

VIZIO, Inc.
v.
Multimedia Technologies Pte. Ltd.

PATENT OWNER DEMONSTRATIVES
IPR2024-00723
U.S. Patent No. 9,578,384

Multimedia Exhibit 2006
IPR2024-00723

Overview

1. Claims 2 and 5

- Paper 26, 1-4
- Ground 1: Obviousness in view of Kim, TechnoBuffalo, MissingRemote, Hunt, and Hunleth
- Ground 2: Obviousness in view of Kim, Ma, Hunt, and Hunleth

2. Claims 1, 2, and 11

- Paper 26, 4-7
- Ground 1: Obviousness in view of Kim, TechnoBuffalo, MissingRemote, Hunt, and Hunleth
- Ground 2: Obviousness in view of Kim, Ma, Hunt, and Hunleth

Claims 2 and 5

1. A method for providing video-on-demand (VOD) in an intelligent television, the method comprising:
receiving, by a processor of the intelligent television, a first selection for a VOD content;
in response to the first selection, providing, by the processor, a master view of the VOD content, wherein the master view presents two or more collections of the VOD content organized by a characteristic of the VOD content;
receiving, by the processor, a second selection for a VOD content;
in response to the second selection, providing, by the processor, a collection view of VOD content, wherein the collection view presents two or more items of the VOD content having the characteristic;
receiving, by the processor, a third selection for a VOD content;
in response to the third selection, providing, by the processor, either a detail view or a digest view of VOD content, wherein the detail view presents information about a selected item of the VOD content, and wherein the digest view presents information about a set of the VOD content that are associated with a series, wherein providing either a detail view or a digest view of the VOD content comprises:
determining, by the processor, if the selection in the collection view is for a series or one of a movie or single show;
if the selection in the collection view is for a series, providing, by the processor, the digest view; and
if the selection in the collection view is for one of a movie or single show, providing, by the processor, a detail view, wherein a navigation to view VOD content is an ordered set of user interfaces, and wherein the order includes a master view at a top level, a collection view at a second level, either a digest view or detail view at a third level, and a player view at a fourth and bottom level.

4. The method as defined in claim 3, further comprising:
receiving a fourth selection of an episode in the digest view; and
in response to the fourth selection, providing a player to present the episode to the user.
5. The method as defined in claim 4, further comprising:
receiving a fifth selection of a user interface device to play the movie or single show; and
in response to the fifth selection, providing a player to present the movie or single show to the user.

'384 Patent, Claims 1, 4, and 5.

Claims 2 and 5

1. A method for providing video-on-demand (VOD) in an intelligent television, the method comprising:
receiving, by a processor of the intelligent television, a first selection for a VOD content;
in response to the first selection, providing, by the processor, a master view of the VOD content, wherein the master view presents two or more collections of the VOD content organized by a characteristic of the VOD content;
receiving, by the processor, a second selection for a VOD content;
in response to the second selection, providing, by the processor, a collection view of VOD content, wherein the collection view presents two or more items of the VOD content having the characteristic;
receiving, by the processor, a third selection for a VOD content;
in response to the third selection, providing, by the processor, either a detail view or a digest view of VOD content, wherein the detail view presents information about a selected item of the VOD content, and wherein the digest view presents information about a set of the VOD content that are associated with a series, wherein providing either a detail view or a digest view of the VOD content comprises:
determining, by the processor, if the selection in the collection view is for a series or one of a movie or single show;
if the selection in the collection view is for a series, providing, by the processor, the digest view; and
if the selection in the collection view is for one of a movie or single show, providing, by the processor, a detail view, wherein a navigation to view VOD content is an ordered set of user interfaces, and wherein the order includes a master view at a top level, a collection view at a second level, either a digest view or detail view at a third level, and a player view at a fourth and bottom level.

4. The method as defined in claim 3, further comprising:
receiving a fourth selection of an episode in the digest view; and
in response to the fourth selection, providing a player to present the episode to the user.
5. The method as defined in claim 4, further comprising:
receiving a fifth selection of a user interface device to play the movie or single show; and
in response to the fifth selection, providing a player to present the movie or single show to the user.

'384 Patent, Claims 1, 4, and 5.

Claims 2 and 5

A. Claimed order of steps

The Challenged Claims must be read as reciting a specific order of steps because the claim language, as a matter of logic and grammar, “requires that the steps be performed in the order written.” *Mformation Tech. v. Research in Motion Ltd.*, 764 F.3d 1392, 1398-99 (Fed. Cir. 2014). Specifically, Claim 2 requires in order: [1] receiving a first selection for VOD content, [2] in response to the first selection, providing a master view of the VOD content, [3] receiving a second selection for VOD content, [4] in response to the second selection, providing a collection view of the VOD content, [5] receiving a third selection for VOD content, [6] in response to the third selection, providing either a digest view or a detail view depending on whether the third selection is for a series or for a movie or a single show, [7] receiving a fourth selection of an episode, [8] in response to the fourth selection, providing a player to present the episode, [9] receiving a fifth selection of a user interface device to play a movie or single show, and [10] providing a player to present the movie or single show. Claim 1 and its dependent claims 4 and 5 recite substantially the same order.

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Paper 20, 11-12.

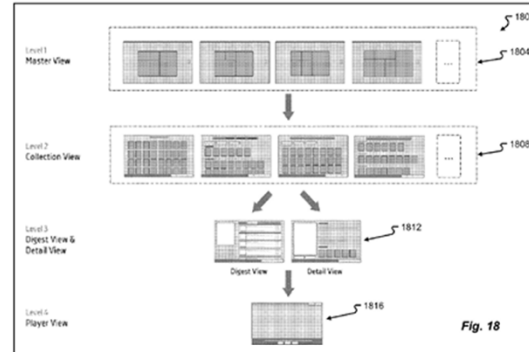
Claims 2 and 5

Here, for claim 1 (from which claims 3-5 depend), the parties agree that the “first selection” to provide a “master view” will occur first, followed by a “second selection” to provide a “collection view,” which is followed by a “third selection” to “provide either a detail view or a digest view of VOD content.”³ However, that structure does not mean that the sequence of the following steps is fixed.

Paper 23, 7.

Claims 2 and 5

As shown in Figure 18, the “third selection” from the collection view leads to a branching path—depending on the user’s action, the system may present either a “digest view” or a “detail view.”



EX-1001, Fig. 18.

Claim 4 relates to a “fourth selection,” where a user selects a series in the collection view, and a corresponding “digest view” is displayed. That “digest view” enables playback of a selected episode. This is a natural and expected result of the claimed method.

Claim 5 describes a different use case: a “fifth selection” in the collection view where a user selects a movie or single show, triggering presentation of a “detail view.” Again, this flow is consistent with the functionality described in the specification and common user experiences in streaming platforms.

Paper 23, 8.

Claims 2 and 5

“[R]eceiving a fifth selection of a user interface device to play the movie or single show” is *not* a conditional step – claim 2 does not condition “receiving a fifth selection of a user interface device to play the movie or single show” on whether the third selection is for a series or for a movie or single show. Instead, claim 2 is explicitly written such that the fifth selection always occurs. By contrast, claim 2 explicitly requires “provid[ing] the digest view” only “if the selection in the collection view is for a series,” and requires “provid[ing] the detail view” only “if the selection in the collection view is for a movie or single show.” The omission of any condition from the “fifth selection” when conditions are found in other claim steps is a strong indication that the applicants intended the claims to perform the “fifth selection” without a condition. *Liebel-Flarsheim Company v. Medrad, Inc.*, 358 F. 3d 898, 909 (Fed. Cir. 2004) (“The omission of reference to a pressure jacket in many of the claims of the applications that matured into the ’669 and ’261 patents is a strong indication that the applicants intended those claims to reach injectors that did not use pressure jackets.”). The language of claims 2 and 5 simply do not match Petitioner’s “branching path” theory. Thus, the claim steps must be read in order, not in the alternative.

Paper 26, 2.

Claims 2 and 5

The Petition addresses both possible outcomes, showing how the user may proceed to a “player view” to watch either a series episode or a movie/single show, depending on their selection. Pet., 40-57, 62-64.

Paper 26, 27.

Claims 1, 2, and 11

B. “Providing either a detail view or a digest view of VOD content”

Patent Owner submits that “providing either a detail view or a digest view of VOD content” should be construed as “providing either [1] a view of information about a single episode without information that is associated with a series or [2] a view of information about a set of the VOD content that are associated with a series without information only about a single episode.”

Paper 20, 14.

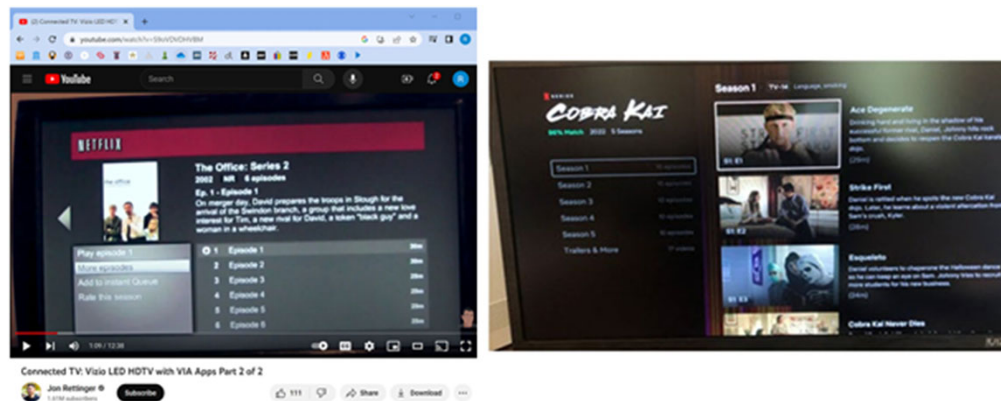
Claims 1, 2, and 11

The Reply's argument that Fig. 35 of the '384 Patent permits both views under the claim language is also wrong. Paper 23, 20. Not every embodiment needs to be claimed. *SIMO Holdings*, 983 F.3d at 1378-79. Here, Fig. 35 provides one embodiment of a digest view that does not implicate the “either / or” language recited by the claims. The '384 Patent shows other example digest views, such as Fig. 18, that does implicate the “either / or” language recited by the claims and does not show information about a single episode. '384 Patent, 45:32-42. The word “either” is unambiguous on its own, and embodiments in the '384 Patent support this reading.

Paper 26, 5.

Claims 1, 2, and 11

Nor are Multimedia's Infringement Contentions from the underlying VIZIO litigation inapposite with this construction. There, the identified digest view includes information about each of multiple different episodes in the digest, rather than only the details of single episode or show, as in the prior art, and as shown below. *Compare* Ex.1011, 1:09 (TechoBuffalo 2 screen, left, asserted “digest view”) *with* Ex.1023 (Multimedia's Infringement Contentions), 7 (right, accused “digest view”):



Paper 26, 6. Multimedia Exhibit 2006
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