIZIO, INC.,
Petitioner

_____

IPR2024-00696
U.S. Patent No. 9,247,174

**PETITION FOR *INTER PARTES* REVIEW**
**UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

MULTIMEDIA EXHIBIT 2007
LG v. Multimedia, IPR2024-00352

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## PETITIONER'S EXHIBIT LIST

| | |
|---|---|
| Ex.1001 | U.S. Patent No. 9,247,174 to Sirpal et al. |
| Ex.1002 | Prosecution History of U.S. 9,247,174 |
| Ex.1003 | Declaration of Dr. Andrew Lippman under 37 C.F.R. § 1.68 |
| Ex.1004 | *Curriculum Vitae* of Dr. Lippman |
| Ex.1005 | U.S. Patent Publication No. 2010/0262938 to Woods et al. ("Woods") |
| Ex.1006 | U.S. Patent Publication No. 2002/0060750 to Istvan et al. ("Istvan") |
| Ex.1007 | "*CurioView*: *TV Recommendations Related to Content Being Viewed*," Hideki Sumiyoshi, IEEE International Symposium on Broadband Multimedia System and Broadcasting 2010 ("CurioView") |
| Ex.1008 | U.S. Patent Publication No. 2007/0047920 to Machida et al. ("Machida") |
| Ex.1009 | U.S. Patent Publication No. 2011/0219395 to Moshiri et al. ("Moshiri") |
| Ex.1010 | WO2013133915 to Cherry et al. ("Cherry") |
| Ex.1011 | U.S. Patent Publication No. 2012/0054794 to Kim et al. ("Kim") |

## I. INTRODUCTION

Pursuant to 35 U.S.C. §§ 311, 314(a), and 37 C.F.R. § 42.100, VIZIO, Inc. ("Petitioner") respectfully requests that the Board review and cancel as unpatentable under (pre-AIA) 35 U.S.C. §103(a) claims 1-14 (the "Challenged Claims") of U.S. Patent No. 9,247,174 ("'174 patent," Ex.1001).

The '174 patent relates to basic, known television user interface concepts. For example, the '174 patent describes and claims an "*application panel interface*" that presents different panels (a "*first content panel*" and a "*second content panel*") based on a directional input.

As shown below and confirmed in the Declaration of Dr. Lippman (Ex.1003), the concept switching panels as a user navigates a user interface was already known and would have been obvious to a POSITA. *See generally* Ex.1003. The references presented in this Petition render obvious the Challenged Claims, which should be canceled for unpatentability.

## II. GROUNDS FOR STANDING

Petitioner certifies that the '174 Patent is eligible for IPR, and that Petitioner is not barred or estopped from requesting IPR challenging the patent claims. 37 C.F.R. § 42.104(a).

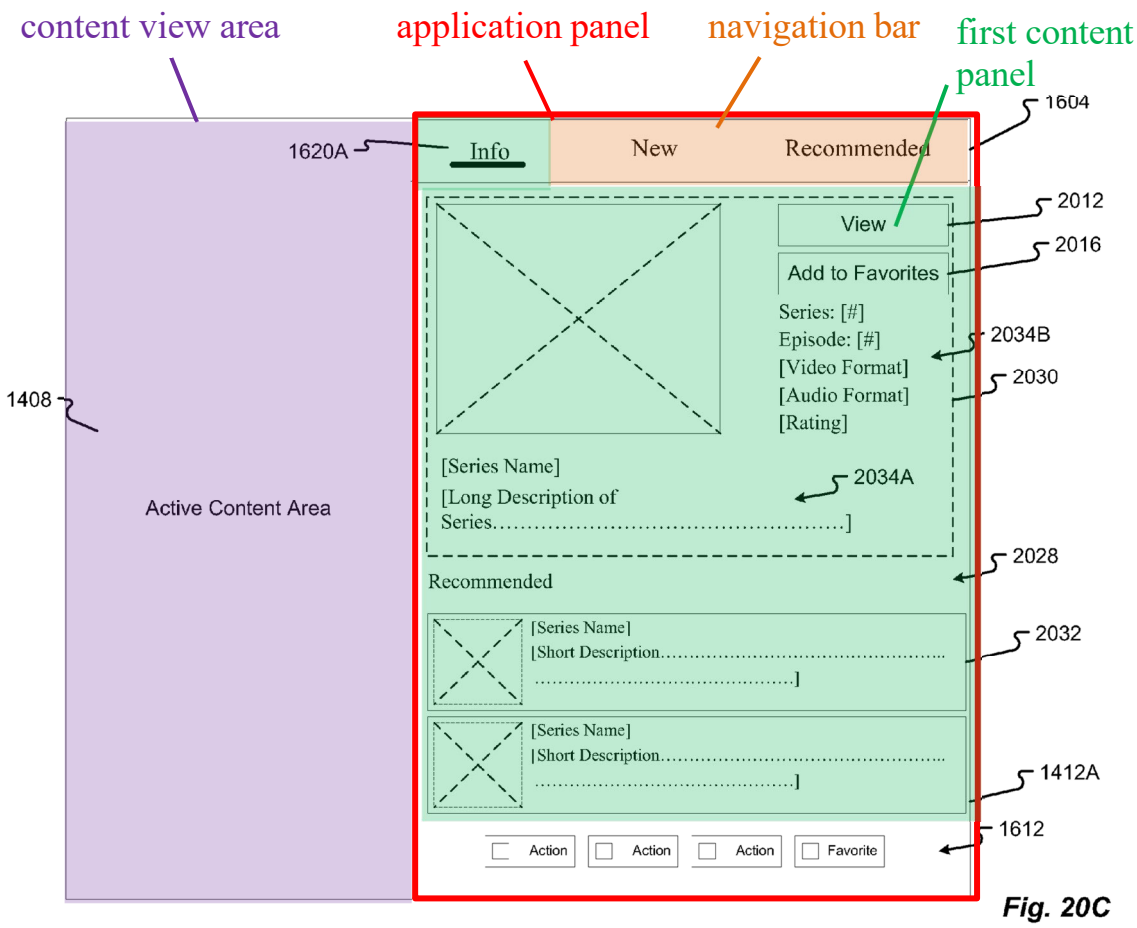
## III. NOTE

Petitioner cites to exhibits' original page numbers. Emphasis in quoted material has been added.

## IV. SUMMARY OF THE '174 PATENT

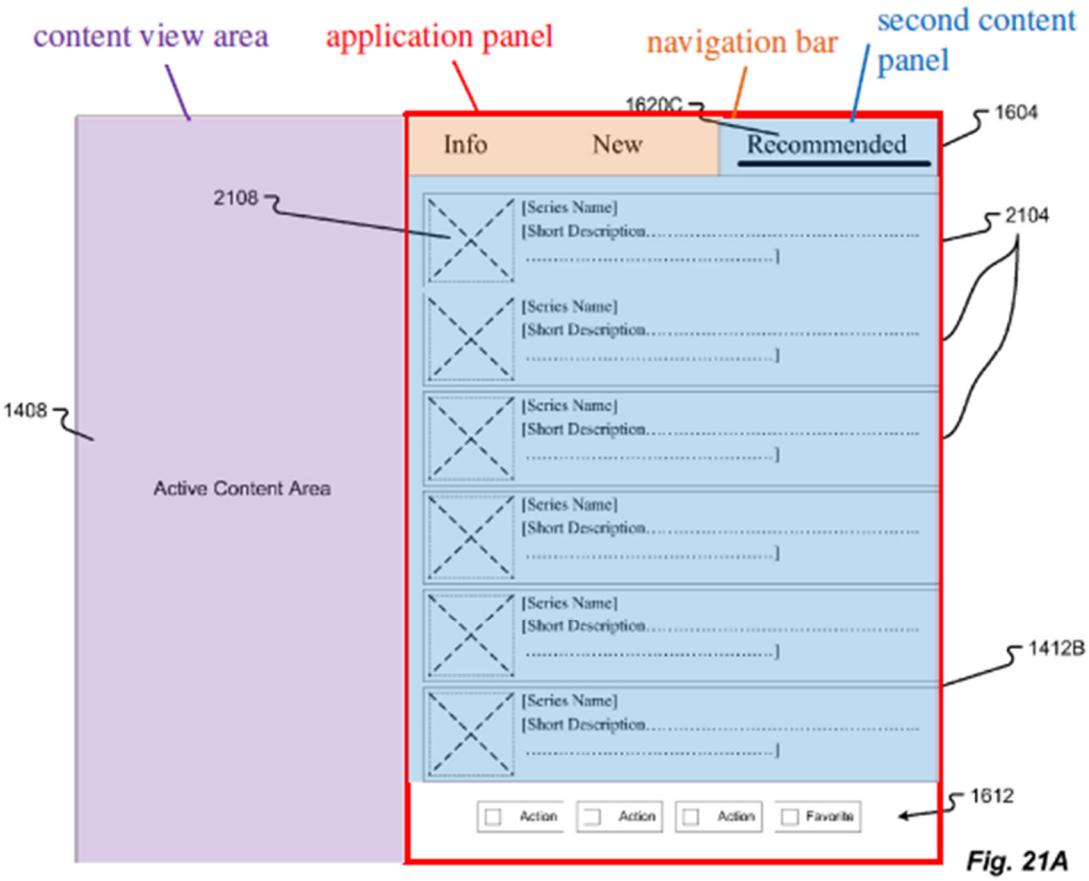
### A. Overview of the '174 Patent

The '174 patent is directed to an "intelligent television and methods for displaying content." Ex.1001, abstract. The '174 patent describes an "*application panel interface*" that includes a "*first content panel*" to display a first type of information. In response to directional inputs from a user, the "*application panel interface*" displays a "*second content panel*" that displays a different type of information. For example, when the "info" item in a navigation bar is highlighted by an indicator, as shown in the annotated figure below, the application panel presents a "*first content panel*" that displays information about the program in the content area.




**Ex.1001, Fig. 20C (annotated); Ex.1003, ¶29.**

Then, when the user moves the indicator to the "recommended" item in the navigation bar, the application panel displays a "*second content panel*" that displays recommended programs as shown in the annotated figure below.




**Ex.1001, Fig. 21A (annotated); Ex.1003, ¶29.**

However, the concept of presenting the user with an application panel and navigating a menu bar with directional inputs such that the information in a content panel within the application panel changes was not new as of the time the '174 patent was filed. Indeed, the Woods reference—described in detail below—shows that these claimed concepts were already known. Ex.1003, ¶¶25-30.

### B. Prosecution History

The '174 patent was filed on August 16, 2013. It claims priority to a series

of provisional applications, the earliest of which was filed on August 17, 2012.

In response to a rejection, the Applicant added claim limitations related to the "application panel interface." Ex.1002, 188-93, 216-27. The Office then allowed the case. Ex.1002, 106-09. However, for the reasons explained below, the concept of an "application panel interface" as well as the other claim limitations of the '174 patent were not new as of the time of filing. Ex.1003, ¶¶31-33.

## V. LEVEL OF ORDINARY SKILL IN THE ART

A Person of Ordinary Skill in The Art ("POSITA") in August of 2012 would have been someone knowledgeable and familiar with the interactive media guide arts that are pertinent to the '174 patent. A POSITA 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. Lack of professional experience can be remedied by additional education, and vice versa. Ex.1003, ¶¶18-20.

## VI. CLAIM CONSTRUCTION

Claim terms in IPR are construed according to their "ordinary and customary meaning" to those of skill in the art. 37 C.F.R. § 42.100(b). *Phillips v. AWH Corp.*, 415 F.3d 1303 (Fed. Cir. 2005) (en banc). Petitioner submits that, for the purposes of this proceeding and the grounds presented herein, no claim term requires

express construction. *Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co.*, 868 F.3d 1013, 1017 (Fed. Cir. 2017). Petitioner further notes that some claim terms are provided with explicit definitions in the specification, as outlined below. The prior art teaches the claim limitations regardless of whether they include the specific definitions below.

### A. "*panel*"

Claims, 1-4 and 8-12 each recite the phrase "*panel*." The phrasing of "*panel*" includes "a user interface displayed in at least a portion of the display." Ex.1001, 7:36-44; Ex.1003, ¶¶37-39.

### B. "*at least one*"

Claims 1, 2, 10, and 11 each recite the phrase "*at least one*." The phrasing of "at least one of A, B, and C" includes "A alone, B alone, C alone, A and B together, A and C together, B and C together, or A, B and C together." Ex.1001, 4:60-67; Ex.1003, ¶¶40-42.

## VII. RELIEF REQUESTED AND THE REASONS FOR THE REQUESTED RELIEF

Petitioner asks that the Board institute a trial for *inter partes* review and cancel the Challenged Claims in view of the analysis below.

## VIII. IDENTIFICATION OF HOW THE CLAIMS ARE UNPATENTABLE

### A. Challenged Claims and Statutory Grounds for Challenge[1]

| Grounds | Claims | Basis |
|---|---|---|
| #1 | 1-14 | 35 U.S.C. § 103 over Woods |
| #2 | 6, 8, and 14 | 35 U.S.C. § 103 over Woods and Istvan |
| #3 | 1-14 | 35 U.S.C. § 103 over Woods and Machida |
| #4 | 6, 8, and 14 | 35 U.S.C. § 103 over Woods, Machida, and Istvan |

Woods was published on October 14, 2010. Istvan was published on May 23, 2002. Machida was published on March 1, 2007. Woods, Istvan, and Machida are all prior art under (pre-AIA) 35 U.S.C. 102(b).

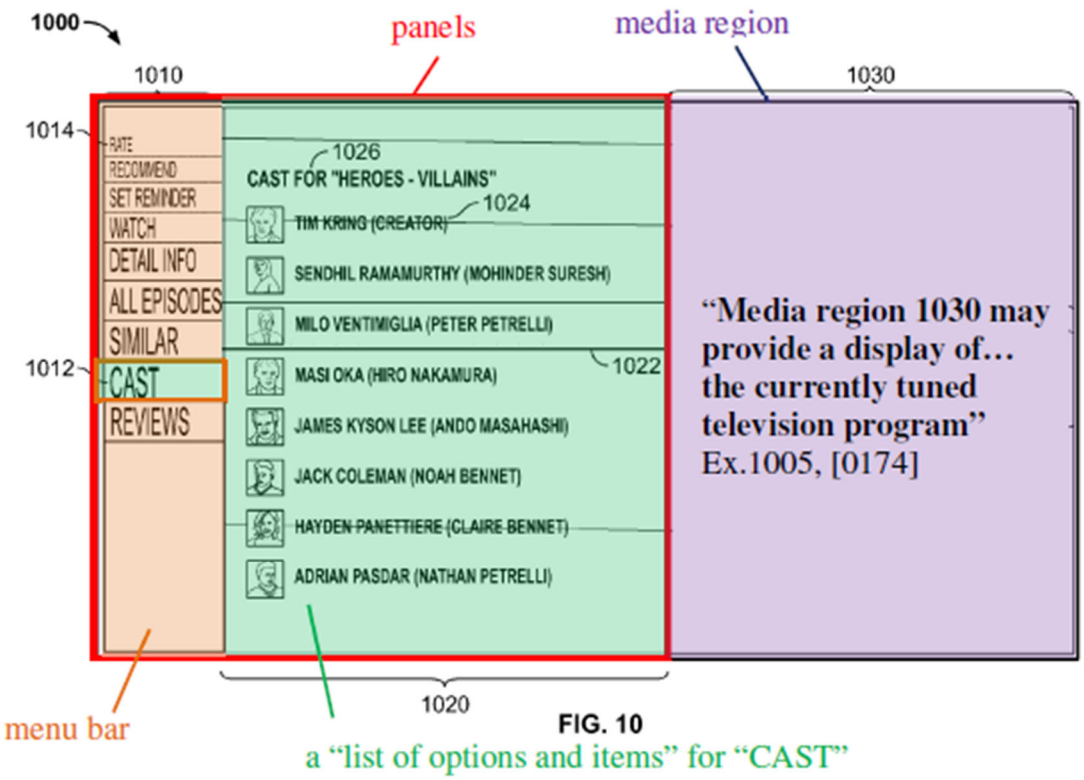
[1] For the combination presented herein, Petitioner relies on the teachings, and not on a physical incorporation of elements. *See In re Mouttet*, 686 F.3d 1322, 1332 (Fed. Cir. 2012); *In re Etter*, 756 F.2d 852, 859 (Fed. Cir. 1985).

### B. Ground 1: Claims 1-14 are obvious under 35 U.S.C. § 103(a) over Woods.

#### 1. Summary of Woods

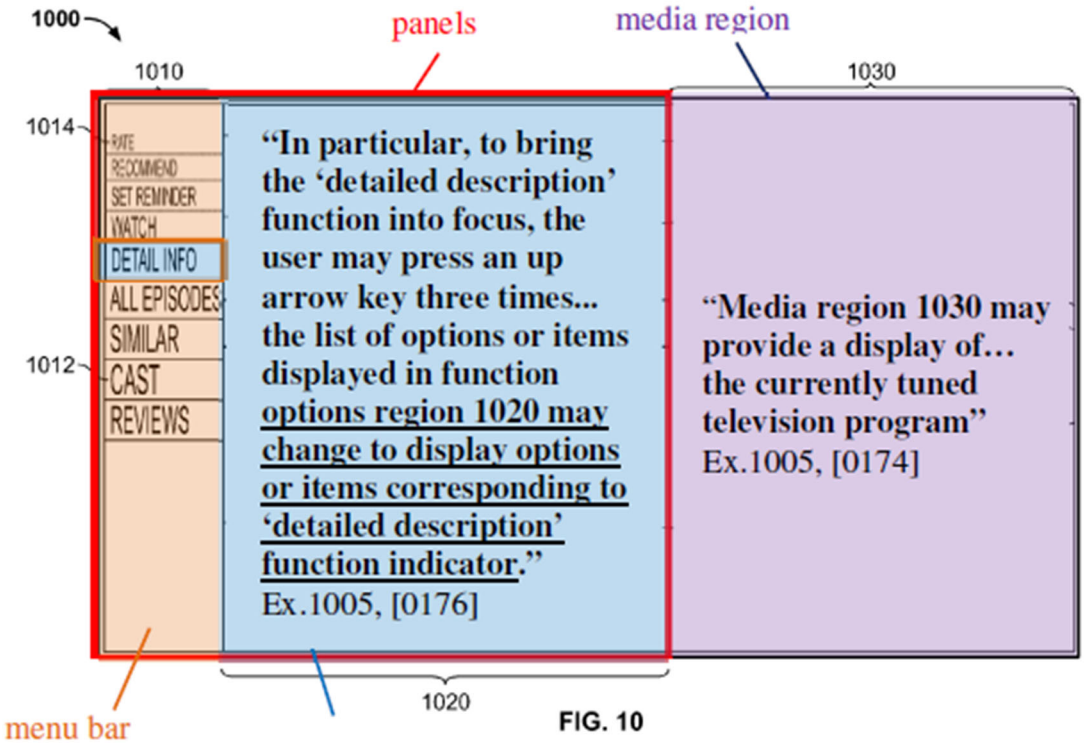
Like the ’174 patent, Woods relates to “systems and methods for navigating a media guidance application with multiple perspective views.” Ex.1005, [0003]. Woods describes an interface that allows a user to navigate a menu bar to change the type of information being displayed about the content currently showing on the television. *See e.g.* Ex.1005, Fig. 10.

For example, when an indicator highlights an item in a menu bar 1010, the options region 1020 displays a first list of options and items (“*first content panel*”) related to the “cast” as shown below.




**Ex.1005, Fig. 10 (annotated); Ex.1003, ¶49.**

Then, when the user moves the indicator to a different item such as the "detailed description" item, the interface displays different options and items ("*second content panel*"), as shown below.




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶50.**

Accordingly, Woods describes an interactive television guide that provides regions 1010/1020 to display information about the program currently being displayed (in media region 1030). The user may use directional inputs to navigate a menu bar 1010 to change the type of options and items displayed in the options region 1020. The following analysis explains in detail how Woods renders obvious each element of the Challenged Claims. Ex.1003, ¶¶43-51.

### 2. Claim 1

**[1.0]** ***A method for displaying content on a television, comprising:***

**First**, Woods discloses user equipment 300 which may be, for example, a television set ("*television*").

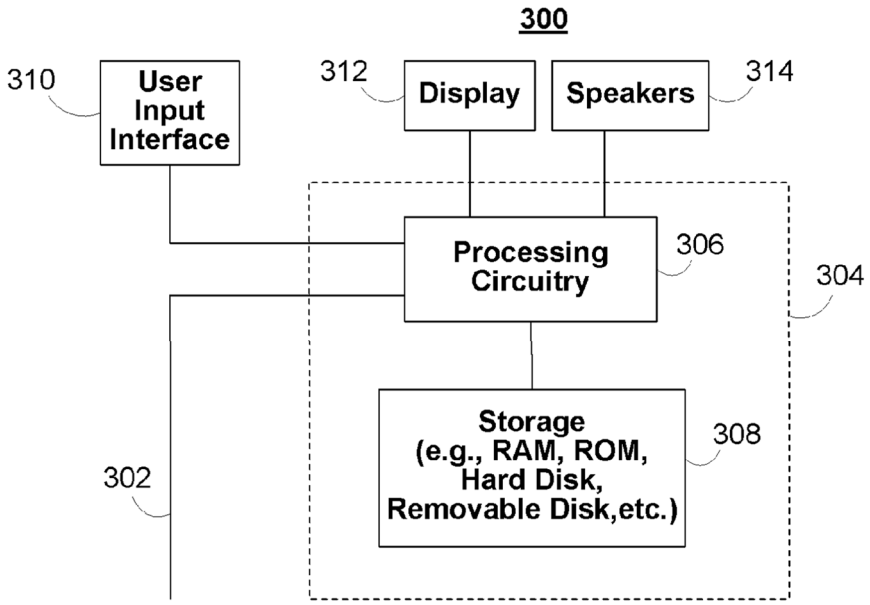
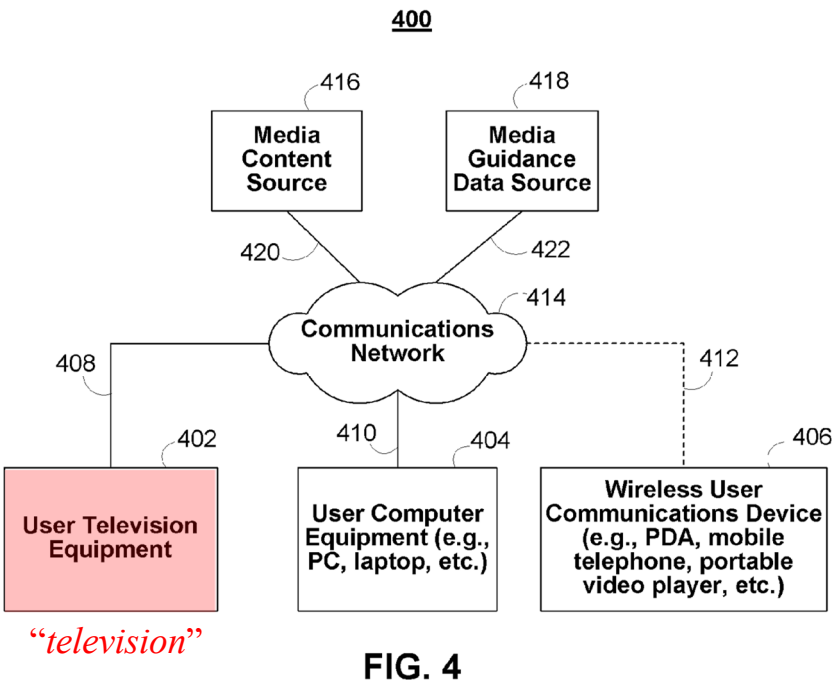



FIG. 3

**Ex.1005, Fig. 3.**

"**<u>User equipment device 300</u> of FIG. 3 can be implemented in system 400 of FIG. 4 as <u>user television equipment 402</u>**." Ex.1005, [0056]; *see also* [0057], [0058].




**Ex.1005, Fig. 4 (annotated); Ex.1003, ¶54.**

**Second**, Woods describes "methods" for navigating a media guidance application, such as an interactive television guide, to "*display[] content*" on the television set. *See* Ex.1005, abstract. Through the television equipment, the user may "access media content and the media guidance application (and its display screens described below)." Ex.1005, [0048]. One example of a television display screen for displaying content is shown below at Figure 10.

