

Inter Partes Review U.S. Patent No. 9,247,174

LG Electronics, Inc. v Multimedia Technologies PTE. Ltd., IPR2024-00352

Calmann Clements
Haynes Boone, LLP



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Overview of '174 Patent

Woods teaches “*displaying ... an application panel interface*”

Woods teaches “*providing a first content panel ... based on the content ...*”

Woods teaches first and second types of content panels

The prior art teaches the dependent claims



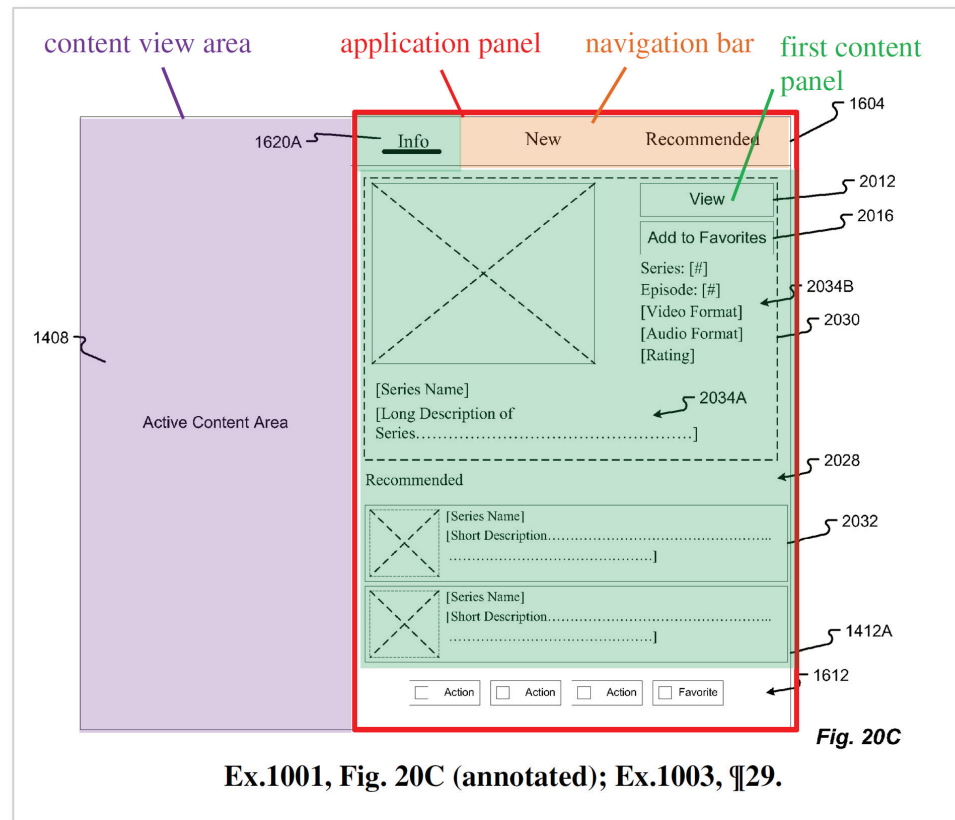
The '174 Patent

1. A method for displaying content on a television, comprising:

- receiving a first input via an input device associated with the television;
- in response to the first input, displaying, via the television, an application panel interface;
- determining content currently being shown on the television;
- identifying at least one of a content source and content information associated with the content currently being displayed via the television;
- 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, wherein the first content panel is a first type of application panel;
- receiving a first directional input via the input device associated with the television;
- 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, wherein the second content panel is a second type of application panel;
- retrieving, from memory, a second content information based on the second type of content panel; and
- displaying, via the television, the second content information in the second content panel.

Ex.1001, claim 1.

'174 Patent



Ex.1001, Fig. 20c; Petition, 8; Ex.1003, 29.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

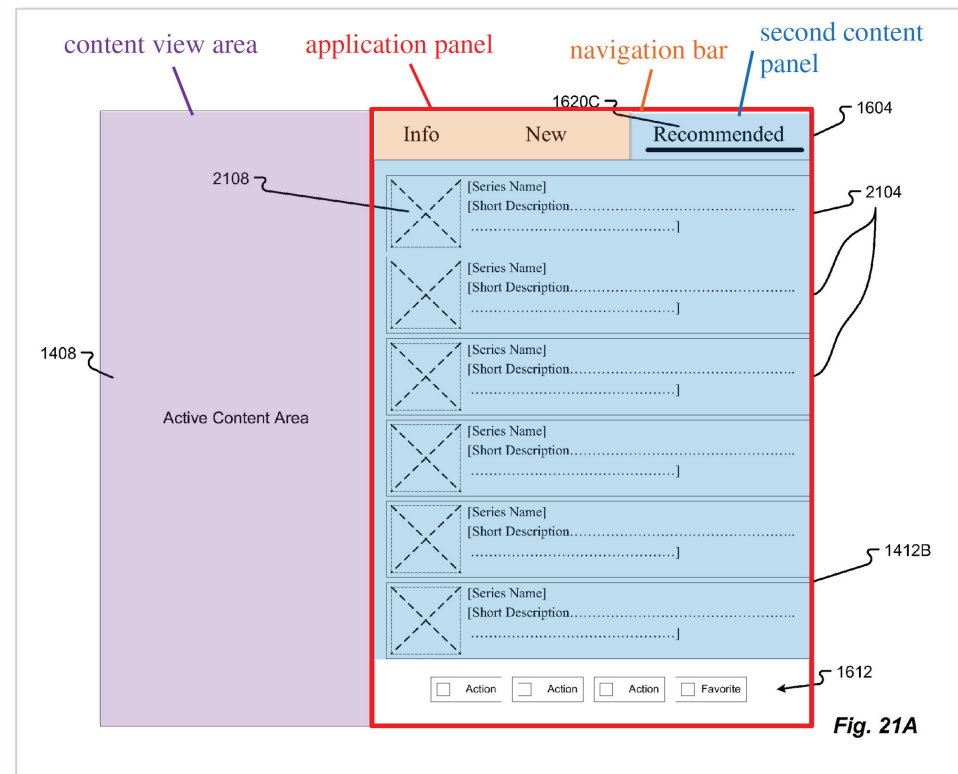
The '174 Patent

1. A method for displaying content on a television, comprising:

- receiving a first input via an input device associated with the television;
- in response to the first input, displaying, via the television, an application panel interface;
- determining content currently being shown on the television;
- identifying at least one of a content source and content information associated with the content currently being displayed via the television;
- 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, wherein the first content panel is a first type of application panel;
- receiving a first directional input via the input device associated with the television;
- 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, wherein the second content panel is a second type of application panel;
- retrieving, from memory, a second content information based on the second type of content panel; and
- displaying, via the television, the second content information in the second content panel.

Ex.1001, claim 1.

