

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIZIO, INC.,

Petitioner

v.

MULTIMEDIA TECHNOLOGIES PTE. LTD.,

Patent Owner.

Case No. IPR2024-00723

U.S. Patent No. 9,578,384

PATENT OWNER PRELIMINARY RESPONSE

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EXHIBIT LIST	
2001	Claim Construction Order in <i>Multimedia Technologies PTE. Ltd. v. LG Electronics Inc.</i> , No. 2:22-cv-0494-JRG-RSP (E.D. Tex. June 30, 2024)

I. INTRODUCTION

Multimedia Technologies PTE. Ltd. (“Multimedia” or “Patent Owner”) submits this Preliminary Response to VIZIO, Inc.’s (“VIZIO” or “Petitioner”) Petition challenging claims 1-12 of U.S. Patent No. 9,578,384 (the “’384 Patent”).

The Board should deny institution because VIZIO has not shown that its prior art combinations suggest every limitation of every claim. Specifically, independent claims 1, 2, and 11 require “a detail view” and a “digest view” and further require “providing... either a detail view or a digest view” depending on whether a selection in the collection view is for a series or for a movie or single show. The ’384 Patent describes a “detail view” as providing information about a single show, movie, or episode and a “digest view” as providing a description of a television series or series of episodes. Petitioner, however, misidentifies prior art detail views that provide information about a single episode as digest views, which the ’384 specifies provides information about a series. Because the Petition conflates detail views and digest views, it has not shown that either a detail view or a digest view is provided depending on whether the selection is for a series or for a movie or single show.

As such, Petitioner has not shown that the prior art combinations suggest every claim limitation and the Board should deny institution.

II. BACKGROUND

A. The '384 Patent

The '384 Patent describes improved interfaces for an intelligent television for providing video-on-demand (VOD). Ex. 1001, abstract. “The user interfaces include unique visual representations and organizations that allow the user to utilize the intelligent television more easily and more effectively.” *Id.* “Further, the user interfaces provide unique process of transitioning between the VOD content.” *Id.*

In one embodiment, the intelligent TV provides “views for the VOD content [that] are broken down into a series of hierarchical steps that allow the user to easily navigate through VOD content.” *Id.*, 14:4-8. “A master view [is] a top tier user interface that allows the user to select a type of collection[]. A collection view[] uses a list of media based on a target or sort criteria. The user may then select some type of content from the collection view[] to be provided in either a digest view[] or a detail view[].” *Id.*, 14:9-25.

In these embodiments, a detail view is an interface for a single show, movie, or episode: “In the detail view provided by the user interface application 468, in step 1644, the user interface application 468 provides information specific about a *single show, movie, or episode.*” *Id.*, 45:21-24. By contrast, a digest view is an

interface for a television series or series of episodes as a whole: “A digest view 1724 shows a view of *a television series or series of episodes*, where a description of the series and a set of episodes is provided. If there is no series with the content selected, the detail view 1728 may be provided, which gives information for the content which was selected.” *Id.*, 44:16-18 (emphasis added).

Figure 17 shows example master views, collection views, digest views (highlighted in red), and detail views (highlight in blue):