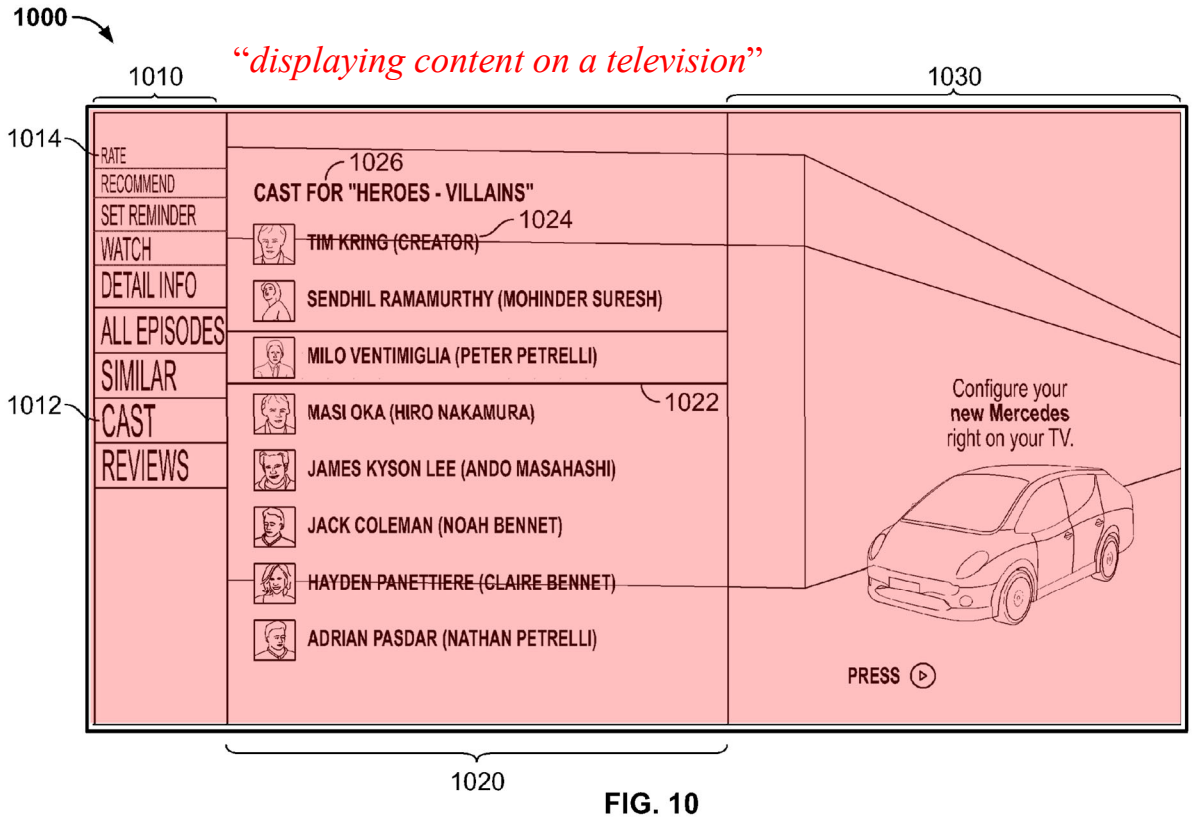



FIG. 10

**Ex.1005, Fig. 10 (annotated); Ex.1003, ¶55.**

Woods' "media guidance application" may be "a **<u>television</u>** program guide" for displaying "media content." Ex.1005, [0034].

Thus, Woods' disclosure of a method for displaying media content on user television equipment 300 renders this limitation obvious. Ex.1003, ¶¶52-57.

**[1.1]** ***receiving a first input via an input device associated with the television;***

**First**, as discussed at the preamble [1.0], Woods discloses user television equipment 300 ("*the television*").

**Second**, Woods teaches "*an input device*" because Woods discloses that television equipment 300 includes "**<u>a user input device</u>**." Ex.1005, [0037]. In the

context of Figure 3, Woods' user input device corresponds to "**<u>user input interface 310</u>**" that is associated with the user television equipment 300.

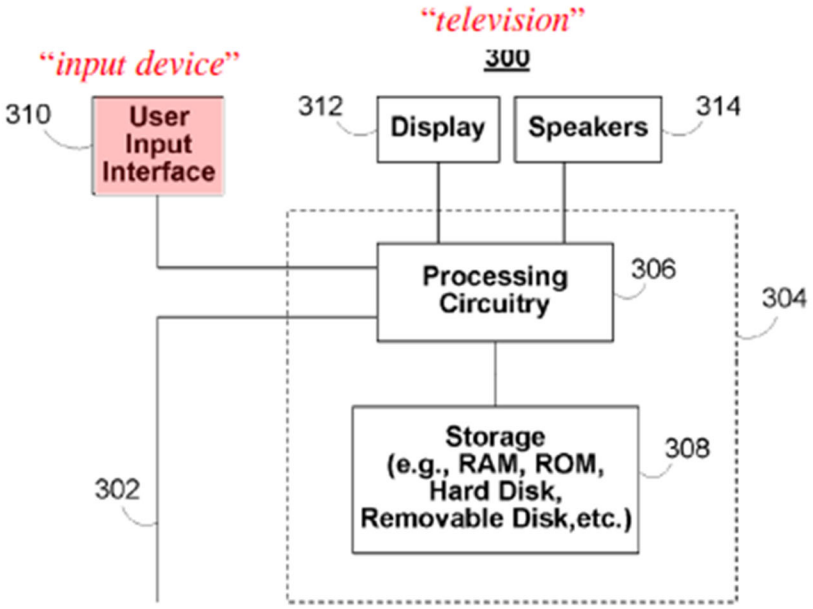


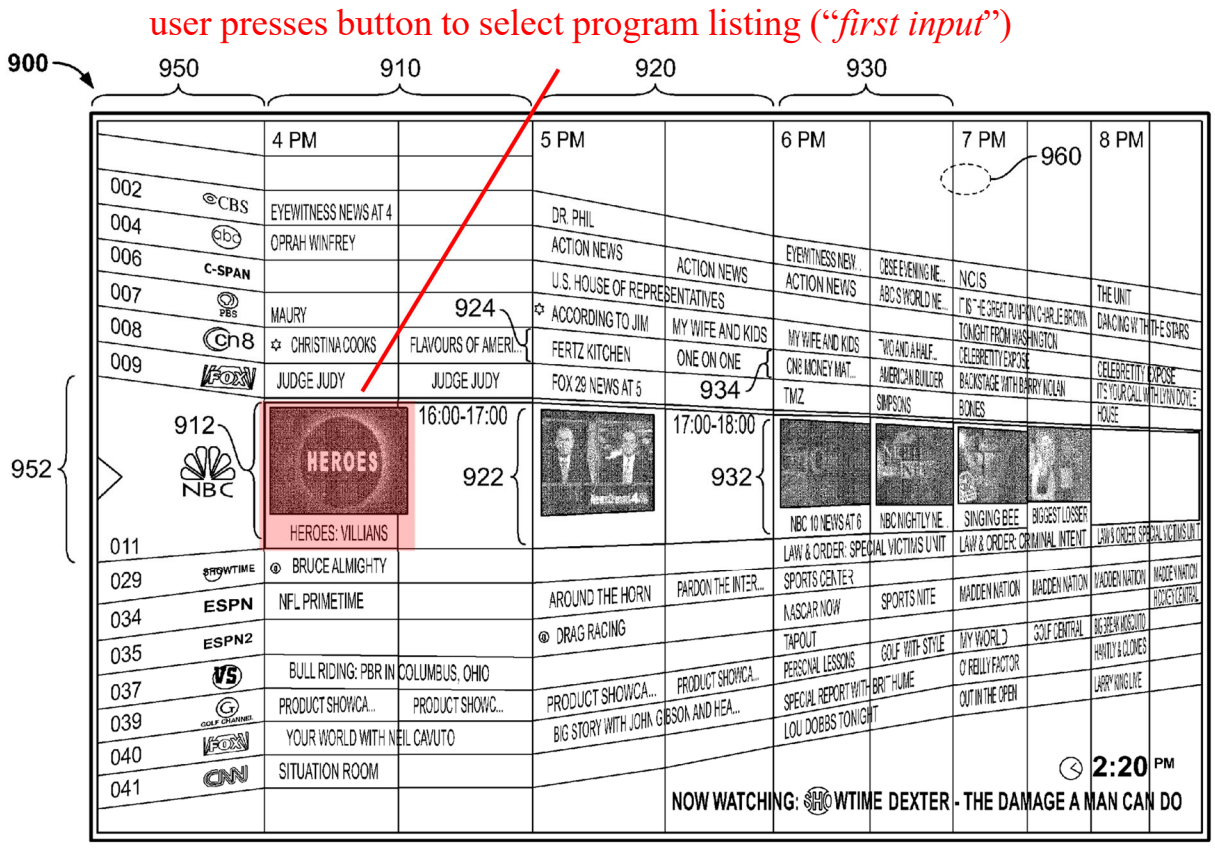

FIG. 3

**Ex.1005, Fig. 3 (annotated); Ex.1003, ¶59.**

Woods discloses that a "user may control the control circuitry 304 using user **<u>input interface 310</u>.**" Ex.1005, [0053]. The input interface 310 may receive commands "**through <u>any input means</u>** such as a remote controller ... or other suitable means." Ex.1005, [0274]. The '174 patent similarly discloses the "user providing an input via **a remote control** or other **input device**." Ex.1005, [0053]; Ex.1001, 43:51-53. While Woods describes other input means, this Petition uses the example in which Woods' input device is a remote control, with the

understanding that any other of Woods' exemplary input means also apply to the analysis below and correspond to the claimed "*input device*." Accordingly, Woods' user input interface 310 (e.g., a remote control) that is associated with the user television equipment 300 teaches "*an input device associated with the television,*" as claimed.

**Second**, Woods teaches "*receiving a first input*" through the input interface 310 because Woods discloses receiving input commands to select a program listing via the user input interface 310. *See* Ex.1005, [0053], [0037]. In one example, "[t]he user may navigate within portions of the media guidance objects to **<u>select a desired program listing</u> corresponding to a media asset**. For example, the user may navigate up/down within program source information region 950 to select a desired program source." Ex.1005, [0156]. For example, "the user may first have selected a program listing corresponding to the media asset 'Heroes.'" Ex.1005, [0184].




**Ex.1005, Fig. 9 (annotated); Ex.1003, ¶65.**

The program listing selected from screen 900 corresponds to either a broadcast program or an on-demand program. Woods discloses that "[i]n some embodiments, all the program listings displayed in the second perspective view correspond to media assets that are **<u>broadcast during a particular time interval</u>**." Ex.1005, [0160]. Woods further discloses that "[i]n some implementations, some of the program listings displayed in the second or third perspective views may correspond to **<u>video-on-demand media assets or previously recorded media assets</u>**." Ex.1005, [0161].

Woods provides examples of how a user may select a program listing (e.g., broadcast, video-on-demand, or recorded media) via the user input interface 310 (e.g., pressing a button on a remote control). *See, e.g.,* Ex.1005, [0036] ("A user may indicate a desire to access media information by selecting a selectable option provided in a display screen (e.g., a menu option, a listings option, an icon, a hyperlink, etc.) or pressing a dedicated button (e.g., a GUIDE button) on a remote control or other user input interface or device."), [0099], [0097]. It would have thus been obvious to a POSITA for the user to select a program listing (e.g., broadcast or video-on-demand) from screen 900 by pressing a button on a remote control (of user input interface 310). Ex.1003, ¶67.

Thus, Woods' disclosure of receiving a user's input command to select a program listing via the user input interface 310 (e.g., by pressing a button on a remote control), renders this limitation obvious. Ex.1003, ¶¶58-68.

**[1.2]** ***in response to the first input, displaying, via the television, an application panel interface;***

**First**, as discussed at [1.1], Woods discloses receiving a user's input command to select a program listing ("*first input*").

**Second**, Woods discloses that in response to the user selecting a program listing ("*in response to the first input*"), the television displays to the user display screen 1000 with functions menu bar 1010 and function options region 1020 that

together teach an "*application panel interface*." Ex.1005, [0170]; *see also* Ex.1005, [0036] ("A user may indicate a desire to access media information by selecting a selectable option provided in a display screen…**<u>In response to the user's indication</u>**, **the media guidance application may provide a display screen with media information**….").

As shown below in Fig. 10, in response to the user selecting the program listing corresponding to "Heroes," (see Ex.1005, [0184]), the television displays screen 1000 with functions menu bar 1010 and function options region 1020, which together correspond to "*an application panel interface*."

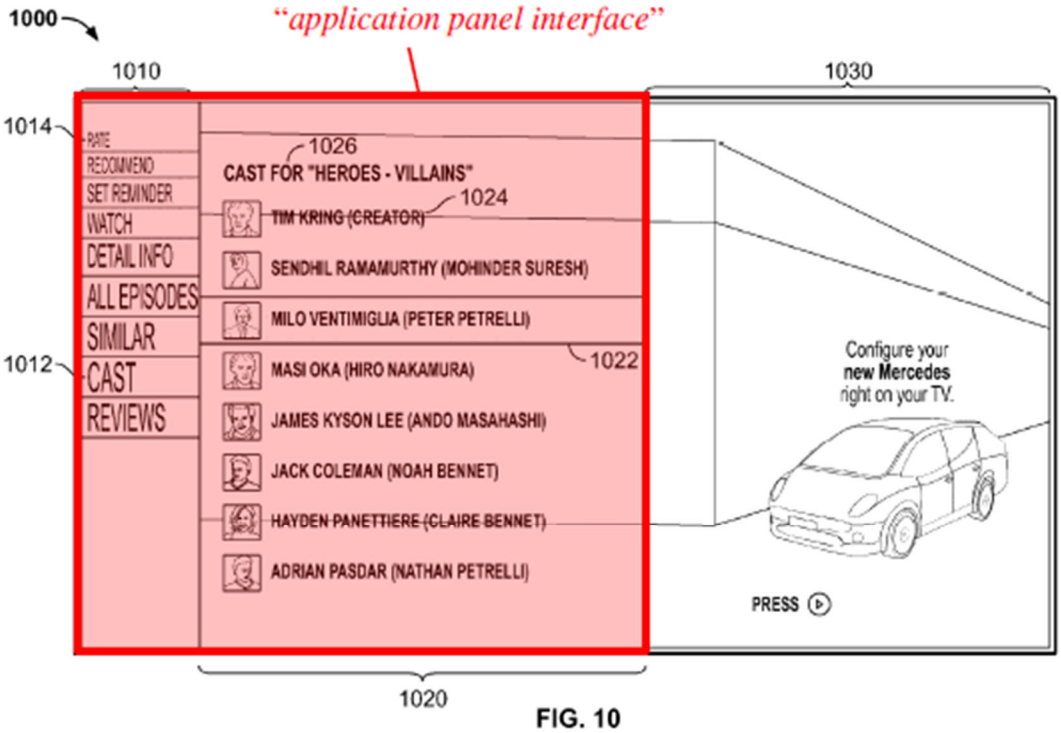


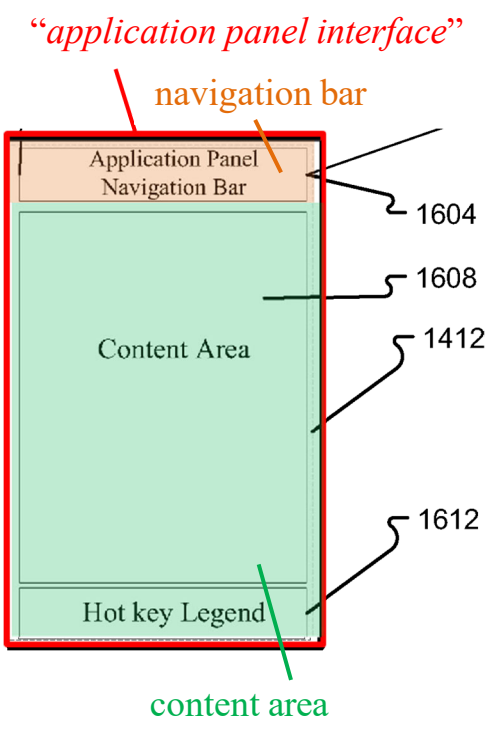

FIG. 10

**Ex.1005, Fig. 10 (annotated); Ex.1003, ¶71.**

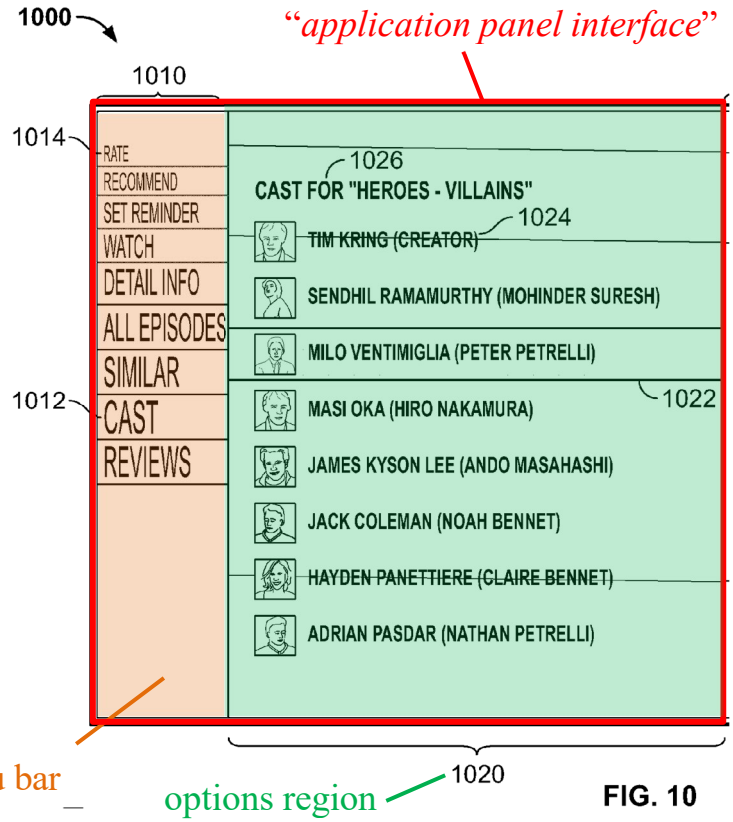
**<u>Functions menu bar 1010</u>** may display of list of indicators of functions associated with the media asset corresponding to the program listing selected from screen 900 (FIG. 9) or a media asset selected in accordance with other embodiments of the invention." Ex.1005, [0171]. "**<u>Function options region 1020</u>** may display a list of options or items relating to the indicator of the function in focus in functions menu bar 1010." Ex.1005, [0175].

As noted in the Claim Construction Section, the '174 patent states that the term "*panel*" includes "a user interface displayed in at least a portion of the

display." Ex.1001, 7:36-37. Woods' regions 1010 and 1020 similarly display a user interface in a portion of the screen as shown in Figure 10 and therefore correspond to a "*panel*." Regions 1010 and 1020 are a user "*interface*" because they provide the user with the ability to interact with the media guidance application through directional controls, as will be described in further detail below. Moreover, Woods' regions 1010 and 1020 are analogous to the description of the "*application panel interface*" in the '174 patent. As explained above in the Overview of the '174 Patent, the "*application panel interface*" includes a navigation bar 1604 and content area 1608, which is analogous to Woods menu bar 1010 and options region 1020 as shown below.




**Ex.1001, Fig. 16A (partial, annotated); Ex.1003, ¶72.**




**Ex.1005, Fig. 10 (partial, annotated); Ex.1003, ¶72.**

Whether the menu bar is horizontal or vertical is an obvious difference. Ex.1005, [0173] ("menu bar 1010 may be displayed horizontally on the screen (instead of vertically as shown"). Ex.1003, ¶73.

Thus, Woods discloses that in response to the user's input command to select a program listing (e.g., with a remote control), displaying, via the television, a functions menu bar 1010 and a function options region 1020 corresponding to the selected program listing, which renders this limitation obvious. Ex.1003, ¶¶69-74.

**[1.3]** ***determining content currently being shown on the television;***

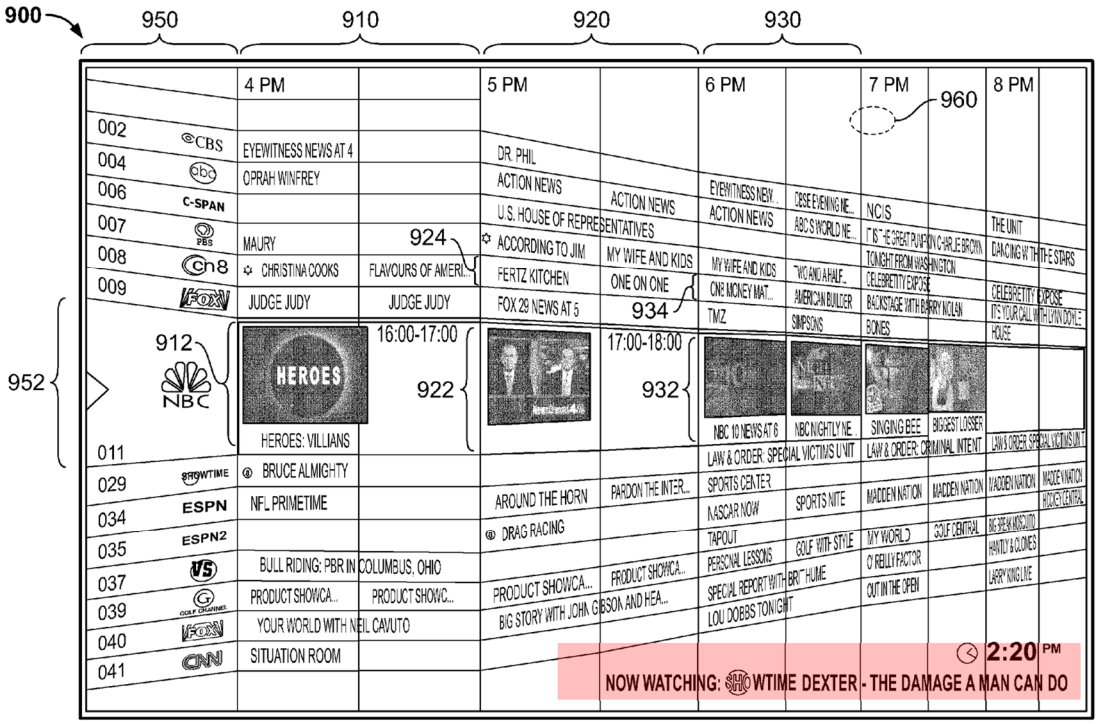
**First**, as discussed at the preamble [1.0], Woods discloses user television equipment 300 ("*the television*").

**Second**, Woods teaches "*determining content currently being shown*" because Woods discloses that the processing circuitry 306 of the user television equipment 300 highlights or brings to focus the program guide listing corresponding to the content currently tuned and displayed on the television. "When the user first enters screen 900, processing circuitry 306 may **highlight or bring into focus** ... **the currently tuned program or program being currently accessed.**" Woods further discloses that "**The currently tuned or accessed program may also be displayed** behind the program schedule information." Ex.1005, [0155]. To do this, the "program schedule information displayed in screen 900 may be partially transparent such that both the program schedule information and the currently tuned to or accessed program can be seen simultaneously." *Id*.

Accordingly, Woods' processing circuity 306 "*determine[es] the content currently being shown on the television*" because it highlights or focuses that content within the program guide of Fig. 9.

Woods' Figure 9 (although not illustrated as partially transparent) also indicates that the television has determined that at time 2:20PM the user is "NOW WATCHING: SHOWTIME DEXTER- THE DAMAGE A MAN CAN DO."

Woods discloses that "[P]rogram schedule information displayed in screen 900 may be partially transparent such that both the program schedule information and the currently tuned to or accessed program can be seen simultaneously" Ex.1005, [0155].

