

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 IPR2024-00446
Patent 8,223,775

**PETITIONER'S OBJECTIONS TO PATENT OWNER'S
DEMONSTRATIVES**

Pursuant to the Board’s Order Setting Oral Argument dated April 24, 2025 (Paper 30), Comcast Cable Communications, LLC (“Petitioner”) submits this paper that identifies objections to Patent Owner’s Demonstratives (Ex. 2016). The Parties met and conferred on May 27, 2025, and May 28, 2025, but could not resolve the following objections.

Petitioner objects to Slide 36 as it disparagingly portrays Petitioner’s expert, Dr. Kiaei, as a cartoon character with a balloon statement that misstates his actual testimony “can be implemented” and “can include,” based upon both Fig. 5b and Ex. 1005, [0097], thus making Dr. Kiaei seem less credible and cartoonish, which is improper new argument not made in the briefing.

Petitioner objects to Slide 47 as disparagingly portraying Comcast as a sorcerer, disparagingly and improperly labeling the sorcerer using a trademark owned by a parent company not involved in this proceeding, which is improper new argument not made in the briefing.

Petitioner objects to Slide 66 as disparagingly portraying Comcast as a hammer about to destroy an integrated circuit, disparagingly and improperly using a trademark owned by a parent company not involved in this proceeding, which is improper new argument not made in the briefing, and to the citation to “POR, 40” that does not support the title of the slide nor the two recited citations to Ex. 1005

(Rabenko) and Ex. 1007 (Kim), and hence the “highly integrated circuit” argument was waived since not supported in the POR.

Petitioner objects to Slide 70, which depicts the “Wile E. Coyote” Looney Tunes character as it includes improper new argument “Unbolt CME,” “Drop in trash,” “Buy new CME,” “Declare: Upgrade Achieved” such that the entirety of the figure included therein is not supported in the cited POR, 41-43 and Sur-Reply, 27-28.

Petitioner objects to Slide 71 as it includes improper new argument which implies that upgrading software requires a user interface and that replacing hardware involves replacing an entire “NEW COMPUTER” which is not supported in the cited POR, 41-43 and Sur-Reply, 27-28.

Petitioner objects to Slide 72 as it implies the claim requires a user interface for a remote software upgrade which is not supported in the cited POR, 42-46 and Sur-Reply, 26-28.

Dated: May 30, 2025

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e)(4), the undersigned hereby certifies that the foregoing PETITIONER'S OBJECTIONS TO PATENT OWNER'S DEMONSTRATIVES was served electronically via e-mail on May 30, 2025 on the following counsel of record for Patent Owner:

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Dated: May 30, 2025

By: /Carlos Goldie/

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