

Inter Partes Review U.S. Patent No. 10,419,805

LG Electronics, Inc. et al. v. Multimedia Technologies Pte. Ltd., IPR2024-00354

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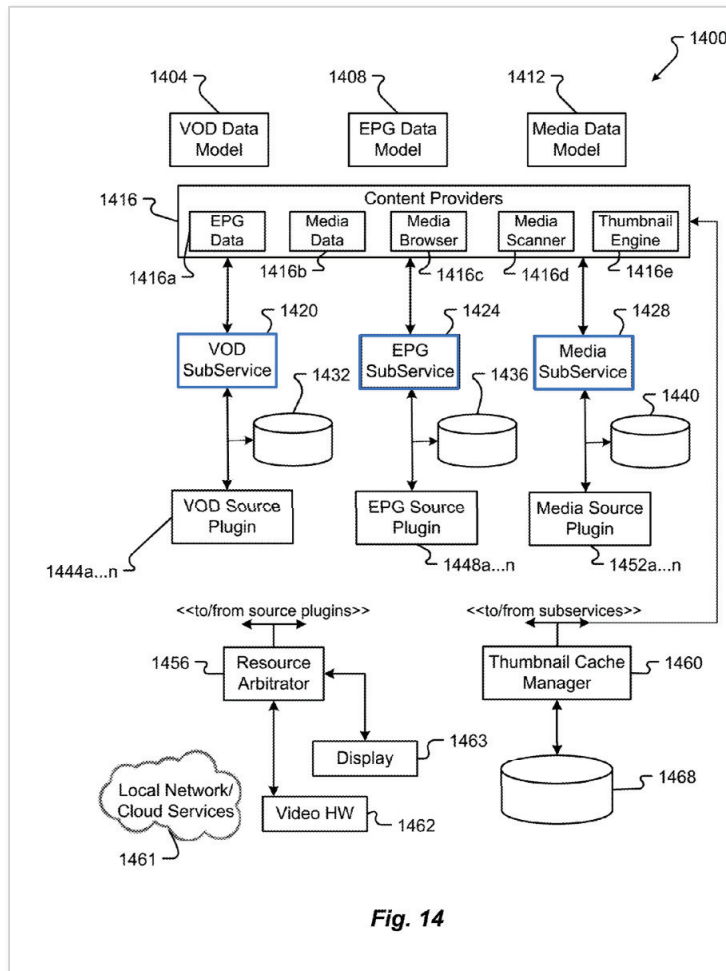
'805 Patent – IPR2024-00354; PETITIONER'S DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Agenda

- Overview of '805 Patent
- Claim Limitation [1.2.1] is Obvious
- Claim Limitation [1.2.4] is Obvious
- Claims 3 and 12 are Obvious
- Claims 4 and 13 are Obvious
- Claims 6 and 14 are Obvious



Background of '805 Patent



A data service system in an Intelligent Television (TV) includes an internal content provider module configured to provide content to video hardware or display of the Intelligent TV or to a content provider module or application of the Intelligent TV and a subservice configured to provide the internet content provider module with requested data for a pre-defined data model. The internal content provider mod-

Ex.1001, Abstract

* * * *

Further, media content and feeds from the various sources may also include metadata information embedded with these contents (i.e., close captions, subtitles, and other information). In one implementation, media source plugins 1452a-n

Ex.1001, 30:26-29

* * * *

1408, and media data model 1412. The received content from the various source plugins may be converted to the specific format handled by the respective data model. The data models provide uniform formats for the respective subservices (i.e., VOD subservice 1420, EPG subservice 1424, and media subservice 1428) and/or the internal content provider modules 1416 which interface with applications 416. In some implementations, step 1530 may be

Ex.1001, 33:23-30



Claim 1 of '805 Patent

What is claimed is:

[1.0]

1. A method of providing content for a television (TV), the method comprising:

[1.1.1]

receiving, by a processor, data relevant to one or more scheduled events from one of a corresponding subservice of a plurality of subservices, wherein the plurality of subservices comprises a video-on-demand (VOD) subservice, electronic programming guide (EPG) subservice, and a media subservice

[1.1.2]

[1.2.1]

organizing, by the processor, the data according to a pre-defined format corresponding to each of the plurality of subservices, wherein the pre-defined format comprises one of a VOD data model, an EPG data model and a media data model, wherein organizing the data according to the pre-defined format comprises converting the data received from the subservice into the pre-defined format of the corresponding data model and wherein each of the VOD data model, EPG data model, and media data model provide a uniform format for the plurality of subservices; and

[1.2.2]

[1.2.3]

[1.2.4]

[1.3]

providing, by the processor, the organized data to one or more of a plurality of content provider modules of the TV.

Ex.1001, claim 1 (with limitation numbering from Petition).



Instituted claims and grounds

Grounds	Claims	Basis
#1	1, 10, 17	35 U.S.C. § 103 over Melnychenko and Chen
#2	1-3, 6, 10-12, 16-18	35 U.S.C. § 103 over Melnychenko, Chen, Kim, and Lee-1
#3	4, 13	35 U.S.C. § 103 over Melnychenko, Chen, Kim, Lee-1, and Lee-2
#4	5	35 U.S.C. § 103 over Melnychenko, Chen, Kim, Lee-1, Lee-2, and Ferren
#5	6-8, 14, 15	35 U.S.C. § 103 over Melnychenko, Chen, Kim, Lee-1 and Choi

Pet., 11; Inst. Dec., 14.



'805 Patent – IPR2024-00354; PETITIONER'S DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

5

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- Overview of '805 Patent
- Claim Limitation [1.2.1] is Obvious
 - PO's construction of "pre-defined format" is wrong
 - Even under PO's construction, the claim limitation is still obvious
- Claim Limitation [1.2.4] ("Uniform Format") is Obvious
- Claims 3 and 12 are Obvious
- Claims 4 and 13 ("Media Metadata Personalized for a User") are Obvious
- Claims 6 and 14 ("Media Sources of the TV") are Obvious



Melnychenko teaches the claimed “*plurality of subservices*”

Multimedia does not contest that Melnychenko teaches VOD, EPG, and media subservices:

- [1.1.1] receiving, by a processor, data relevant to one or more scheduled events from one of a corresponding subservice of a plurality of subservices, wherein the plurality of subservices comprises a video-on-demand (VOD) subservice, electronic programming guide (EPG) subservice, and a media subservice

Melnychenko provides EPG content and metadata, VOD content and metadata, and media content and metadata.