'174 Patent



Ex.1001, Fig. 21a; Petition, 9; Ex.1003, 29.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Overview of '174 Patent

Woods teaches “*displaying ... an application panel interface*”

Woods teaches “*providing a first content panel ... based on the content ...*”

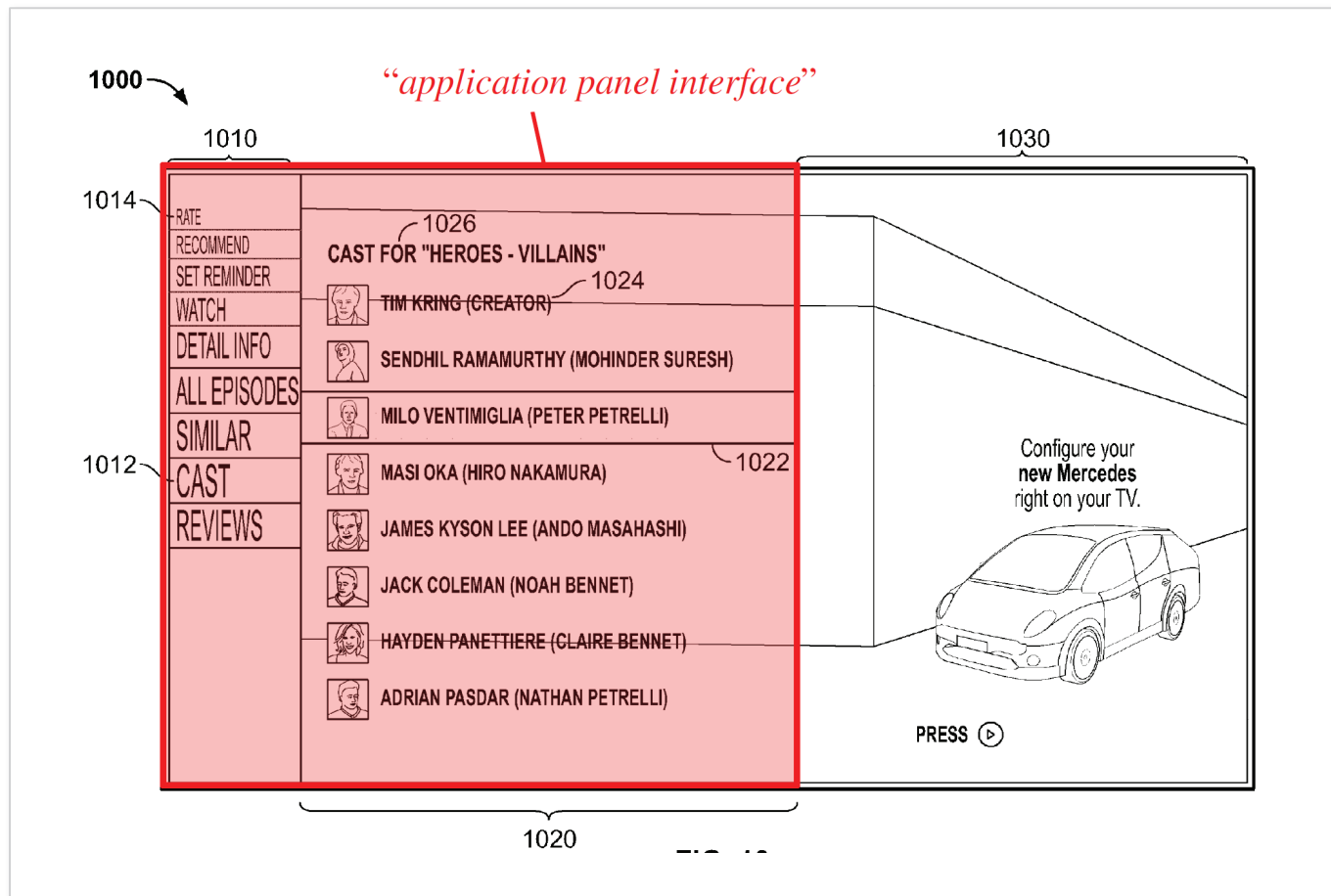
Woods teaches first and second types of content panels

The prior art teaches the dependent claims



Woods' menu bar 1010 and function options region 1020 teach an "application panel interface"

Woods



Ex.1005, Fig. 10; Petition, 24; Ex.1003, 71.

Patent Owner relies on unrecited claim limitations

Patent Owner's Response

response to a user input. A POSITA would understand the ordinary and customary meaning of “*application panel interface*” as referring to a panel interface providing information that is determined based on currently-displayed program content. *Surati*

Patent Owner Response, 31-32; Petitioner Reply, 5-8.

174 Patent, Claim 1

in response to the first input, displaying, via the television,
an application panel interface;

Ex.1001, Claim 1.

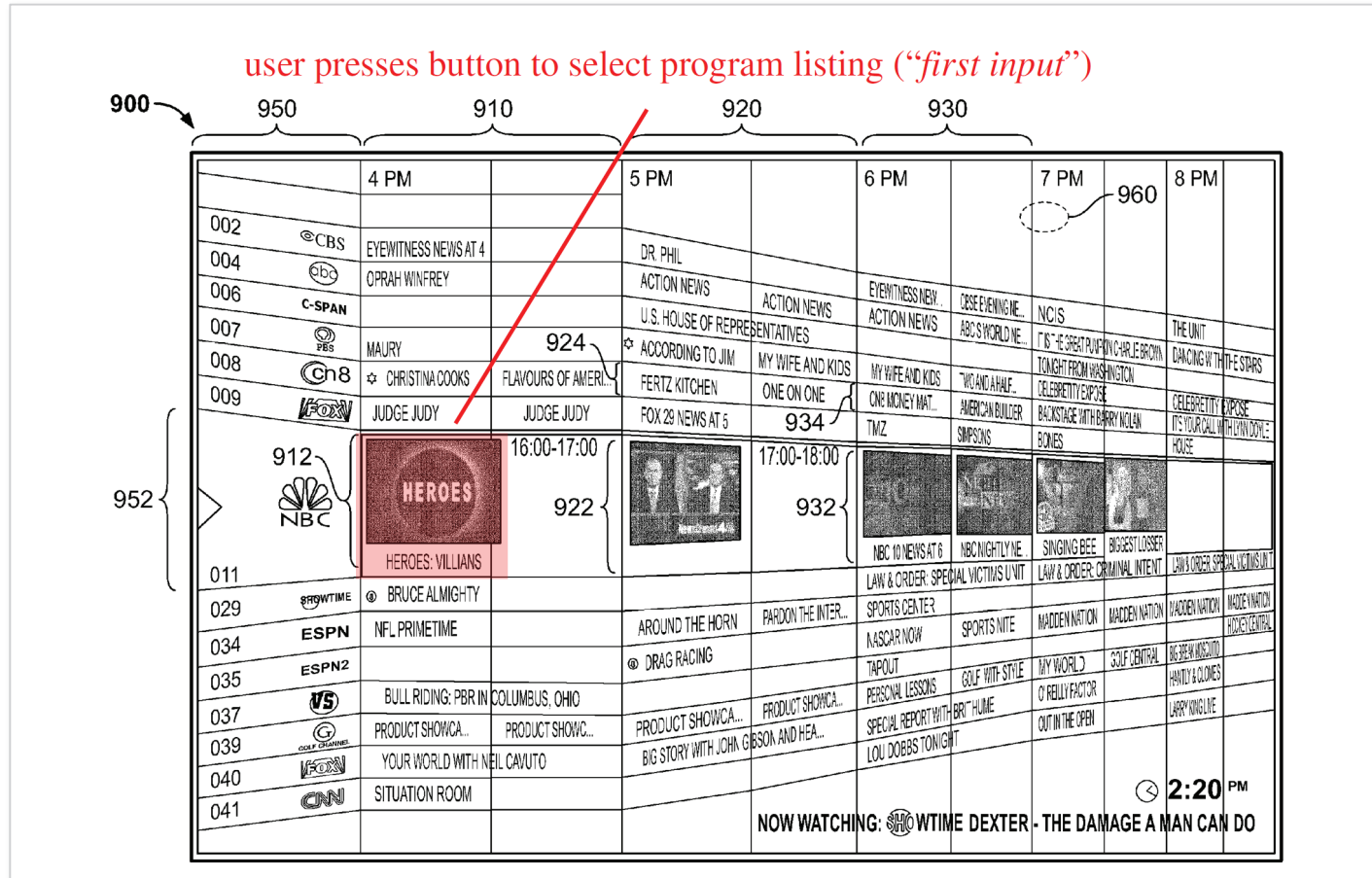


DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

7

The application panel is displayed “*in response to the first input*”

Woods



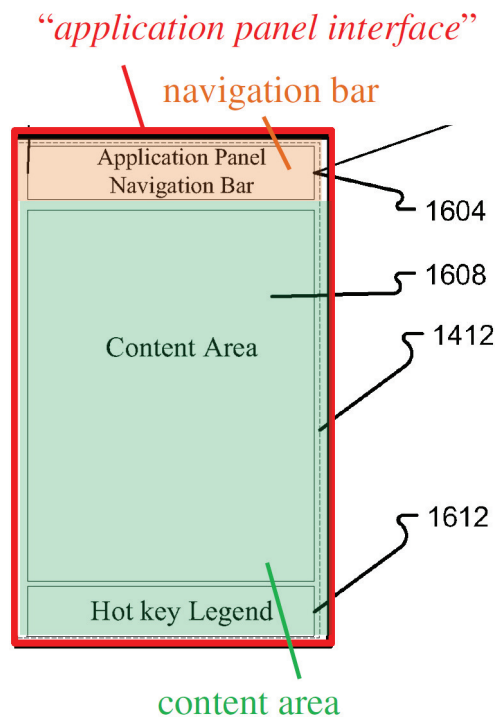
Ex.1005, Fig. 9; Petition, 21; Ex.1003, 65.



