

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COMCAST CABLE COMMUNICATIONS, LLC,
Petitioner,

v.

ENTROPIC COMMUNICATIONS, LLC,
Patent Owner.

Case IPR2024-00435
Patent 11,381,866

**PATENT OWNER'S OBJECTIONS TO
PETITIONER'S ORAL ARGUMENT DEMONSTRATIVE EXHIBITS**

Pursuant to the Board's Order Setting Oral Argument (Paper 34) at 4-5, Patent Owner hereby respectfully submits its objections to Petitioner's oral argument demonstratives, Exhibit 1080, slide numbers 20 and 45.

I. **Exhibit 1080, Slide 20.**

Zhang's C1-Cn are Desired Channels at Least Because They are "accessed," "used," and "selected" by a Subscriber

'362 Patent, Element [1D]: "digital circuitry configured to: select said plurality of desired television channels from said digitized plurality of frequencies; and output said selected plurality of television channels to a demodulator as a digital datastream."

Desired channels includes channels a user desires to watch

Zhang states that C1-Cn includes "content" and "data streams" that are:

- "accessed ... by a subscriber"
- "used by a subscriber"
- "selected ... by a subscriber"

Zhang, Ex. 1013, claim 3

3. The circuit of claim 2 wherein each separate digital RF channel comprises one or more data streams to be accessed or used by a subscriber.

Zhang, Ex. 1013, ¶ [0028]

RF channels C₁ to C_n contain content channels that are selected or used by a subscriber. Channel-search capabilities

('362 Pet, pp. 28-31; Ex. 1002 (Lett '362 Dec.), ¶¶ 111-118, 121; Ex. 1013 (Zhang), Cl. 3, ¶ [0028]; '362 Reply, pp. 20-21; Ex. 1078 (Lett '362 Reply Dec), ¶¶ 22-23)

BANNER WITCOFF

Petitioner's Demonstrative Exhibit - Not Evidence

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Patent Owner objects to slide 20 on the basis that it presents, for the first time, a construction for the term "desired channel," including in the title of the slide and in the red text in the slide body.

II. Exhibit 1080, Slide 45.

Zhang Discloses the '866 Patent's Elements [14C] and [14D]

Fig. 3 Ex. 1013, Figs. 3, 5 (annotated)

Element [14C]:
“a plurality of digital down converters ... , wherein each digital down converter, of the plurality of digital down converters, is operable to generate a digital channel output corresponding to each desired channel, of the plurality of desired channels, and

Element [14D]
wherein the plurality of digital down converters is operable to provide each digital channel output via a serial interface.”

('866 Pet., pp. 28-32; Ex. 1002 (Lett '866 Dec.), ¶¶ 125-132; Ex. 1013 (Zhang), Figs. 3, 5; '866 Reply, pp. 18-19, 21; Ex. 1078 (Lett '866 Reply Dec.), ¶¶ 22-23)

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Petitioner's Demonstrative Exhibit - Not Evidence

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Patent Owner objects to slide 45 on the basis that it maps the claimed “plurality of digital down converters” in limitations [14C] and [14D] to only *two* of the multipliers 320(1)-(n) within Zhang’s Demultiplexer 230, as opposed to its papers (*e.g.*, IPR2024-00435 Pet., 29), where it mapped the claimed “down converters” to *all* of the multipliers 320(1)-(n) that generate channels C_1 - C_n .

Respectfully submitted,

/ Parham Hendifar /

Parham Hendifar (Reg. No. 71,470)
Nathan Lowenstein, *pro hac vice*
Kenneth J. Weatherwax (Reg. No. 54,528)
LOWENSTEIN & WEATHERWAX LLP

Date: July 11, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following documents were served by electronic service, by agreement between the parties, on the date signed below:

PATENT OWNER'S OBJECTIONS TO PETITIONER'S ORAL ARGUMENT DEMONSTRATIVE EXHIBITS

The names and addresses of the parties being served are as follows:

Frederic M. Meeker	fmeeker@bannerwitcoff.com
Michael S. CuvIELlo	mcuviello@bannerwitcoff.com
H. Wayne Porter	wporter@bannerwitcoff.com
Paul T. Qualey	pqualey@bannerwitcoff.com
Joshua L. Davenport	jdavenport@bannerwitcoff.com
ComcastIPRService@bannerwitcoff.com	

Respectfully submitted,

/ Parham Hendifar /

Date: July 11, 2025