[0063] Content source 416 may include one or more types of content distribution equipment including a television distribution facility, cable system headend, satellite distribution facility, programming sources (e.g., television broadcasters, such as NBC, ABC, HBO, etc.), intermediate distribution facilities and/or servers, Internet providers, on-demand media servers, and other content providers. NBC is a trade-

[0064] Media guidance data source 418 may provide media guidance data, such as the media guidance data described above. Media guidance data may be received and transmitted by media guidance data source 418 as metadata. Metadata is data on content or on other types of data. Metadata may include information on files, such as metadata for a specific file accessible via on-demand, information on content, such as program guide listings and other media guidance data, or even information on metadata, such as metadata describing how program guide listings are to be displayed. Metadata may serve to inform the user about content, may instruct the user equipment device how to display or process content or other metadata, and may even be used to monitor data transmitted and received, such as metadata on the size of transferred files or the rate of the transfer.

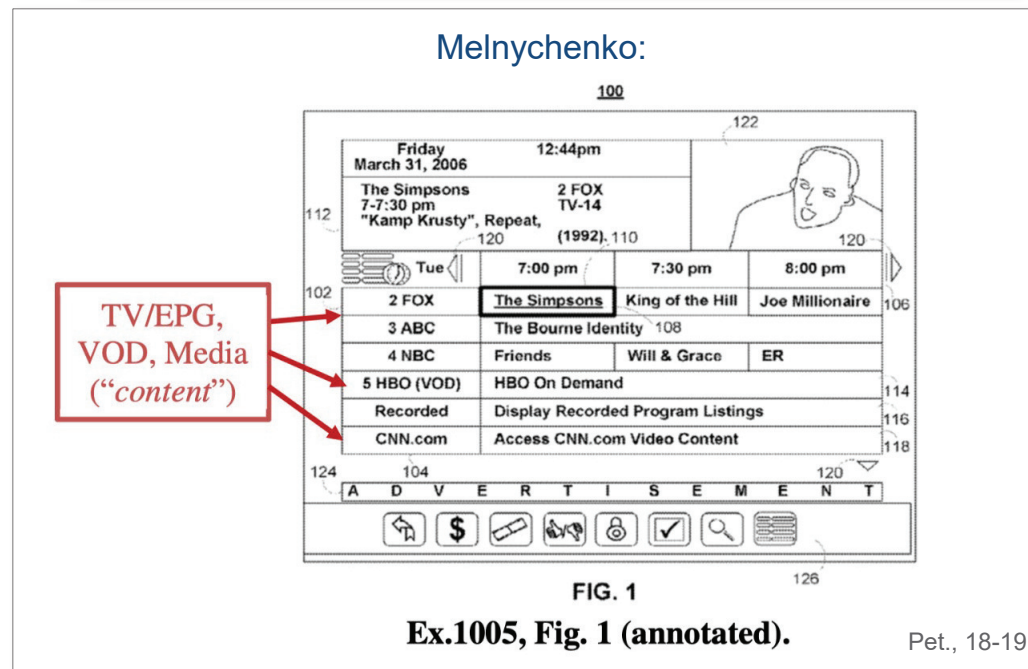
Ex.1005, [0063]-0064]



Melnychenko teaches the claimed “*plurality of subservices*”

Multimedia does not contest that Melnychenko teaches VOD, EPG, and media subservices:

- [1.1.1] receiving, by a processor, data relevant to one or more scheduled events from one of a corresponding subservice of a plurality of subservices, wherein the plurality of subservices comprises a video-on-demand (VOD) subservice, electronic programming guide (EPG) subservice, and a media subservice



Pet., 18-19, 25-26, 28-30; Ex.1003, ¶¶ 96, 125; Reply, 24; Ex.1005, Fig. 1
'805 Patent – IPR2024-00354; PETITIONER'S DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

The term “*pre-defined format*” refers to the order of data or metadata in a pre-defined format

‘805 patent, limitations [1.2.1]-[1.2.2]:

organizing, by the processor, the data according to a pre-defined format corresponding to each of the plurality of subservices, wherein the pre-defined format comprises one of a VOD data model, an EPG data model and a media data model, wherein organizing the

The ‘805 patent uses the term “pre-defined format” in the following passages:

For example, EPG information embedded with content feeds may contain limited information that are ordered in a pre-defined format (i.e., the order of other relevant information such as title, time, description, and/or other information about the programming). EPG information taken

Ex.1001, 30:1-5

Process 1600 next organizes the requested media and/or data according to a pre-defined format as content 1630. As discussed with respect to process 1500, in step 1540, the content provider modules 1416 process the received media and/or data from the corresponding subservices 1420, 1424, and 1428. In one implementation, each of the content provider modules 1416 is configured to serve the relevant applications 416 with information. The content provider modules will need to process the received media and/or data (i.e., in the forms of data models 1404, 1408, and 1412) and organize such media and/or data into a pre-defined format for use by the relevant applications 416.

Ex.1001, 34:49-60

Dr. Lippman:

10. In view of the above-cited portions of the ‘805 patent specification (Ex.1001, 30:1-5, 34:49-60), a POSITA would have understood that the scope and meaning of the term “pre-defined format,” as used in the claim and the ‘805 patent specification, refers to the order of data or metadata in a pre-defined format. As

Ex.1020, ¶10

Reply, 6-8; Ex.1020, ¶10; Ex.1001, 30:1-5, 34:49-60.