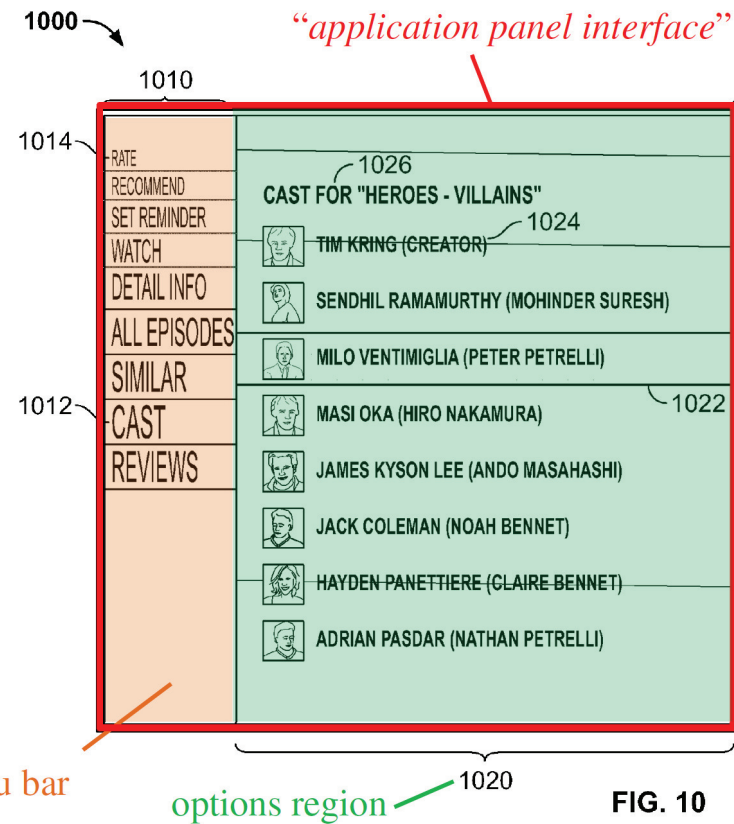
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Woods teaches an “application panel interface”

'174 Patent



Woods



Ex.1001, Fig. 16A; Ex.1005 (Woods), Fig. 10; Petition, 26; Ex.1003, 72; Petitioner Reply, 5-8.

Overview of '174 Patent

Woods teaches “*displaying ... an application panel interface*”

Woods teaches “*providing a first content panel ... based on the content ...*”

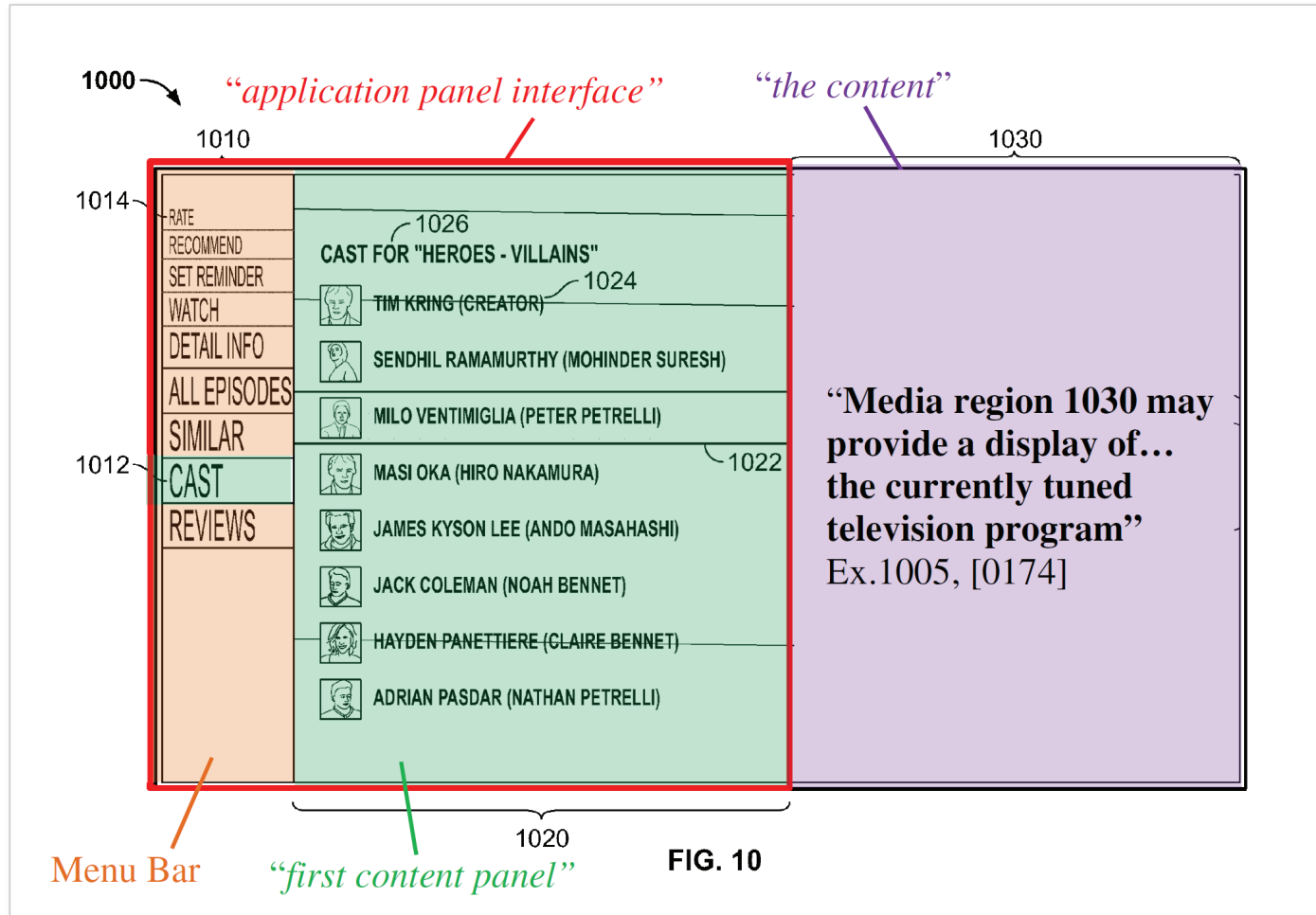
Woods teaches first and second types of content panels

The prior art teaches the dependent claims



Woods' panel is *"based on the content"*

Woods



Ex.1005, Fig. 10; Petition, 44; Ex.1003, 111; Petitioner Reply, 8-16.