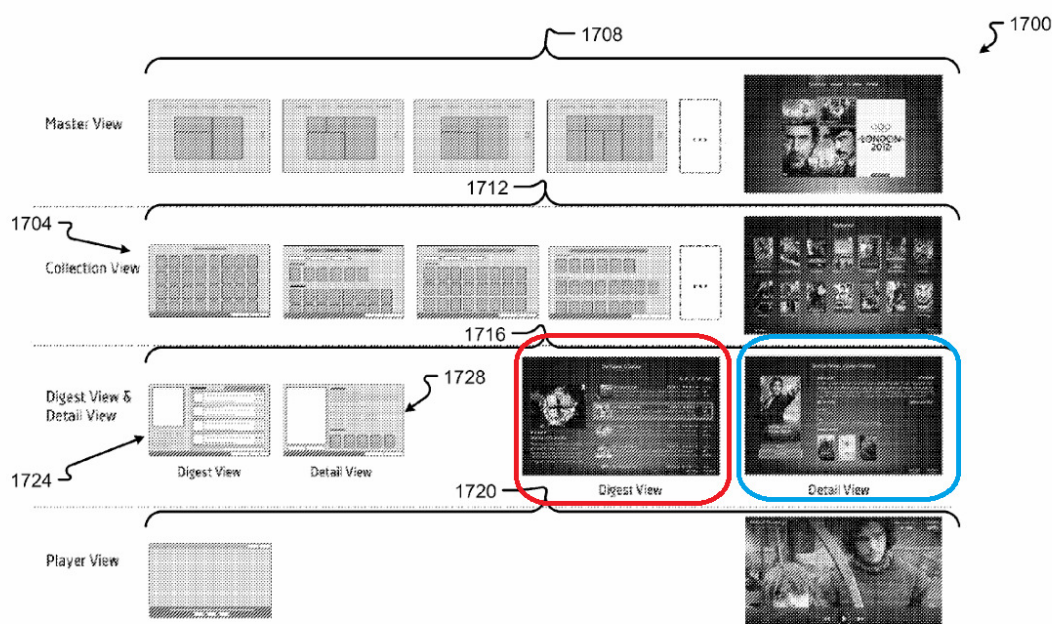


Fig. 17

Id., Fig. 17.

If “the selection is associated with a series with two or more episodes,” then the digest view is provided, but “if a single show, movie, or a series with only a single episode is selected,” then the detail view is provided. *Id.*, 44:62-66.

B. Petitioner’s Cited References

The Petition asserts two grounds of invalidity: Ground 1 challenging claims 1-12 under 35 U.S.C. §103 based on Kim, TechnoBuffalo, MissingRemote, Hunt, and Hunleth; and Ground 2 challenging claims 1-12 under §103 based on Kim, Ma, Hunt, and Hunleth.

1. Kim (Ex. 1019)

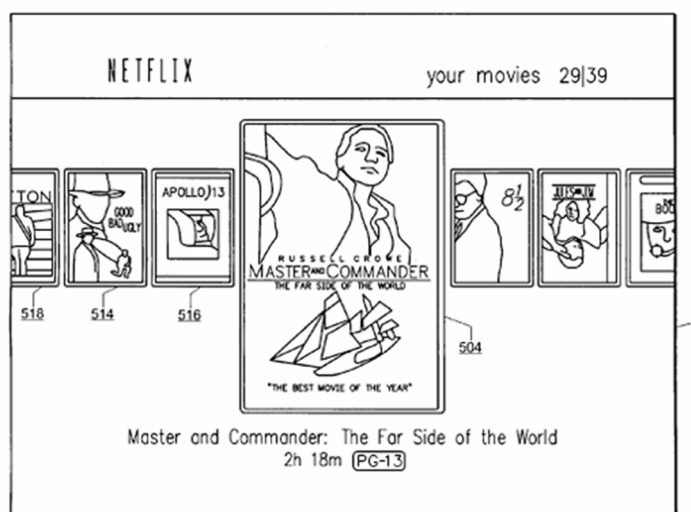
Kim describes a “multifunctional display device” consisting of a number of “card object” panels displayed in different portions of the display, along with “a method of controlling” the same. Ex. 1019 at Abstract. Kim describes this display as a “home screen” for smart television content. *Id.* at [0094], [0192]. Consistent with this function, Kim notes that it “may be set as an initial screen that may be displayed when the image display apparatus is powered on or wakes up from a standby mode” or “may be a default screen which may be displayed when a local key on the display apparatus or a home key on the remote controller is selected.” *Id.* at [0192].