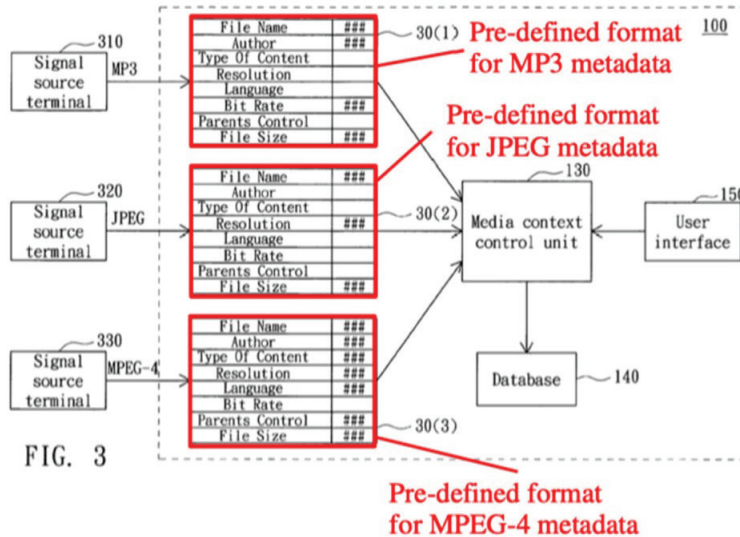


Chen teaches organizing metadata from different sources according to a “pre-defined format”

‘805 patent, limitation [1.2.1]:

organizing, by the processor, the data according to a pre-defined format corresponding to each of the plurality of subservices, wherein the pre-defined format

Chen:



Chen:

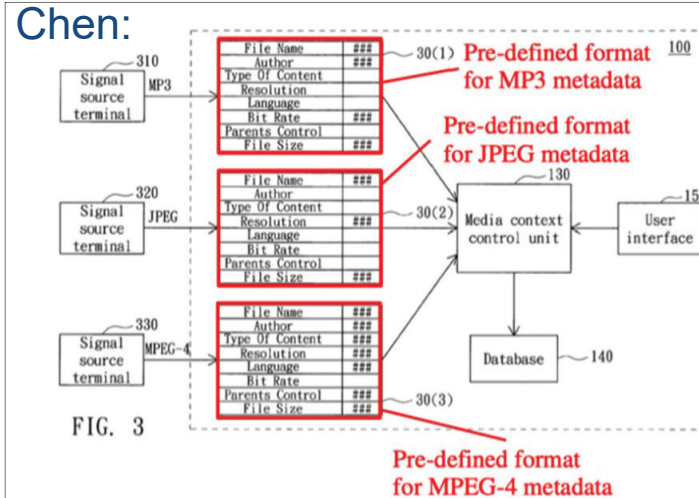
[0020] Referring to FIG. 3, the relationship among media data, metadata tables and a database according to the preferred embodiment of the invention is shown. Examples of signal source terminals 310, 320 and 330 include a USB storage unit, a personal computer and a cabled TV respectively outputting an audio data such as MP3 file, an image data such as JPEG file and a video data such as MPEG-4 file to the set top box 100. Importers (not illustrated) are used by the set top box 100 to respectively generate three metadata tables 30(1), 30(2) and 30(3) complying with a specific table. The specific table (not illustrated) is the table before the context of metadata is inputted to the columns of the metadata tables 30(1), 30(2) and 30(2). The metadata tables 30(1), 30(2) and 30(2) include columns such as file name, author, file size and so on. The columns correspond to the columns of the metadata of the MP3 file, JPEG file and MPEG-4 file. However, the metadata tables 30(1), 30(2) and 30(3) still include partial columns. Examples of partial columns include the bit rate column corresponding to the metadata of MP3 file only, the parent control column corresponding to the metadata of MPEG-4 file only, and the resolution column corresponding to the metadata of JPEG file. In the metadata table 30(1), only the metadata columns corresponding to MP3 file are inputted with data. In the metadata table 30(2), only the metadata columns corresponding to JPEG file are inputted with data. In the metadata table 30(3), only the metadata columns corresponding to MPEG-4 file are inputted with data. The metadata tables 30(1), 30(2) and 30(3) are illustrated in FIG. 3. The symbol ### in FIG. 3 denotes that the table is inputted with data. The

Ex.1007, [0020]



Chen teaches organizing metadata from different sources according to a “*pre-defined format*”

‘805 patent, limitation [1.2.1]:
organizing, by the processor, the data according to a pre-defined format corresponding to each of the plurality of subservices, wherein the pre-defined format



Ex.1007, Fig. 3 (annotated).

Ex.1003, ¶¶ 74, 147

Dr. Lippman identifies the pre-defined format:

30(3)). In Figure 3, MP3 metadata table 30(1), JPEG metadata table 30(2), and

MPEG-4 metadata table 30(3) are illustrated to be organized in a “*pre-defined*

format,” because the relevant fields in the columns are organized in the following

order: (1) File Name; (2) Author; (3) Type of Content; (4) Resolution; (5)

Language; (6) Bit Rate; (7) Parents Control; and (8) File size. Ex.1007, [0019]

Ex.1020, ¶ 35



Chen's examples are broader than Figure 3

Chen:

[0016] Referring to FIG. 1, a block diagram of a set top box according to a preferred embodiment of the invention is shown. The set top box 100 is operable to receive plural types of media data transmitted by a signal source terminal, for example, TV programs transmitted by a cabled TV, a video on demand (VoD) movie program transmitted by the Internet, an AV data transmitted by a personal computer, or media data stored in other storage devices such as a universal serial bus (USB) storage unit. The invention is exempli-

[0019] The types of media operable to the set top box of the invention is not limited to the first media data and the second media data disclosed in the above embodiment. In

The Petition:

A POSITA would have understood that Chen's teachings represent a general technological principle and are not limited to the exemplary content of MP3, JPEG, and MPEG-4. Ex.1007, [0009] (generally applying the teachings to "plural types of media data."), [0011] ("...non-limiting embodiments"), [0019] ("The types of media operable to the set top box of the invention is not limited."), [0022] ("While the invention has been described by way of example...the invention is not limited thereto."). Ex.1003, ¶151.