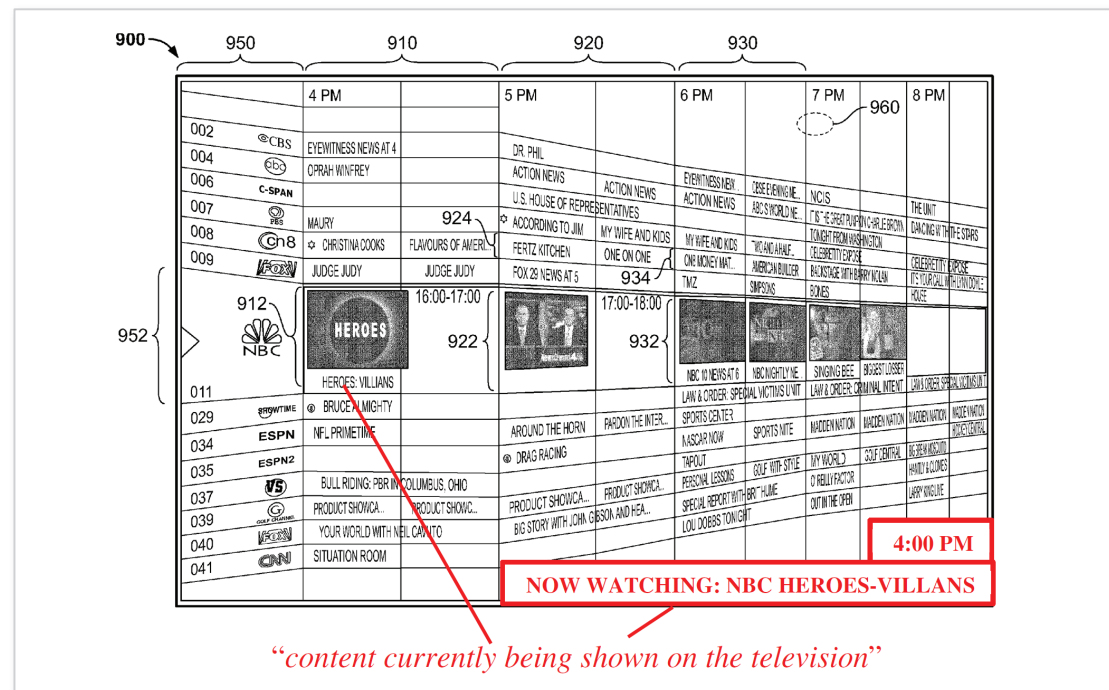
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Woods' panel is “based on the content”

Woods

[0155] When the user first enters screen 900, processing circuitry 306 may highlight or bring into focus the program listings corresponding to the currently tuned program or program being currently accessed. The currently tuned or

Ex.1005, [0155]; Petitioner Reply 8-16.



Woods' panel is “*based on the content*”

Petition

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].

Petition, 44; Ex.1003, 112; Petitioner Reply, 8-16.



Woods' panel is based on "*the at least one of the content source and the content information*"

Petition

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].

Petition, 44-45; Ex.1003, 113; Petitioner Reply, 8-16.

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

Petition, 40; Petitioner Reply, 9.



Patent Owner attacks the wrong example

Patent Owner's Expert

20 A. Yeah, well, I think what I mean is that it's
21 not based on the content that's being displayed. It's
22 based on the content that was selected. And so the
23 content that's selected isn't what's being displayed
24 because what's being displayed is a Mercedes
25 advertisement.

Ex.1013, 70; Petitioner Reply, 11.

Woods

[0174] Media region 1030 may provide a display of an advertisement, a video, a clip, the currently tuned television program, icon, image, text or any other suitable media. For

Ex.1005, [0174]; Petition, 41; Petitioner Reply, 14.



Patent Owner relies on unrecited claim limitations

Claim 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, wherein the first content panel is a first type of application panel;

Ex.1001, Claim 1.

Patent Owner Response

displayed via the television.” In other words, limitation 1.5.1 provides that the first content panel is determined based on the content source and/or the content information that is identified for the currently-displayed content in limitation 1.4. Surati Decl., ¶ 126.

Patent Owner Response, 18; Petitioner Reply 12-13.

As explained by Dr. Surati, Woods teaches that the information displayed in options region 1020 is **determined independently** of the currently-viewed content in media region 1030. The media region 1030 may display an advertisement, a clip

Patent Owner Response, 27; Petitioner Reply, 12-13.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Presenting information based on the current show was known

Petition

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

Petition, 45; Petitioner Reply, 14-15.

Patent Owner's Expert

11	Q. So let's say the user is watching Heroes.
12	Wouldn't it seem natural the user would want to learn
13	information about the show they're watching, Heroes?
14	A. That seems reasonable.

Ex.1013, 65; Petitioner Reply, 15.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Overview of '174 Patent

Woods teaches “*displaying ... an application panel interface*”

Woods teaches “*providing a first content panel ... based on the content ...*”

Woods teaches first and second types of content panels

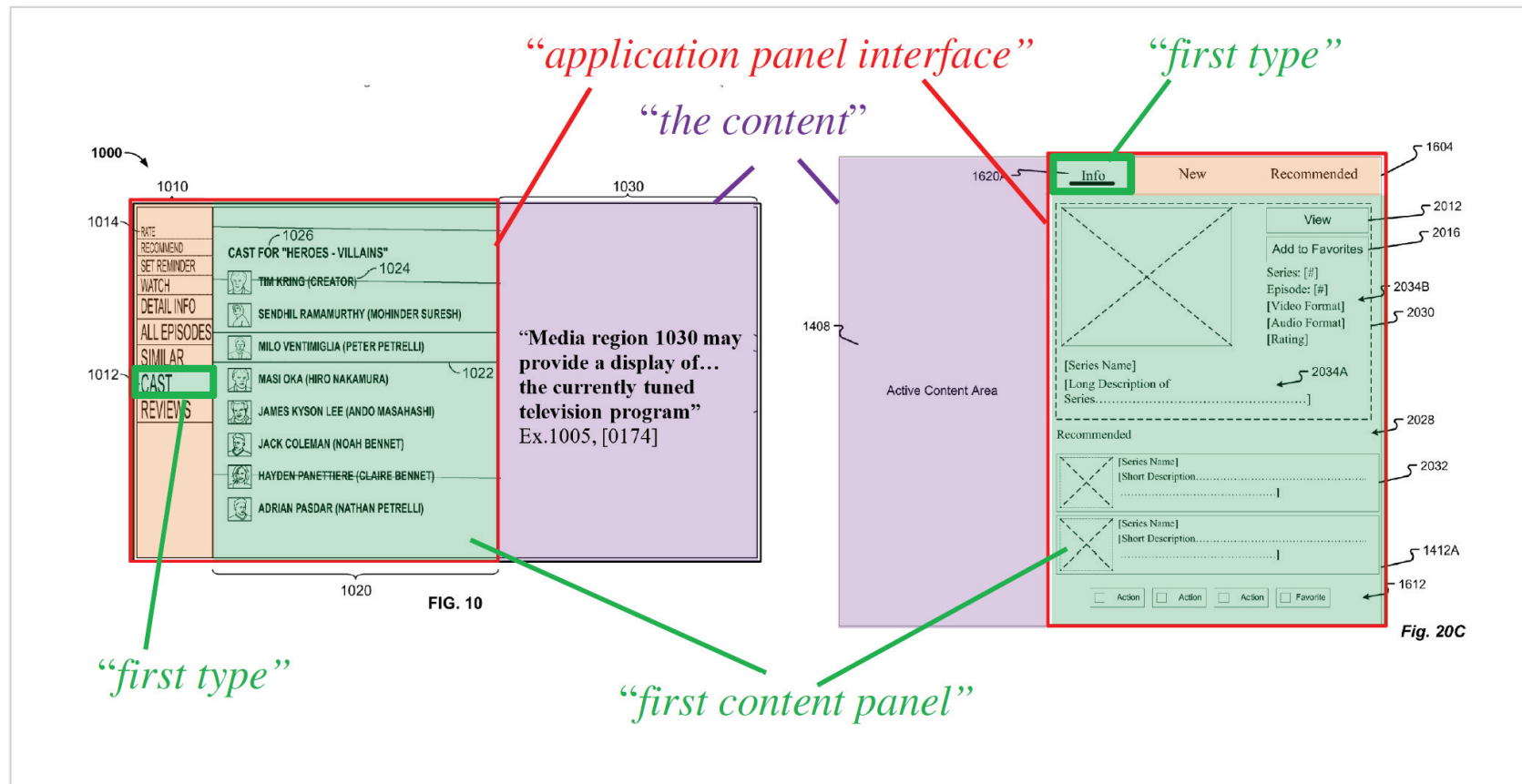
The prior art teaches the dependent claims



Woods teaches “a first type of application panel”

Woods

'174 Patent



Ex.1005, 10; Ex.1001, 20c; Petition, 47; Ex.1003, 119; Petitioner Reply, 16-23.