Consistent with its role as a centralized home screen, Kim's display incorporates a wide variety of program-specific menus. *Id.* at [0195]-[0197], [0220]-[0221]. These include: (1) a "BROADCAST" card displaying a "broadcast image 1315 received through the tuner 110" alongside program information describing the contents of that image, (2) a "NETCAST" card listing all available content providers on the television, (3) an "APP STORE" card providing "a plurality of icons representing applications available" to the user "for download or purchase," (4) a "CHANNEL BROWSER" card listing "a plurality of broadcast channels" that have been favorited by the user or are otherwise of particular import, (5) a "TV GUIDE" card providing a "program list" of future programming, (6) a "RESERVATION/REC" card providing "a reserved (e.g., a scheduled recording) or recorded program list," (7) a "MY MEDIA" card listing "multimedia files available on the [smart tv] or a device connected" to it, (8) an "EXTERNAL DEVICE" card providing "a list of connected external devices" and (9) a "PHONE" card providing call-related information and permitting users to make phone calls from the smart tv. *Id.* at [0197]-[0212]. Kim instructs that the home screen may additionally include a wide variety of "application menu items" assembled in an "application compact view menu"—including a search function, direct access to an AppStore, and options to access the internet and an email server

(with the possibility of additional, optional application menu items). *Id.* at [0215]-[0217].

2. Hunt (Ex. 1020)

Hunt is a patent issued January 29, 2013 titled “Trick Play of Streaming Media” and discloses interfaces for playing videos. A user may be presented with “successive still images [that] support the selection of audiovisual programs from among a library or set of available programs,” as shown in Fig. 6:



Ex. 1020, Fig. 6, 16:19-22. Based on the user’s selection of a movie in Fig. 6, the user may be presented with a “springboard screen” as shown in Fig. 11 that displays information about the user’s selected movie:

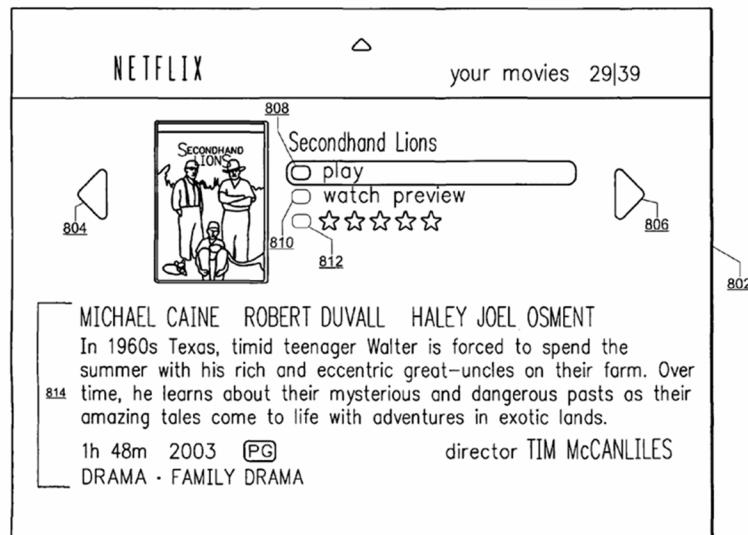


FIG. 8

Ex. 1020, Fig. 8, 17:33-43. If the user selects a season among a plurality of seasons, the user is instead presented with the “springboard screen” shown in Fig. 11:

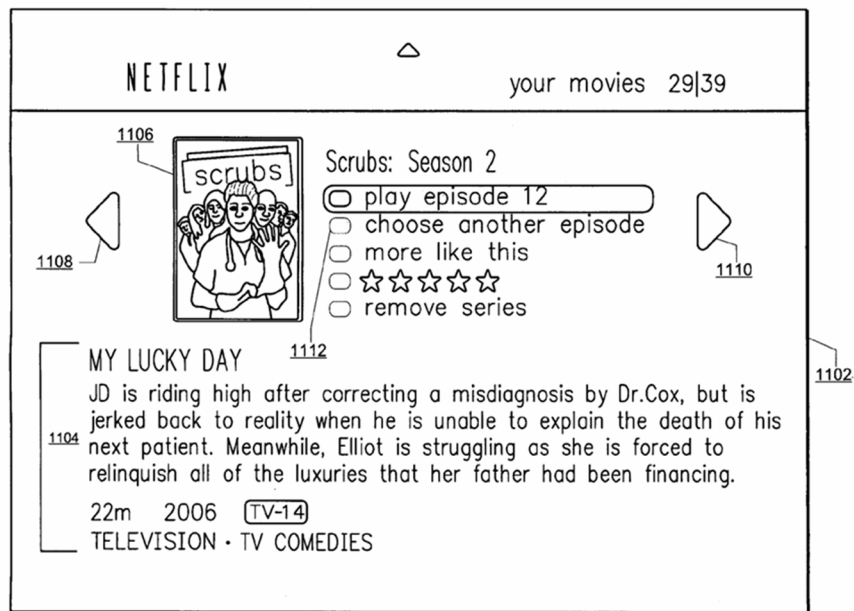


FIG. 11

Ex. 1020, Fig. 11, 18:33:52 (“In an embodiment, the springboard screen 1102 is displayed in response to a user selecting a particular season of a series program, from among a plurality of available seasons, using a poster screen interface such as that of FIG. 5, FIG. 6, FIG. 7, except that poster images for seasons are displayed rather than poster images for movies.”).

The “springboard screen” of Fig. 11 further includes a “Choose another episode” option to display the screen of Fig. 12 to choose another episode:

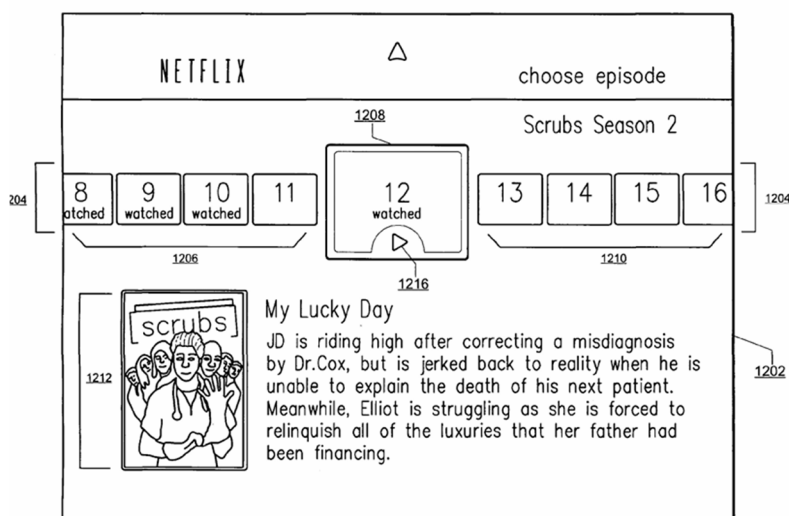


FIG. 12

Ex. 1020, Fig. 12, 18:65-19:3.

3. Hunleth (Ex. 1021)

Hunleth is a patent issued December 15, 2009 titled “Client-Server Architectures and Methods for Zoomable User Interfaces” and discloses

“specialized user features, such as hover-zooming.” Ex. 1021, abstract. Hunleth’s Fig. 1 “shows a user interface having a plurality of media objects available for selection as images, e.g. DVD cover art.” Ex. 1021, 4:35-40. Hyperlinks can transition to the detailed view shown in Fig. 2. *Id.*, 8:50-63.

4. TechBuffalo2 (Ex. 1011-1017)

TechBuffalo2 is a YouTube video titled “Connected TV: VIZIO LED HDTV with VIA Apps Part 2 of 2.” The video is part of a series on connected TVs and shows Netflix’s UI on a VIZIO HDTV.

5. MissingRemote (Ex. 1018)

MissingRemote is a YouTube video titled “Apple TV Netflix Walkthrough.” The video provides a walkthrough of Netflix’s UI on the Apple TV.

6. Ma (Ex. 1022)

Ma is a patent application published March 1, 2012 titled “Menuing Structure for Favorite Media Content” and describes “generating a menu of favorite media items for presentation to a user.” Fig. 2 shows an exemplary menu in the form of a shelf having seven different movies. Ex. 1022, [0028].