Pet., 35



Multimedia's proposed construction of "*pre-defined format*" is wrong

'805 patent, limitations [1.2.1]-[1.2.2]:

organizing, by the processor, the data according to a pre-defined format corresponding to each of the plurality of subservices, wherein the pre-defined format comprises one of a VOD data model, an EPG data model and a media data model, wherein organizing the

Multimedia's incorrect argument:

Specifically, the term "pre-defined format" refers to the format of the VOD data model, EPG data model, and media data model having a format that is defined prior to the organizing step (i.e., "pre-defined" prior to the organizing step). There are at least three "pre-defined formats," one each for the VOD data model corresponding to the VOD subservice, the EPG data model corresponding to the EPG subservice, and the media data model corresponding to the media subservice.

Resp., 20

Dr. Lippman's rebuttal:

16. Above, I cited Ex.1001, 34:49-60, which includes passage (1) cited by Multimedia and Dr. Surati. However, passages (2) and (3) cited by Multimedia and Dr. Surati (Ex.1001, 29:63-67, Ex.1001, 30:32-41) do not use the term "pre-defined format" or provide guidance on what this term means. The term "specific format" is used in passage (2), but the '805 patent specification does not define or suggest that a "specific format" is a "pre-defined format." The '805 patent specification does not define what the term "pre-defined format" means. Passage (3) describes different data models (VOD data model and media data model), but there is no discussion of any "pre-defined format" for any of the different data models or media formats.

Ex.1020, ¶16

Multimedia's alleged support:

- (2) An exemplary EPG source plugin receives and processes EPG information from a designated EPG information source. The EPG source plugin is configured to process the received EPG information according to the specific format of the corresponding designated EPG information source.

Ex.1001, 29:63-67

- (3) Similar to as discussed with respect to the EPG source plugins **1448a-n**, VOD source plugins **1444a-n** and media source plugins **1452a-n** may need to translate the various different media format and information received into a consistent model. In one implementation, information related to the VOD or media received from a corresponding VOD source plugin or media source plugin can be translated according to the respective VOD data model **1404** or media data model **1412** and stored into the respective storage **1432** or storage **1440**. The VOD or media content received can be

Ex.1001, 30:32-41

Reply, 9-11; Resp., 20; Ex.1020, ¶16; Ex.1001, 29:63-67, 30:32-41.



Multimedia's argument that Chen is only organizing data according to file types is wrong on the technology

Dr. Lippman:

38. Multimedia and Dr. Surati also argue that Chen “is only organizing data according to file types.” Resp., 31; see also Ex.2010, ¶¶125, 127-128. **This argument is inaccurate on the technology.** Resp., 31. As I explained in my first
* * * *
invention is not limited thereto.”). Chen provides example sources including “a video on demand (VoD)” and “a digital TV program, or a cabled TV program.” Ex.1007, claim 6 (“wherein the first media data or the second media data is...a VoD program...or a cabled TV program.”); *see also* Ex.1007, [0018]-[0019], [0022] (explaining that the set-top box receives a VOD program transmitted over the Internet). **As is known in the art, these services provide data streams and not files, as Multimedia incorrectly asserts.** *See, e.g.*, Ex.1006 (Kim), [0063] (image display apparatus (set-top box) uses real-time stream protocol (RTSP) for streaming content), [0142] (EPG received as “input stream signal” including “broadcasting information specifying the start time, end time, etc. of scheduled broadcast TV or radio programs”); Ex.1023 (Seo), [0017]-[0018], [0026]-[0027], Fig. 16C (describing EPG as streamed content); Ex.1024 (Dolce), [0068]-[0069] (describing VOD content as streamed content); Ex.1005 (Melnychenko), [0032], [0037] (describing Internet media content as streamed content). Ex.1020, ¶ 38



Melnychenko and Chen render obvious organizing metadata according to a “pre-defined format” under Multimedia’s incorrect construction

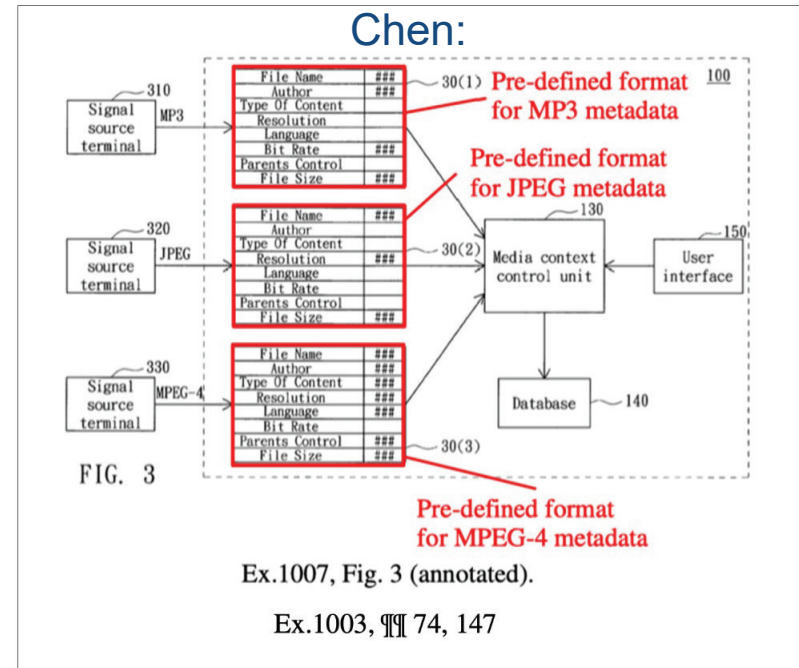
‘805 patent, limitation [1.2.1]:

organizing, by the processor, the data according to a pre-defined format corresponding to each of the plurality of subservices, wherein the pre-defined format

Chen:

author, file size and so on. The columns correspond to the columns of the metadata of the MP3 file, JPEG file and MPEG-4 file. However, the metadata tables 30(1), 30(2) and 30(3) still include partial columns. Examples of partial columns include the bit rate column corresponding to the metadata of MP3 file only, the parent control column corresponding to the metadata of MPEG-4 file only, and the resolution column corresponding to the metadata of JPEG file. In the metadata table 30(1), only the metadata columns corresponding to MP3 file are inputted with data. In the metadata table 30(2), only the metadata columns corresponding to JPEG file are inputted with data. In the metadata table 30(3), only the metadata columns corresponding to MPEG-4 file are inputted with data. The metadata tables 30(1), 30(2) and 30(3) are illustrated in FIG. 3. The symbol ### in FIG. 3 denotes that the table is inputted with data. The