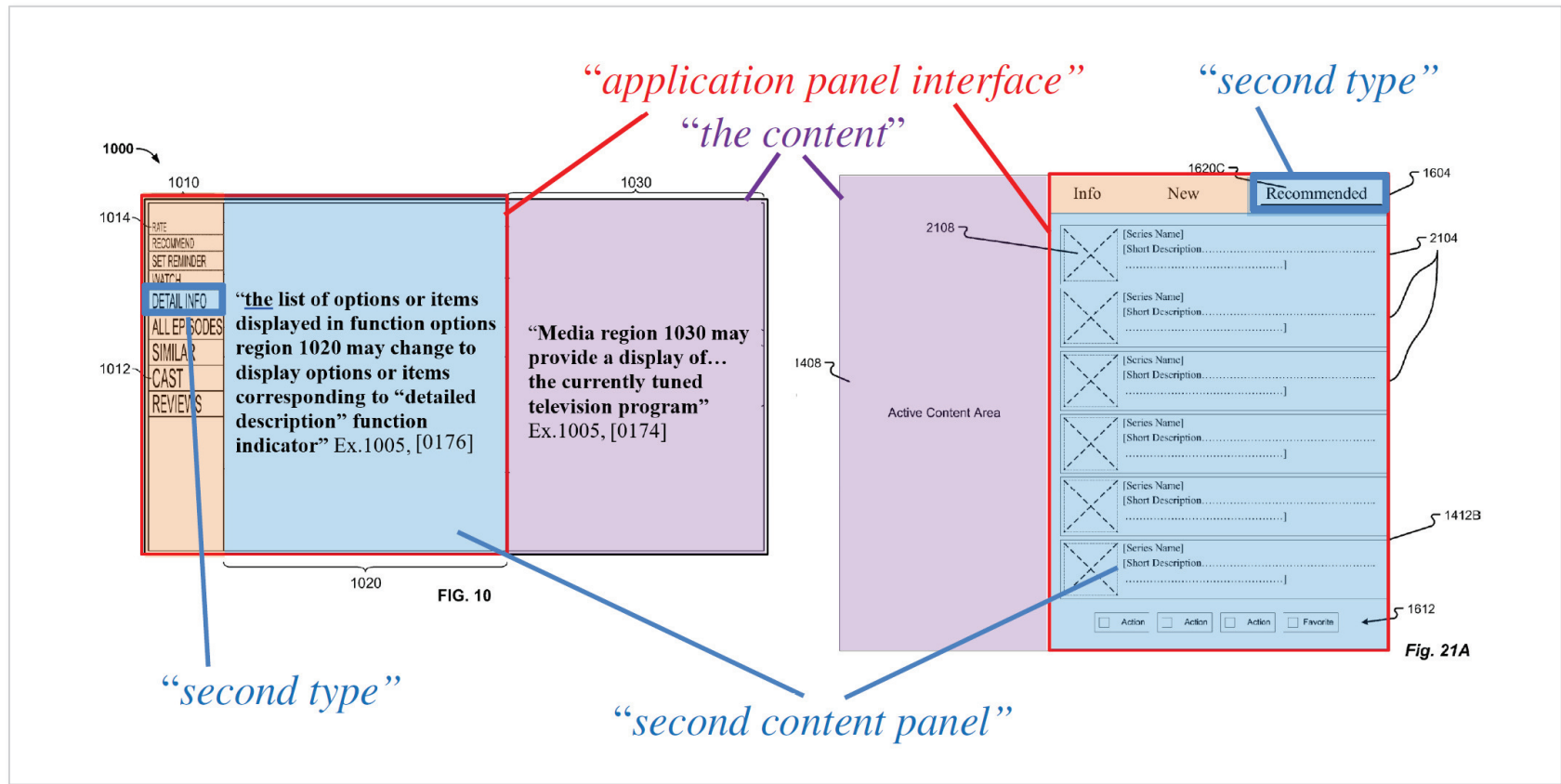


DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Woods teaches “a second type of application panel”

Woods

'174 Patent



Ex.1005; 10; Ex.1001, Fig. 21a; Petition, 54; Ex.1003, 142; Petitioner Reply, 16-23.