III. LEVEL OF ORDINARY SKILL

The Petition proposes that a “person of ordinary skill in the art (‘POSITA’) in August of 2012 would have been knowledgeable and familiar with UIs in

consumer products that are pertinent to the '384 Patent. A POSITA would have had a bachelor's degree in Electrical, Software, or Computer Engineering, or equivalent training, and approximately two years of experience working in the field of television and/or digital video systems, human-computer interaction, or related technologies. Lack of professional experience can be remedied by additional education, and vice versa.” Pet., 15. Patent Owner applies this level of ordinary skill for the purposes of this preliminary response but reserves the right to dispute or clarify the level of ordinary skill, including through expert testimony, in this or any other proceeding.

IV. CLAIM CONSTRUCTION

The Petition proposes that all claim terms be construed according to their ordinary and customary meaning. Pet., 16. Nonetheless, the Petition also cites two statements where the '384 Patent purportedly “self-defines ‘intelligent TV’ as ‘a television configured to provide one or more intuitive UIs and interactions based on a unique application platform and architecture’ [and] ‘computer-readable medium’ ‘refers to any tangible storage and/or transmission medium that participate in providing instructions to a processor for execution.’” *Id.*, (citing Ex. 1001, 17:65-18:1, 15:42-45). Without agreeing with Petitioner’s characterization of these statements, Patent Owner further notes that the '384 Patent states that a detail

view provides information about a single show, movie, or episode (*see* Ex. 1001, 45:21-24 (“In the detail view provided by the user interface application 468, in step 1644, the user interface application 468 provides information specific about a single show, movie, or episode.”)), whereas a digest view shows a view of a television series or series of episodes, where a description of the series and a set of episodes is provided (*see* Ex. 1001, 44:16-18 (“A digest view 1724 shows a view of a television series or series of episodes, where a description of the series and a set of episodes is provided. If there is no series with the content selected, the detail view 1728 may be provided, which gives information for the content which was selected.”)).

Although no claim terms appear to be in dispute and require express construction (*see Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co.*, 868 F.3d 1013, 1017 (Fed. Cir. 2017)), Patent Owner reserves the right to construe terms of the ’384 Patent in this or any other proceeding.

V. PETITIONER FAILS TO SHOW THE PRIOR ART COMBINATIONS SUGGEST CLAIMS 1, 2, AND 11

Independent claims 1, 2, and 11 recite both “a detail view” and a “digest view.” Each claim then further requires “providing... either a detail view or a

digest view” depending on whether a selection in the collection view is for a series or for a movie or single show.

The '384 Patent describes a “detail view” as providing information about a single show, movie, or episode:

“In the detail view provided by the user interface application 468, in step 1644, the user interface application 468 provides information specific about a *single show, movie, or episode.*”

Ex. 1001, 45:21-24.

Likewise, the '384 Patent describes a “digest view” as providing a description of a television series or series of episodes:

“A digest view 1724 shows a view of a television series or series of episodes, where a description of the series and a set of episodes is provided. If there is no series with the content selected, the detail view 1728 may be provided, which gives information for the content which was selected.”

Ex. 1001, 44:16-18.

Figure 17 of the '384 Patent shows examples of a digest view (highlighted in red) and a detail view (highlight in blue):

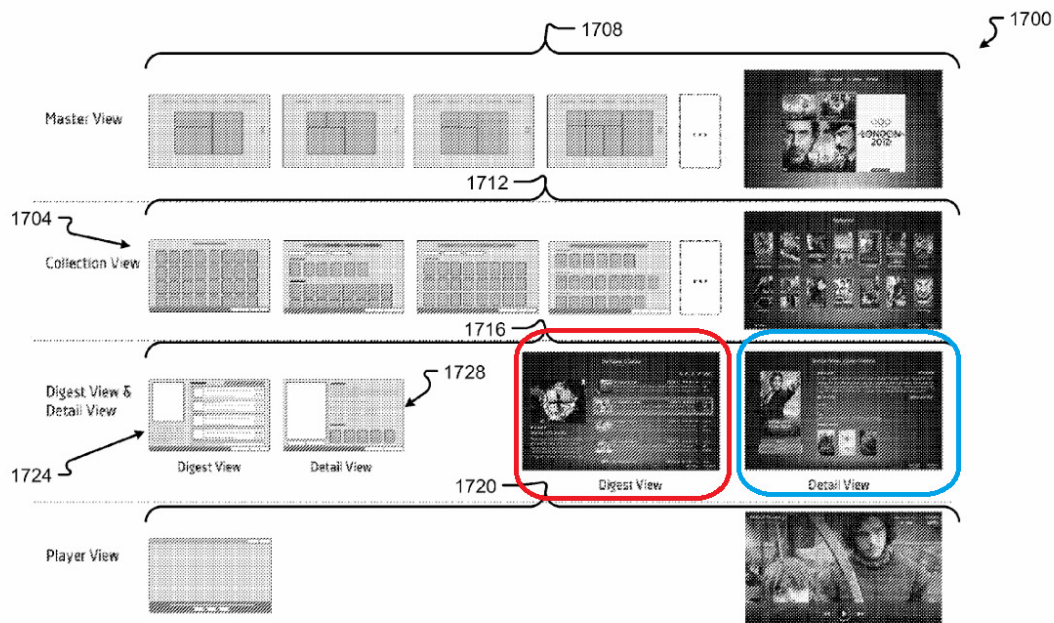


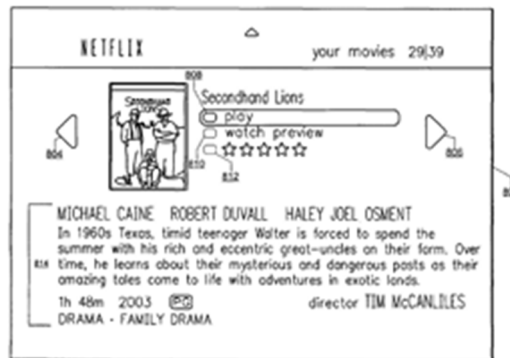
Fig. 17

Ex. 1001, Fig. 17.

Finally, the '384 Patent states that the digest view is provided if “the selection is associated with a series with two or more episodes,” but a detail view should be provided “if a single show, movie, or a series with only a single episode is selected.” Ex. 1001, 44:62-66.

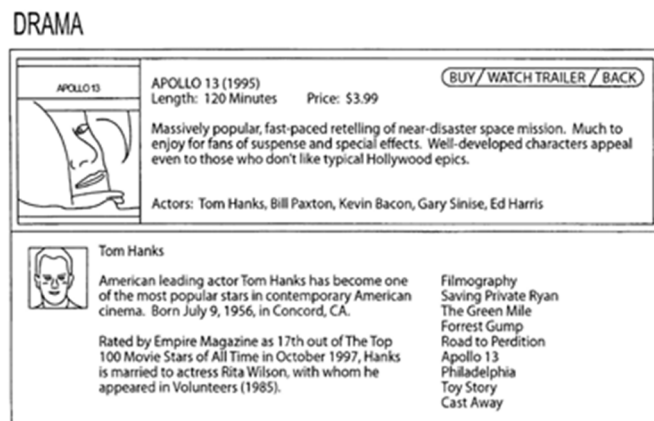
The Petition identifies the following as alleged “detail views.”

First, Hunt’s Fig. 8:



Pet., 45 (“Fig. 8 is “a detail view” as it presents information (e.g., title, rating, etc.) about a selected VOD content item (e.g., “Secondhand Lions”).”). This alleged detail view (correctly) shows information specific to a single movie.

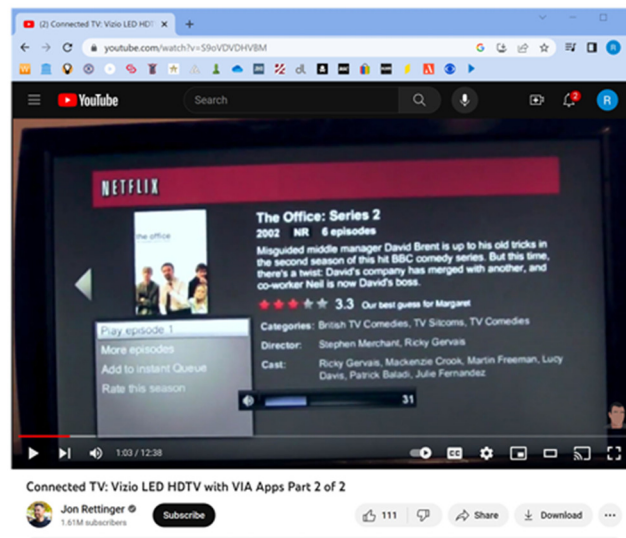
Second, Hunleth’s Fig. 2:



Pet., 46 (“Hunleth also teaches providing “a detail view” in response to a selection of a movie from a collection view... EX-1010, Fig. 2 (detail view).”). This alleged detail view also (correctly) shows information specific to a single movie.

The Petition identifies the following (some incorrectly) as alleged “digest views.”

First, a TechnoBuffalo2 screenshot:



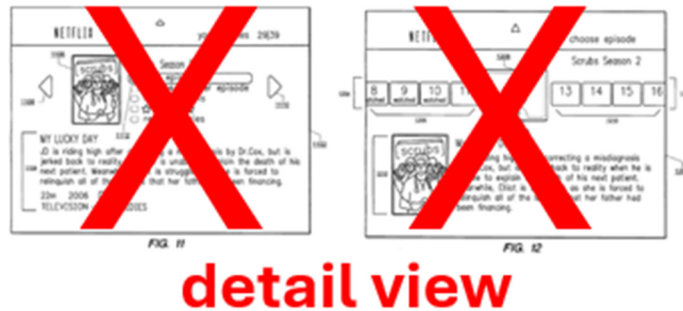
Pet., 41 (“This is “a digest view” as it presents information (e.g., number of episodes, synopsis of entire season, ratings for season, menu items for “More episodes”) about a set of VOD content (e.g., television episodes in Season 2) that is associated with a series (e.g., “The Office”).”). This alleged digest view (correctly) shows information for a series with more than two episodes.

Second, another TechnoBuffalo2 screenshot:



Pet., 42 (“This is also a digest view because it presents information (e.g., year, rating, number of episodes (6), episode lengths) about a set of VOD content (e.g., episodes in Season 2) that are associated with a series (e.g., ‘The Office’).”). This example, however, does not show a digest view. This screen does not provide a description of Series 2 of “The Office”—the *entire series* or season, but rather a description of only Series 2 Episode 1—a *single episode* of that series. Thus, applying the classification of the ’384 Patent, this screen would properly be understood to be a detail view.

Third, Hunt's Figs. 11 and 12:



Pet., 43 (“Hunt discloses digest views for TV episodes associated with a series...

Hunt teaches that the digest views are provided in response to a selection (“third selection”) in the collection view.”). As with the second TechBuffalo2 screenshot,

Hunt's Figs. 11 and 12 do not provide a description of the *entire series* or season

(“Scrubs” Season 2), but rather a description of a *single episode* of that series (“My

Lucky Day,” Season 2 Episode 9). Thus, applying the classification of the '384

Patent, these figures would also properly be understood to be detail views.

Fourth, a MissingRemote screenshot:



Pet., 44 (“This is a digest view because it presents information (e.g., episode titles) about a set of VOD content (e.g., episodes in Season 2) that are associated with a series (e.g., “Parks and Recreation”).”). As with the preceding examples, the MissingRemote screenshot does not show a digest view because it does not provide a description of the *entire series* or season (“Parks and Recreation” Season 2). Rather, it would at most show a detail view because it merely provides a description of a *single episode* of that series (“Greg Pikitis,” Episode 7 of Season 2).