Ex.1007, [0020]

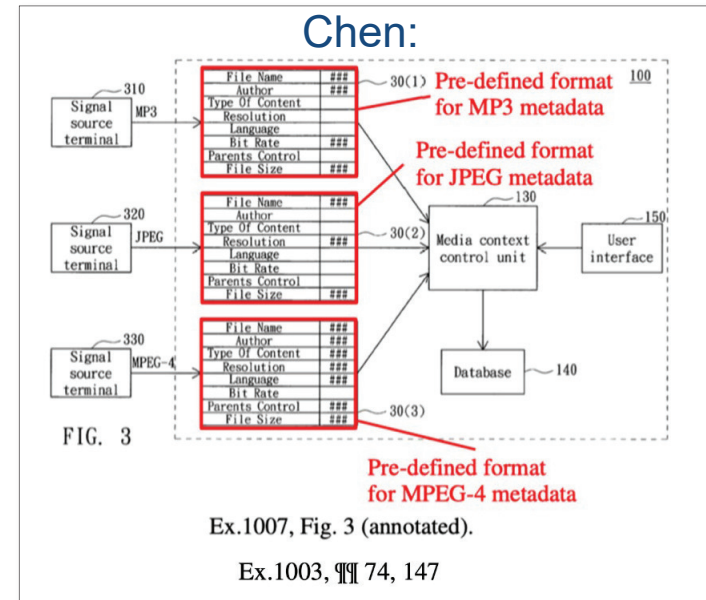


Melnychenko and Chen render obvious organizing metadata according to a “pre-defined format” under Multimedia’s incorrect construction

Dr. Lippman:

Even under this incorrect construction, the combination of Melnychenko and Chen renders this obvious. As I explained in my first Declaration, Melnychenko teaches the claimed EPG subservice, VOD subservice, and media subservice. Ex.1003, ¶¶134-138. Further, as I explained in my first Declaration, it would have been obvious to organize the EPG subservice, VOD subservice, and media subservice, as taught by Melnychenko, according to pre-defined formats. Specifically, the metadata in each of the tables for EPG, VOD, and media subservices would be organized in a “pre-defined format,” because they include different metadata as indicated by symbol “###,” as taught by Chen. Ex.1007, [0020]; Ex.1003, ¶¶149-150.

Ex.1020, ¶ 37



Chen:

file. In the metadata table 30(1), only the metadata columns corresponding to MP3 file are inputted with data. In the metadata table 30(2), only the metadata columns corresponding to JPEG file are inputted with data. In the metadata table 30(3), only the metadata columns corresponding to MPEG-4 file are inputted with data. The metadata tables 30(1), 30(2) and 30(3) are illustrated in FIG. 3. The symbol ### in FIG. 3 denotes that the table is inputted with data. The

Ex.1007, [0020]

Reply, 23-25; Ex.1020, ¶ 37; Ex.1007, [0020].



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- Claim Limitation [1.2.4] is Obvious
 - PO's construction of "uniform format" is wrong
- Claims 3 and 12 are Obvious
- Claims 4 and 13 ("Media Metadata Personalized for a User") are Obvious
- Claims 6 and 14 ("Media Sources of the TV") are Obvious



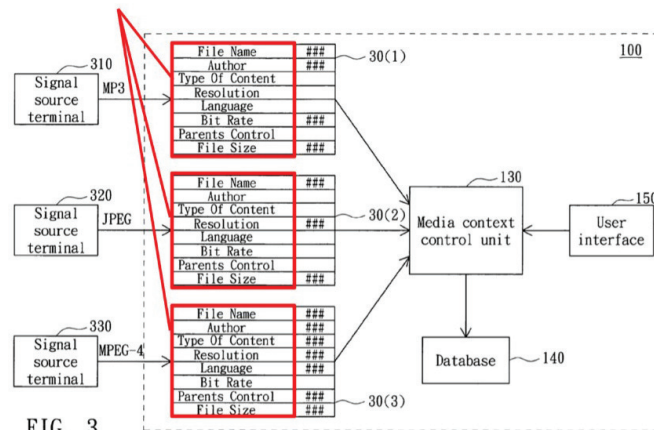
Chen's metadata tables have "a uniform format" by including the same fields

Limitation [1.2.4]:

and wherein each of the VOD data model, EPG data model, and media data model provide a uniform format for the plurality of subservices; and

Chen:

The tables have the same fields



Metadata tables 30(1)-30(3) have uniform format.

Ex.1007, Fig. 3 (annotated).

Pet., 44; Ex.1003, ¶180

Chen:

[0017] The set top box 100 further includes a user interface 150 to access all the media data operable to the set top box 100 by the specific table of uniform format. Since the Ex.1007, [0017]

to the set top box 100. Importers (not illustrated) are used by the set top box 100 to respectively generate three metadata tables 30(1), 30(2) and 30(3) complying with a specific table. The specific table (not illustrated) is the table before the context of metadata is inputted to the columns of the metadata tables 30(1), 30(2) and 30(2). The metadata tables 30(1), 30(2) and 30(2) include columns such as file name, author, file size and so on. The columns correspond to the columns of the metadata of the MP3 file, JPEG file and MPEG-4 file. However, the metadata tables 30(1), 30(2) and 30(3) still include partial columns. Examples of partial columns include the bit rate column corresponding to the metadata of MP3 file only, the parent control column corresponding to the metadata of MPEG-4 file only, and the resolution column corresponding to the metadata of JPEG file. In the metadata table 30(1), only the metadata columns corresponding to MP3 file are inputted with data. In the metadata table 30(2), only the metadata columns corresponding to JPEG file are inputted with data. In the metadata table 30(3), only the metadata columns corresponding to MPEG-4 file are inputted with data. The metadata tables 30(1), 30(2) and 30(3) are illustrated in FIG. 3. The symbol ### in FIG. 3 denotes that the table is inputted with data. The

Ex.1007, [0020]



Claim 1 requires “a uniform format,” not a plurality of uniform formats

‘805 Patent, limitation [1.2.4]:

and wherein each of the VOD data model, EPG data model, and media data model provide a uniform format for the plurality of subservices; and

Dr. Lippman confirms the term is singular:

13. The term “uniform format” appears nowhere else in the ‘805 patent specification other than the claims. As is evident in Ex.1001, 33:25-30 above, **the ‘805 patent does not appear to ascribe any specific meaning to the term “uniform format” and the passage does not limit the scope of this term to require a plurality of uniform formats.** As such, a POSITA would ascribe to the claim term its ordinary and customary meaning. For example, consistent with my first Declaration, the prior art expressly teaches a ‘uniform format,’ which is within the scope of the ‘805 patent’s claims. See Ex.1003, ¶¶179-180 (showing how Chen teaches a “uniform format”).