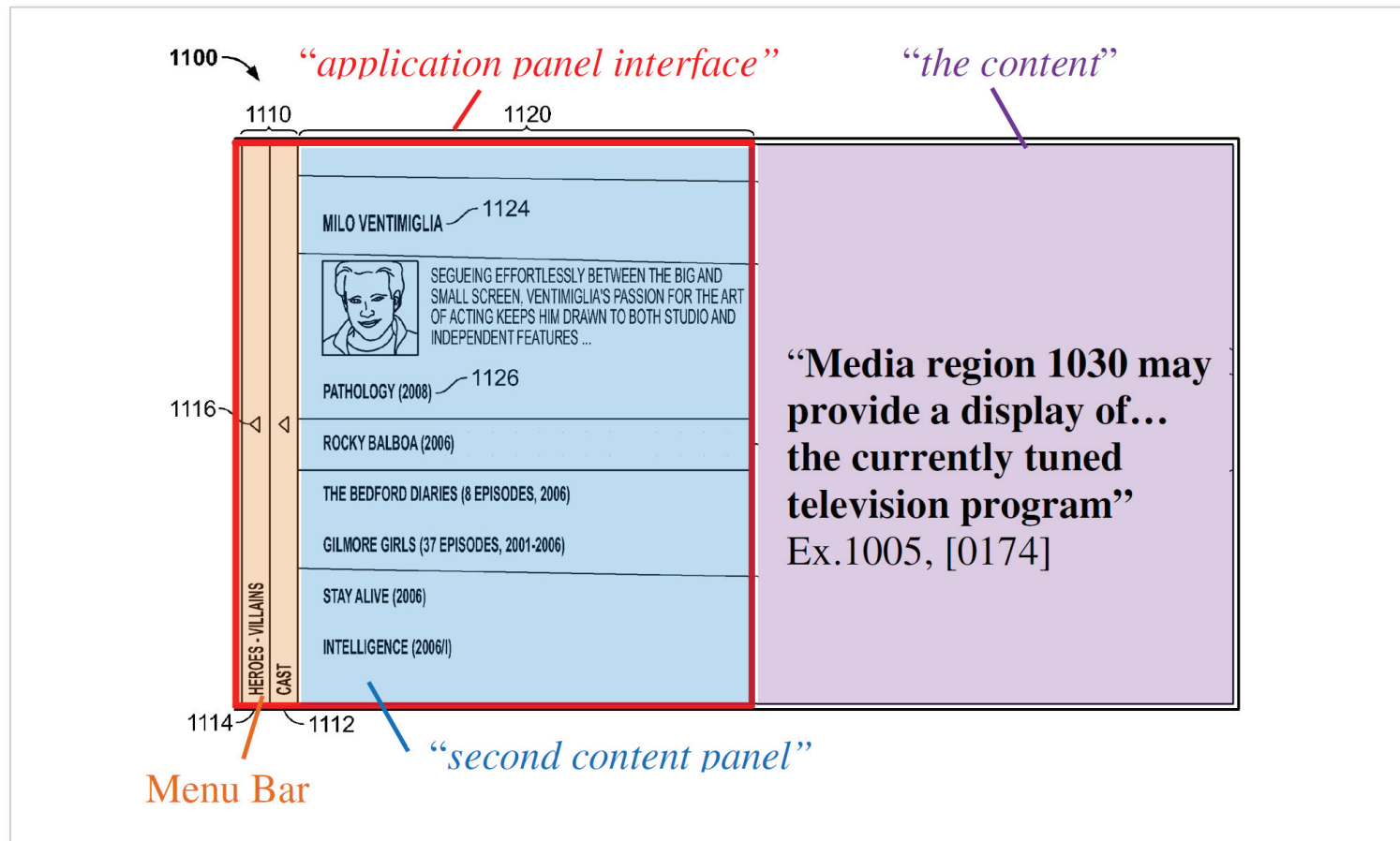


DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

20

Woods teaches different types of panels as claimed

Woods



Ex.1005, Fig. 11; Petition, 51; Ex.1003, 133; Petitioner Reply, 16-23.

Woods teaches a “*panel*” per the definition provided in the ‘174 patent

‘174 Patent

The term “panel,” as used herein, can mean a user interface displayed in at least a portion of the display. The panel may be interactive (e.g., accepts user input) or informational (e.g., does not accept user input). A panel may be translucent whereby the panel obscures but does not mask the underlying content being displayed in the display. Panels may be provided in response to a user input from a button or remote control interface.

Ex.1001, 7:36-44; Petition, 11; Petitioner Reply, 18.

Patent Owner’s Expert

20	Q.	You agree with that definition of a panel?
21	A.	Well, it's the one I need to use because it's
22		defined in the -- in the patent.

Ex.1013, 17; Petitioner Reply, 18.



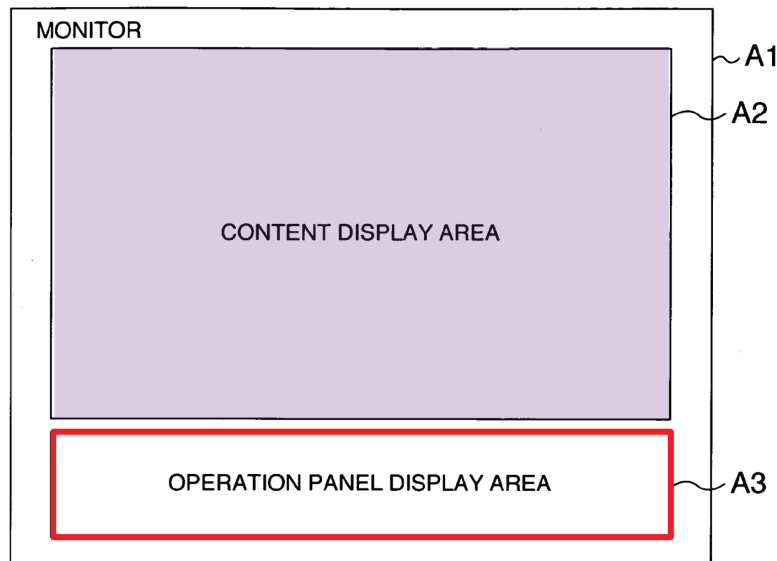
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

22

Woods and Machida teach different types of panels

Machida

FIG. 2



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

Ex.1008, Fig. 2; Petition, 91; Ex.1003, 266.

FIG. 3

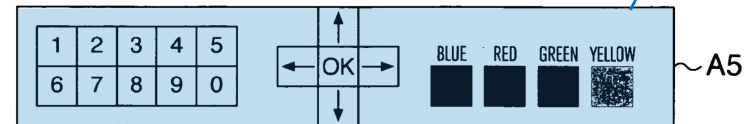
LINEAR CONTENT OPERATION PANEL



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

FIG. 4

INTERACTIVE CONTENT OPERATION PANEL



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

Ex.1008, Figs. 3-4; Petition, 92; Ex.1003, 267; Petitioner Reply, 32-33.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

A POSITA would have found it obvious to combine Woods and Machida

Petitioner's Expert

272. A POSITA would have found it obvious to implement Woods such that in one context (menu bar indicates “cast”) the user interface displays a predetermined panel in the form of options and items related to the cast within the predetermined options region 1020. In a different context (menu bar indicates “detailed description”) the user interface displays a second predetermined panel in the form of options and items related to “detailed description” within the same predetermined options region 1020.

Ex.1003, 272; Petition, 93-94; Petitioner Reply, 32.

274. 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:

Ex.1003, 274; Petition, 90-98.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

24

Overview of '174 Patent

Woods teaches “*displaying ... an application panel interface*”

Woods teaches “*providing a first content panel ... based on the content ...*”

Woods teaches first and second types of content panels

The prior art teaches the dependent claims



'174 Patent, Claim 6

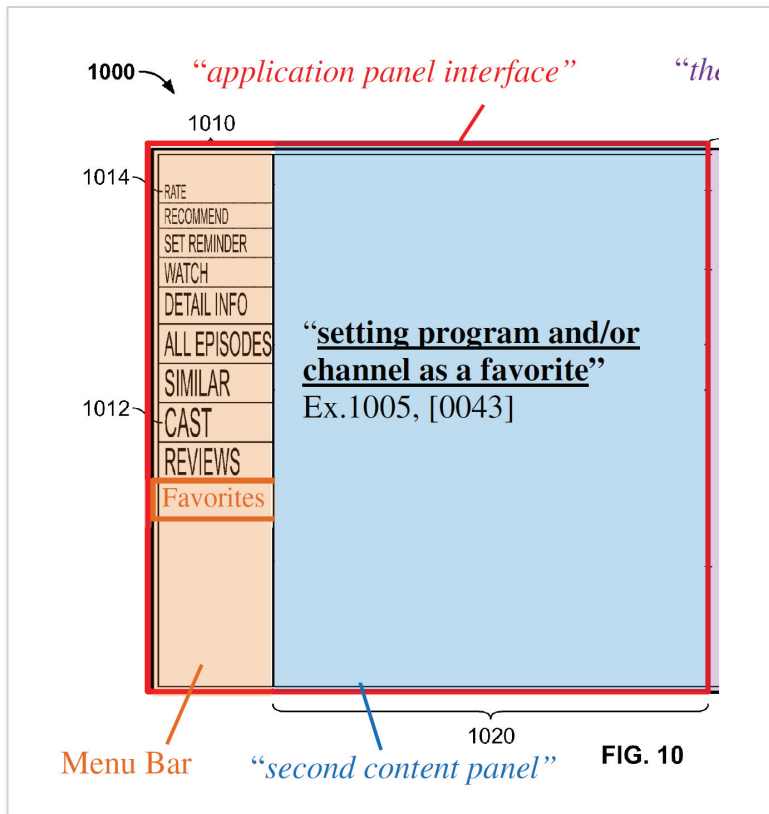
6. The method of claim 1, wherein the second content information comprises information associated with content information marked as favorite.

Ex.1001, Claim 6.



The prior art teaches content “*marked as favorite*”

Woods



Ex.1005, Fig. 10; Petition, 71; Ex.1003, 200.

[0043] Options region 126 may allow the user to access different types of media content, media guidance application displays, and/or media guidance application features. Options region 126 may be part of display 100 (and other display screens of the present invention), or may be invoked by a user by selecting an on-screen option or pressing a dedicated or assignable button on a user input device. 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. Features related to program listings may include searching for other air times or ways of receiving a program, recording a program, scheduling a reminder for a program, ordering a program, enabling series recording of a program, setting program and/or channel as a favorite, purchasing a program, or other features. Options

Ex.1005, [0043]; Petition, 70; Ex.1003, 199; Petitioner Reply, 24-25.