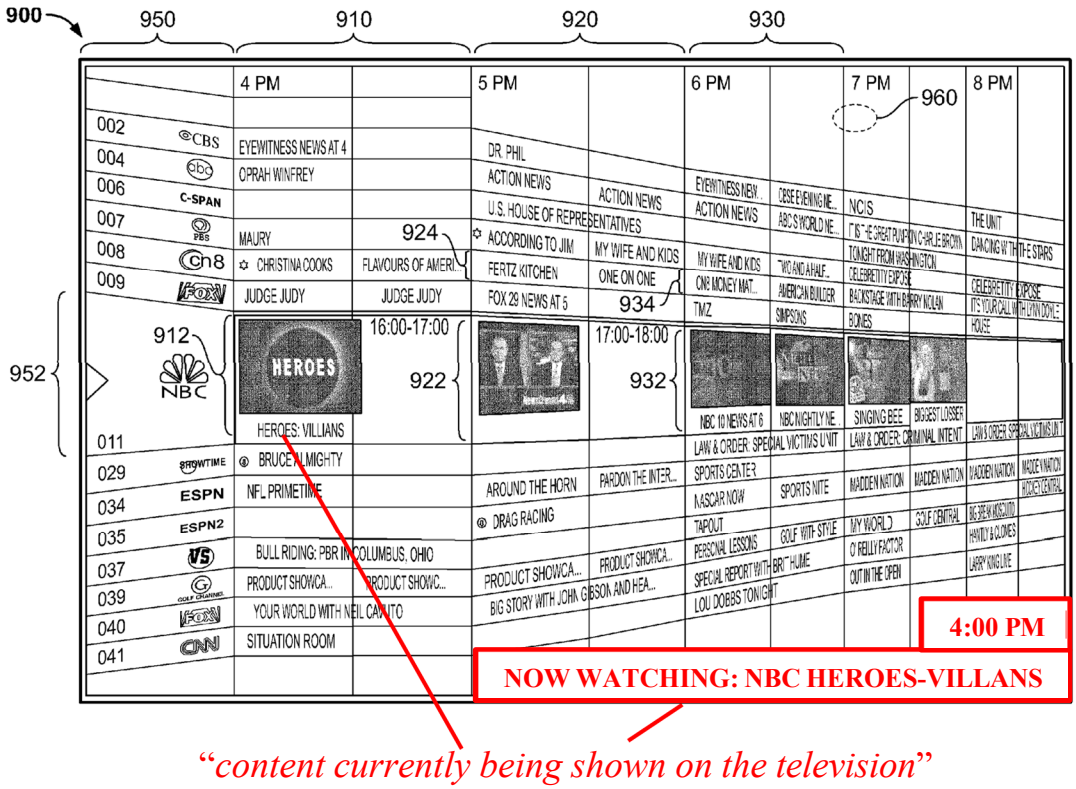



**Ex.1005, Fig. 9 (annotated); Ex.1003, ¶78.**

A POSITA would have recognized that when a different program is being watched at a different time, display screen 900 would display differently. Ex.1003, ¶79. For example, the information at the bottom of the screen would show different program information than what is illustrated in Fig. 9. To illustrate by example, Woods describes that the user is interested in the show "Heroes." *See, e.g.,* Ex.1005, [0184] ("In particular, the user may first have selected a program listing

corresponding to the media asset 'Heroes.'"). In the particular circumstance when the time is 4:00PM and the user is watching "Heroes," the information at the bottom of the screen 900 would indicate, for example, that the user is "NOW WATCHING: NBC HEROES-VILLANS."

For reference, modified Figure 9, as shown below to illustrate the scenario where the program "Heroes," is currently being watched at 4:00PM.




**Ex.1005, Fig. 9 (modified/annotated); Ex.1003, ¶80.**

As noted above, "**[w]hen the user first enters screen 900, processing circuitry 306 may <u>highlight or bring into focus the program listings</u> corresponding to the currently tuned program or program being currently**

**accessed**." Ex.1005, [0155]. A POSITA would have recognized that in the circumstance where the user is watching the show Heroes, the processing circuitry 306 would highlight or bring into focus the program listing corresponding to Heroes when the user enters screen 900. It would have been obvious for Woods' processing circuitry 306 to "*determin[e]*" what program is currently tuned and displayed so that corresponding information about the program may be displayed at the bottom of the screen and so that the program listing may be highlighted or brought into focus on screen 900. Ex.1003, ¶81.

Additionally, Woods discloses that the user viewing screen 900 of Figure 9 may select the highlighted program listing to access the interface of Figure 10, which includes region 1030 that also displays the currently tuned television program. Ex.1005, [0174] ("Media region 1030 may provide a display of **... <u>the currently tuned television program</u>**"). Ex.1003, ¶82.

Woods' Figure 10, reproduced below has been modified and annotated to illustrate that instead of showing an advertisement, it displays the "currently tuned television program" in media region 1030.

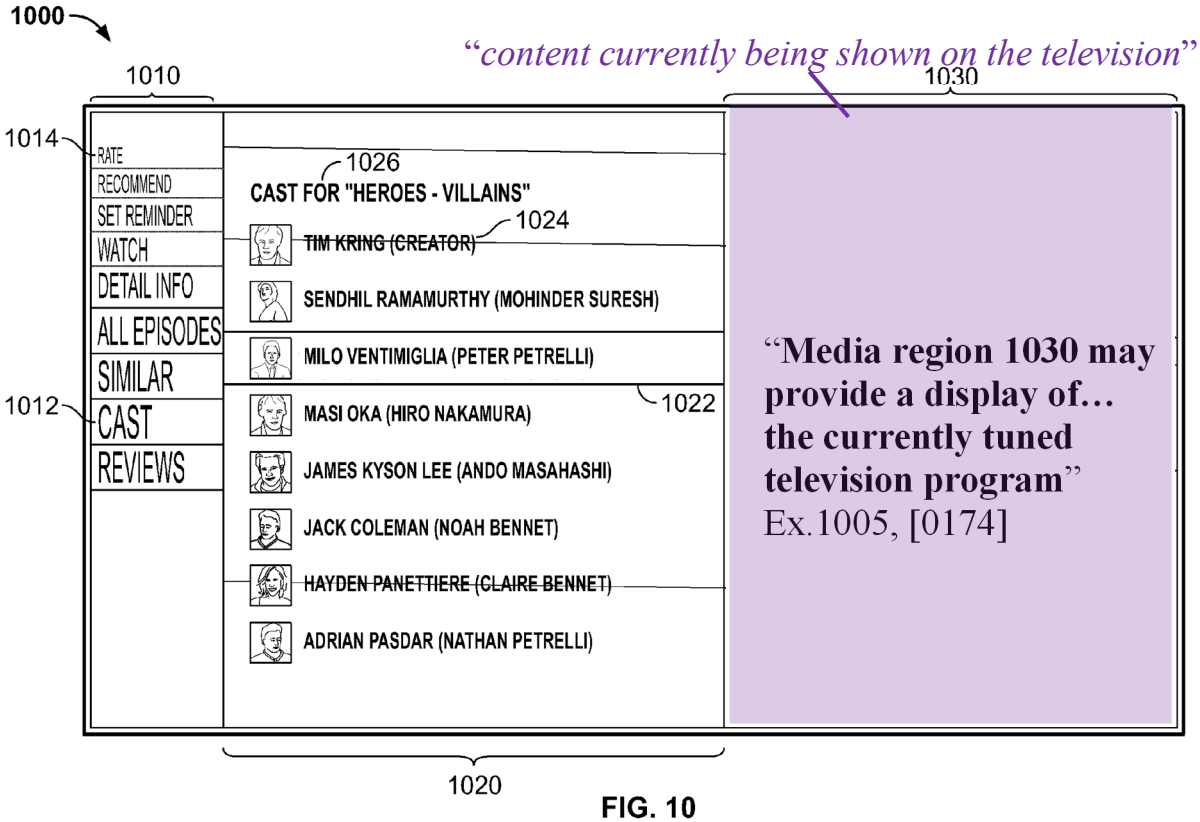



FIG. 10

**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶82.**

It would have thus been obvious to a POSITA for Woods' processing circuitry 306 to "*determin[e]*" what program is currently watched (e.g., simultaneously in Figure 9) so that it may be displayed in media region 1030. Indeed, Woods' teaching is consistent with the '174 patent's determining teaching. Ex.1001, 9:50-54 ("The terms 'determine,' 'calculate,' and 'compute,' and variations thereof, as used herein, are used interchangeably and include **any type of methodology, process, mathematical operation, or technique**.").

A POSITA would have recognized that there were many types of methodologies to determine the content currently being displayed on the television.

One such known methodology would be for the media guidance application to obtain metadata about the content currently being displayed. *See* Ex.1007, 2 ("**Metadata associated with the content that the viewer is watching** is obtained from the metadata server (2)(3) by using the **content ID** and playback position information obtained from the display system (1)").

Thus, Woods teaches determining the program currently shown on the television so that it may highlight or bring into focus the program listing corresponding to the currently tuned program being displayed on the television, which renders this limitation obvious. Ex.1003, ¶¶75-85.

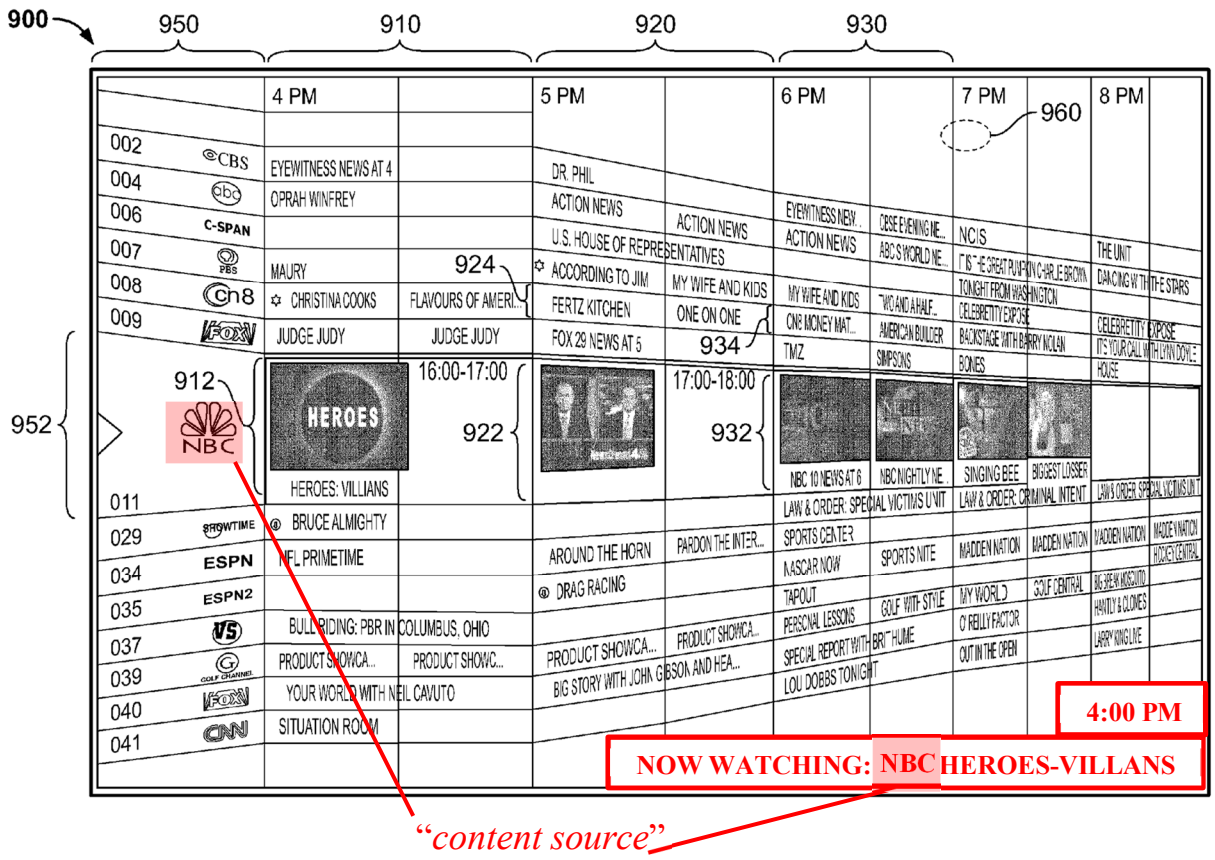
**[1.4.1]** ***identifying at least one of a content source and content information***

As a threshold matter, the claim's recitation of "*at least one of*" requires either a "*content source*" **or** a "*content information*" to be identified, but not necessarily both. *See* Ex.1001, 4:60-67. Nevertheless, Woods identifies both *"content source"* and *"content information*."

**First**, Woods teaches the claimed "*content source*" by disclosing a "media content source," "program source," and "broadcasters" or "providers" of the program currently tuned and displayed (shown) on the television. Ex.1005, [0065], [0036]. "Program source information region 950 may include text (e.g., source name), icons (e.g., source logo), or any other visual indicator that is unique to a **<u>particular program source</u>** that allows the user to associate the program source

information with the program source of the programs." Ex.1005, [0153]. "Information about the currently tuned to or accessed program may also be displayed at, for example, the bottom of the screen. The information may include ... the **program source of the program**." Ex.1005, [0155].

Consistent with the example provided where the user is watching the Heroes program at 4:00PM, as shown below at modified Figure 9 (*See* [1.3]), screen 900 (which can "be partially transparent such that both the program schedule information and the currently tuned to or accessed program can be seen simultaneously") displays program source 950 and program source information at the bottom of the screen (e.g., broadcaster "NBC").



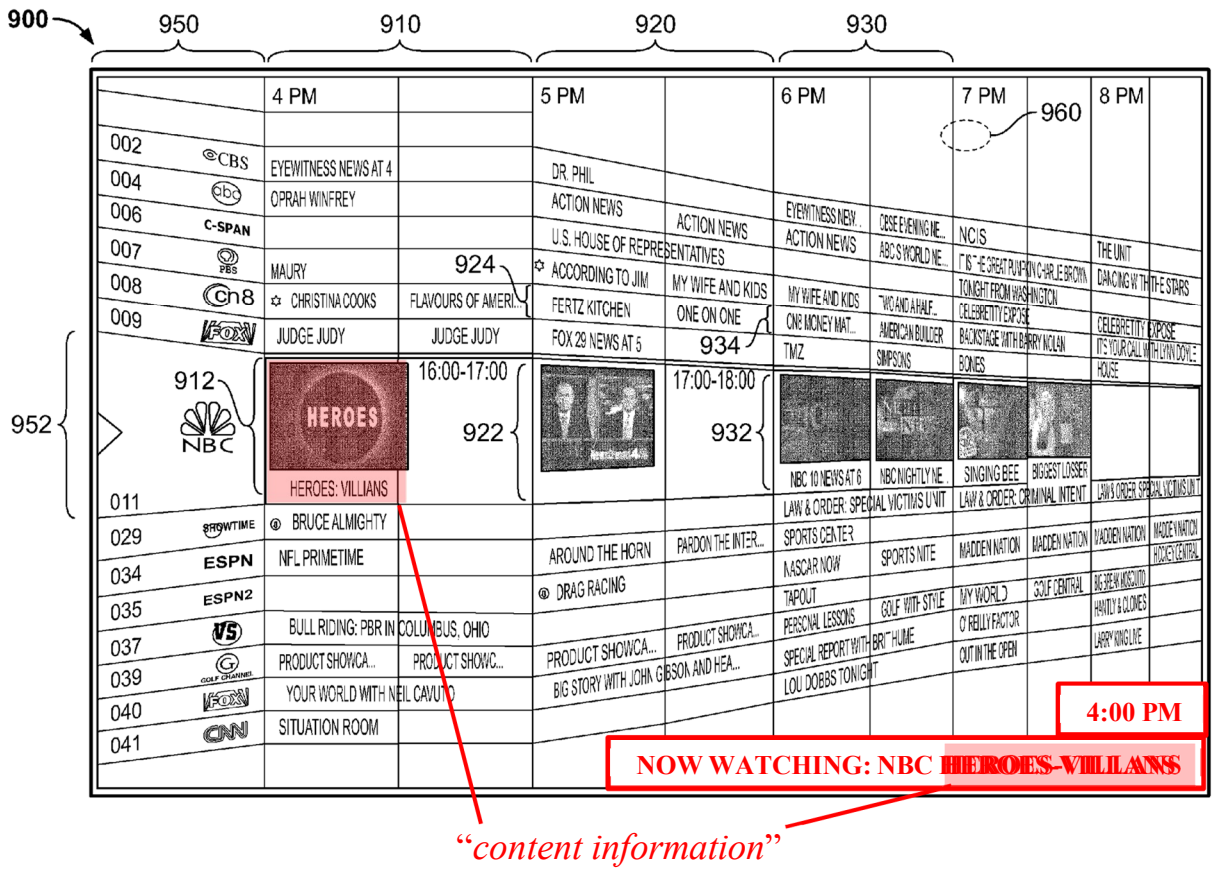

**Ex.1005, Fig. 9 (modified/annotated); Ex.1003, ¶88.**

The program source can be retrieved from a media content source 416. In particular, the "media guidance application [is used] to communicate directly with **<u>media content source 416 to access media content</u>**." Ex.1005, [0071]. "**<u>Media content source 416</u>** may include ... programming sources (e.g., television broadcasters, such as NBC, ABC, HBO, etc." Ex.1005, [0064].

Accordingly, Woods' disclosure of media content source (e.g., one or more of programming source, on-demand source, broadcasters, providers, and other media content provider, etc.) corresponds to a "*content source*."

**Second,** Woods teaches the claimed "*content information*" by disclosing information such as title, name, short description, etc., of the program currently tuned and displayed (shown) on the television. "**Information about the currently tuned to or accessed program may also be displayed** at, for example, the bottom of the screen. The information may include the **title or name of the program** or media asset being accessed ... and a **short description of the program** or media asset." Ex.1005, [0155], Fig. 9.

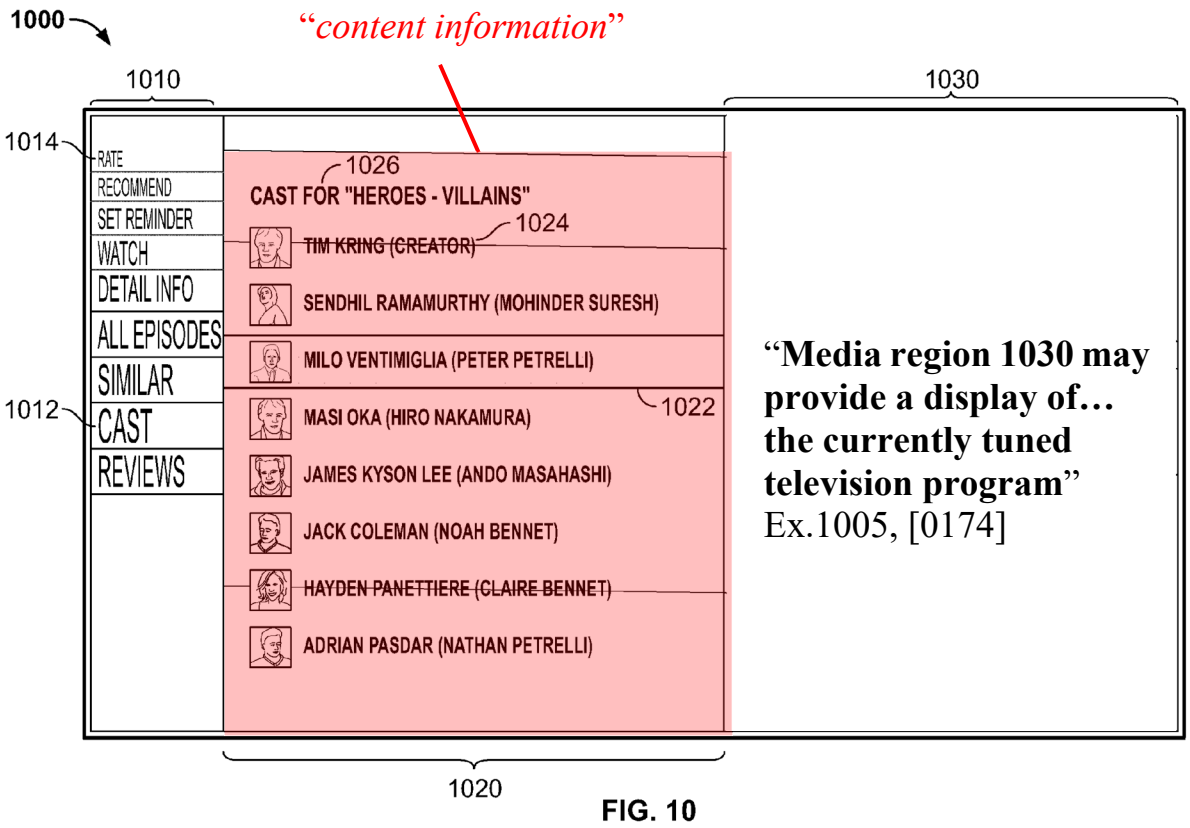
As shown below at modified Figure 9 (*See* [1.3]), screen 900 (which can "be partially transparent such that both the program schedule information and the currently tuned to or accessed program can be seen simultaneously") displays content information (e.g., title or name of the program, "HEROES-VILLIANS").




**Ex.1005, Fig. 9 (modified/annotated); Ex.1003, ¶92.**

Additional content information may be displayed when the user selects a program listing from screen 900 of Figure 9, as shown below in the context of Figure 10. Under such an operation, "Functions menu bar 1010 may display of list of indicators of functions associated with the media asset." Ex.1005, [0171]. "Some of the functions that may be associated with a particular media asset may include requests for **reviews**, **a list of the cast members**, list of similar media assets, broadcast or schedule information of the media asset (which may include other air times of the media asset), a list of all episodes of the media asset, **detailed**

**description** of the media asset, watch or access the media asset, set or schedule reminders for the media asset, schedule a recording for the media asset, provide **a rating** for the media asset." Ex.1005, [171].




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶93.**

Woods further explains that the content information can be retrieved from a media guidance data source 418. Woods states that "guidance data from media guidance data source 418 may be provided to users' equipment using a client-server approach." Ex.1005, [0066]. "**Media guidance data source 418** may provide media guidance data, such as media listings, media-related information

(e.g., broadcast times, broadcast channels, **media titles, media descriptions, ratings information** (e.g., parental control ratings, critic's ratings, etc.), **genre or category information, actor information**." Ex.1005, [0065]; *see also* [0036].

Accordingly, Woods' content information (e.g., one or more of name or title of the program, list of cast members, actor information, genre or category information, detailed description, rating, etc.) correspond to a "*content information.*"

**Third**, Woods discloses "*identifying*" the "*content source*" and "*content information*" in many ways. For example, Woods discloses that the media guidance application locates and retrieves content source data from the media content source 416 and content information data from the media guidance data source 418, as analyzed immediately above. This is consistent with the '174 patent which contemplates "identifying and recalling stored information." Ex.1001, 15:58-60. Accordingly, it would have been obvious to a POSITA for Woods' processing circuity 306 to identify data (e.g., content source and content information) in order to locate it in memory and retrieve the content so that it may be displayed.

Furthermore, Woods explains that its television set includes memory storage 308, which "may be used to store various types of media described herein and **guidance application data, including program information**, guidance

application settings, user preferences or profile information, or **other data used in operating the guidance application**." Ex.1005, [0051]. To display information, the "**[p]rocessing circuitry 306 may determine where media guidance objects are stored** and ... may retrieve [the] media guidance objects from the memory." Ex.1005, [0270]. Accordingly, Woods "*identif[ies]*" the "*content source*" and "*content information*", for example, by locating and retrieving it from the media content source 416 and the media guidance data source 418.

Moreover, Woods "*identif[ies]*" the "*content source*" by displaying source information, e.g., icons, logos, any other visual indicator that is unique. Woods explains that "icons (e.g., source logo), or any other visual indicator that is unique to a particular program source that **allows the user to associate the program source information with the program source of the programs**." Ex.1005, [0153]. Similarly, Woods "*identif[ies]*" the "*content information*" via the display (see e.g., Figures 9 and 10, identifying "HEROES-VILLIANS").