Ex.1020, ¶ 13



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The prior art renders claims 3 and 12 obvious

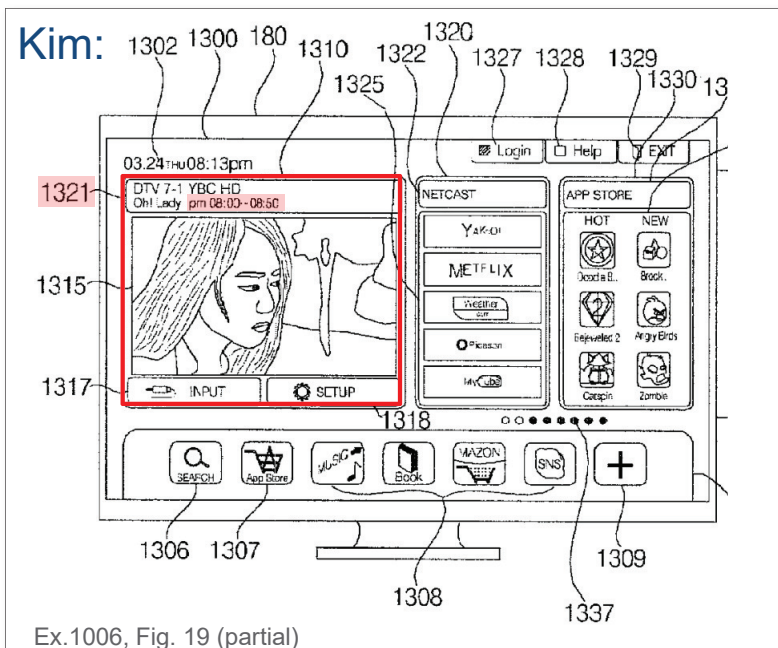
'805 patent:

3. The method of claim 2, wherein the EPG data provider is configured to serve one or more applications of the TV with EPG information in a read-only format.

Kim:

[0199] The information object 1321 that displays information related to the broadcast image 1315 may include a channel number (DTV7-1), a channel name (YBC HD), the title of a broadcast program ("Oh! Lady"), and an airtime (8:00-8:50 PM) for the broadcast program. Therefore, the user may readily obtain information regarding the displayed broadcast image 1315 through the information object 1321. Moreover,

Ex.1006, [0199]



Pet., 71-72; Reply, 28; Ex.1006, Fig. 19, [0199].



'805 Patent – IPR2024-00354; PETITIONER'S DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

21

Kim renders obvious serving EPG information in a read-only format

Dr. Lippman:

281. Further, Kim renders obvious that the “EPG information [is] in a read-only format.” For example, Kim discloses that “[t]he information object 1321 [in the broadcast card object 1310] that displays information related to the broadcast image 1315 may include a channel number (DTV7-1), a channel name (YBC HD), the title of a broadcast program (‘Oh! Lady’), and an airtime (8:00-8:50 PM) for the broadcast program.” Ex.1006, [0199]. This information is served in a read-only format because “the user may readily obtain information regarding the displayed broadcast image 1315 through the information object 1321,” and “EPG information” about the broadcast program is displayed “if the user selects the information object 1321.” Ex.1006, [0199]. A POSITA would have understood that this EPG information is served in a read-only format because its purpose is to provide information to the user about the broadcast program currently displayed and therefore may not be edited. See, e.g., Ex.1006, [0142] (controller 170 receives “encoded signal such as an EPG which includes broadcasting information specifying the start time, end time, etc. of scheduled broadcast TV or radio programs.”).

Ex.1003, ¶ 281

‘805 patent:

3. The method of claim 2, wherein the EPG data provider is configured to serve one or more applications of the TV with EPG information in a read-only format.

Dr. Lippman:

41. Multimedia and Dr. Surati appear to be suggesting that Kim must provide that *all* EPG information may not be edited. Resp., 43; Ex.2010, ¶¶159-160. However, claims 3 and 12 do not require that *all* EPG information must be read-only. It would be obvious to serve certain types of EPG information, such as the channel number, channel name, broadcast program title, and airtime disclosed in Kim (Ex.1006, [0199]), in a read-only format because that EPG information (e.g., channel number such as 7, 9, 10, etc. or channel name such as ABC, CBS, ESPN, FOX, etc.) is designated by the broadcast provider as static information that should not be editable.

Ex.1020, ¶ 41



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- Claims 6 and 14 ("Media Sources of the TV") are Obvious



Lee-2's favorite channels have “*media metadata personalized for a user*”

‘805 patent:

4. The method of claim 2, wherein the media data provider is configured to provide **media metadata personalized for a user.**

Lee-2:

Referring to FIG. 39B, upon selection of **the favorite channel object 2019**, a favorite channel list screen including a favorite channel list is displayed fullscreen.

The favorite channel list screen may include a plurality of groups A through D.