Fifth, Ma’s Fig. 5C:

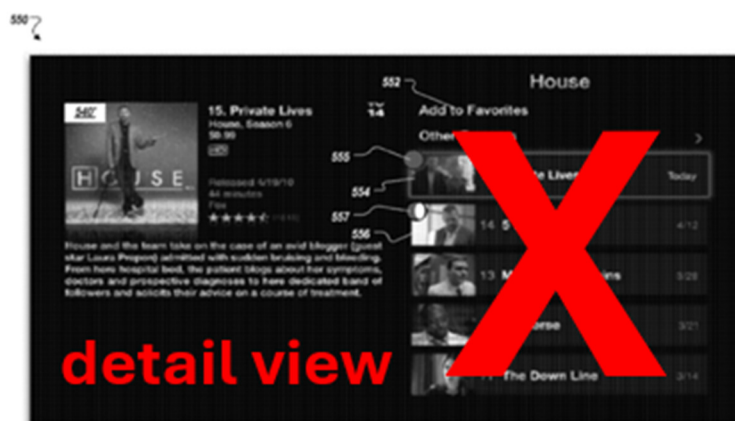


FIG. 5C

Pet., 92-93 (“Ma’s ‘series screen’ represents a ‘digest view’ as it presents information about a set of VOD content (e.g., TV episodes) that are associated with a series (e.g., ‘House’).”). Again, Ma’s Figure 5C is a detail view, not a digest

view, because it provides a description of the *single episode* “Private Lives” (“House” Season 6 Episode 15), not the *entire* “House” season 6.

The Petition’s conflation of a “detail view” with a “digest view” fatally undermines its argument that the relied-upon prior art combinations suggest providing a detail view or a digest view depending on whether a selection is for a series or for a movie or single show. First, every purported example of a “digest view” from Hunt, MissingRemote, and Ma is properly characterized as a “detail view,” so none of these three references can suggest a “digest view.” Second and more importantly, the Petition alleges that TechBuffalo2 presents *either* the first TechBuffalo2 menu *or* the second TechBuffalo2 menu based on a selection for a TV series. Pet., 40-41 (“[I]f ‘the third selection’ in TechnoBuffalo2 is for a TV series (e.g., ‘The Office’), then [the alleged digest view at the top of page 41 of the Petition] is provided... Alternatively, it would have been obvious to a POSITA to present the following digest view [the alleged digest view at the top of page 42 of the Petition] in response to ‘the third selection.’”). But because the first TechBuffalo2 menu is a digest view whereas the second TechBuffalo2 menu is a detail view, the Petition alleges that a selection for a series will result in *either* a detail view or a digest view being presented.

Hunt, which Petitioner admits is directed to the same Netflix menu as TechBuffalo2 (*see* Pet., 11), further confirms that a selection for a series results in the presentation of a detail view. Specifically, Hunt states that if a particular season is selected, the interface of Fig. 11 is shown. Ex. 1020, Fig. 11, 18:33:52 (“In an embodiment, the springboard screen 1102 is displayed in response to a user selecting a particular season of a series program, from among a plurality of available seasons, using a poster screen interface such as that of FIG. 5, FIG. 6, FIG. 7, except that poster images for seasons are displayed rather than poster images for movies.”). But as discussed above, Fig. 11 at most shows a detail view, not a digest view.

This is directly contrary to the claims’ requirement of providing a digest view if the selection is for a series and providing a detail view if the selection is for a single show or episode. In contrast to the ’384 Patent, which provides a digest view if the selection is for a series, the prior art combination may provide a detail view even if the selection is for a series. This cannot meet the steps of “providing either a detail view or a digest view of the VOD content” based on “if the selection in the collection view is for a series or one of a movie or single show” as recited by the claims.

Accordingly, Petitioner has not shown that the prior art combinations suggest independent claims 1, 2, and 11, and the Board should deny institution.

VI. CONCLUSION

For the reasons set forth above, the Board should deny institution because the prior art combinations do not suggest every limitation of claims 1, 2, and 11.

Dated: August 26, 2024

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CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMITS

This Patent Owner's Preliminary Response (the "POPR") consists of 3,092 words, excluding table of contents, table of authorities, certificate of service, this certificate, or table of exhibits. The POPR complies with the type-volume limitation of 14,000 words as mandated in 37 C.F.R. § 42.24. In preparing this certificate, counsel has relied on the word count of the word-processing system used to prepare the paper (Microsoft Word).

Respectfully submitted,

/Minghui Yang/

Date: August 26, 2024

CERTIFICATE OF SERVICE

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

**PATENT OWNER'S PRELIMINARY RESPONSE
EXHIBIT 2001**

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