In summary, Woods' individual steps of locating, retrieving, and displaying information (see e.g., Figures 9 or 10), separately and together renders obvious "*identifying*" as claimed. Thus, Woods renders this limitation obvious. Ex.1003, ¶¶86-100.

**[1.4.2] [*the content source and content information are] associated with the***

***content currently being displayed via the television[2];***

**First,** as analyzed at [1.3], Woods discloses determining the program currently tuned and displayed (shown) on the television ("*the content currently being displayed via the television*").

**Second**, as analyzed at [1.4.1], Woods discloses content source (e.g., one or more of programming source, on-demand source, and other media content provider, etc.) ("*content source*") and content information (e.g., one or more of name or title of the program, list of cast members, actor information, genre or category information, detailed description, rating, etc.) ("*content information*.")

The content source and content information are "*associated with the content currently being displayed*" because they correspond to "[i]nformation **<u>about the currently tuned to or accessed program</u>**" which "can be seen simultaneously" on the display of the television. Ex.1005, [0155].

Furthermore, the noted information disclosed in the context of Figure 10's menu bar 1010 and options region 1020 is also "*associated with the content currently being displayed*" because it corresponds to the program listing selected by the user that is currently displayed in region 1030. Woods discloses that

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[2] The term "***<u>the</u>*** *content currently being displayed via the television*" appears to refer to the previously recited "*content currently being shown on the television*."

"[f]unctions menu bar 1010 may display of list of indicators of functions associated with the media asset corresponding to the program listing selected from screen 900 (FIG. 9)." Ex.1005, [0171]. Also, "[m]edia region 1030 may provide a display of… the currently tuned television program… corresponding to the program listing selected from screen 900 (FIG. 9) or a media asset selected." Ex.1005, [0174]; *see also* Ex.1005, [0184] ("[T]he user may first have selected a program listing corresponding to the media asset 'Heroes.'").

Figure 10 illustrates an example in which the identified "cast" information is displayed on the television screen with the currently tuned television program (HEROES-VILLIANS, *See* [1.3]).

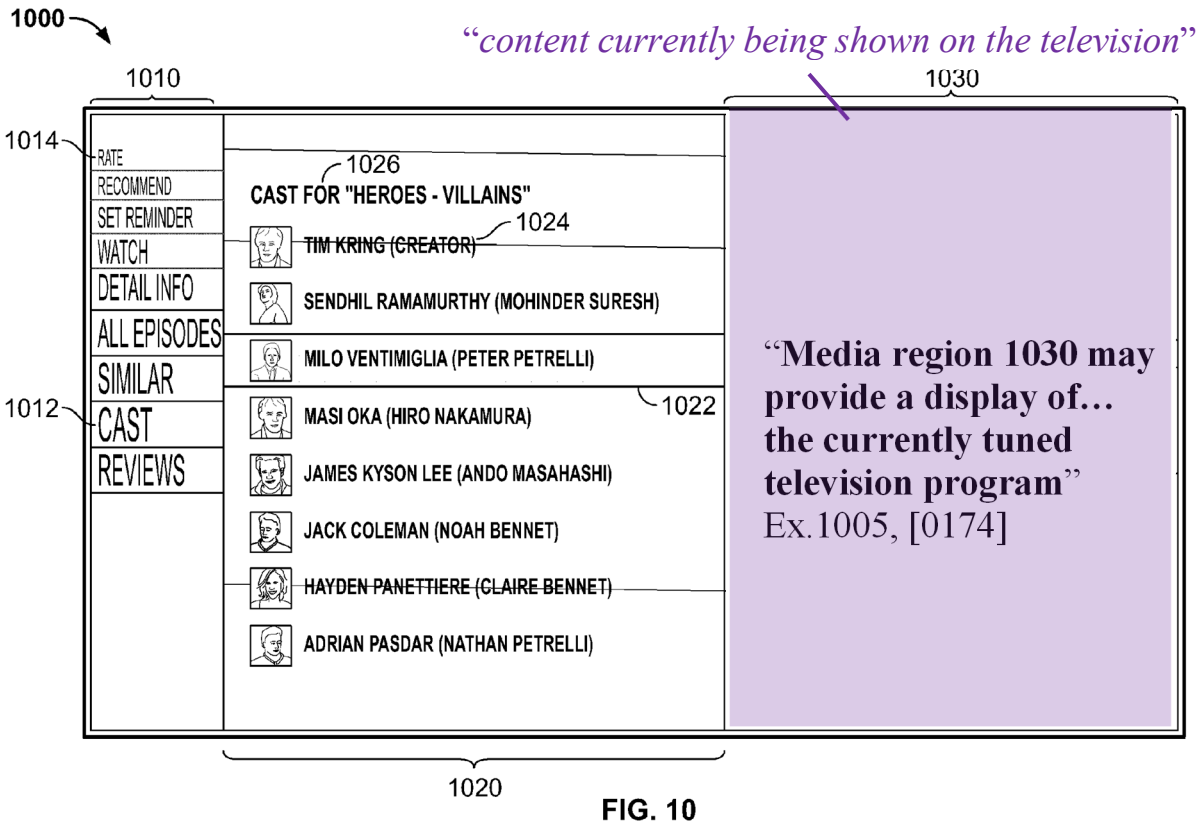



FIG. 10

**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶105.**

Thus, Woods' disclosure of source and content information about the tuned program currently being displayed on the television renders this limitation obvious. Ex.1003, ¶¶101-06.

**[1.5.1]** ***based on the content and the at least one of the content source and the content information, providing a first content panel in the application panel interface,***

**First**, as discussed at [1.2], Woods, in the context of Figure 10, discloses functions menu bar 1010 and function options region 1020 (collectively "*the application panel interface*").

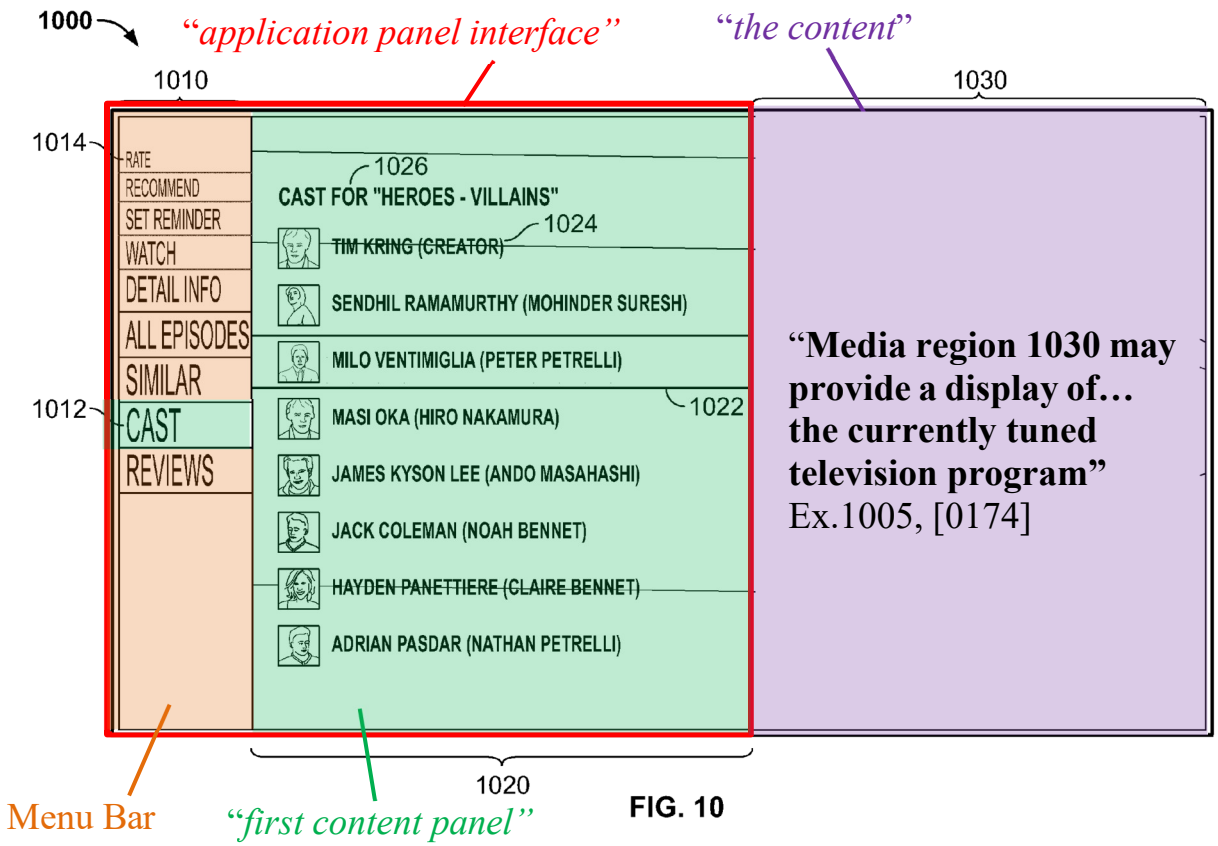
Further, consistent with the analysis at [1.3], Woods Figure 10 is based on

the selected program which corresponds to the program watched by the user.

As discussed at elements [1.4.1]-[1.4.2], Woods discloses identifying source and content information ("*the content source and the content information*") about the program currently being displayed on the television ("*the content*").

**Second**, Woods teaches a "*first content panel*" as claimed. As noted above, the '174 patent defines a panel as "a user interface displayed in at least a portion of the display." Ex.1001, 7:36-37. Similarly, Woods discloses that a "list of options or items" related to the selection in the menu bar is displayed within options region 1020. Ex.1005, [0175]; *see also* Ex.1005, [0174] ("Media region 1030 may provide a display of… the currently tuned television program… corresponding to the program listing selected from screen 900 (FIG. 9) or a media asset selected."), [0184] ("[T]he user may first have selected a program listing corresponding to the media asset 'Heroes.'").

Fig. 10 illustrates an example where the indicator of the menu bar is focused on "cast." Accordingly, option regions 1020 displays a first "list of options or items" related to the cast, which teaches claimed "*first content panel*."




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶111.**

Consistent with the analysis above at [1.3], the first "list of options or items" displayed within options region 1020 (of Figure 10) is "*content information*" that is based on the currently displayed program (e.g., Heroes) that the "processing circuitry 306 [] highlight[ed] or br[ought] into focus" when the user first entered screen 900 (of Figure 9). Accordingly, the "list of options or items" within options region 1020 ("*first content panel*") is "*based on the content*." Ex.1005, [0155].

Furthermore, consistent with the analysis above at [1.4.1], the first list of options or items in function options region 1020 (of Figure 10) is based on the

program title information (e.g., "HEROES-VILLIANS,") and cast information (e.g., Tim Kring, etc.), which discloses that the provided panel is "*based on…the at least one of the content source and the content information*." *See also* elements [1.4.1]-[1.4.2].

Moreover, Woods' disclosure of displaying information about the content currently being viewed by the user was a well-known feature of media guidance systems. For example, the prior art reference Istvan describes an example where the user presses a "menu" button. Ex.1006, [0040] ("A 'menu' button on a remote control unit may be used to activate ... the UI."); *see also* Ex.1006, [0043], Ex.1007, 2, ("Metadata associated with the content that the viewer is watching is obtained from the metadata server (2)(3) by using the content ID and playback position information obtained from the display system (1)"), 4 ("the viewer can press a button to enter the CurioView mode where the display changes ... "). Accordingly, user interfaces that display information about media currently being viewed were well-known as of the time the '174 patent was filed. Ex.1003, ¶114.

Thus, Woods disclosure of providing a first list of options or items in function options region 1020 in the application panel interface (*See* [1.2]), based on the content information (*See* [1.4.1]), renders this limitation obvious. Ex.1003, ¶¶107-15.

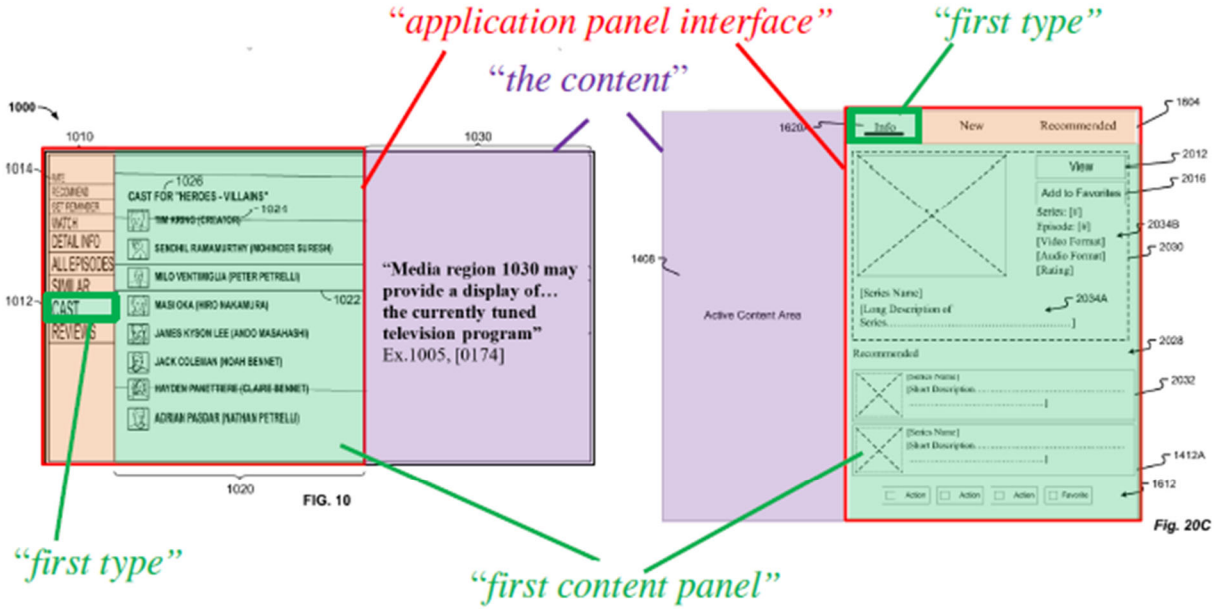
**[1.5.2]** ***wherein the first content panel is a first type of application panel;***

**First**, as discussed at [1.5.1], Woods discloses that function options region 1020 has a first list of options or items ("*first content panel*").

**Second**, Woods explains that when the menu bar 1010 has the "cast" indicator highlighted the list of options or items of the function options region 1020 ("*first content panel*") is a "cast" type of application panel ("*first type of application panel*"). **"**As the user brings different indicators into focus, the list of options or items displayed in function options region 1020 may change to correspond to the indicator of the function in focus." Ex.1005, [0175].

The first content panel is a type of "***application*** *panel*" because (in the present example) it corresponds to specifically tailored "cast" list of options or items displayed within Woods' media guidance ***application***. Ex.1005, [0177] ("…function options region 1020 may be tailored to the particular function in focus."). Woods' disclosure is consistent with how the '174 patent describes application. Ex.1001, 7:30-33 ("An application can be a software service that provides a particular type of function (e.g., Live TV, Video on Demand, User Applications, photograph display, etc.).").

Moreover, consistent with the Overview of the '174 Patent and shown below in a side-by-side comparison, Woods' interface of Figure 10 is structured like the '174 patent interface of Figure 20C.




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶119.**

**Ex.1001, Fig. 20C (annotated); Ex.1003, ¶119.**

Thus, Woods discloses that the first list of options or items displayed within option region 1020 is a "cast" type of application panel, which renders this limitation obvious. Ex.1003, ¶¶116-20.

**[1.6]** ***receiving a first directional input via the input device associated with the television;***

**First**, as discussed at [1.1], Woods discloses user input interface 310 ("*the input device associated with the television*").

**Second**, Woods teaches a "*first directional input*" because Woods discloses that "[t]he indicators of functions displayed in functions menu bar 1010 may be brought into focus or selected by pressing **<u>an up/down key</u>**." Ex.1005, [0173]; *see also* Ex.1005, [0132] ("As the user navigates to select different menu bars by, for

example, pressing an up/down arrow key or using a movable cursor (e.g., mouse)."), [0230] ("Alternatively, the user may position a cursor over the particular item."), [0177] ("[A]ny other function in functions menu bar 1010 may be selected in a similar manner (e.g., by placing the function focus or selecting the function with a moveable cursor or highlight region)"). It would have been obvious for a POSITA to use a mouse cursor to select different items in the functions menu bar 1010 as an alternative implementation. Ex.1003, ¶124.

In one example, "**<u>the user may press an up arrow key three times" to move the indicator</u>** "between the 'cast' function and 'detailed description function.'" Ex.1005, [0176]. Accordingly, receiving a directional input (e.g., by pressing an up key or a mouse cursor directional input) corresponds to "*receiving a first directional input*," as recited in the claim. The '174 patent similarly describes directional inputs. Ex.1001, 34:24-27 ("The two fundamental rules of navigating on the application panel 1412 are: (1) Left-Right and (2) Up-Bottom. Using the left and right arrows on the D-Pad navigates between the various panel views 1620.")

Thus, Woods discloses that the television set receives a directional input via the user input interface 310 (e.g., by pressing an up key or a mouse cursor directional input) to navigate the menu bar 1010, which renders this limitation obvious. Ex.1003, ¶¶121-26.

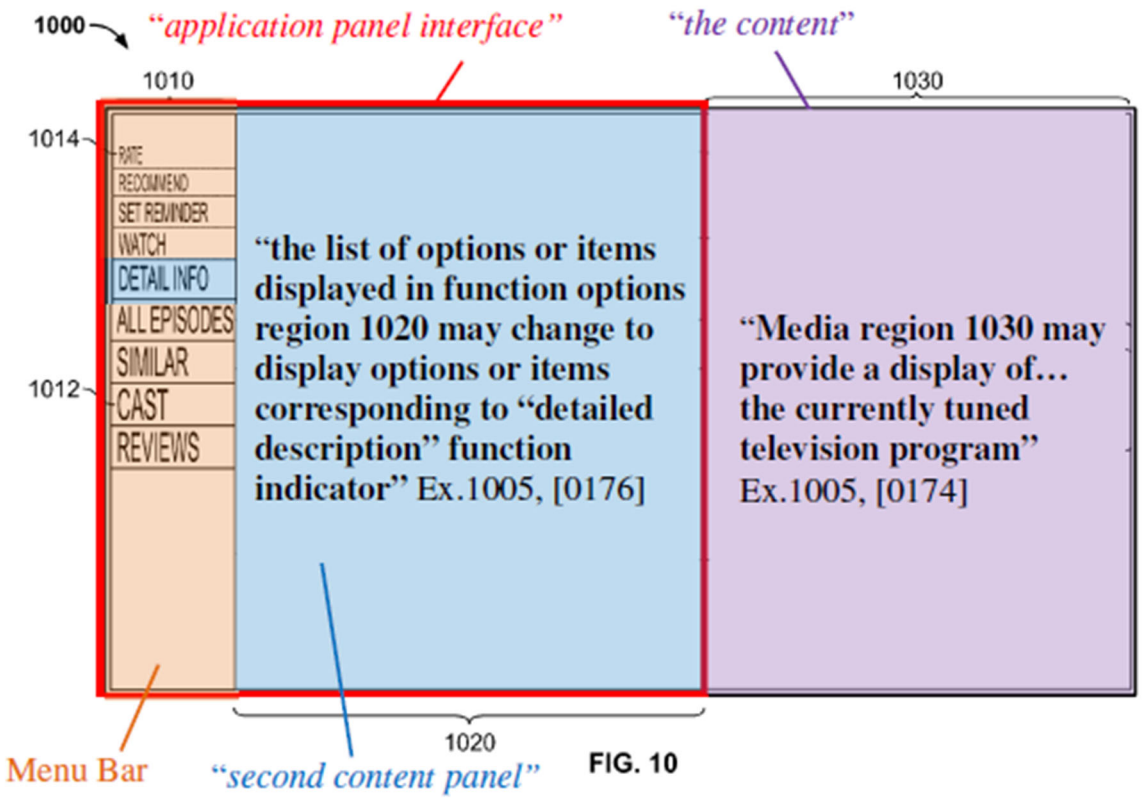
**[1.7.1]** ***determining, based on a first direction associated with the first directional***

***input, a second content panel to display via the television in the application panel interface,***

**First**, as discussed at [1.2], Woods discloses functions menu bar 1010 and function options region 1020 (collectively "*the application panel interface*"). Further, as discussed at [1.6], Woods discloses a directional input such as pressing an up key or a mouse cursor directional input ("*the first directional input*").

**Second**, Woods teaches a "*second content panel*" by disclosing that the "the list of options or items displayed in function options region 1020 **<u>may change</u>** or be updated as each indicator of the function is brought into focus." Ex.1005, [0175]. For example, when the focus in menu bar 1010 changes from "cast" to "detailed description," the list of options and items in region 1020 **<u>changes</u>** to a second list of options displayed within region 1020. Ex.1005, [0176].

For example, in the context of [1.5.1], functions options region 1020 had first list of options or items ("*first content panel*") that facilitated the presentation of "cast" type of information. In the context of the present [1.7.1], a POSITA would have understood that the functions options region 1020 **changes** to a second list of options or items ("*second content panel*") displayed within region 1020 that facilitate the presentation of "detailed description" type of information.




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶129.**

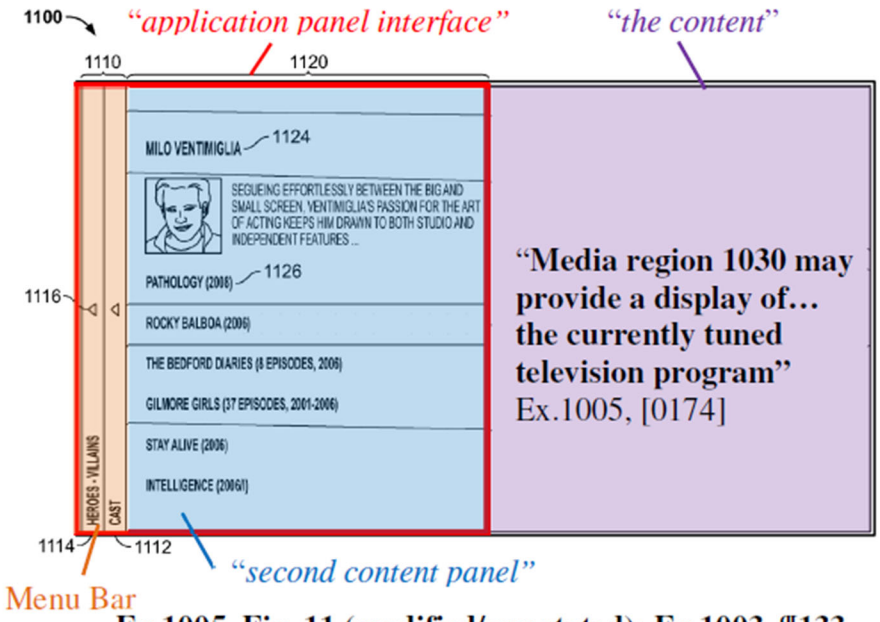
**Third**, Woods discloses "*determining*" the second list of options and items in region 1020 ("*second content panel*") to display "*based on a first direction associated with the first directional input*" by disclosing that when the user presses the up-arrow key three times to move the cursor in an upward direction, function options region 1020 changes three times (per key press) so that "detailed description function" list of options or items is displayed in function options region 1020. Ex.1005, [0176].

Accordingly, Woods' "*determine[es]*" that it will display the second list of

options and items associated with the "detailed description" option when the user presses the up-arrow key.

Thus, Woods determines, based on an upward direction using the up-arrow key, a second list of options or items in function options region 1020 to display via the television (*See* [1.0]) in the application panel interface (*See* [1.2]), which renders this limitation obvious. Ex.1003, ¶¶127-32.

**Alternatively,** Woods describes a "*second content panel*" in the form of information region 1120 shown in Figure 11.




**Ex.1005, Fig. 11 (modified/annotated); Ex.1003, ¶133.**

Woods explains that a user may use an arrow key to select an option within the options region 1020 (of Figure 10). Ex.1005, [0180] (after "**<u>pressing up/down</u>**

**arrow keys**," the "user may press an "enter" or "**confirm**" key to receive a display of information about the selected cast member."). Accordingly, by pressing the arrow keys ("*a first direction associated with the first directional input*"), the region 1020 changes to display information region 1120 ("*second content panel*"); Ex.1003, ¶¶133-36.