In FIG. 39B, a group area 3920 includes tabbed menus including the plurality of groups, for example, A group, B group, C group, and D group. **Each group favorite channel list may correspond to the favorite channel list of each user.**

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

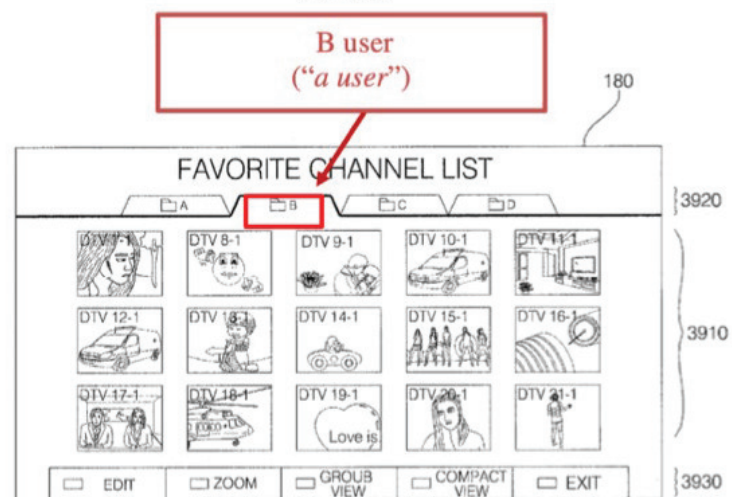
Ex.1009, 41:47-55

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

Ex.1009, 41:61-67

Lee-2:

FIG. 39B



Ex.1009, Fig. 39B (annotated).



Lee-2's favorite channels have "*media metadata personalized for a user*"

'805 patent:

4. The method of claim 2, wherein the media data provider is configured to provide **media metadata personalized for a user.**

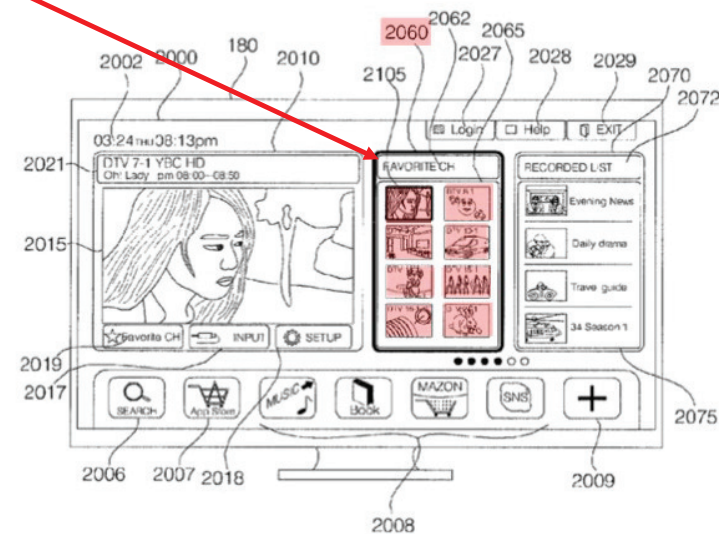
User-selected favorite channels display personalized metadata

Dr. Surati:

6	Q. Okay. And there are different channels shown
7	based on our selection, correct?
8	A. Sure.
9	Q. Okay. And if the different -- if there are
10	different channels shown aren't there different metadata
11	corresponding to the different channels?
12	A. So there is -- yeah, two different channels
13	would have different metadata.

Lee-2:

FIG. 33B



Ex.1009, Fig. 33B (annotated).



The Board should construe “*media metadata personalized for a user*” according to its plain and ordinary meaning

‘805 patent:

4. The method of claim 2, wherein the media data provider is configured to provide **media metadata personalized for a user.**

Dr. Lippman:

19. As I explain below, the term “*media metadata personalized for a user*” should be construed according to its **plain and ordinary meaning as “media metadata that has been personalized for a user.”** This term should not be construed to require limitations from the specification that are not recited in the claim.

Ex.1020, ¶ 19



Multimedia's construction of "*media metadata personalized for a user*" improperly imports limitations not required by the claim

'805 patent:

4. The method of claim 2, wherein the media data provider is configured to provide media metadata personalized for a user.

Dr. Surati is relying on limitations not recited in the claims:

16 Q. Okay. So if we are going with your first
17 sentence in paragraph 54 which adds the word "content,"
18 where do you see the word "content" in claim 4?
19 A. There is no word "content" in claim 4.
20 Q. Okay. So if we are going with your second
21 sentence in paragraph 54, which says the metadata
22 content of the same media is personalized, i.e.
23 different for each user, where do you see that in claim
24 4?
25 A. Don't see it.

Ex.1021, 125:16-25

12 Q. I just want to know, are you saying that the
13 metadata has to be edited in order to be personalized?
14 A. I am.
15 Q. Okay. So you are saying that in order to be
16 personalized there has to be a specific requirement that
17 the metadata is edited?
18 A. Yeah.

Ex.1021, 178:12-18

16 Q. So at the end of the paragraph you cite a
17 sentence and you emphasize this sentence which talks
18 about generating the personalized media metadata, right?
19 A. That's right.
20 Q. Okay. So do you see the word "generating" or
21 "generate" in claim 4 at all?
22 A. Doesn't appear to be.

Ex.1021, 133:16-22

Reply, 12-15; Ex.1021, 125:16-126:2, 178:12-18, 133:16-22; Ex.1020, ¶¶ 20-23.



'805 Patent – IPR2024-00354; PETITIONER'S DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

27

Agenda

- Overview of '805 Patent
- Claim Limitation [1.2.1] is Obvious
- Claim Limitation [1.2.4] (“Uniform Format”) is Obvious
- Claims 3 and 12 are Obvious
- Claims 4 and 13 are Obvious
- Claims 6 and 14 are Obvious
 - PO’s construction of “media sources of the TV” is wrong