'174 Patent, Claim 8

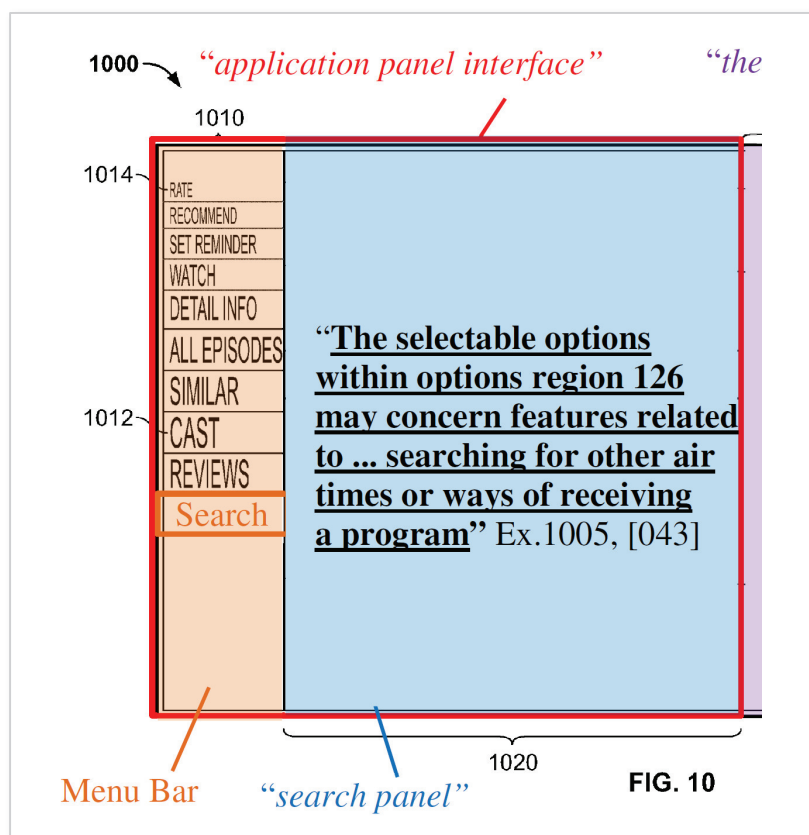
8. The method of claim 1, wherein the second type of content panel is a search panel.

Ex.1001, Claim 8.



The prior art teaches a “search panel”

Woods



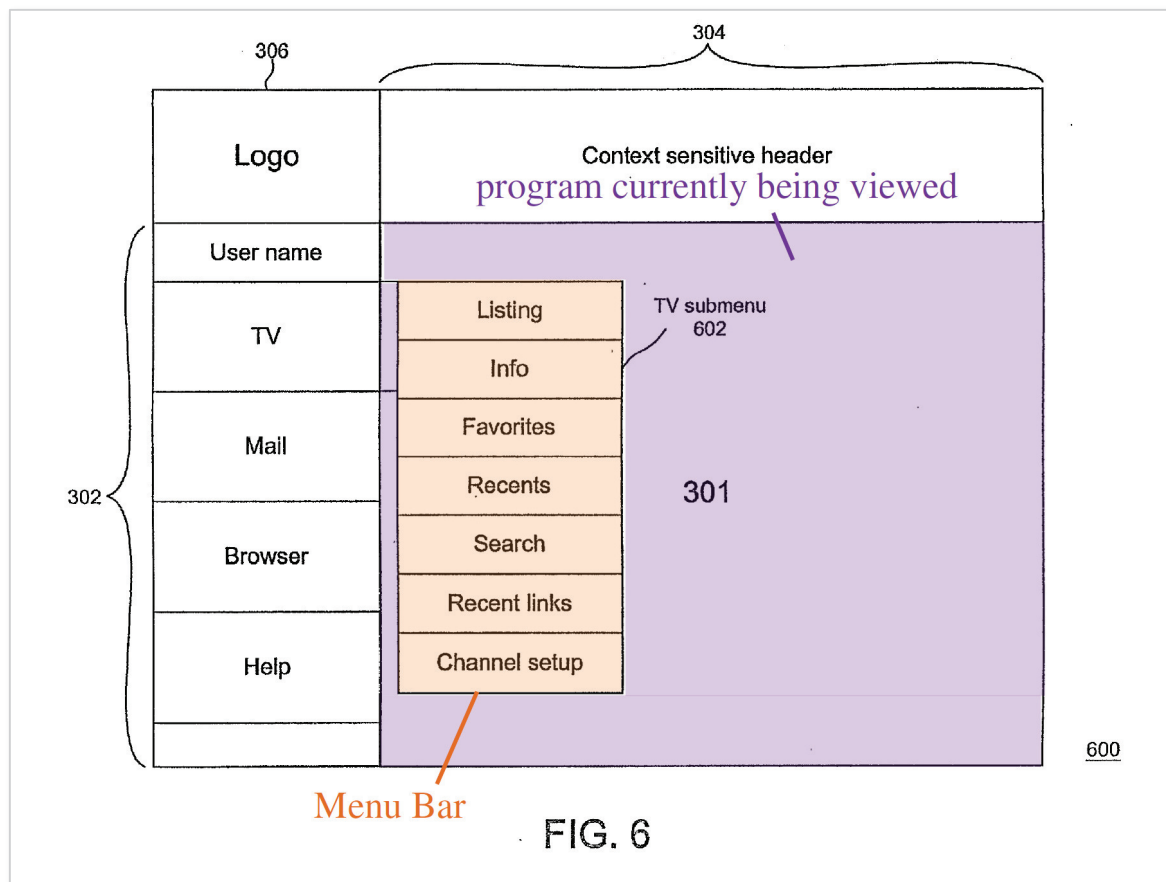
Ex.1005, Fig. 10; Petition, 76; Ex.1003, 215.

[0043] Options region 126 may allow the user to access different types of media content, media guidance application displays, and/or media guidance application features. Options region 126 may be part of display 100 (and other display screens of the present invention), or may be invoked by a user by selecting an on-screen option or pressing a dedicated or assignable button on a user input device. 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. Features related to program listings may include searching for other air times or ways of receiving a program, recording a program, scheduling a reminder for a program, ordering a program, enabling series recording of a program, setting program and/or channel as a favorite, purchasing a program, or other features. Options

Ex.1005, [0043]; Petition, 70; Ex.1003, 199; Petitioner Reply, 27-28.

Woods and Istvan teach “search” and “favorite”

Istvan



Ex.1006, Fig. 6; Petition, 81; Ex.1003, 240; Petitioner Reply, 29-31.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

30

A POSITA would have found it obvious to combine the teachings of Woods and Istvan

Petitioner's Expert

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,

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

Ex.1003, 250-51; Petitioner Reply, 29-31.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