**[1.7.2]** ***wherein the second content panel is a second type of application panel;***

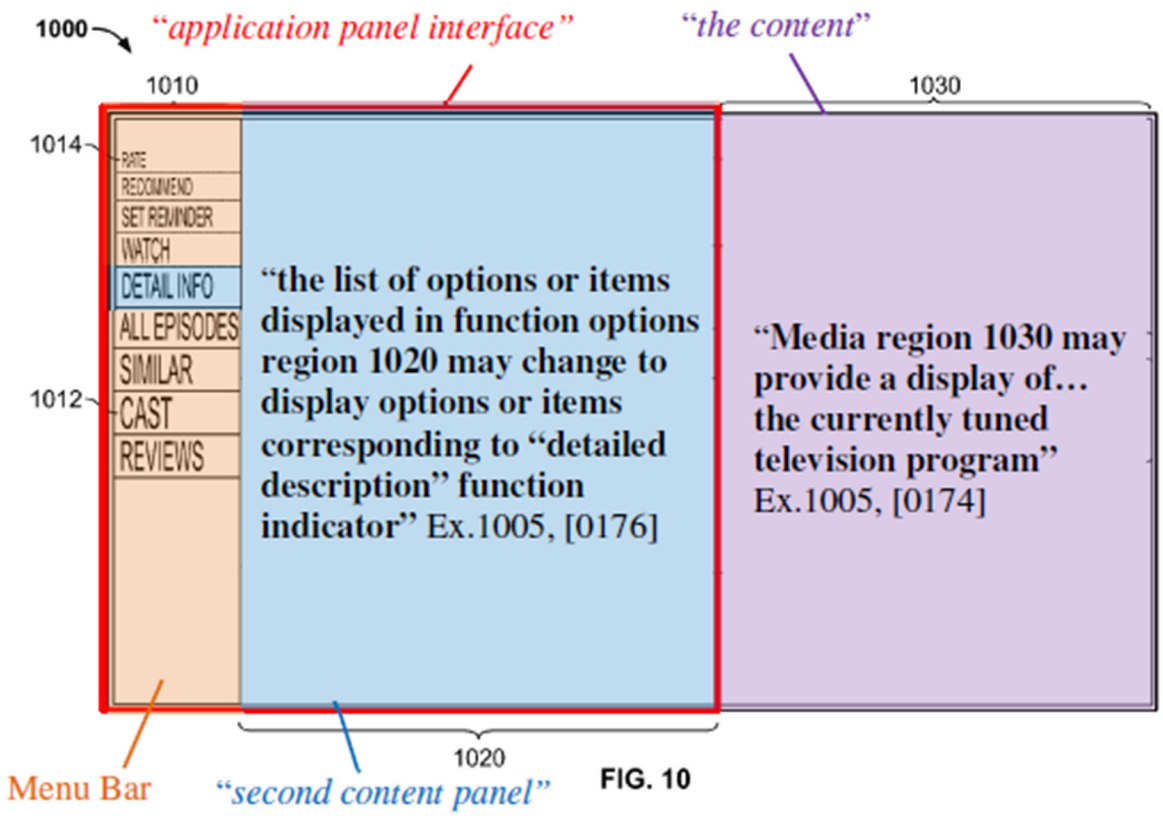
**First**, as discussed at [1.7.1], Woods discloses that function options region 1020 changes to display a second list of options or items ("*second content panel*").

**Second**, as noted above, Woods teaches a "*second type of application panel*" because Woods discloses that when the menu bar 1010 has the "detailed description" highlighted, the list of options or items of the function options region 1020 changes from "cast" type of information to the "detailed description" type of information. Thus, the second list of options or items of the function options region 1020 ("*second content panel*") is a "detailed description" type of application panel ("*second type of application panel*").

While Woods does not illustrate an example display of the other types of content from the menu bar 1010, Woods makes clear that different types of content panels "may be tailored to the particular function in focus." Ex.1005, [0177].

Consistent with Woods' disclosure, Figure 10 is shown modified and annotated to illustrate that when the menu bar 1010 has the "detailed description"

highlighted, the list of options or items of the function options region 1020 in application interface changes accordingly.

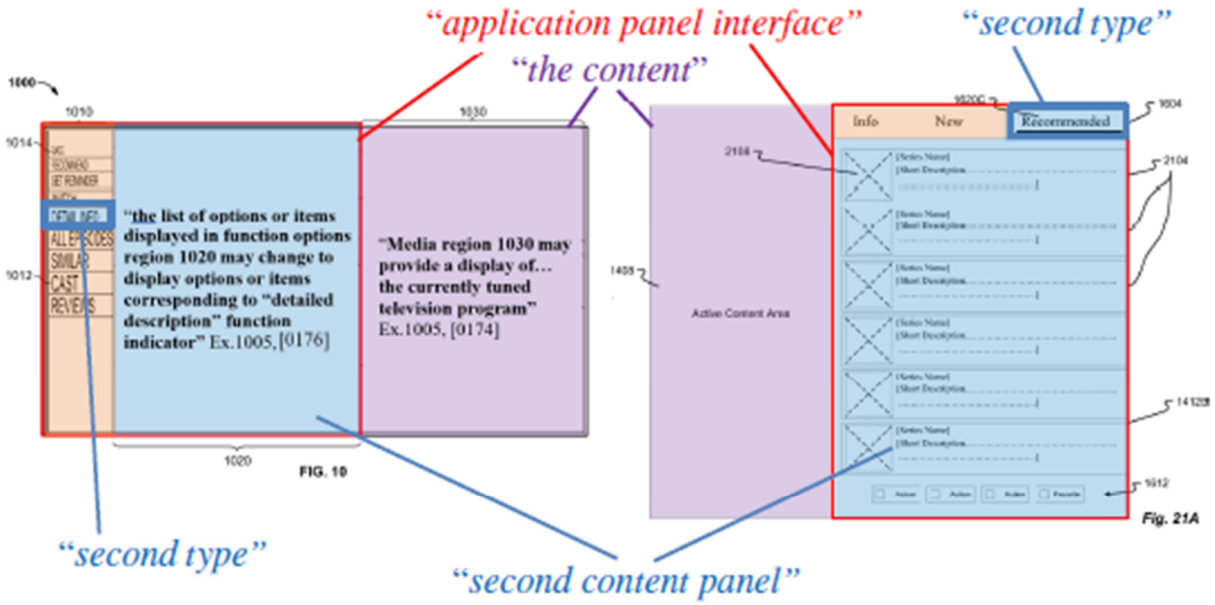



**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶140.**

Moreover, it would have been obvious to a POSITA to tailor the list of options or items displayed in function options region 1020 to correspond to "detailed description" type, so that the program information (i.e., other than "cast" type) is displayed to provide the user additional information and options.

Moreover, consistent with the Overview of the '174 Patent and shown below in a side-by-side comparison, Woods' interface of Figure 10 is structured like the

’174 patent interface of Figure 21A.




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶142.**
**Ex.1001, Fig. 21A (annotated); Ex.1003, ¶142.**

Thus, Woods discloses that the function options region 1020 with second list of options or items is a “detailed description” type of application panel, which renders this limitation obvious. Ex.1003, ¶¶137-43.

**Alternatively,** in the example where Woods describes a “*second content panel*” in the form of information region 1120 shown in Figure 11, the information region 1120 is a “*second type of application panel*” as claimed because it both has a different size and shape and displays different information (e.g., about the selected cast member). Thus, because Woods describes using arrow keys to navigate to and select more detailed information about a cast member, and doing

so brings up information region 1120, Woods renders this limitation (and [1.7.2]) obvious. Ex.1003, ¶144.

**[1.8]** ***retrieving, from memory, a second content information based on the second type of content panel; and***

**First**, as discussed at [1.7.1]-[1.7.2], Woods' media guidance application displays a "detailed description" type of panel ("*second type of application panel*").

**Second**, Woods teaches "*retrieving*" content "*from memory*" because Woods discloses that as the user navigates the media guidance application, the content to be displayed (i.e., a guidance object) is retrieved from memory.

Woods' television set includes memory. As discussed at [1.0], Woods' media guidance application is associated with the user television equipment 300. *See* Ex.1005, [0056]-[0057]. As shown at Figure 3 below, the user television equipment 300 includes processing circuitry 306 and storage 308 (e.g., "random-access memory" abbreviated as RAM, "read-only memory" abbreviated as ROM, hard disk, removable disk, etc.).

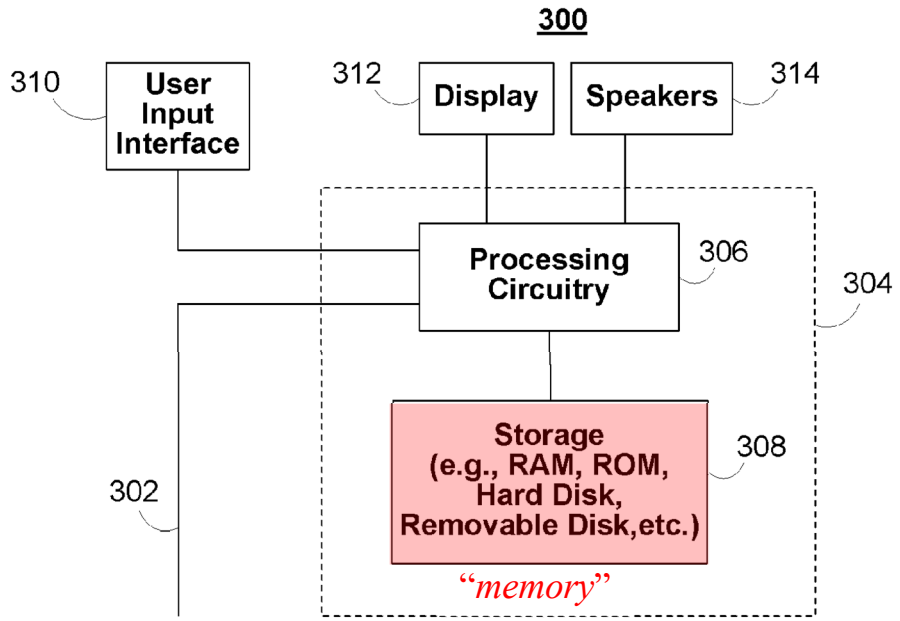



**FIG. 3**

**Ex.1005, Fig. 3 (annotated); Ex.1003, ¶147.**

The storage 308 ("*memory*") stores the information that is displayed within the content panels described above. "Memory ... may be provided as storage 308."). Ex.1005, [0051].

**Second**, Woods' processing circuitry retrieves from memory content information for the list of second options or items for function options region 1020 ("*second content panel*") that correspond to the "detailed description" type ("*second type of application panel*"). Woods discloses that "**[t]he options or items that are provided in function options region 1020** may either be **retrieved from local storage** or from a remote server or website (e.g., via the Internet)." Ex.1005, [00178]. "As the user browses the different function indicators in bar 1010, the

links associated with the functions may be accessed to **retrieve the necessary information**." Ex.1005, [0179]; *see also* [0155], [0270], [0065], [0036], [0176].

It would have been obvious to a POSITA to implement Woods' television to retrieve from storage 308 "*second content information*" that includes specific information (e.g., one or more of title or name of the program, short description of the program, broadcast times, broadcast channels, ratings information, genre or category information, media format information, data used in operating the guidance application, and any other necessary information) about the currently tuned program. Ex.1003, ¶150. This content information would be used to populate the second options or items of function options region 1020 corresponding to the "detailed description" type. Retrieving this content information would be beneficial because it would thereby be available for display on the television to inform the user about specific details of the program currently tuned. *See* [1.9].

Thus, Woods discloses retrieving from storage 308, a second content information corresponding to the "detailed description" type, which renders this limitation obvious. Ex.1003, ¶¶145-51.

In the example where region 1120 in Fig. 11 is a second content panel, it would have similarly been obvious to retrieve content from memory. *See* Ex.1005, [0186]. Ex.1003, ¶¶152-53.

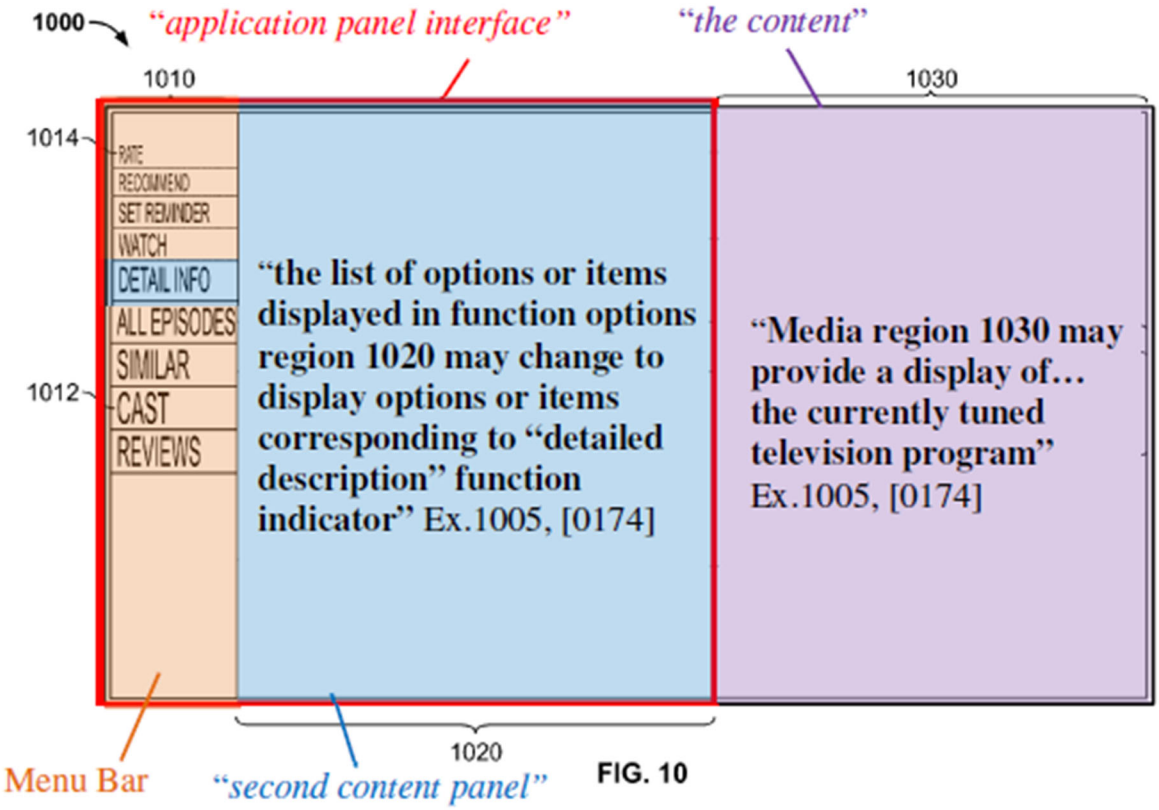
**[1.9]** ***displaying, via the television, the second content information in the second***

***content panel.***

**First**, as discussed the preamble [1.0], Woods discloses user television equipment 300 ("*the television*"). Further, as discussed at [1.8] Woods retrieves various detailed description content information for the second list of options or items ("*second content panel*") in function options region 1020.

**Second**, consistent with the discussion at elements [1.7.1] and [1.8] and as analyzed below, Woods "*display[s]*" via the television, detailed description content information within region 1020. As each of the function indicators between the "cast" function and "detailed description function" is brought into focus, the list of options or items displayed in function options region 1020 may change." Ex.1005, [0176]; *see also* Ex.1005, [0065].

It would have been obvious to a POSITA to implement Woods' television to display detailed description content information (e.g., one or more of title or name of the program, short description of the program, broadcast times, broadcast channels, ratings information, genre or category information, media format information, data used in operating the guidance application, and any other necessary information) in the second options or items of function options region 1020 to thereby inform the user about specific details of the program being watched. Ex.1003, ¶156.




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶156.**

Thus, Woods discloses displaying, via the user television equipment 300, detailed description content information in the second options or items of function options region 1020, which renders this limitation obvious. Ex.1003, ¶¶154-57.

Additionally, for the reasons described above at [1.7.1], [1.7.2], and [1.8], Woods discloses displaying within information region 1120 the additional cast information retrieved from memory, which also renders this limitation obvious. *See* Ex.1005, [0180], [0186], Fig. 11. Ex.1003, ¶158.

### 3. Claim 2

**[2.1]** ***The method of claim 1, further comprising: retrieving, from a memory, a first image that is representative of the at least one of content source and the content information; and***

**First**, as discussed at [1.4.1]-[1.4.2], Woods describes identifying various pieces of information such as the program source, cast information, and detailed information ("*at least one of content source and the content information*"). Ex.1005, [0155], [0171].

**Second,** Woods explains that the content provider ("*content source*") may be represented with "icons (e.g., source logo)" ("*a first image*"). Ex.1005, [0065], [0153].

Further, Woods explains that the cast information ("*content information*") may be represented with "**names or pictures**" pictures ("*a first image*"). Ex.1005, [0153].

**Third**, as discussed at [1.8]-[1.9], Woods user television equipment 300 retrieves the information from memory for display. *See also* Ex.1005, Ex.1005, [0153], [0178].

Thus, because Woods' media guidance application retrieves data from memory images (e.g., broadcast icons or logos) representative of the content source and images (e.g., cast member pictures) representative of the content information, Woods renders this limitation obvious. Ex.1003, ¶¶159-63.

**[2.2]** ***displaying, via the television, the first image in the first or second content panel.***

**First**, as discussed the preamble [1.0], Woods discloses user television equipment 300 ("*the television*"). Further, as discussed at [1.5.1]-[1.5.2] Woods discloses that function options region 1020 has a first list of options or items ("*first content panel*") and as discussed at [1.7.1]-[1.7.2] the function options region 1020 has a second list of options or items ("*second content panel*").

**Second**, in the instance where the "*first image*" corresponds to cast member pictures (*See* [2.1]), Woods discloses that "**the user may select one of the <u>cast member indicators (e.g., names or pictures) that is displayed</u> in the list**." Ex.1005, [0180]. As shown below at Figure 10, Woods displays via the television pictures of "CAST FOR 'HEROES-VILLIANS."

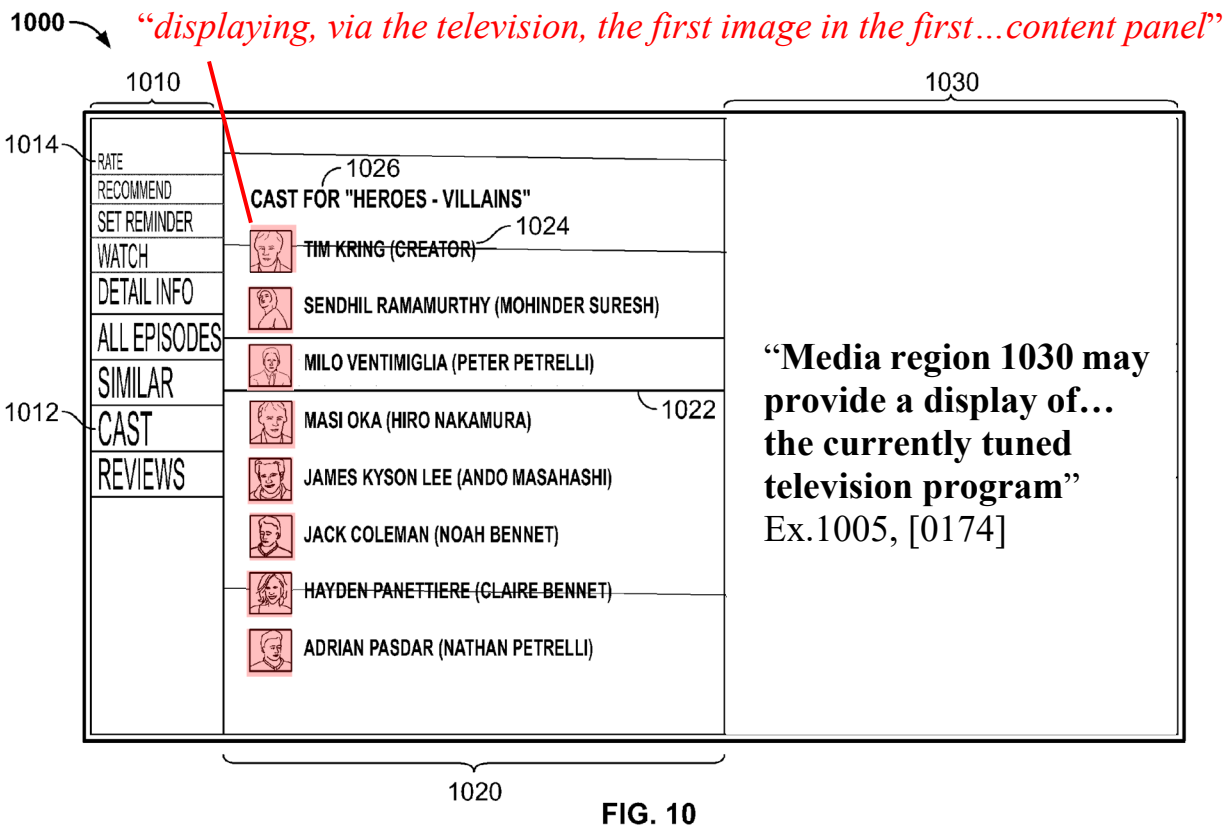



FIG. 10

**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶165.**

**Third**, in the instance where the "*first image*" corresponds to a broadcaster icon or logo of (*See* [2.1]), Woods discloses that the "icons (e.g., source logo)…allows the user to associate the program source information with the program source of the programs." Ex.1005, [0180]. When the second list of options or items ("*second content panel*") corresponds to detailed information (*See* [1.7.1]), it would have been obvious for the detailed information displayed on the television in the second list of options or items to include a broadcaster icon or logo to so that the user can make appropriate associations.

Additionally, for the reasons described above at [1.7.1], [1.7.2], and [1.8], Woods discloses displaying within information region 1120 the additional cast information retrieved from memory, which teaches a "*second content panel*." *See* Ex.1005, [0180], [0186], Fig. 11. Thus, in many ways, Woods renders this limitation obvious. Ex.1003, ¶¶164-68.

#### 4. Claim 3

**[3.1]** ***The method of claim 1, wherein the application panel interface is provided in a portion of the display of the television.***

**First**, as discussed at [1.2], Woods, in the context of Figure 10, discloses functions menu bar 1010 and function options region 1020 (collectively "*the application panel interface*").

**Second,** as can be seen in Figure 10, the menu bar 1010 and function options region 1020 ("*application panel interface*") occupy only a portion of the screen.