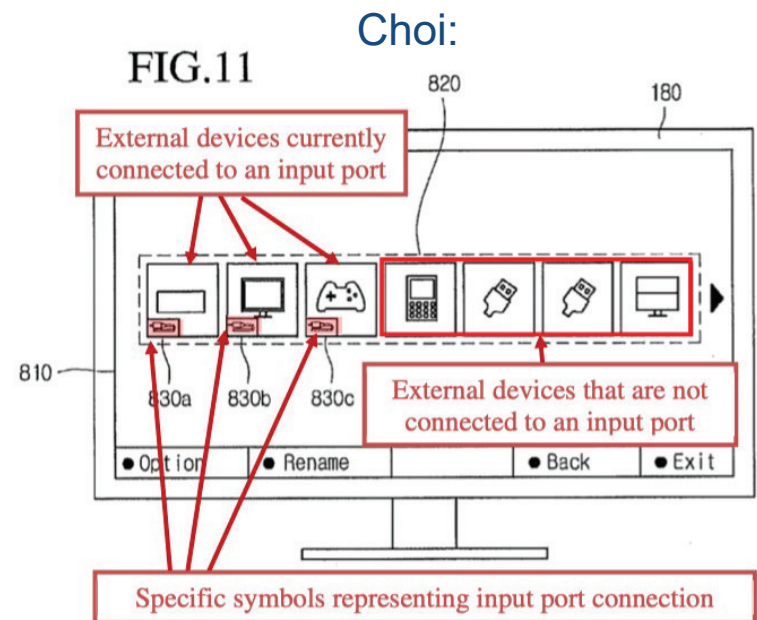
Choi teaches “*provid[ing] a real-time view of media sources of the TV and maintain[ing] a list of connected media sources of the TV*”

‘805 patent: 6. The method of claim 2, wherein the media browser is configured to provide a real-time view of media sources of the TV and maintain a list of connected media sources of the TV.

Choi:

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

Ex.1011, [0250]



Ex.1011, Fig. 11 (annotated).

Pet., 84-86; Reply, 34-35; Ex.1011, Fig. 11, [0250].



The Board should construe “*media sources of the TV*” according to its plain and ordinary meaning

‘805 patent: 6. The method of claim 2, wherein the media browser is configured to provide a real-time view of **media sources of the TV** and maintain a list of connected **media sources of the TV**.

Dr. Lippman:

26. The term “*media sources of the TV*” in limitation [6.0] should be construed according to its plain and ordinary meaning as including any media source that may be connected to the TV. Claim 6 does not recite any specific type of “*media sources of the TV*.”

27. Multimedia and Dr. Surati propose to construe “*media sources of the TV*” as requiring the VOD subservice, EPG subservice, and media subservice as recited in claim 1. Multimedia and Dr. Surati’s proposed construction is incorrect for the following reasons.

Ex.1020, ¶¶ 26-27



Claim 6 does not recite that the “*media sources of the TV*” must include any VOD subservice, EPG subservice, or media subservice

‘805 patent: 6. The method of claim 2, wherein the media browser is configured to provide a real-time view of **media sources of the TV** and maintain a list of connected **media sources of the TV**.

Dr. Surati:

16 Q. Okay. And that is in paragraph 60 of your
17 declaration?
18 A. I think that's correct.
19 Q. Do you see that that characterization about
20 **media sources of the TV must at least comprise a VOD**
21 **subservice source, an EPG subservice source, and a media**
22 **subservice source anywhere in claim 6?**
23 A. **I don't. It is not explicit.**

Ex.1021, 159:16-23

12 Q. And can you **identify the specific language in**
13 **claim 6** that requires media sources of the TV to have to
14 comprise -- must comprise VOD subservice source, an EPG
15 subservice source, and a media subservice source?
16 A. **There is nothing specific in there, explicit**
17 **saying that.**

Ex.1021, 167:12-17

Reply, 16-17; Ex.1021, 159:16-23, 167:12-17; Ex.1020, ¶ 28.



Multimedia's construction of “*media sources of the TV*” excludes embodiments

‘805 patent: 6. The method of claim 2, wherein the media browser is configured to provide a real-time view of **media sources of the TV** and maintain a list of connected **media sources of the TV**.

‘805 patent:

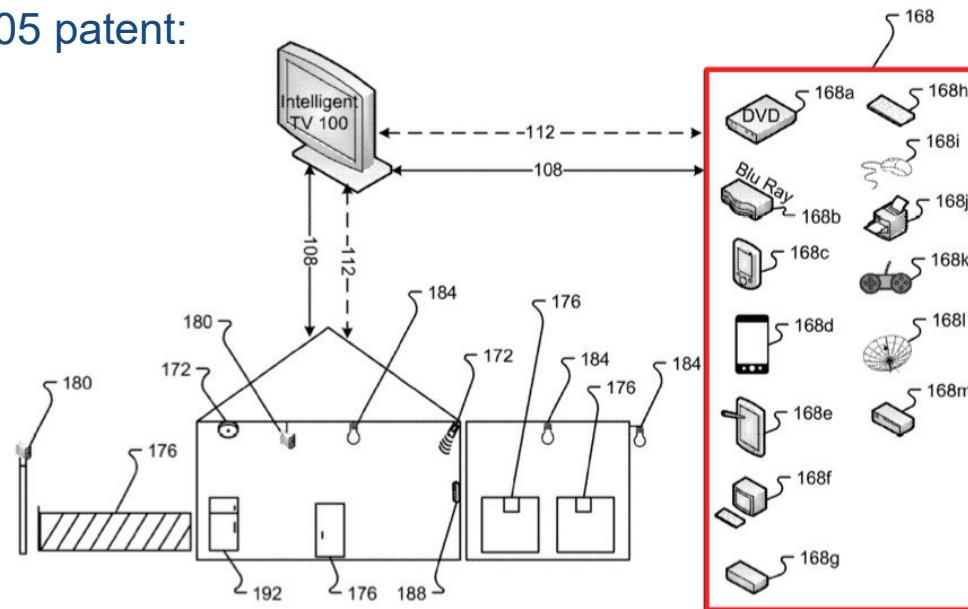


Fig. 1B

Ex.1001, Fig. 1B (annotated); Ex.1020, ¶30.



Reply, 18-19; Ex.1020, ¶ 30 (citing Ex.1001, 13:3-18, 30:16-31).
'805 Patent – IPR2024-00354; PETITIONER'S DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Inter Partes Review

U.S. Patent No. 10,419,805

LG Electronics, Inc. et al. v. Multimedia Technologies Pte. Ltd., IPR2024-00354

Jonathan Bowser
Haynes Boone, LLP



'805 Patent – IPR2024-00354; PETITIONER'S DEMONSTRATIVE EXHIBIT – NOT EVIDENCE