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 IPR2024-00438
Patent 11,399,206

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]

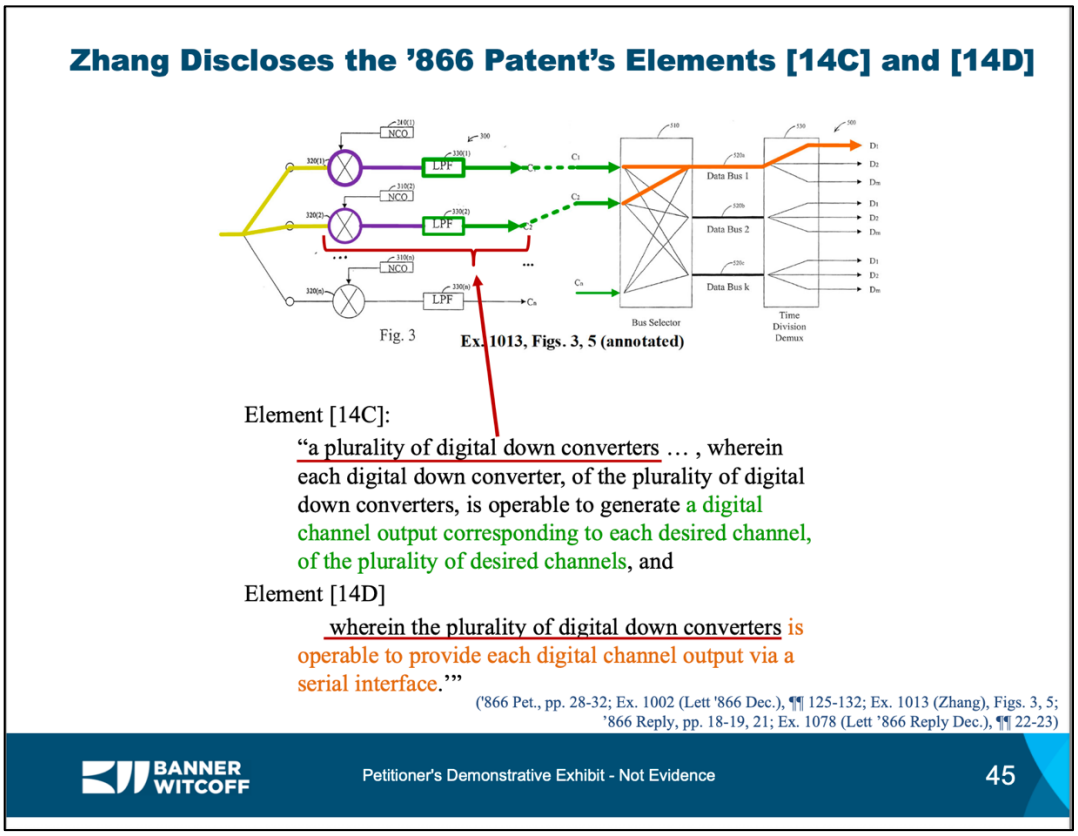
RF channels C_1 to C_n contain content channels that are selected or used by a subscriber. Channel-search capabilities

('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 20

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.



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