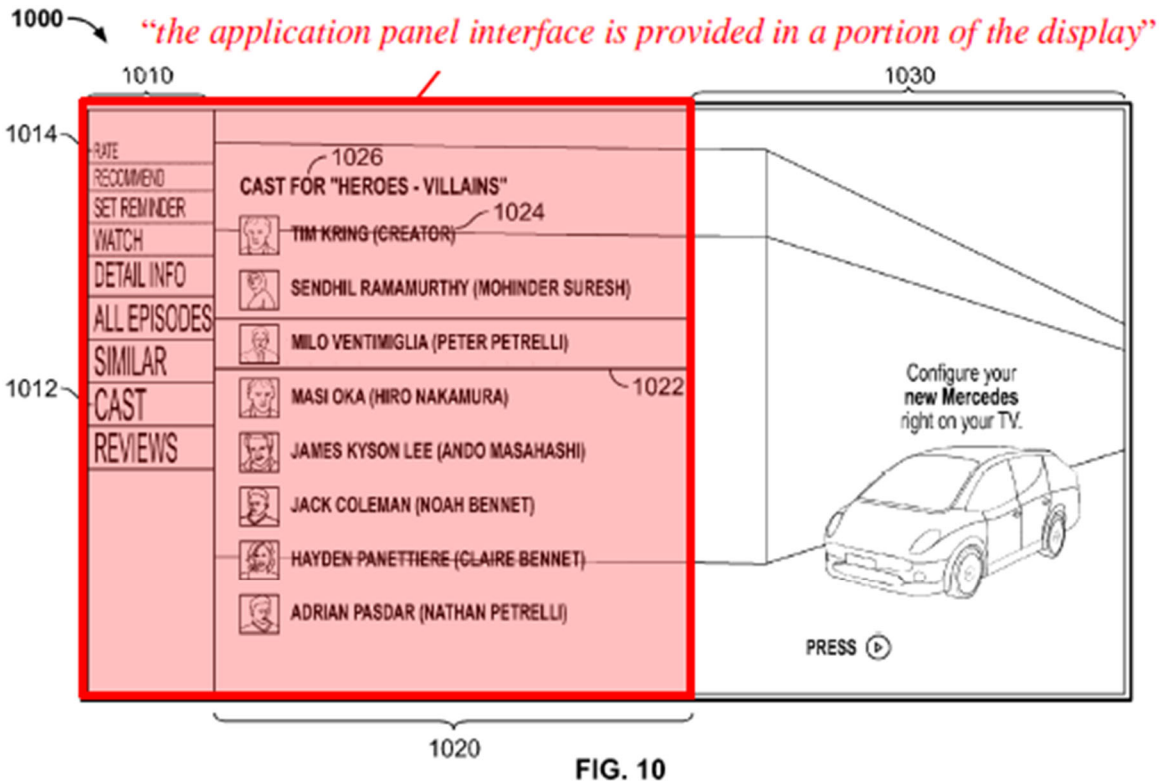



FIG. 10

**Ex.1005, Fig. 10 (annotated); Ex.1003, ¶170.**

The remaining portion of the screen is used to provide media region 1030, which may display the currently tuned program as discussed at [1.2].

Thus, because the menu bar 1010 and options region 1020 occupy only a portion of the screen, Woods renders this limitation obvious. Ex.1003, ¶¶169-72.

### 5. Claim 4

**[4.1]** ***The method of claim 1, further comprising: receiving a second directional input via the input device; and***

As discussed at [1.7.1]-[1.7.2], Woods' user input interface 310 (e.g., remote control) receives inputs such as up/down arrow keys to navigate the menu bar

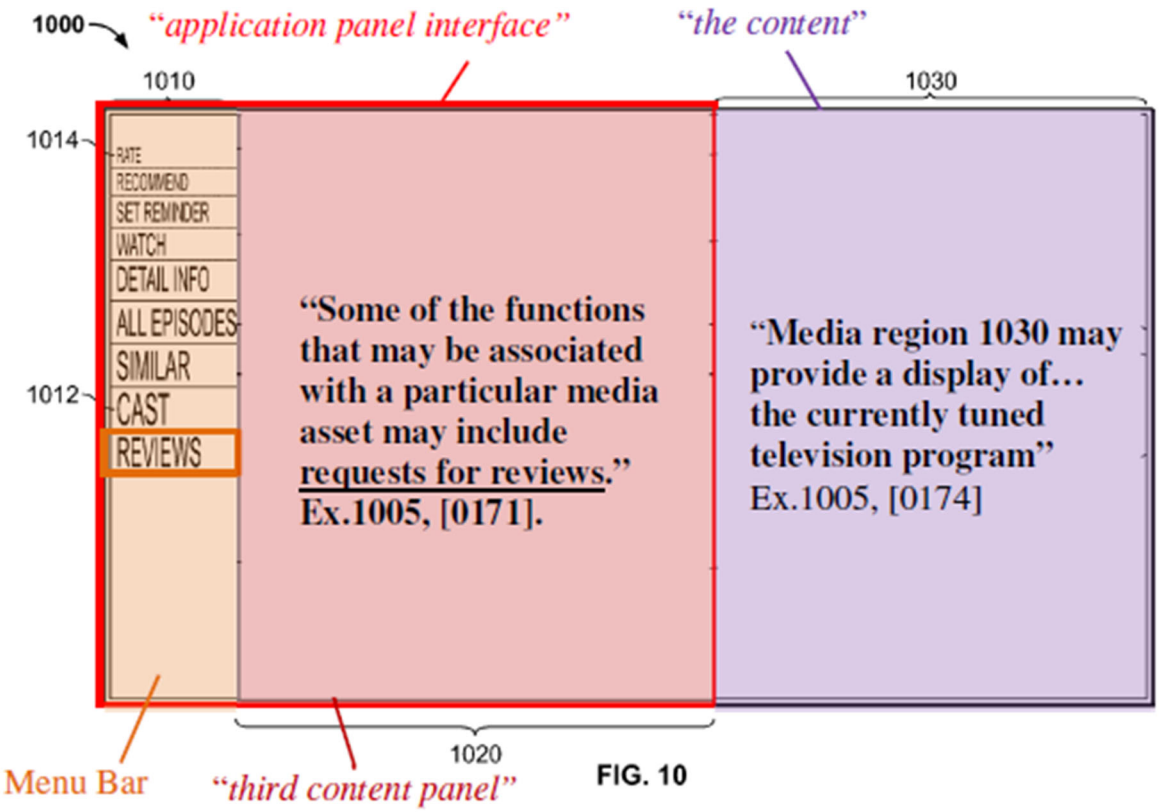
1010. *See* Ex.1005, [0176]. In the example above where the up arrow corresponds to a "*first directional input*," the down arrow corresponds to a "*second directional input.*"

Thus, because Woods' input interface 310 (e.g., remote control) receives a downward directional input when the user presses down arrow key, Woods renders this limitation obvious. Ex.1003, ¶¶173-74.

**[4.2] *determining, based on a second direction associated with the second directional input, a third content panel to display via the television.***

Consistent with the discussion at [1.7.1]-[1.7.2], Woods explains that a user may press the up/down keys to navigate the menu bar 1010. *See* Ex.1005, [0173], [0176].

When the user navigates within menu bar 1010 downwards ("*based on a second direction*") using the down arrow key ("*associated with the second directional input*"), the content in function options region 1020 changes accordingly. For example, when the user navigates downward to the "reviews" function in the menu bar 1010, the content in function options region 1020 changes to a third list of options or items that corresponds to the "reviews" type. Ex.1005, Ex.1005, [0171] ("Some of the functions that may be associated with a particular media asset may include **<u>requests for reviews</u>**"). The third list of options or items corresponds to the claimed "*third content panel.*"




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶176.**

While Woods does not illustrate an example display of the other types of content from the menu bar 1010, Woods explains that different types of content panels would be displayed.

Thus, Woods discloses determining, based on a downward direction associated with the downward directional input received when the user presses down arrow key, a third list of options or items to display via the television in options region 1020, which renders this limitation obvious. Ex.1003, ¶¶175-79.

**Alternatively,** Woods describes a "*third content panel*" in the form of

information region 1220 shown in Figure 12. Ex.1005, [0187]. Ex.1003, ¶¶180-83.

### 6. Claim 5

**[5.1]** ***The method of claim 1, further comprising: retrieving at least a portion of the content information from the content source; and***

**First,** as discussed at [1.4.1]-[1.4.2], Woods identifies content information, including title, cast, detailed description, etc. ("*content information*").

**Second**, as also explained at [1.4.1]-[1.4.2] Woods' media guidance data—including title, cast, detailed description information, etc. ("*content information*")—is retrieved from a media guidance data source 418.

Woods discloses that "media content source 416 ["*content source*"] and media guidance data source 418 may be integrated as **<u>one source device</u>**." Ex.1005, [0063]. The combined media content source 416 and media guidance data source 418 provides content and content information over a network. *See id.*

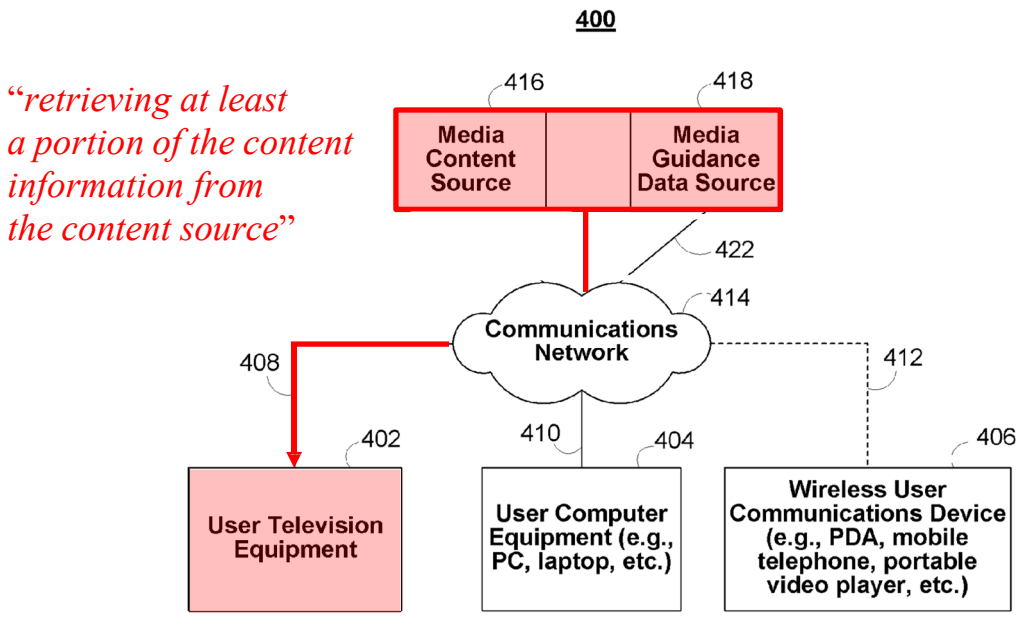



**FIG. 4**

**Ex.1005, Fig. 4 (annotated); Ex.1003, ¶186.**

In such an implementation, Woods' "one source device" corresponds to the "*content source*" and the title, cast, detailed description information, etc. ("*content information*") would be retrieved from that one content source. Thus, Woods renders this limitation obvious. Ex.1003, ¶¶184-188.

**[5.2] *displaying, via the television, the content information associated with the determined source.*[3]**

As discussed at [1.4.1], Woods displays via the television (*See* [1.0]) content information such that it is associated with the content source. For example, Woods

[3] Petitioner treats "*the determined source*" as referring to the "*content source*" that was identified in [1.4.1]-[1.4.2]. Ex.1003, ¶189.

displays "icons (e.g., source logo), or any other visual indicator that is unique to a particular program source that allows the user to associate the program source information with the program source of the programs" and also displays "[i]nformation about the currently tuned to or accessed program." Ex.1005, [0153], [0155].

Thus, because Woods displays, via the television, content information associated with the determined content source, Woods renders this limitation obvious. Ex.1003, ¶¶189-93.

### 7. Claim 6

**[6.1]** ***The method of claim 1, wherein the second content information comprises information associated with content information marked as favorite.***

**First**, as discussed at [1.7.1]-[1.8], when Woods' "detailed description" function is selected in the menu bar 1010, "*second content information*" corresponding to the "detailed description" of the currently tuned program is displayed in the second options or items of function options region 1020.

**Second,** in certain instances, the currently tuned program will be one the user has marked as "favorite." Woods explicitly notes that users may identify programs or channels as "favorites." Ex.1005, [0043], [0060].

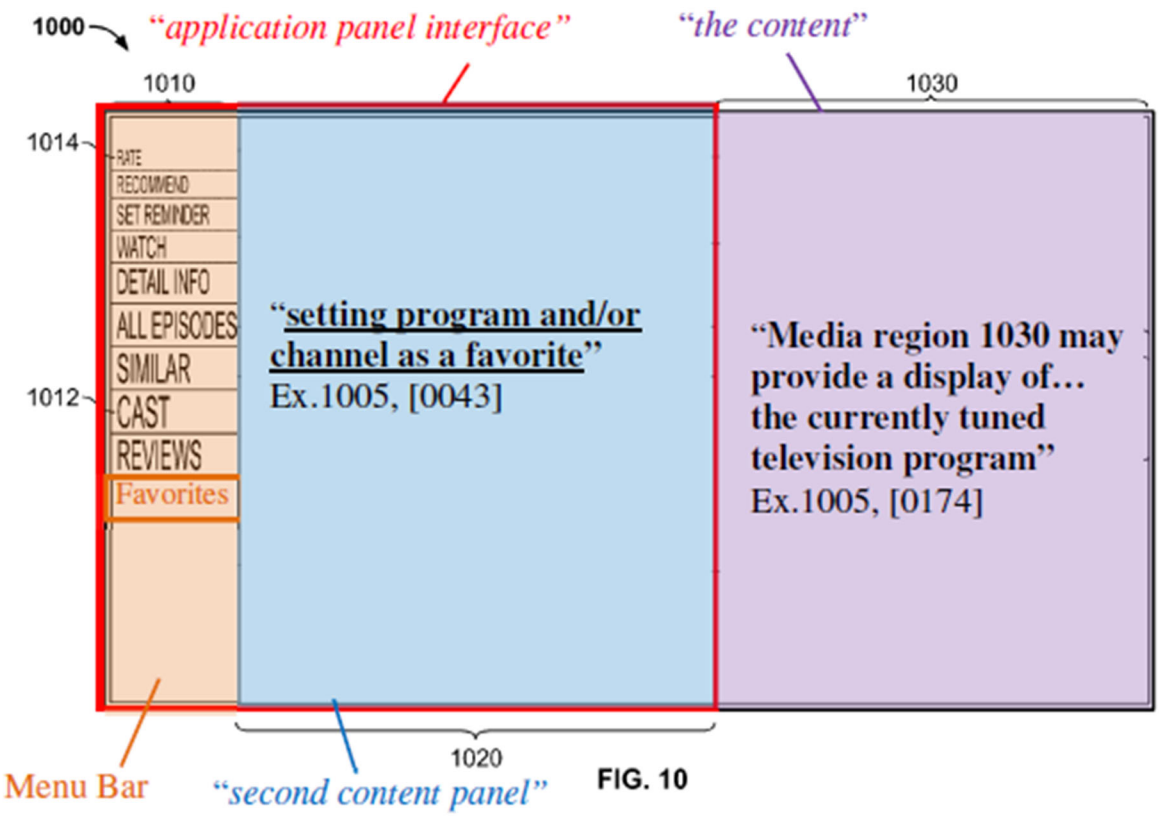
Given that the user has the ability to identify programs and channels as favorites, it would have been obvious that there will be times when the currently

tuned program (e.g., "Heroes") is one that the user has marked as favorite. Accordingly, second content information corresponding to the "detailed description" about such currently tuned program is "*associated with content information marked as favorite*."

Thus, because Woods discloses displaying second content information about a currently tuned program, which may be marked as favorite, Woods renders this limitation obvious. Ex.1003, ¶¶194-97.

**Additionally**, a POSITA would have found it obvious for Woods' menu bar 1010 to include a favorites section. As discussed at [1.7.1]-[1.7.2], Woods explains that the menu items illustrated in menu bar 1010 represent merely "some" of the menu options that may be included. *See* Ex.1005, [0171]. Ex.1003, ¶198.

A POSITA would have found it obvious for one of the options in menu bar 1010 to be a favorites section. Ex.1003, ¶199. Indeed, Woods describes an options region 126 which may be part of "other display screens of the present invention" (e.g., display screen 1000). Ex.1005, [0043]. Options region 126 "may concern features related to ... **setting program and/or channel as a favorite**." Ex.1005, [0043]. Accordingly, it would have thus been obvious for the menu bar 1010 to include a "favorites" option, as shown below at modified and annotated Figure 10.




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶ 200.**

When the "favorites" item from menu bar 1010 is in focus, it would have been obvious for the second list of options or items ("*second content panel*") in function options region 1020 to correspond to the "favorites" type. As such, the retrieved second content information (*See* [1.8]) "*comprises information associated with content information marked as favorite*." This implementation, i.e., of including a "favorites" option, was a well-known user interface feature for a menu bar. *See e.g.,* Ex.1006, Fig. 6.

Thus, because it would have been obvious for Woods' menu bar 1010 to

include a "favorites" option, such that selection of the favorites displays information within the content panel associated with the user's selection of a favorite channel, Woods renders this limitation obvious. Ex.1003, ¶¶198-203.

### 8. Claim 7

**[7.1]** ***The method of claim 1, wherein the second content information comprises information associated with TV series episode content information.***

**First**, as discussed at elements [1.8]-[1.9], Woods' discloses displaying via the television second content information corresponding to the "detailed description" type, which includes specific information about the currently tuned program.

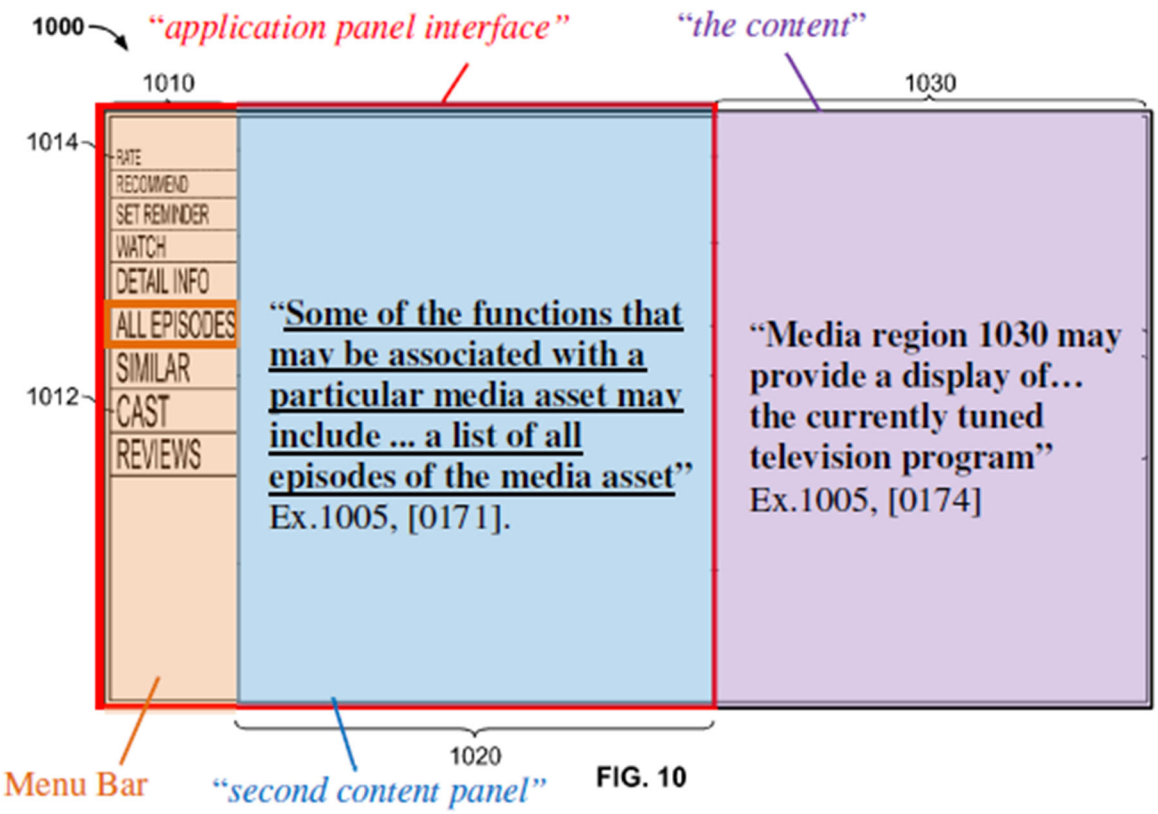
**Second,** in certain instances, the currently tuned program will be an episode in a series of episodes. Woods explicitly notes that some programs may be one of several episodes in the series. Given that the currently tuned program on the television may be one of several episodes in a series, it would have been obvious that there will be times when the currently tuned program is a television series (e.g., "Heroes," "Curb Your Enthusiasm," and "Sopranos" (Ex.1005, [0178], [0038])) and the second content information corresponding to the "detailed description" is "*associated with TV series episode content information*."

Thus, because Woods discloses displaying second content information about a currently tuned program, which may be an episode in a TV series, Woods renders

this limitation obvious.

**Additionally**, as discussed at [1.7.1]-[1.7.2], Woods' menu bar 1010 includes various options. Woods, further illustrates that the menu bar may include an "all episodes" option. Woods' menu bar may include "a list of all episodes of the media asset." Ex.1005, [171].

When the "all episodes" option from menu 1010 is in focus, it would have been obvious for the second list of options or items ("*second content panel*") in function options region 1020 to correspond to a "all episodes" type. As such, the retrieved second content information (*See* [1.8]) "*comprises information associated with TV series episode content information*."




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶209.**

Thus, because Woods' menu bar 1010 includes an "all episodes" option, which when selected retrieves episode information ("*second content information*" [1.8]) for display in the second list of options or items in function options region 1020, Woods renders this limitation obvious. Ex.1003, ¶¶204-10.

Additionally, for the reasons described above at [1.7.1], [1.7.2], and [1.8], Woods discloses displaying within information region 1120 the additional cast information retrieved from memory, which also renders this limitation obvious. *See* Ex.1005, [0180], [0186], Fig. 11. Ex.1003, ¶211.

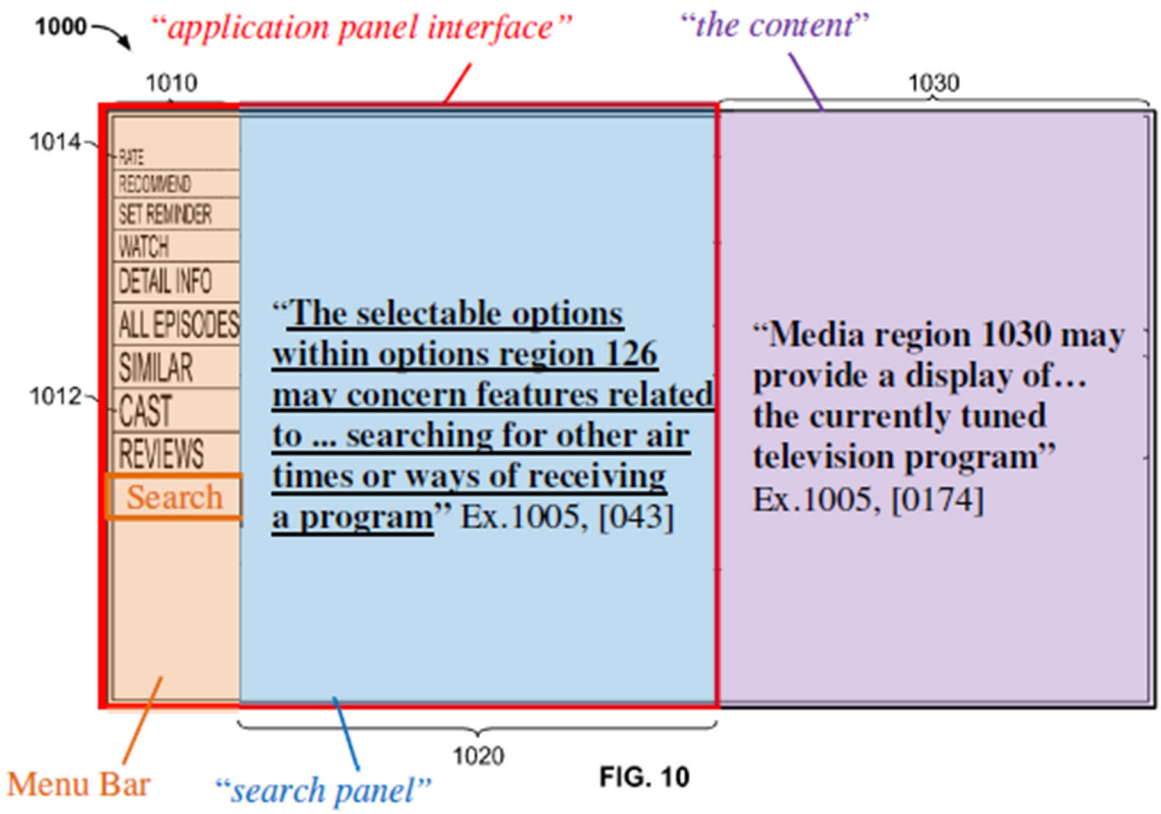
### 9. Claim 8

**[8.1]** ***The method of claim 1, wherein the second type of content panel is a search panel.***

**First**, as discussed at [1.7.1], Woods' menu bar 1010 includes various options. Woods further notes that the menu items of menu bar 1010 represent merely "some" of the types of information that may be displayed. *See* Ex.1005, [0171]

**Second**, Woods further contemplates other types of information including that "the **user may select an option to search program listings from submenu bar 820**." Ex.1005, [0191]; *see also* [0043] ("searching for other air times or ways of receiving a program").

Accordingly, it would have been obvious for the menu bar 1010 to include a "search" option as shown elsewhere in Woods, as shown below at modified and annotated Figure 10.




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶215.**

When the "search" option from menu 1010 is in focus, it would have been obvious for the second list of options or items ("*second content panel*") in function options region 1020 to correspond to a "search" type.

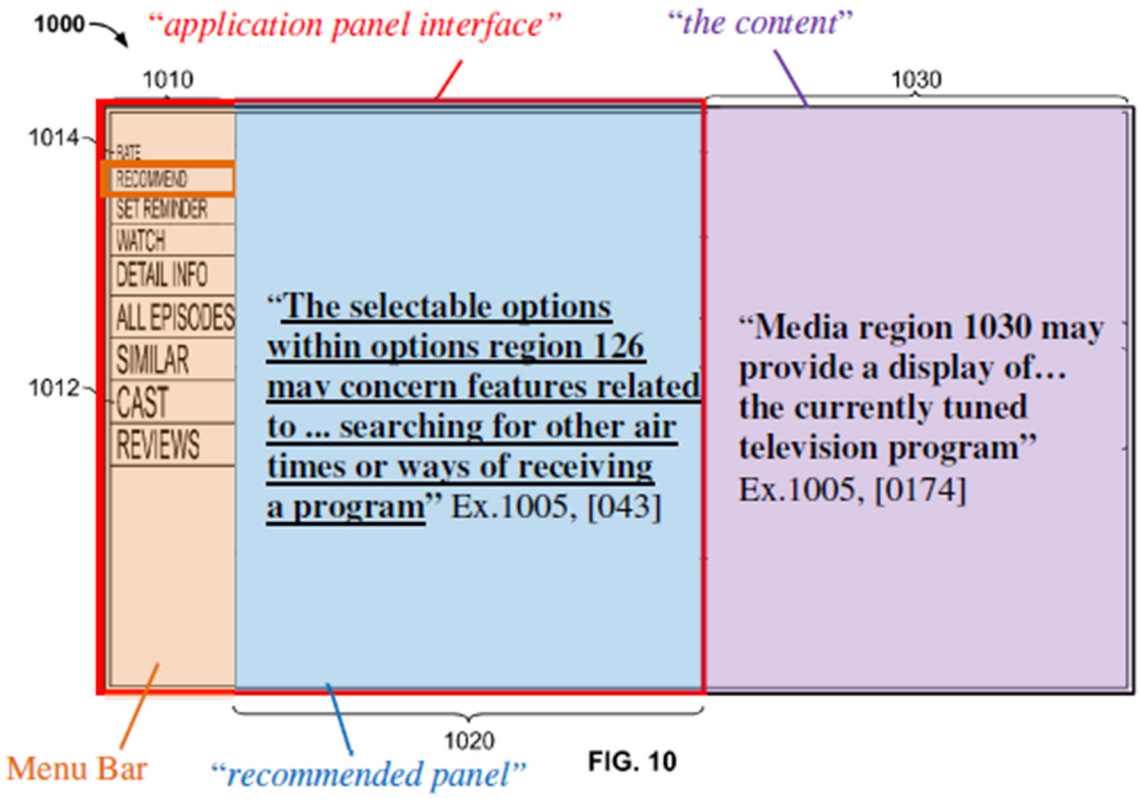
Thus, because Woods' menu bar 1010 includes a "search" option, which when selected changes the second list of options or items ("*second content panel*") in function options region 1020 to correspond to a "search" type, Woods renders this limitation obvious. Ex.1003, ¶¶212-17.

### 10. Claim 9

**[9.1]** ***The method of claim 1, wherein the second type of content panel is a recommended panel.***

**First**, as discussed at [1.7.1], Woods' menu bar 1010 includes various options. Ex.1005, [0171]. Woods contemplates other types of information including a "recommended" option. While the "recommend" option is illustrated in the menu bar 1010 of Fig. 10 (display screen 1000), Woods describes the recommended function in more detail in the text accompanying Fig. 6. *See* Ex.1005, [0134]. "The user may navigate to and select a particular media asset representation that corresponds to **a media asset recommendation**." *Id*. The user may "otherwise access the media asset associated with a selected media asset recommendation." Ex.1005, [0133]-[0134].

It would have been obvious to a POSITA for the recommend option to allow the user to provide recommendations and to also display recommended content. Accordingly, when the "recommend" option from menu 1010 is in focus, it would have been obvious for the second list of options or items ("*second content panel*") in function options region 1020 to correspond to a "recommend" type.




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶219.**

Thus, because Woods' menu bar 1010 includes a "recommend" option, which when selected changes the second list of options or items ("*second content panel*") in function options region 1020 to correspond to a "recommend" type, Woods renders this limitation obvious. Ex.1003, ¶¶218-20.

### 11. Claim 10

**[10.0]** ***A system for displaying content on a television, comprising: an input device associated with the television; a memory; and a microprocessor that*:**

**First**, as discussed at [1.0], Woods discloses "**[s]ystems** and methods are provided for navigating a media guidance application" (Ex.1005, Abstract) to

display content on user television equipment 300 ("*system for displaying content on a television*"). As discussed at [1.1], Woods' user television equipment 300 includes a user input interface 310 ("*input device associated with the television*"). Further, as discussed at [1.8], Woods' television set 402 includes storage 308 ("*memory"*).

**Second**, Woods' television set further includes "processing circuitry 306." Ex.1005, [0050].

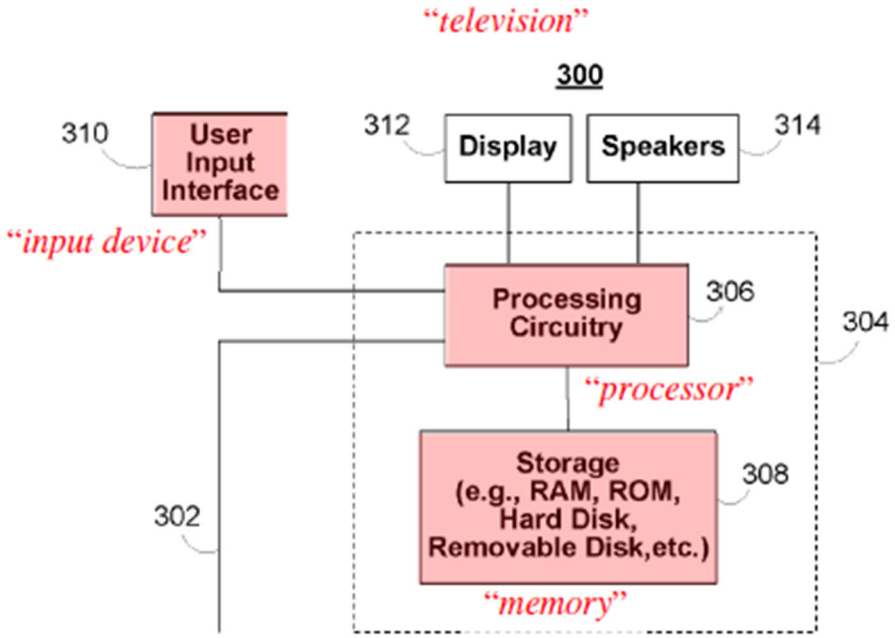



FIG. 3

**Ex.1005, Fig. 3 (annotated); Ex.1003, ¶223.**

Thus, Woods discloses a system for displaying content on a user television equipment 300, with the television comprising an input interface 310, processing

circuitry 306 (e.g., microprocessor), and memory 308, which renders this limitation obvious. Ex.1003, ¶¶221-24.

**Limitations [10.1]-[10.9]**

Limitations [10.1]-[10.9] are substantially similar to limitations [1.1]-[1.9], and therefore are unpatentable for the same reasons as described above. Ex.1003, ¶¶225-33.

#### 12. Claims 11-14

Claims 11-14 are substantively similar to claims 2-3 and 5-6. Thus, the analysis above applies to these claims as well. Ex.1003, ¶234-39.

### C. Ground 2: Claims 6, 8, and 14 are obvious under 35 U.S.C. § 103(a) over Woods in view of Istvan.

#### 1. Summary of Istvan

Like the ’174 patent, Istvan relates to a “method of displaying multimedia content on a display area of a broadband Internet-enabled television system.” Ex.1006, Abstract.

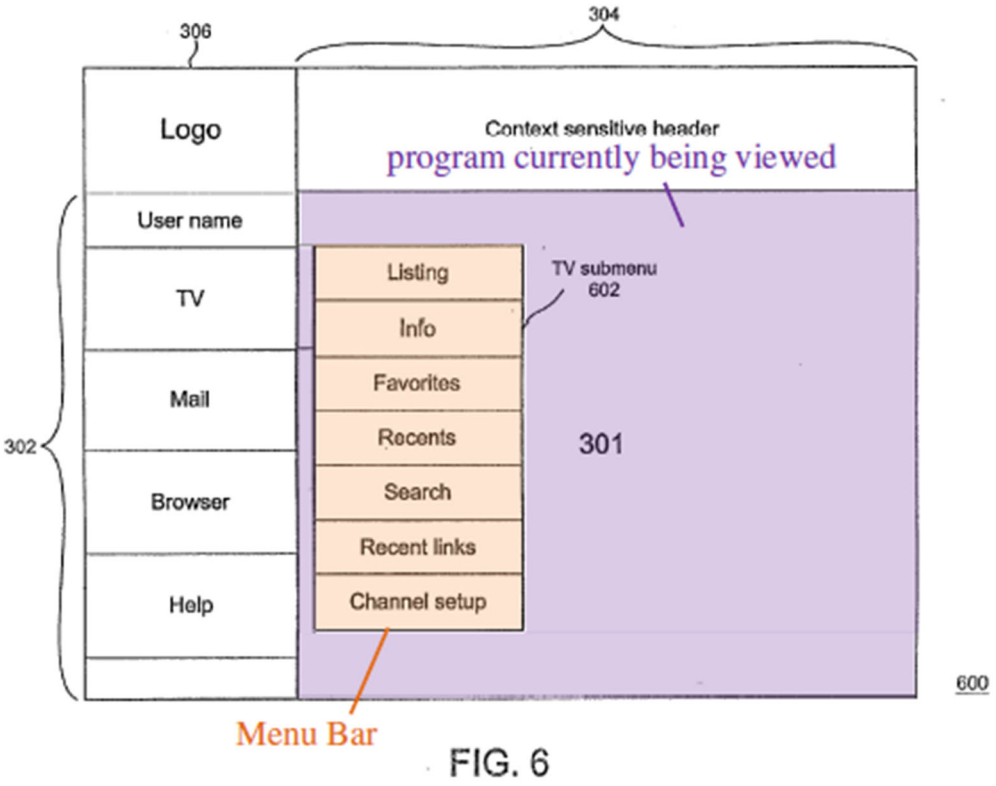



FIG. 6

**Ex.1006, Fig. 6 (annotated); Ex.1003, ¶240.**

Istvan's guide application includes a submenu 602 that includes a variety of menu options for the user. Thus, Istvan provides evidence that it was known to includes options such as "favorites" and "search" within a menu bar alongside other known options like "info." Ex.1003, ¶¶240-44.

### 2. Reasons to Combine Woods and Istvan

A POSITA would have found it obvious for Woods' menu bar 1010 to include additional selections such as "favorites" or "search" as suggested by Woods itself and explicitly taught by Istvan. Ex.1003, ¶245. Indeed, Woods explicitly contemplates the existence of both a "favorites" and a "search" option

within the program guide. Istvan provides evidence that it would have been obvious to include such options within menu bar 1010 alongside options like "info."

As described above, Woods describes a menu bar 1010 with several options including "cast," "detailed description," "all episodes," and "recommended." Woods identifies these as merely "some" of the options that may be included in the menu bar. Ex.1005, [0171].

Woods further provides examples elsewhere in its disclosure of a "favorites" option and a "search" option in a menu bar. Woods describes an options region 126 to "allow the user to access different types of media content, media guidance application displays, and/or media guidance application features." Ex.1005, [0043]. "The selectable options within options region 126 may concern features related to **program listings** in grid 102 or may include options available from a **main menu display**." Ex.1005, [0043]. "Features related to **program listings** may include ... setting program and/or channel **as a favorite**." Ex.1005, [0043]. "Options available from a **main menu display** may include **search options**." Ex.1005, [0043].

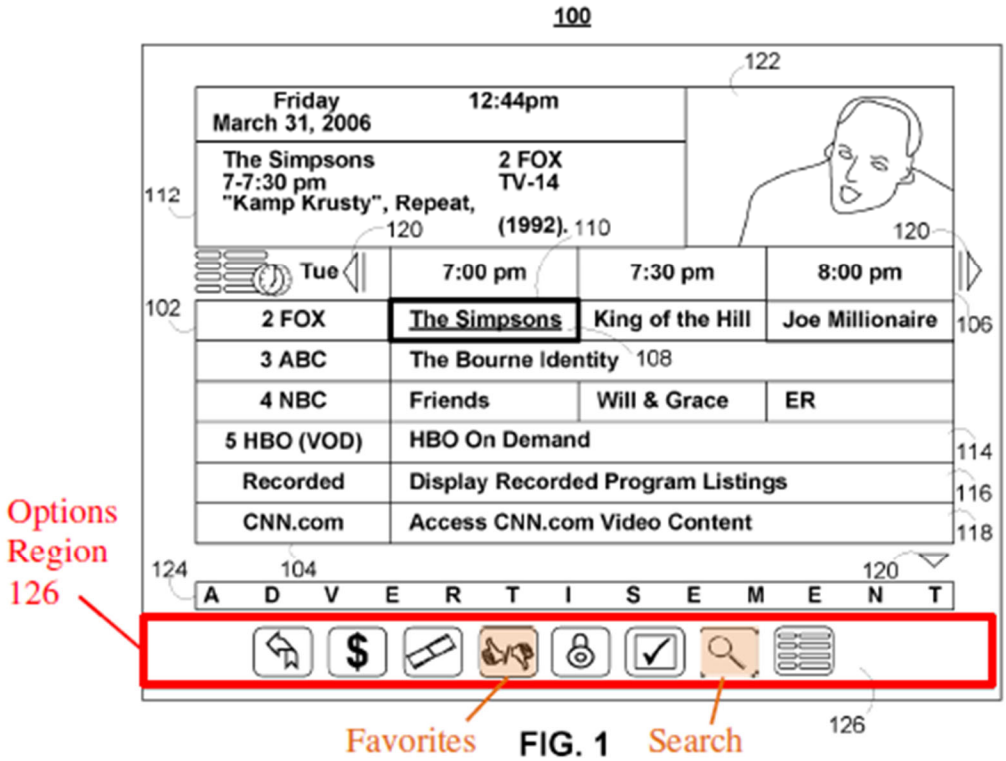



FIG. 1

**Ex.1005, Fig. 1 (annotated); Ex.1003, ¶247.**

Notably, Woods explains that the "Options region 126 may be part of display 100 (**<u>and other display screens of the present invention</u>**)." Ex.1005, [0043]. Because Woods expressly indicates that the options regions (including the favorites and search bar) may be part of any other display screen, Woods suggests that the favorites and search functions may be part of the menu bar 1010 in display screen 1000.

Istvan confirms the obviousness of having a "favorites" and "search" function. Fig. 6 of Istvan explicitly illustrates a "favorites" option and a "search" option within a menu bar.

A POSITA would have found it beneficial to include the favorites bar within menu 1010. Woods indicates several times that a user may mark a channel or program as favorite. *See* Ex.1005, [0043], [0044], [0060], [0078], [0245]. A POSITA would have found it beneficial to have quick access to the user's list of favorite shows or channels. Providing the "favorites" option in various menu bars, such as menu bar 1010 provides that quick access. That way, when the user is browsing content and wishes to return to his or her favorites list, the user can do so through the menu bar 1010. Ex.1003, ¶250.

A POSITA also would have found it beneficial to include the "search" bar within menu bar 1010. Woods indicates several times that a user may be provided with a search bar. *See* Ex.1005, [0006], [0043], [0133], [0149], [0191], [0192], Fig. 13. A POSITA would have found it beneficial to have quick access to a mechanism for searching content, particularly given the "overwhelming volume of media content (e.g., video and audio) available to the average person (e.g., via the Internet, cable and satellite television and radio)." Ex.1005, [0002]. Providing the "search" option in various menu bars, such as menu bar 1010 provides that quick access. That way, when the user is browsing content and wishes to search for particular content, the user can do so through the menu bar 1010. Ex.1003, ¶251.

Given that placing the "search" and "favorites" options within the menu bar 1010 is already suggested by Woods, a POSITA would have had a reasonable

expectation of success in placing such options in the menu bar 1010 as taught and shown explicitly by Istvan. Doing so would have yielded the predictable result of a menu bar with additional options to provide the user with quicker access to desirable features. Ex.1003, ¶252.

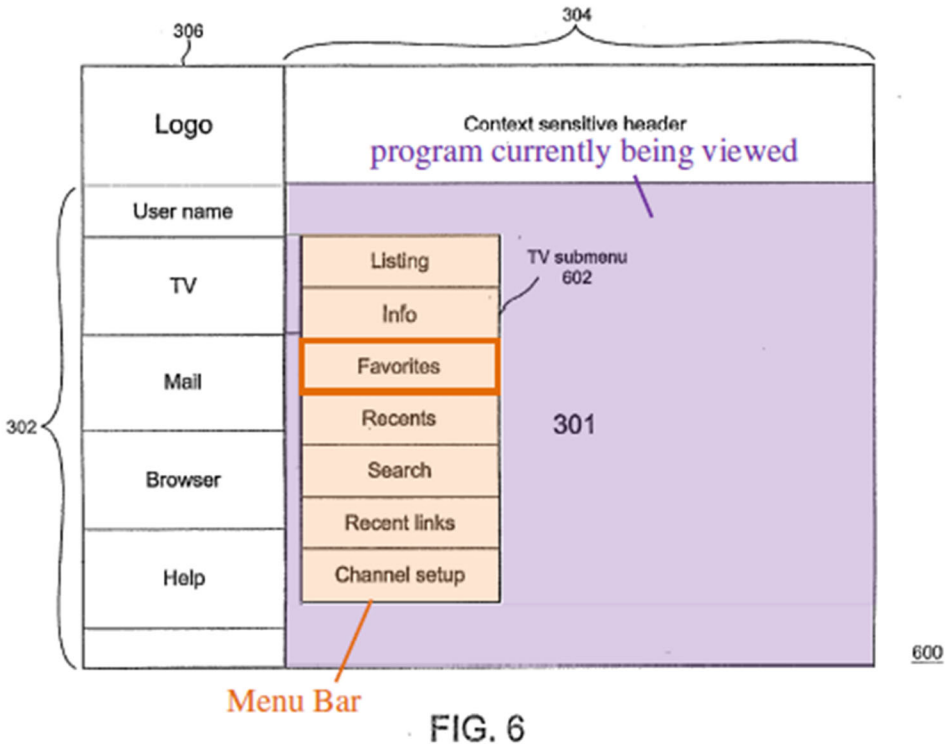
Thus, the combination of Woods and Istvan represents combining prior art elements (info, search, and favorites selections) according to known methods (options on a menu bar) to yield predictable results (a menu bar with additional options). Ex.1003, ¶¶245-54.

### 3. Claim 6

**[6.1]** ***The method of claim 1, wherein the second content information comprises information associated with content information marked as favorite.***

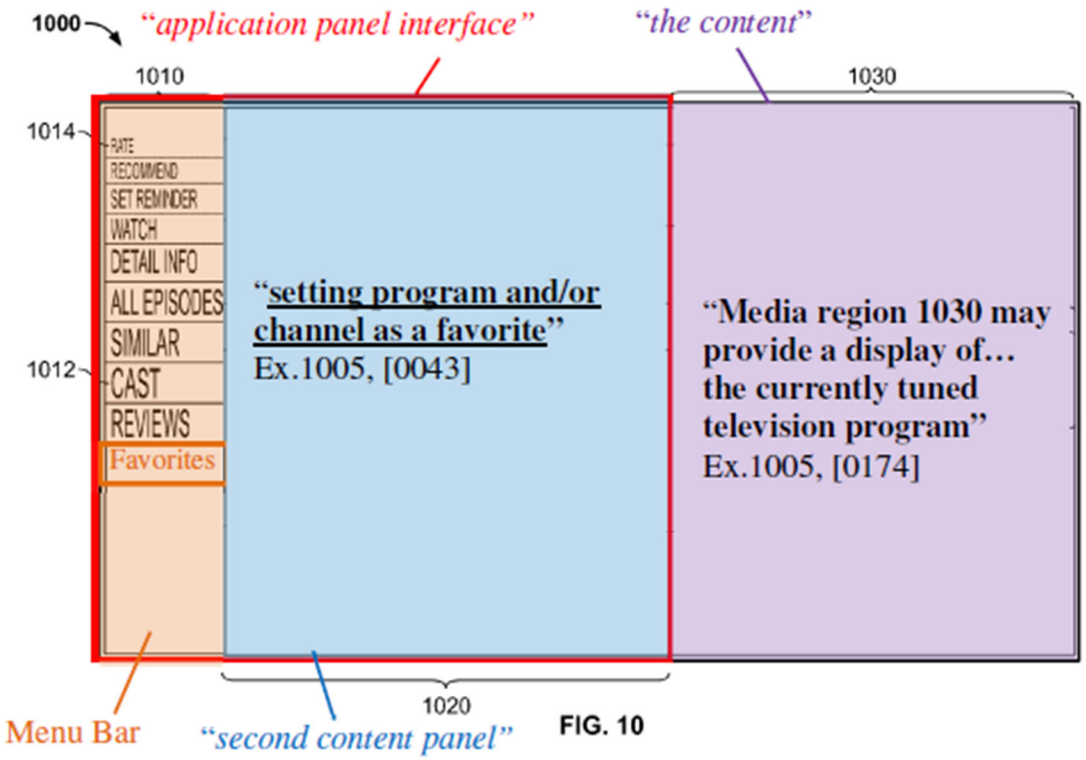
**First**, as discussed at [1.7.1]-[1.7.2], Woods' menu bar 1010 includes various options, including the "detailed description" option. In particular, when the "detailed description" function is selected in the menu bar, options region 1020 displays "detailed description" information ("*second content information*") which is based on the currently tuned program.

**Second**, a POSITA would have found it obvious for Woods' menu bar 1010 to include a favorites section, as explicitly illustrated by Istvan.




**Ex.1006, Fig. 6 (annotated); Ex.1003, ¶256.**

As explained above at [6.1] for Ground 1, it would have thus been obvious for the menu bar 1010 to include a "favorites" option. An example of the "*second content panel*" may thus also be a "favorites" type. Indeed, a "favorites" option was a well-known user interface feature for a menu bar. *See e.g.,* Istvan, Fig. 6.




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶257.**

Thus, because it would have been obvious for Woods' menu bar 1010 to include a favorites section, such that selection of the favorites section displays information within the content panel associated with the user's selection of a favorite channel, Woods renders this limitation obvious. Ex.1003, ¶¶255-58.

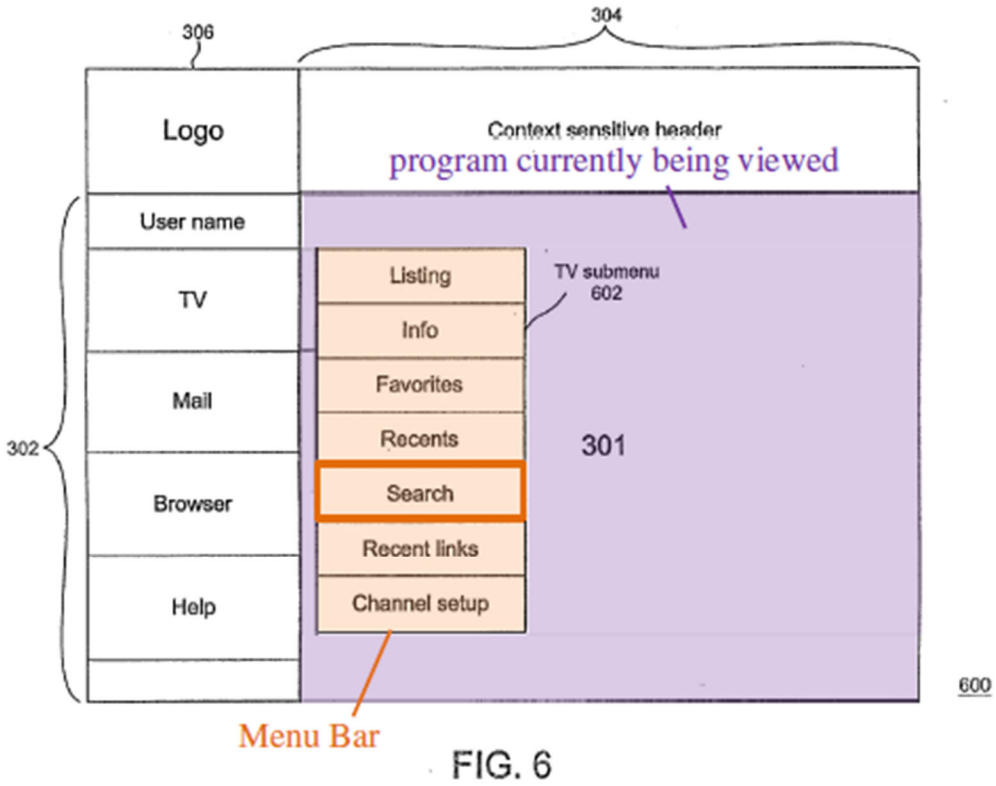
### 4. Claim 8

**[8.1]** ***The method of claim 1, wherein the second type of content panel is a search panel.***

**First**, as discussed at [1.7.1]-[1.7.2], Woods' menu bar 1010 includes various options, including the "detailed description" option. In particular, when the

"detailed description" function is selected in the menu bar 1010, options region 1020 displays "detailed description" information in a "*second content panel*."

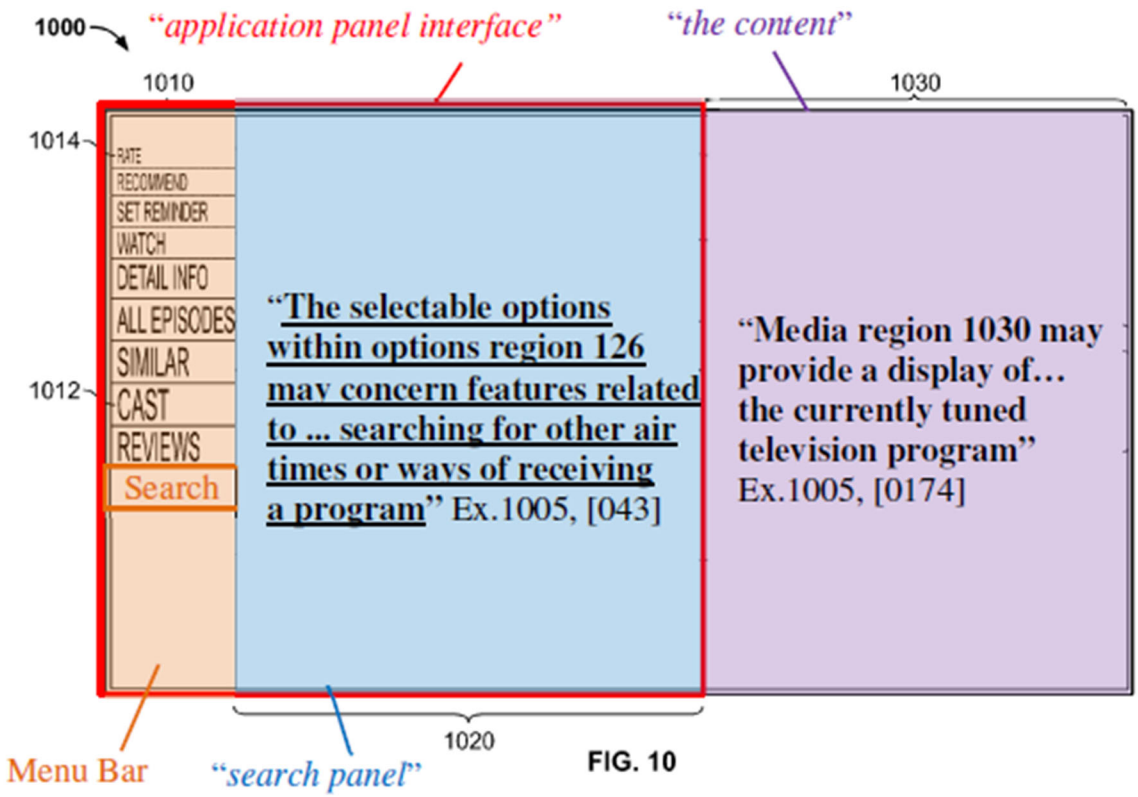
**Second**, a POSITA would have found it obvious for Woods' menu bar 1010 to include a search section, as explicitly illustrated by Istvan.




**Ex.1006, Fig. 6 (annotated); Ex.1003, ¶260.**

As explained above at [8.1] in Ground 1, it would have been obvious for the menu bar 1010 to include a search option as shown elsewhere in Woods. In so doing, the content displayed within options region 1020 ("*second content panel*") would be of the "search" type. As such, the options region 1020 ("*second content*

*panel*") is a "*search panel*" as claimed. Indeed, a "search" option was a well-known user interface feature for a menu bar. *See e.g.,* Istvan, Fig. 6.




**Ex.1005, Fig. 10 (modified/annotated); Ex.1003, ¶262.**

Thus, because Woods explains that one option for use with display screens such as display screen 1000 is a search function, and a POSITA would have thus found it obvious for options region 1020 to display a search panel, Woods renders this limitation obvious. Ex.1003, ¶¶259-63

### 5. Claim 14

**[14.1]** ***The system of claim 10 ... favorite.***

*See* [6.1], Ground 2. Ex.1003, ¶264.

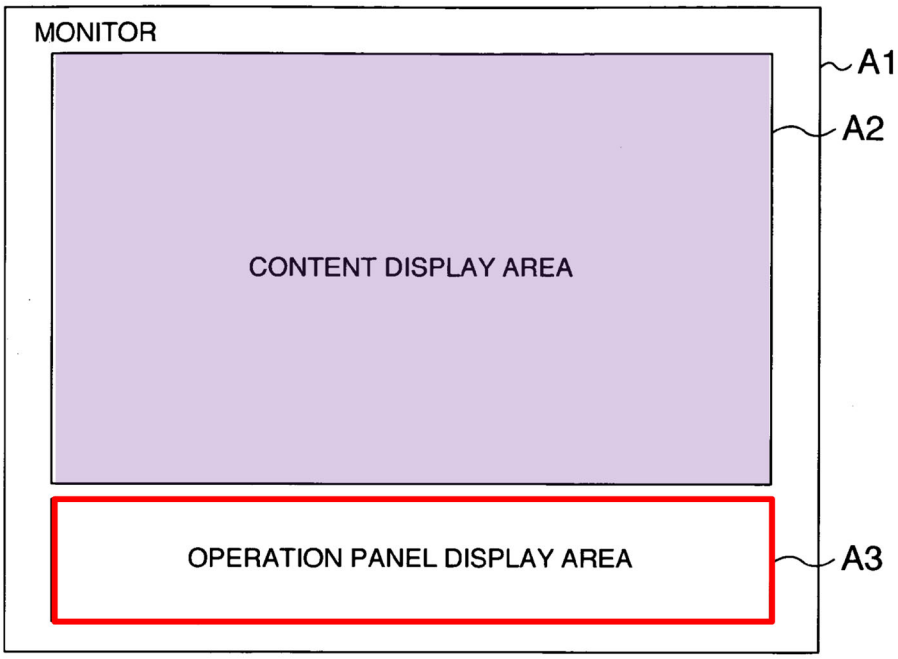
### D. Ground 3: Claims 1-14 are obvious under 35 U.S.C. § 103(a) over Woods in view of Machida.

To the extent Patent Owner argues that the claimed "*first content panel*" and "*second content panel*" must be predetermined, such would have been obvious in view of Woods. As explained above, Woods describes how the list of options and items ("*first content panel*") of one type can change—as opposed to update—to a different set of options and items ("*second content panel*") based on the user's directional navigation. Nevertheless, Machida teaches that it was known in the art to predefine at least two different panels and, based on context, interchangeably display them within the same display area. Ex.1003, ¶265.

#### 6. Summary of Machida

Like the '174 patent, Machida relates to "image rendering techniques for an apparatus which reproduces digital contents." Ex.1008, [0002]. Machida describes a user operation interface that includes a content display area A2 and an operational panel display area A3 as shown below in Figure 2. Ex.1008, [0030]-[0031].

FIG. 2




**Ex.1008, Fig. 2 (annotated); Ex.1003, ¶266.**

Machida further discloses that two different types of panels, with predefined functions, may be displayed within the same panel display area A3: "a linear content operation panel A4" and "an interactive content operation panel A5." Ex.1008, [0032].

FIG. 3

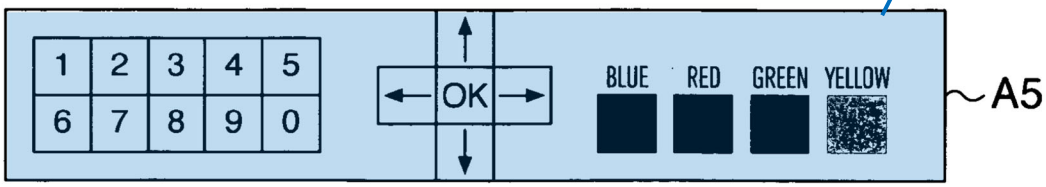
LINEAR CONTENT OPERATION PANEL

**Ex.1008, Fig. 3 (annotated); Ex.1003, ¶267.** first panel

FIG. 4

INTERACTIVE CONTENT OPERATION PANEL

second panel




**Ex.1008, Fig. 4 (annotated); Ex.1003, ¶267.**

Machida explains that "[t]he linear content operation panel A4 and interactive content operation panel A5 are displayed exclusively and are not displayed at the same time." Ex.1008, [0033]. Machida thus generally teaches that it was known in the art to use the same panel area to change between two different types of panels with predefined functions. Ex.1003, ¶¶266-68.

**7. Reasons to Combine Woods and Machida**

A POSITA would have found it obvious for the options and items within Woods' options region 1020 to be presented as different predetermined panels according to Machida's teachings of displaying different panels (panel A4 and panel A5) within a predefined display area A3. Ex.1003, ¶269. Woods

contemplates changing the types of panels by disclosing that "the list of options or items displayed in function options region 1020 **<u>may change</u>** or be updated as each indicator of the function is brought into focus." Ex.1005, [0175]. In other words, distinct from merely updating the content within options region, Woods suggests changing the options and items (i.e., panel) within the same options region 1020. Machida discloses an example of providing different predetermined panels within a predefined area. Ex.1008, Figs. 2-4.

As explained above, Woods discloses that when the focus in menu bar 1010 changes from "cast" to "detailed description," the "list of options or items displayed in function options region 1020 may change to display options or items corresponding to 'detailed description' function indicator." Ex.1005, [0175]-[0176].

Like Woods' function options region 1020, Machida describes an operation panel display area A3. In one context (linear content) Machida's displays a first predetermined panel (i.e., linear content operation panel A4) within display area A3. Ex.1008, [0031]. In another context (interactive content) Machida's displays a second predetermined panel (i.e., interactive content operation panel A5) within display area A3. Ex.1008, [0032].

A POSITA would have found it obvious to implement Woods such that in one context (menu bar indicates "cast") the user interface displays options and

items related to the cast in the form of a first predetermined panel within options region 1020. In a different context (menu bar indicates "detailed description") the user interface displays options and items related to "detailed description" in the form of a second predetermined panel within the same options region 1020. Ex.1003, ¶272.

A POSITA would have been motivated—to implement Woods according to known, suitable options. Woods provides an example in which the options and items in region 1020 **change** rather than update. A POSITA would have looked to known techniques such as Machida's in which two different predetermined panels are interchangeably displayed within the same predefined region. Doing so would have yielded the predictable result of displaying Woods options and items for different functions (cast, detailed description, episodes) within different panels in the same predefined region 1020 at different times. Ex.1003, ¶273.

A POSITA would have found it obvious to use predetermined panels as suggested by Woods and explicitly taught by Machida because doing so allows for precise, uniform, and consistent arrangement of the user interface elements according to design. The benefit of using predetermined panels (which may also be referred to as objects or windows) was known in the art: "The card object may be a window having a **predetermined configuration** (e.g., size, shape, color, style, etc.) ... displayed in areas **predefined on the home screen** 1300 ... In this manner,

the arrangement of the home screen 1300 may be maintained while the displayed content on the home screen 1300 may be updated or changed." Ex.1011, [0194]. A POSITA also would have found it beneficial to use predetermined panels that can be loaded into memory for faster switching; Ex.1003, ¶274.

The combination of Woods and Machida merely represents combining prior art elements (Woods' options and items/Machida's panels) according to known methods (interchangeable, predetermined panels for display within the same predefined display area) to yield predictable results (changing content panels based on context).

A POSITA would have had a reasonable expectation of success in implementing Woods' options and items according to Machida's panel technique, given the similarities in the two systems. Any modification needed to Woods, in order to accommodate the teachings of Machida, including implementing in software cast, detailed description, episode types of panels (or any other types of predetermined panels) that are interchangeably displayed within the same region 1020, would have been within the level of ordinary skill in the art. The expectation of success is also evidenced by the art of record. *See e.g.,* Ex.1009, [0034]-[0037], [0045], Figs. 4A-4D; Ex.1010, Figs. 4-7; Ex.1011, [0194]. Ex.1003, ¶¶269-77.

**8. Claims 1-14**

The analysis of claims 1-14 with respect to Ground 3 is nearly identical to

that of Ground 1. Ground 3 provides additional detail on the obviousness of switching from a "*first content panel*" to a "*second content panel*" in response to directional input.

As explained above at [1.5.1], Woods teaches a "*first content panel*" because Woods discloses that a first "list of options or items" related to the "cast" selection in the menu bar is displayed within options region 1020. Furthermore, as explained above at [1.7.1], Woods teaches a "*second content panel*" by disclosing that the "the list of options or items displayed in function options region 1020 **<u>may change</u>** or be updated as each indicator of the function is brought into focus." Ex.1005, [0175]. For example, when the focus in menu bar 1010 changes from "cast" to "detailed description," the list of options and items in region 1020 **changes** to a second list of options displayed within region 1020.

A POSITA would have found it obvious to implement the presentation of a first "list of options and items" related to "cast" as a first content panel for presentation within region 1020—similar to how Machida presents the operation panel A4 within area A3. Ex.1008, [0031]-[0032]. When the function indicator of Woods' menu bar indicator is moved to the "detailed description," it would have been obvious to change the first content panel with a second "list of options and items" related to the "detailed description" as a second content panel within region 1020—similar to how Machida replaces operation panel A4 with operation panel

A5 within panel display area A3. Ex.1008, [0031]-[0032]. Moreover, by implementing the first and second list of options and items as different, exchangeable panels—with a different structure of options and items (one for cast and one for detailed description)—the first and second content panels are different **types** of panels as claimed.

Thus, consistent with the discussion above at [1.5.1] and [1.5.2], a POSITA would have found it obvious for Woods' first "list of options and items" for the "cast" function to be presented within region 1020 as a first content panel similar to how Machida presents panel A4 within panel display area A3, which renders obvious [1.5.1] and [1.5.2].

Further, consistent with the discussion above at [1.7.1] and [1.7.2], a POSITA would have found it obvious for Woods' second "list of options and items" for the "detailed description" function to be presented within region 1020 as a second content panel similar to how Machida presents panel A5 within panel display area A3, which renders obvious [1.7.1] and [1.7.2].

Independent claim 10 similarly recites a "*first content panel*" and a "*second content panel*." Accordingly, the analysis presented with respect to claim 1 similarly applies to claim 10.

Furthermore, for the reasons presented with respect to claim 1, it would have been obvious for a third "list of options or items" that corresponds to the "reviews"

type ("*third content panel*" of claim 4) to be implemented as an additional panel within the options region—similar to how Machida provides additional panels within the operation panel display area A3. Ex.1003, ¶¶278-84.

### E. Ground 4: Claims 6, 8, and 14 are obvious under 35 U.S.C. § 103(a) over Woods in view of Machida and Istvan.

#### 9. Claims 6, 8, and 14

The analysis for claims 6, 8, and 14 is similar to that of Ground 2, but additionally relies on the analysis in Ground 3 with respect to the independent claims. Ex.1003, ¶285.

## IX. DISCRETIONARY DENIAL WOULD BE INAPPROPRIATE

### A. Discretionary denial under the *Fintiv* factors is not appropriate

The Fintiv factors favor institution. (1) No motion to stay has been filed. (2) The trial date is irrelevant in light of Petitioner's stipulation below. (3) The co-pending litigations are in relatively early stages. (4) **Petitioner hereby stipulates that if instituted, Petitioner will not pursue in District Court the specific grounds asserted here, or on any other ground that was raised or could have been reasonably raised in this IPR**. For this reason alone, the Board should not discretionarily deny institution in view of the parallel proceedings. *See* June 21, 2022 Director Memo, p. 3. (5) Petitioner's involvement in the parallel proceeding should not be a basis for denying institution. (6) The merits of this case are

compelling for the reasons described above. Accordingly, discretionary denial is inappropriate here.

### B. Discretionary denial under 35 U.S.C. § 325(d) is not appropriate

Denial under § 325(d) is not warranted because the challenges presented in this petition are neither cumulative nor redundant to the prosecution of the ’174 Patent.

## X. CONCLUSION

Accordingly, Petitioner has established a reasonable likelihood that the Challenged Claims are unpatentable.

Dated: March 14, 2024

Respectfully Submitted,

*/Steven W. Hartsell/*
Steven W. Hartsell (Reg. No. 58,788)
Lead Counsel for Petitioner

## XI. MANDATORY NOTICES

### A. Real Party-in-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioner certifies that the real party-in-interest is VIZIO, Inc.

### B. Related Matters

Pursuant to 37 C.F.R. § 42.8(b)(2), to the best knowledge of the Petitioner, the ’174 patent is involved in the following cases:

| Case Heading | Number | Court | Date |
|---|---|---|---|
| *Multimedia Technologies Pte. Ltd. v. LG Electronics Inc. et al.* | 2:22-cv-00494 | EDTX | December 23, 2022 |
| *Multimedia Technologies Pte. Ltd. v. Vizio, Inc.* | 2-23-cv-00124 | EDTX | March 24, 2023 |
| *LG Electronics, Inc. v. Multimedia Technologies Pte. Ltd.* | IPR2024-00352 | PTAB | December 20, 2023 |

### C. Lead and Back-up Counsel and Service Information

Lead counsel is Steven W. Hartsell (Reg. No. 58,788). Back-up counsel is Rex Hwang (Reg. No. 56,206). Petitioner consents to service in this proceeding by email at VIZIO_SDTeam@skiermontderby.com.

### D. Fee for Inter Partes Review

The director is authorized to charge any fees during this proceeding to Deposit Account No. DA506293.

## XII. CLAIM APPENDIX

**Claim 1**

**[1.0]** A method for displaying content on a television, comprising:

**[1.1]** receiving a first input via an input device associated with the television;

**[1.2]** in response to the first input, displaying, via the television, an application panel interface;

**[1.3]** determining content currently being shown on the television;

**[1.4.1]** identifying at least one of a content source and content information

**[1.4.2]** [the content source and content information are] associated with the content currently being displayed via the television;

**[1.5.1]** based on the content and the at least one of the content source and the content information, providing a first content panel in the application panel interface,

**[1.5.2]** wherein the first content panel is a first type of application panel;

**[1.6]** receiving a first directional input via the input device associated with the television;

**[1.7.1]** determining, based on a first direction associated with the first directional input, a second content panel to display via the television in the application panel interface,

**[1.7.2]** wherein the second content panel is a second type of application panel;

**[1.8]** retrieving, from memory, a second content information based on the second type of content panel; and

**[1.9]** displaying, via the television, the second content information in the second content panel.

**Claim 2**

**[2.1]** The method of claim 1, further comprising: retrieving, from a memory, a first image that is representative of the at least one of content source and the content information; and

**[2.2]** displaying, via the television, the first image in the first or second content panel.

**Claim 3**

**[3.1]** The method of claim 1, wherein the application panel interface is provided in a portion of the display of the television.

**Claim 4**

**[4.1]** The method of claim 1, further comprising: receiving a second directional input via the input device; and

**[4.2]** determining, based on a second direction associated with the second directional input, a third content panel to display via the television.

**Claim 5**

**[5.1]** The method of claim 1, further comprising: retrieving at least a portion of the content information from the content source; and

**[5.2]** displaying, via the television, the content information associated with the determined source.

**Claim 6**

**[6.1]** The method of claim 1, wherein the second content information comprises information associated with content information marked as favorite.

**Claim 7**

**[7.1]** The method of claim 1, wherein the second content information comprises information associated with TV series episode content information.

**Claim 8**

**[8.1]** The method of claim 1, wherein the second type of content panel is a search panel.

**Claim 9**

**[9.1]** The method of claim 1, wherein the second type of content panel is a recommended panel.

**Claim 10**

**[10.0]** A system for displaying content on a television, comprising: an input device associated with the television; a memory; and a microprocessor that:

**[10.1]** receives a first input via an input device associated with the television;

**[10.2]** in response to the first input, displays, via the television, an application panel interface;

**[10.3]** determines content currently being shown on the television;

**[10.4]** identifies at least one of a content source and content information associated with the content currently being displayed via the television;

**[10.5]** based on the content and the at least one of the content source and the content information, provides a first content panel in the application panel interface, wherein the first content panel is a first type of application panel;

**[10.6]** receives a first directional input via the input device associated with the television;

**[10.7]** determines, based on a first direction associated with the first directional input, a content panel to display via the television in the application panel interface, wherein the second content panel is a second type of application panel;

**[10.8]** retrieves, from memory, a second content information based on the second type of content panel; and

**[10.9]** displays, via the television, the second content information in the second content panel.

**<u>Claim 11</u>**

**[11.1]** The system of claim 10, wherein the microprocessor is further operable to: retrieve, from a memory, a first image that is representative of the at least one of content source and the content information; and

**[11.2]** display, via the television, the first image in the first or second content panel.

**Claim 12**

**[12.1]** The system of claim 10, wherein the application panel interface is provided in a portion of the display of the television.

**Claim 13**

**[13.1]** The system of claim 10, wherein the microprocessor is further operable to: retrieve at least a portion of the content information from the source; and

**[13.2]** display, via the television, the content information associated with the determined source.

**Claim 14**

**[14.1]** The system of claim 10, wherein the second content information comprises information associated with content information marked as favorite.

## CERTIFICATE OF WORD COUNT

Pursuant to 37 C.F.R. § 42.24(d), Petitioner hereby certifies, in accordance with and in reliance on the word count provided by the word-processing system used to prepare this Petition, that the number of words in this paper is 13,957. Pursuant to 37 C.F.R. § 42.24(d), this word count excludes the table of contents, table of authorities, mandatory notices under § 42.8, certificate of service, certificate of word count, appendix of exhibits, and any claim listing.

Dated: March 14, 2024

Respectfully Submitted,

*/Steven W. Hartsell/*
Steven W. Hartsell (Reg. No. 58,788)
Lead Counsel for Petitioner

## CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e) and 37 C.F.R. § 42.105, I certify that I caused to be served on counsel for Patent Owner a true and correct copy of the foregoing Petition for *Inter Partes* Review Under 35 U.S.C. § 312 and 37 C.F.R. §§ 42.104 on March 14, 2024 by delivering a copy to the attorneys of record for Patent Owner as follows:

Per USPTO records via Federal Express:

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