31

'174 Patent, Claim 4

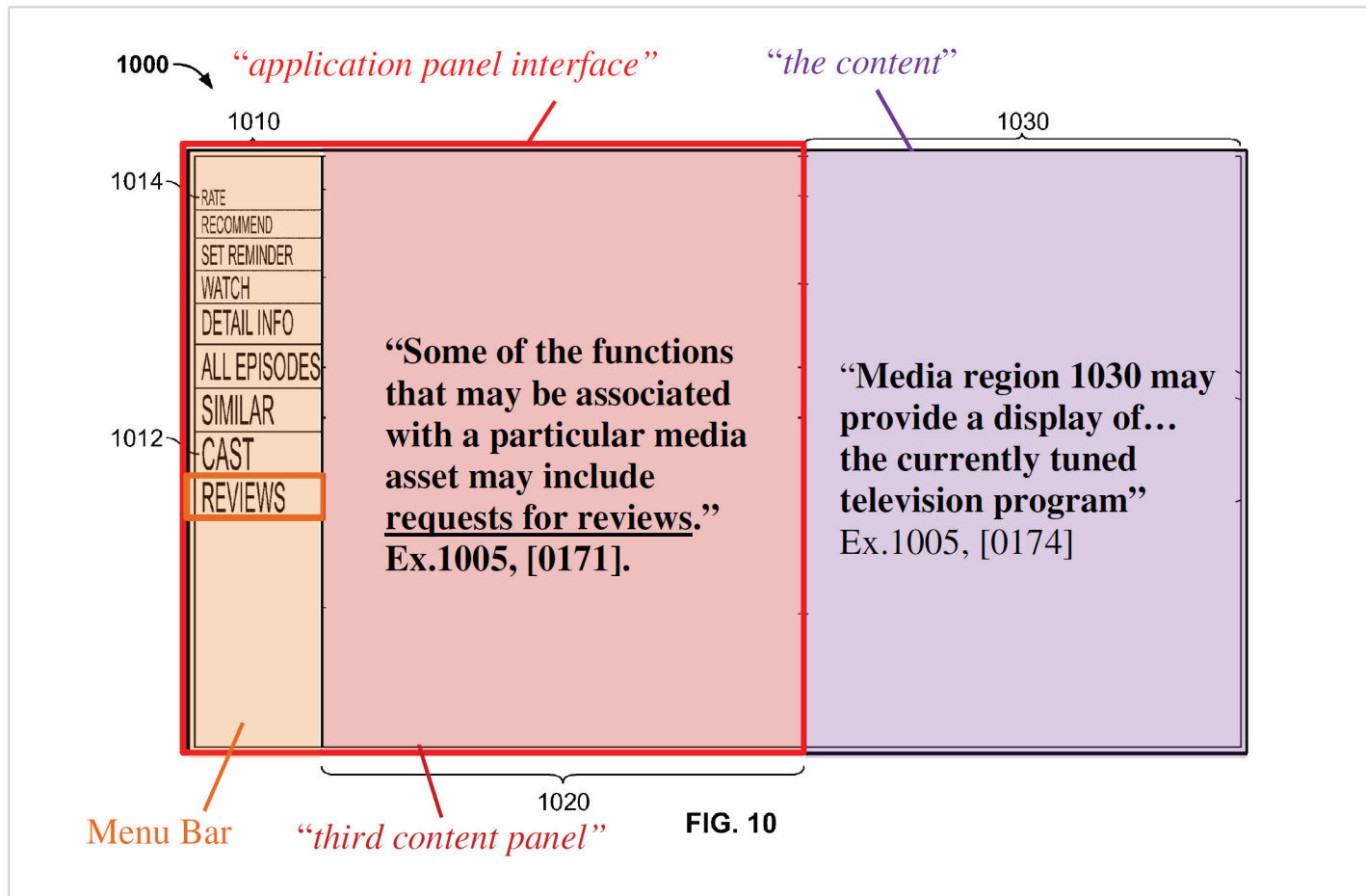
4. The method of claim 1, further comprising:
receiving a second directional input via the input device;
and
determining, based on a second direction associated with
the second directional input, a third content panel to
display via the television.

Ex.1001, claim 4.



Woods teaches a “third content panel”

Woods



Ex.1005, Fig. 10; Petition, 74; Ex.1003, 176; Petitioner Reply, 23-24.

'174 Patent, Claim 7

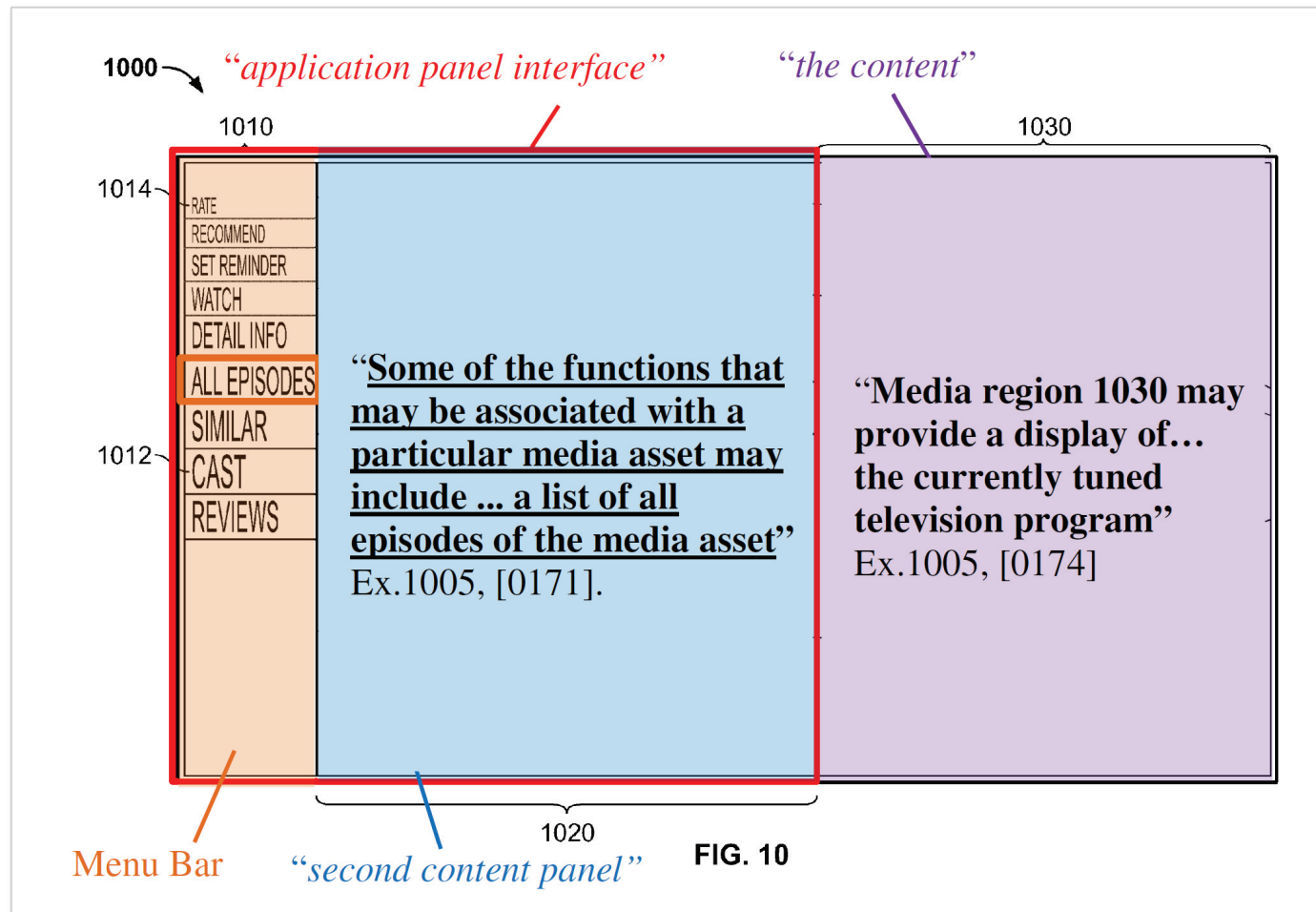
7. The method of claim 1, wherein the second content information comprises information associated with TV series episode content information.

Ex.1001, claim 7.



Woods teaches “TV series episode content information”

Woods



Ex.1005, Fig. 10; Petition, 74; Ex.1003, 209; Petitioner Reply, 25-27.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Inter Partes Review U.S. Patent No. 9,247,174

LG Electronics, Inc. v Multimedia Technologies PTE. Ltd., IPR2024-00352

Calmann Clements
Haynes Boone, LLP



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE