



PATENT OWNER'S HEARING DEMONSTRATIVES

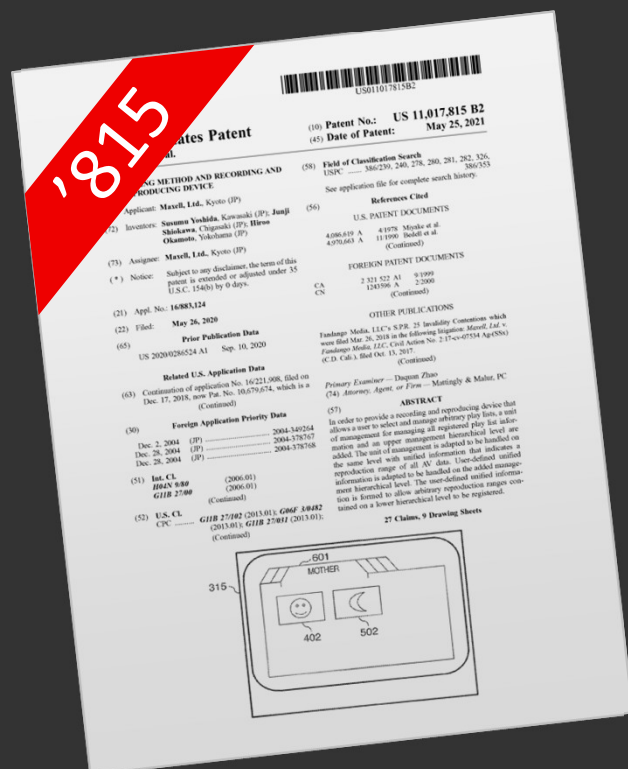
*Samsung Electronics Co., Ltd. and Samsung Electronics America,
Inc. v. Maxell, Ltd. IPR2024-00735 & IPR2024-00777*

September 24, 2025



EDITING METHOD AND RECORDING AND REPRODUCING DEVICE U.S. PATENT NO. 11,017,815

'815 PATENT OVERVIEW



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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'815 Patent Overview

Patent No.: US 11,017,815 B2

Date of Patent: May 25, 2021

Foreign Application Priority Data

Dec. 2, 2004	(JP)	2004-349264
Dec. 28, 2004	(JP)	2004-378767
Dec. 28, 2004	(JP)	2004-378768

EDITING METHOD AND RECORDING AND REPRODUCING DEVICE

Subject Matter of the Invention

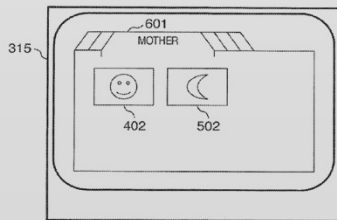
sequence. In view of the problem, the present invention has been achieved. An object of the present invention is to provide a recording scheme and device in which the user can conduct manipulation of arbitrarily rearranging the display sequence of the play lists in the play list catalog on the user interface.

EX1001 ('815 Patent) at 2:34-39

In a recording and reproducing device according to the present invention, it becomes possible for the user to select arbitrary play lists or reproduction ranges and conduct management. Even in the case where a plurality of users share a single recording medium, therefore, each user can manage favorite reproduction contents, resulting in improved usage. Since the play lists are subject to unified management, it becomes possible for the user to arbitrarily alter the display sequence of play lists.

EX1001 ('815 Patent) at 2:63-3:4

(30) Foreign Application Priority Data
Dec. 2, 2004 (JP) 2004-349264
Dec. 28, 2004 (JP) 2004-378767
Dec. 28, 2004 (JP) 2004-378768
(51) Int. Cl. (2006.01)
H04N 9/80 (2006.01)
G11B 27/00 (Continued)
(52) U.S. Cl. (2013.01); G06F 3/0482
CPC (2013.01); G11B 27/081 (2013.01);
(Continued)
27 Claims, 9 Drawing Sheets

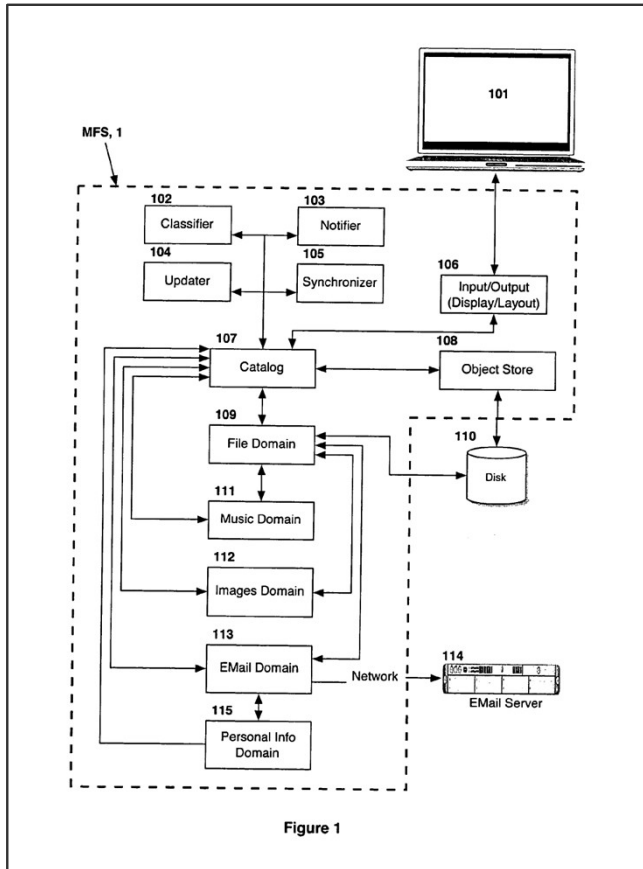


EX1001

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



Overview of Horn (EX1005)



EX1005 (Horn) Fig. 1

The computer(s) of the invention can be configured in a system architecture, for example, as one or more client or server computer(s), database computer(s), routers, interfaces and peripheral input and output devices, that together implement the system and network(s) to which a client computer system may be connected. A computer used in the inventive system typically includes at least one processor and memory coupled to a bus. The bus may be any one or more of any

EX1005 (Horn) at 6:40-47

A network interface is coupled to the bus to provide an interface to the data communication network (LAN, WAN, and/or Internet) for exchange of data among the various local network users, site computers, routers, and other computing devices. The system also includes at least one

EX1005 (Horn) at 6:59-63

context of the prior art. Specifically, the Horn system is a **specialized, server-based computer** running the Metadata Filing System (MFS), **not just a general-purpose or personal computer**. Rather than assessing the technology in light of its intended

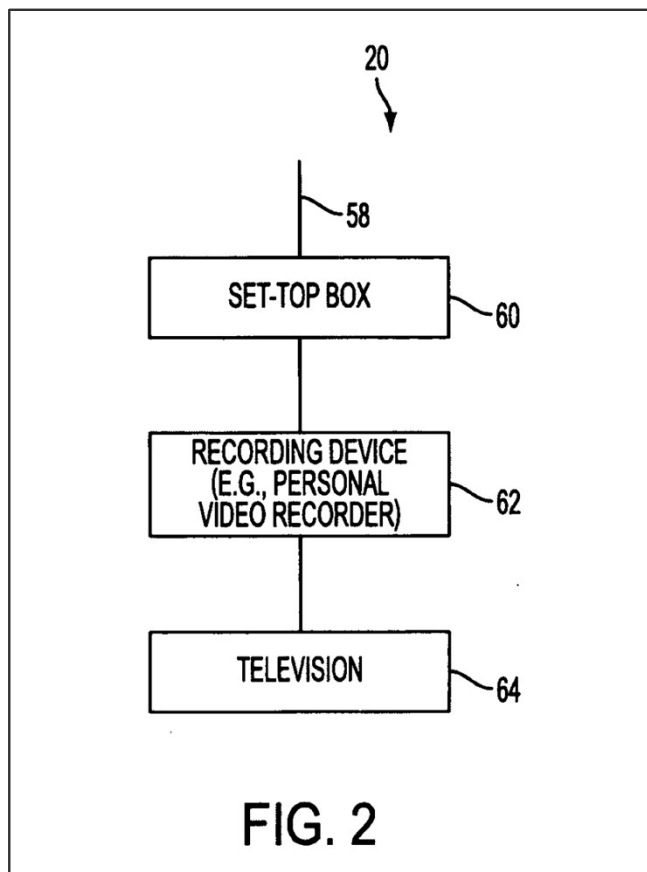
735 POR at 9-11
777 POR at 20-22

EX2040 (Balakrishnan Declaration) at ¶ 126

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Overview of Baumgartner (EX1016)



EX1016 (Baumgartner), Fig. 2

[0008] In accordance with the present invention, interactive television systems such as interactive television program guide systems may be used to display listings of available video-on-demand (VOD) content offerings. For

EX1016 (Baumgartner) at ¶ [0008]

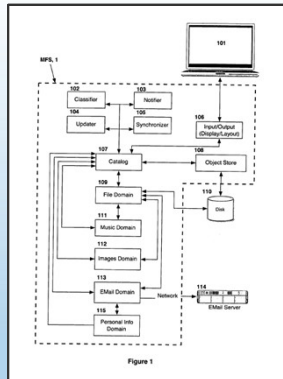
95. Baumgartner discloses an interactive television system in which a user can use an interactive television application to access and request media-on-demand programming. The interactive television application may display customized

EX2040 (Balakrishnan Declaration) at ¶ 95

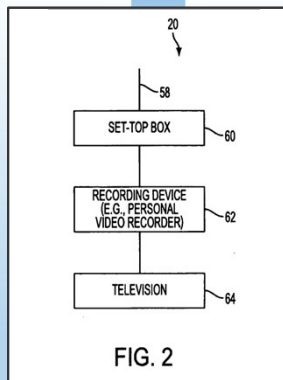
735 POR at 9-11
777 POR at 20-22

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

6



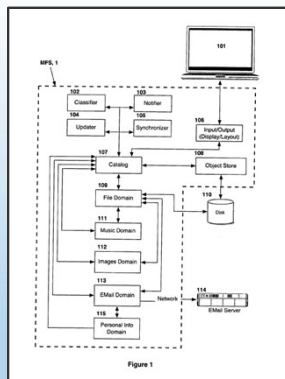
EX1005 (Horn), Fig. 1



EX1016 (Baumgartner), Fig. 2

- 735 POR at 9-21
735 Sur-Reply at 2-8
777 POR at 20-29
777 Sur-Reply at 3-8

Horn Is Not Amenable to Wireless Communications (Grounds 1-3, 6-8)



EX1005 (Horn), Fig. 1

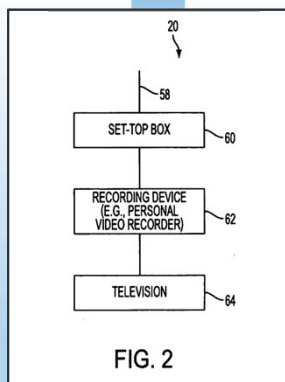


FIG. 2

EX1016 (Baumgartner), Fig. 2

- No rational motivation to introduce **wireless reception of video** to Horn
- Downsides of:
 - Speed
 - Unstable throughput
 - Expense

735 POR at 10, 13-21
 735 Sur-Reply at 2-8
 777 POR at 21-29
 777 Sur-Reply at 3-8

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



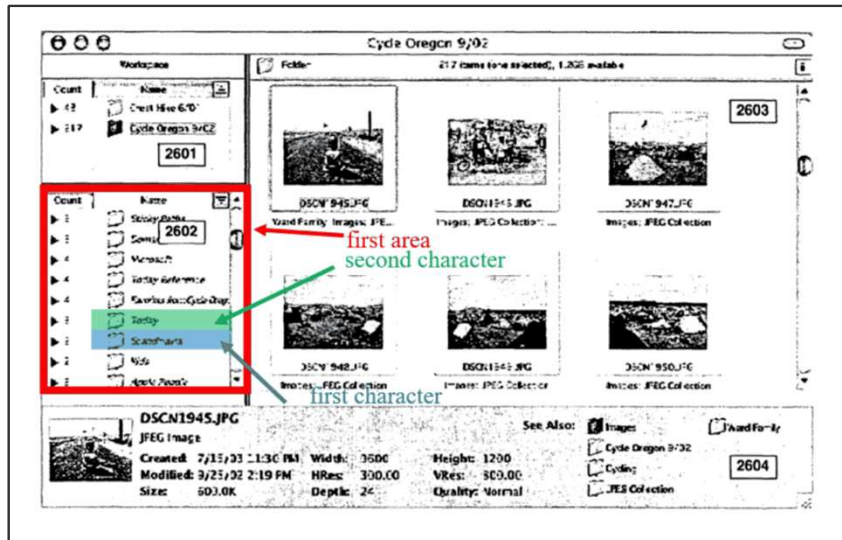
Horn Lacks Organization by User Profiles (Grounds 1-3, 6-8)

CLAIM ELEMENTS 1(c) / 9(b)

“at least some of the plurality of video information is associated with a user profile”

CLAIM ELEMENTS 16(b) / 21(b)

“a first user interface for a user to select a user profile from among a plurality of user profiles”



777 Petition at p. 33 (annotating EX1005 (Horn) at Fig. 26)

Collection: means a grouping of objects based on a metadata specification describing properties that all objects in the group have in common, or objects that were grouped together specifically by the user as having some shared meaning or logical grouping.

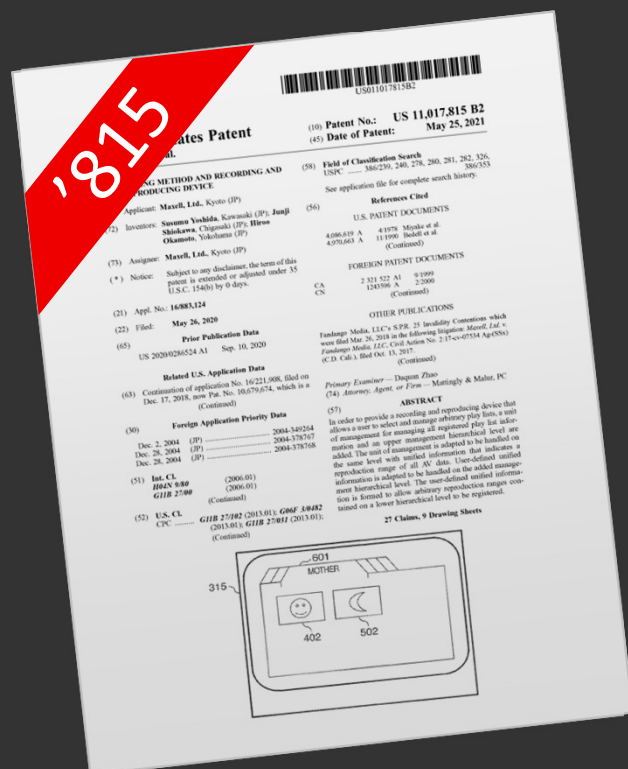
EX1005 (Horn) at 4:1-5; 8:58-67

735 POR at 21-22
735 Sur-Reply at 8-9
777 POR at 29-31
777 Sur-Reply at 9-11

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



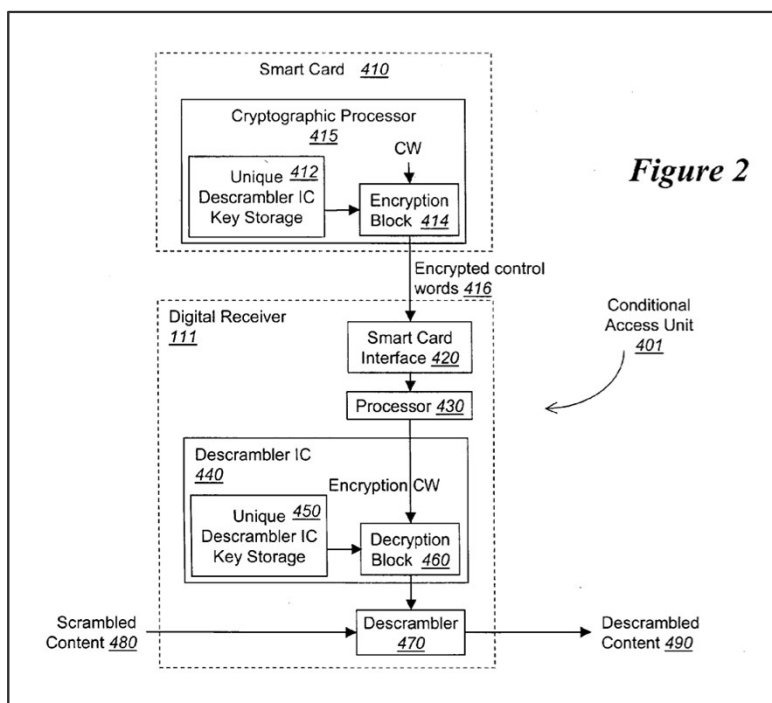
DEFICIENCIES OF ADDING CANDELORE TO HORN & BAUMGARTNER (GROUNDS 6-8)



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Overview of Candelore (EX1013)



EX1013 (Candelore), Fig. 2

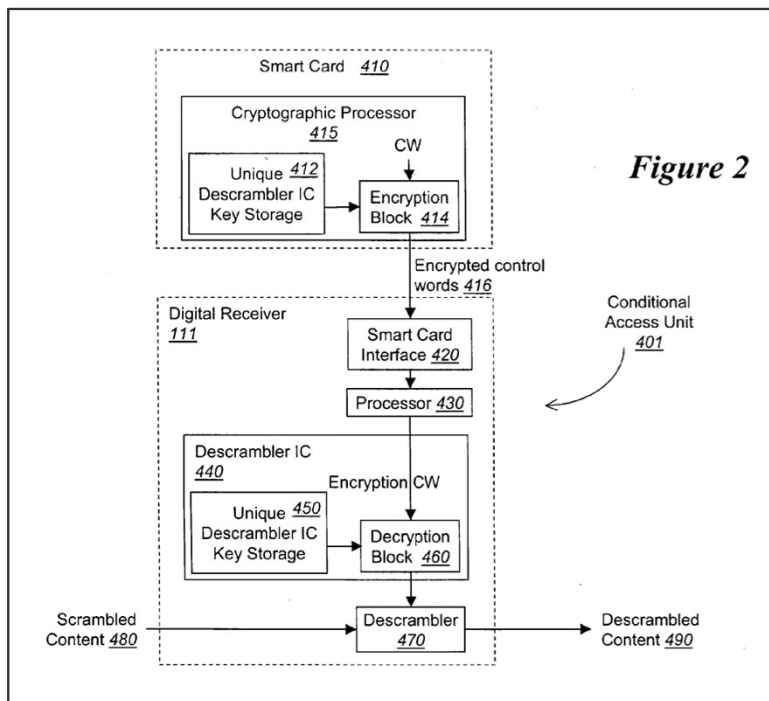
[0072] Embodiments of the encryption and decryption functions performed by encryption block 414 and decryption block 460 are shown in FIGS. 4, 5 and 6. These operations transform the CW based on the Unique Key stored in storage elements 412 and 450. An encryption algorithm such as DES, M6, or DVB Common Scrambling Algorithm may be used. In the embodiments shown in FIGS. 4, 5 and 6, Triple DES is used. As shown in FIG. 6, the descrambler IC 440 uses Triple DES to decrypt the CW in decryption block 460. The decrypted CW is then used by descrambler logic 470 to descramble the scrambled program content 480 and output clear program content 490.

EX1013 (Candelore) at ¶ 0072

777 POR at 38-41
777 Sur-Reply at 17



No Motivation to Use Candelore's Video Decryption with Baumgartner & Horn (16(m) and 21(l-m))



EX1013 (Candelore), Fig. 2

238. In my opinion, a POSITA would not have a reasonable expectation of success in the combination because decryption in Candelore is performed by an “embedded” IC—an embedded IC that is required to co-work with a “smart card” to perform the decryption—that a POSITA simply cannot pick and put in another system. Dr. Bederson Specifically, Horn-Baumgartner does not suggest any benefit to such a combination, and without a clear teaching or motivation, Dr. Bederson’s argument is based purely on hindsight.

EX2040 (Balakrishnan Declaration) at ¶ 238

241. Furthermore, Dr. Bederson ignores the reality that Candelore’s embedded IC cannot simply be abstractly combined with Horn-Baumgartner. The prior art does not teach any method for making this integration work, nor does Dr. Bederson provides any technical rationale for overcoming the clear incompatibilities. A POSITA would recognize that this is not an obvious combination but an impractical and speculative one.

777 POR at 38-41
777 Sur-Reply at 17

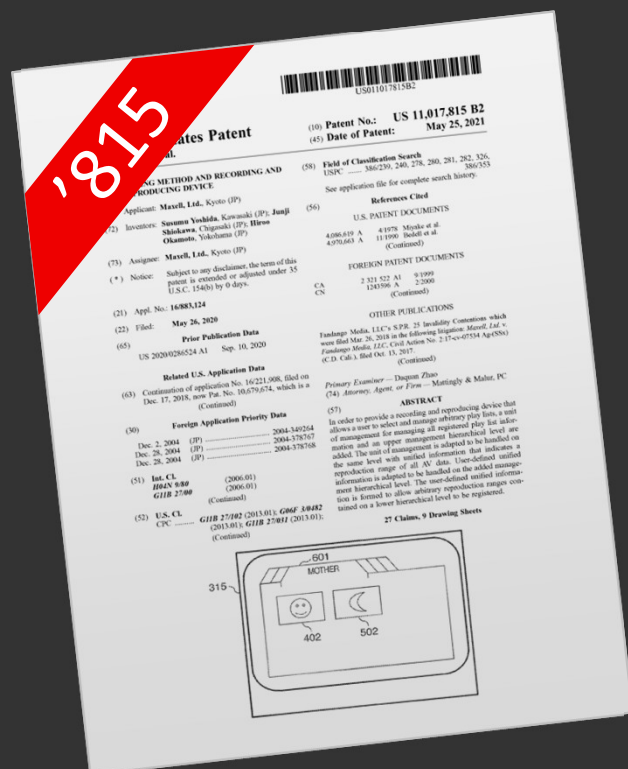
EX2040 (Balakrishnan Declaration) at ¶ 241

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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DEFICIENCIES OF ADDING WINTV TO HORN & BAUMGARTNER (& CANDELORE) (GROUNDS 2-3 & 7-8)

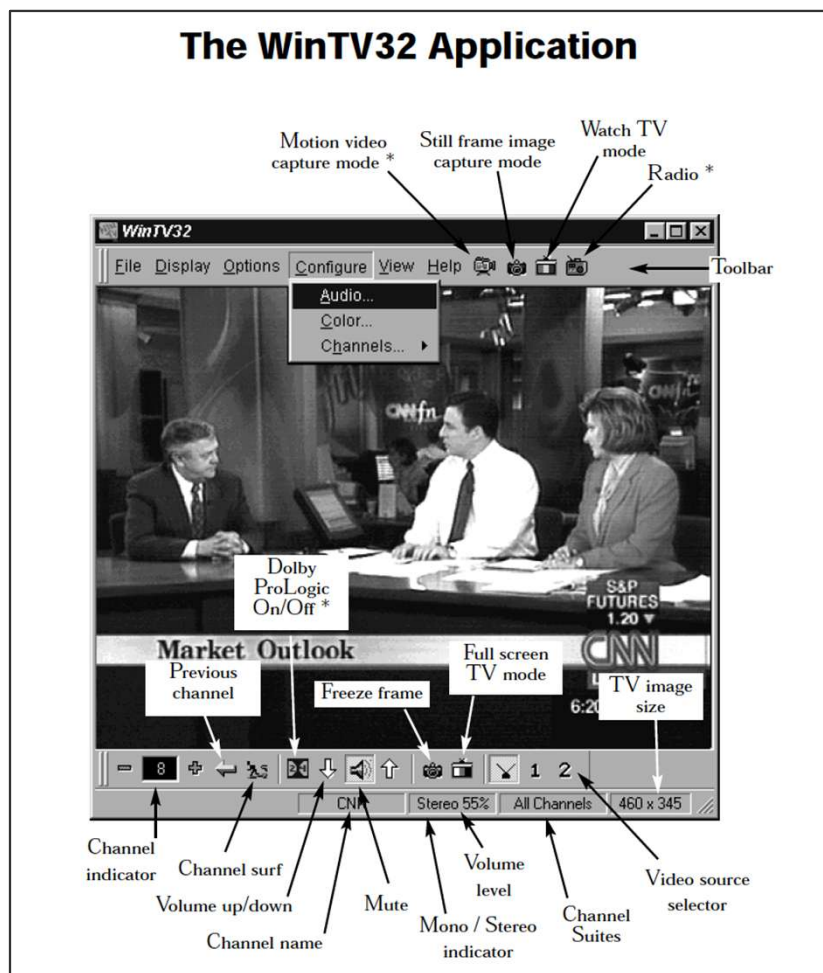


DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Overview of WinTV (EX1010)



EX1010 (WinTV) at 3-1

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



WinTV Is Not Prior Art

99. For example, I navigated within the Internet Archive to the Hauppauge web site around the time Petitioner contends the WinTV manual was available (in August or September 2003) (*see, e.g.*, Exs. 2022 and 2023). I explored some links present at the time within those web pages, for example:

Exhibit	Link
2027	https://web.archive.org/web/20031001191953/http://www.hauppauge.com:80/html/tech.htm
2028	https://web.archive.org/web/20031001185005/http://www.hauppauge.com:80/html/specs.htm
2029	https://web.archive.org/web/20031011045622/http://www.hauppauge.com:80/manuals/

100. With respect to the link at Exhibit 2029, it is the next higher level directory where one would expect the manuals to be accessible. However, as can be seen from Exhibit 2029, that access was denied.

The Wayback Machine - <https://web.archive.org/web/20031011045622/http://www.hauppauge.com:80/manuals/>

Directory Listing Denied

This Virtual Directory does not allow contents to be listed.



Ravin Balakrishnan, Ph.D.

Q. Does the link in paragraph 97 match the link that you're currently displaying on the screen now?

A. Sorry. It's a long link.

Q. Yeah. Take your time.

A. It's slightly different. There is a colon in the link -- in the URL link in paragraph 97 of my report, it has a Hauuppauge.com:80/. The link I'm seeing up here on the screen in front of me doesn't have that, so in that sense it is a different link.

Q. I see. Okay.

A. And that's the -- yeah, there's a bit of a difference in the URL.

EX2040 (Balakrishnan Declaration) at ¶¶ 99-100

EX1072 at 67:3-15

735 POR at 25-30; Sur-Reply at 11-13
777 POR at 43-48; Sur-Reply at 18-20

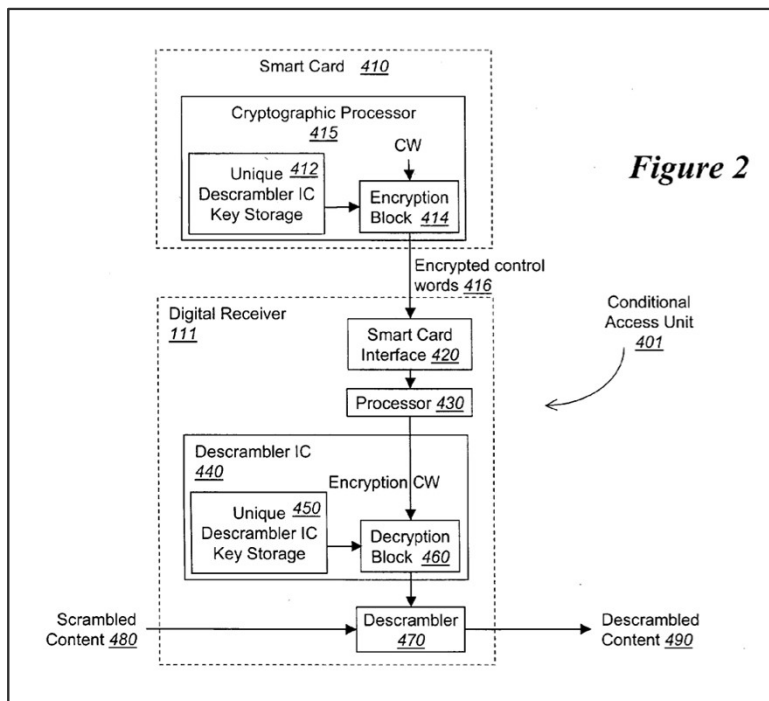
15

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



No Motivation to Import Real-Time Video Input into Horn

Affects Claims 7, 8, 14, 15, 20, 26, and 27 (real-time video)



EX1013 (Candelore) Fig. 2

238. In my opinion, a POSITA would not have a reasonable expectation of success in the combination because decryption in Candelore is performed by an “embedded” IC—an embedded IC that is required to co-work with a “smart card” to perform the decryption—that a POSITA simply cannot pick and put in another system. Dr. Bederson Specifically, Horn-Baumgartner does not suggest any benefit to such a combination, and without a clear teaching or motivation, Dr. Bederson’s argument is based purely on hindsight.

EX2040 (Balakrishnan Declaration) at ¶ 238

241. Furthermore, Dr. Bederson ignores the reality that Candelore’s embedded IC cannot simply be abstractly combined with Horn-Baumgartner. The prior art does not teach any method for making this integration work, nor does Dr. Bederson provides any technical rationale for overcoming the clear incompatibilities. A POSITA would recognize that this is not an obvious combination but an impractical and speculative one.

EX2040 (Balakrishnan Declaration) at ¶ 241

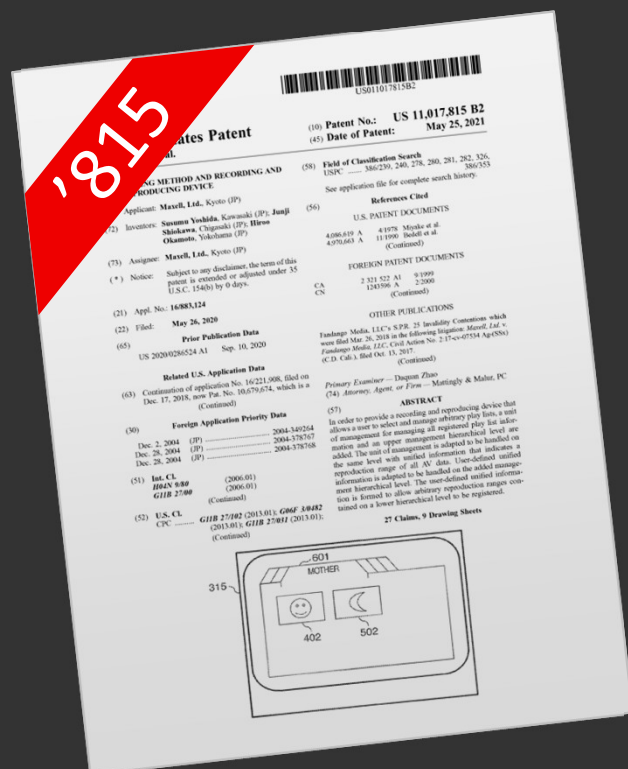
735 POR at 30-31
Sur-Reply at 13-15
777 POR at 48-49
Sur-Reply at 20-22

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

16



DEFICIENCIES OF KAPLAN & BRYANT (AND BAUMGARTNER AND HORN) (GROUNDS 4-5, 9-10)

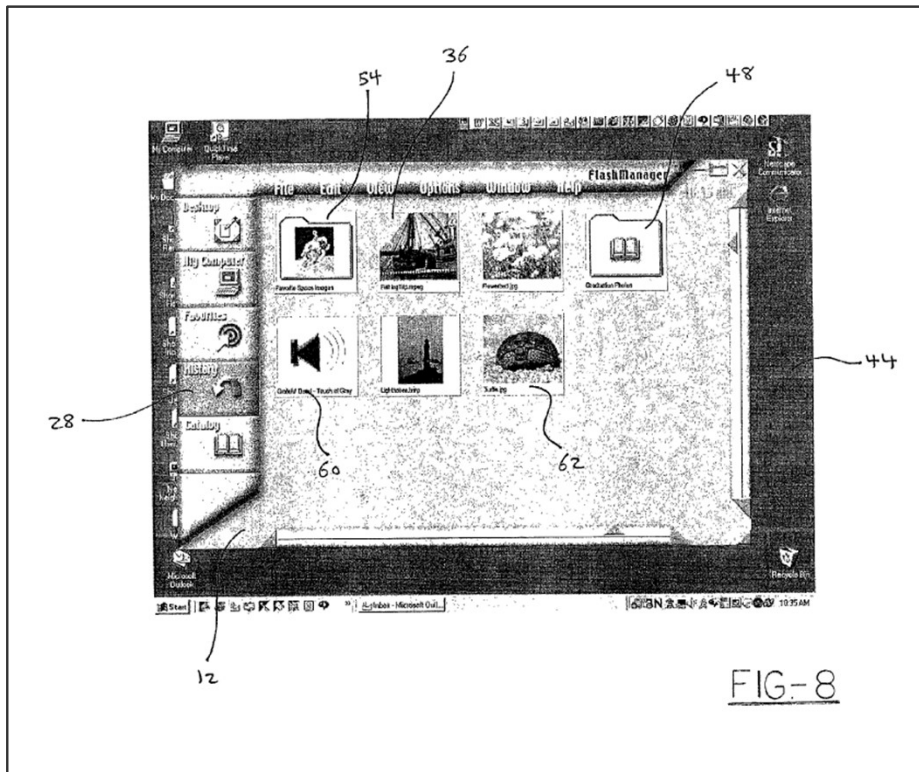


DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Overview of Kaplan (EX1014)



EX1014 (Kaplan), Fig. 8

[0004] The present invention is a multimedia management system for storing, manipulating, and displaying multimedia content. The system comprises a user interface, a plurality of predefined functions, a multimedia acquisition interface, and system controls. The system provides users with a simple and intuitive method and computer program for reviewing multimedia content, which can include digital video, digital audio and text, still images, animation, and MIDI.

EX1014 (Kaplan) at ¶ [0004]

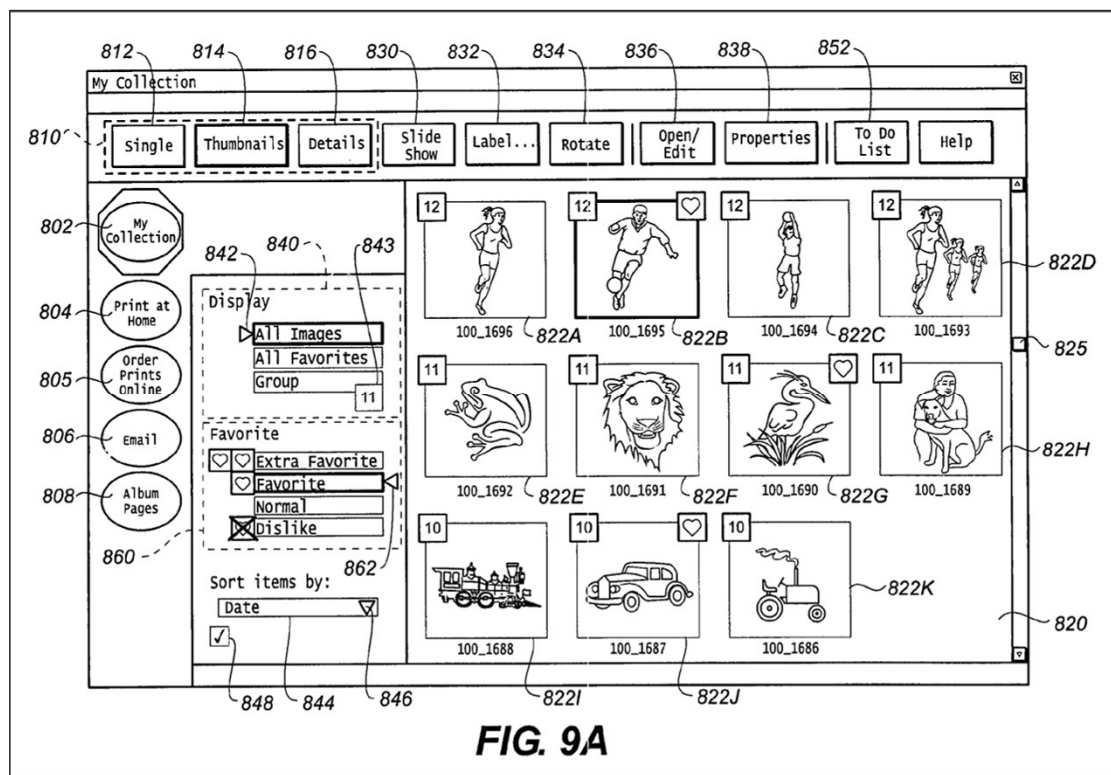
735 EX2040 at ¶¶ 109-110

777 EX2040 at ¶¶ 109-110

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

18

Overview of Bryant (EX1015)



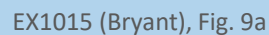
EX1015 (Bryant), Fig. 9a

[0029] The present invention defines methods for grouping and classifying digital still images and digital motion images captured using a handheld digital camera. The grouping can be done manually by the camera user, by pressing a “new group” button on the digital camera before capturing a group of digital images. The classification can be done manually by the camera user, for example, by identifying a “favorite” image within each group of captured images, using a control button on the digital camera as the user reviews the group of captured digital images on the camera’s image display. A user identifier can also be stored along with the classification data, in order to identify the particular camera user for whom the classification was made. In one embodiment of the present invention, the grouping and classification data is stored in a database on a host computer, and can later be used in retrieving digital images and in producing hardcopy output, such as album pages. In a second embodiment, the grouping and classification data is used to create “electronic job pages”, where each group of images corresponds to one “job”, such as an item offered for sale electronically. By grouping the images on the digital camera as they are captured, the process of later creating the “electronic job pages” on a computer is greatly simplified, since the images are already organized into the appropriate job groups. In a third embodiment, the digital camera includes a wireless modem which transmits some of the captured images to a service provider, and the grouping and classification information is used to simplify the process of selecting and organizing the images stored by a local host computer and by the service provider.

EX1015 (Bryant) at ¶ [0029]

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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- 735 POR at 35-43
777 POR at 53-60



Neither Kaplan Nor Bryant Discloses Video Information Associated with a User Profile

“Affective Information” does not meet claim language for elements 1c and 9b (Grounds 4-5):

CLAIM ELEMENTS 1(c) / 9(b)

“at least some of the plurality of video information is associated with a user profile”

[0033] When the affective information is stored in association with a user identifier, it is known as “personal affective information”. The affective information and user identifier are types of image “metadata”, which is a term used for any information relating to an image. Examples of other types of image metadata include image capture time, capture device, capture location, date of capture, and image capture parameters (such as lens f-number, focus distance).

EX1015 (Bryant) at ¶ [0033]

735 POR at 44
Sur-Reply at 19-20

Extra References (Baumgartner & Horn)



IX. GROUND 4: KAPLAN AND BRYANT

2. [1a]

This limitation is obvious over Bryant. Bryant discloses a network interface in the form of a dial-up modem 22 in the home computer 10 that is suitable for connection to the Internet. EX1015, ¶38 and Fig 1 (excerpted below):

Bryant also discloses, in connection with a digital camera 300, a wireless modem such as a cellular modem or an “802.11 type” modem. EX1015, ¶140. It would have been obvious to a POSITA to modify Bryant’s home computer 10 by incorporating such a wireless modem in place of the modem 22 for connection to the Internet service provider 30. Such a wireless connection of a computer to the Internet is disclosed in Baumgartner. EX1016, ¶54 and Fig. 1. A POSITA would

735 Petition at pp. 71-72

IX. GROUND 9: KAPLAN, BRYANT, WONG AND CANDELORE

9. [16h]

Kaplan-Bryant renders this limitation obvious. §IX.B.3[16b], IX.B.7[16f]; EX1003, ¶384. Kaplan discloses that selection of the Favorites button results in the

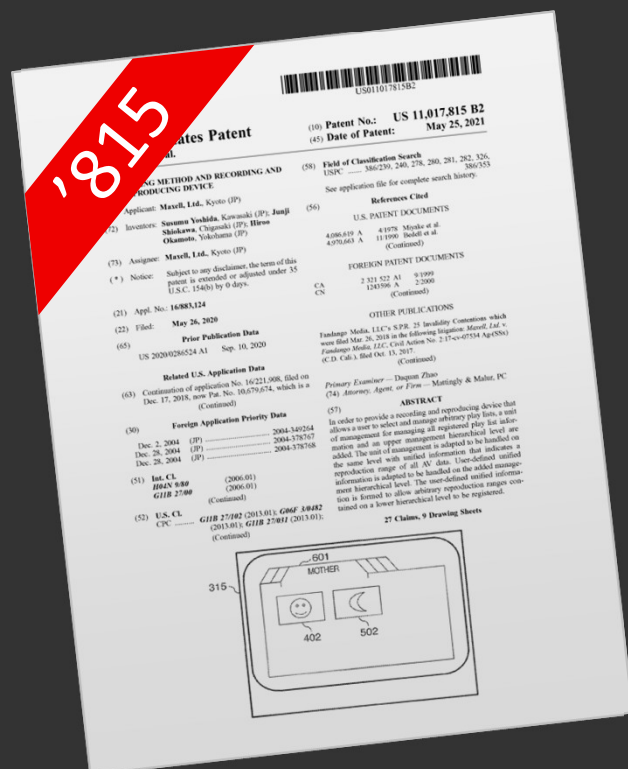
While Wong uses text instead of a graphical thumbnail, it would have been obvious to a POSITA to replace that text with graphical thumbnails such as those disclosed by Horn FIG. 26 for the reasons set forth in limitation [16h]. EX1003, ¶386.

777 Petition at pp.81-83

735 POR at 41-42
777 POR at 59

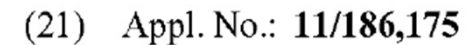


DEFICIENCIES OF ADDING WONG AND CANDELORE TO KAPLAN & BRYANT (GROUNDS 9-10)



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

23



(22) Filed: **Jul. 21, 2005**

EX1007 (Wong)

777 POR at 52
777 EX2040 at ¶ 107

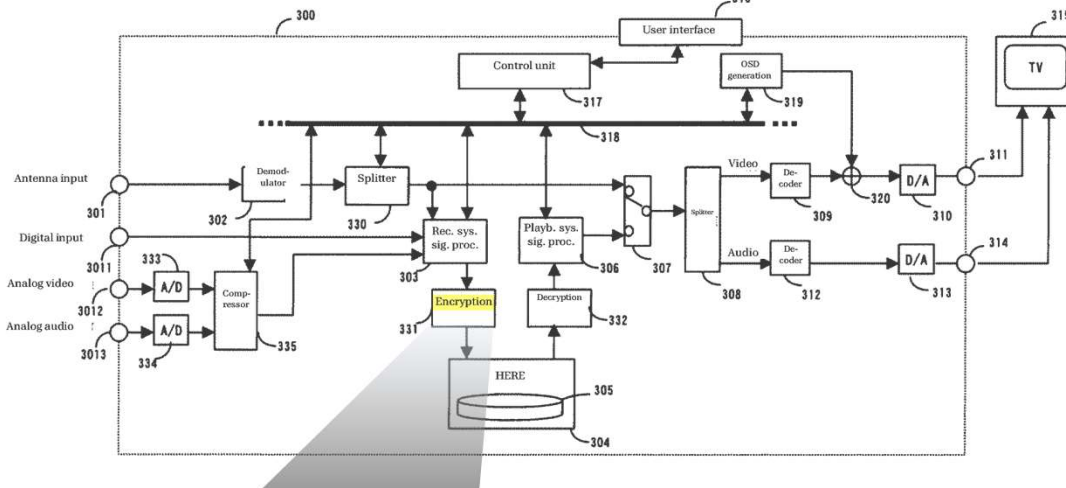


Wong Is Not Prior Art

TERM 1

“first video information being received including second video information that is encrypted”

FIG. 3



EX2019 (JP4385943B2) at Fig. 3

Encryption

1. Digital broadcasting and conditional access systems

The essential role of broadcasting is to convey information on a broad scale; therefore, "scrambling", which has the aim of restricting reception, is at odds with this role. In recent years, however, the implementation of fee-based broadcasting has made it necessary to prevent non-subscribers from receiving broadcasts, so scrambling of broadcast signals has nonetheless become widespread. This has been achieved through the "conditional access system", which is now a normal prescription for any new broadcast system. Although scrambling began with cable television (CATV) and limited-range terrestrial broadcasts, the advent of worldwide satellite-based broadcasts has fueled the development and implementation of large-scale conditional access systems.

EX2031 (2002) at 1

777 POR at 4-9

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



Wong Is Not Prior Art

TERM 2

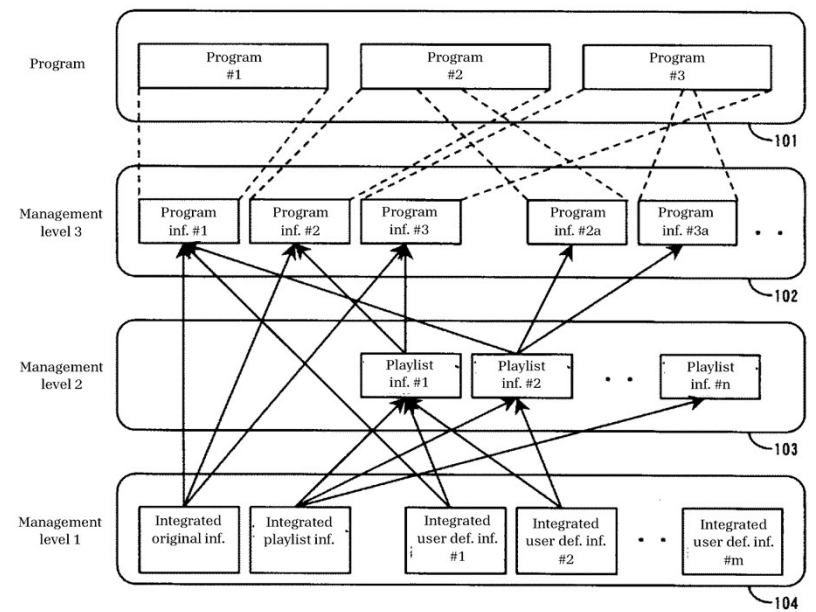
“upon the one video being removed...”

Next, FIG. 6 is an example of a menu display using integrated user defined information #1 in FIG. 1. 601 is a user #1 (here being "mom") menu display tag, and 402 and 502 are the thumbnails showing program information #1 and playlist information #1, as can be seen from FIG. 1. "Mom" can freely register and delete data to be played back, using the mom menu display tag 601 as her own folder.

Similarly, FIG. 7 is an example of a menu display using integrated user defined information #2 in FIG. 1. 701 is a user #2 (here being "dad") menu display tag, and 503 and 502 are the thumbnails for playlist information #2 and playlist information #1, as can be seen from FIG. 1. In this case, "dad" has selected two playlists and can change the playback order. As with "mom" above, "dad" can freely register and delete data to be played back, using the dad menu display tag 701 as his own folder.

EX2019 (JP4385943B2) at ¶ 24-25

FIG. 1



EX2019 (JP4385943B2) at Fig. 1

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

777 POR at 9-10

26



Wong Is Not Prior Art

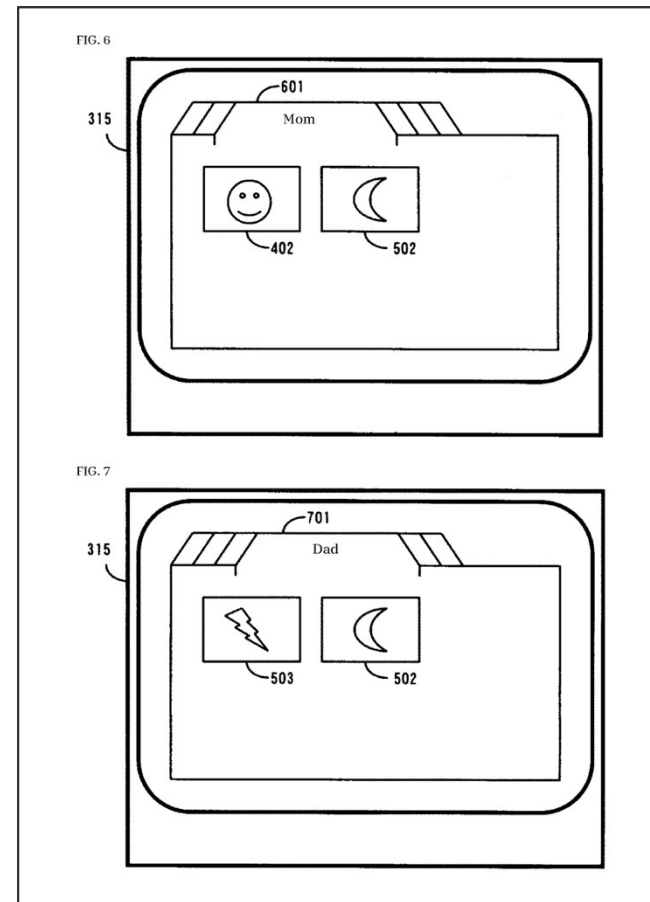
TERM 3

"user profile"

Next, FIG. 6 is an example of a menu display using integrated user defined information #1 in FIG. 1. 601 is a user #1 (here being "mom") menu display tag, and 402 and 502 are the thumbnails showing program information #1 and playlist information #1, as can be seen from FIG. 1. "Mom" can freely register and delete data to be played back, using the mom menu display tag 601 as her own folder.

Similarly, FIG. 7 is an example of a menu display using integrated user defined information #2 in FIG. 1. 701 is a user #2 (here being "dad") menu display tag, and 503 and 502 are the thumbnails for playlist information #2 and playlist information #1, as can be seen from FIG. 1. In this case, "dad" has selected two playlists and can change the playback order. As with "mom" above, "dad" can freely register and delete data to be played back, using the dad menu display tag 701 as his own folder.

EX2019 (JP4385943B2) at ¶ 24-25



EX2019 (JP4385943B2) Figs. 6-7

777 POR at 10-11

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



Problem with the Combination

No Motivation to Use User Profiles of Wong with Kaplan/Bryant

A POSITA would have recognized the benefit to having multiple different users use Kaplan-Bryant with unique user profiles as disclosed by Wong to provide customized user collections for multiple users on a single PC. EX1003, ¶361. This obvious application of Kaplan-Bryant's functionality would have motivated a POSITA to make the combination. EX1003, ¶361. As taught by Wong, a POSITA would have found it obvious that a multimedia content management system incorporating a multiple user account system could be configured to allow multiple individualized playlists, each customized to suit the tastes of different users. EX1003, ¶361.

777 Petition at pp.64-65

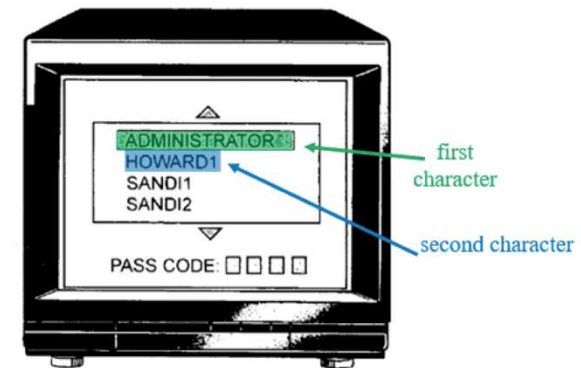


FIG. 3

Wong discloses “[t]he user may respond by selecting a username from the available list of active usernames followed by entry of an authentication scheme....” EX1007, 8:44-9:6, FIG. 5; EX1003, ¶376.

777 Petition at p.74

777 POR at 62, 64; Sur-Reply at 25
777 EX2040 at ¶¶ 278-79

28

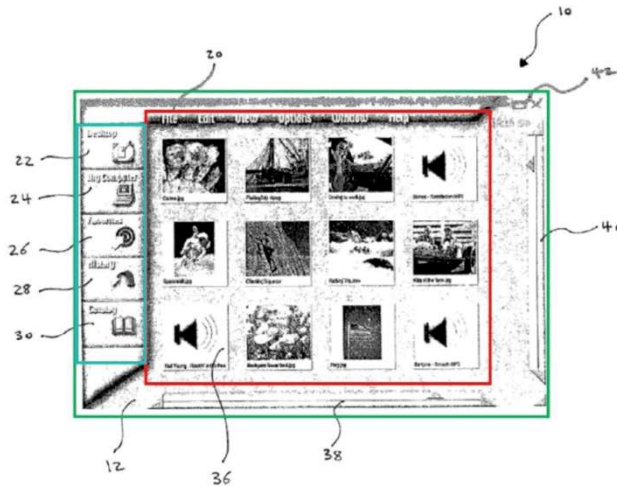
DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



Problem with the Combination

No Motivation to Use User Profiles of Wong with Kaplan/Bryant

user of the first user profile. As discussed in the IPR2018-0143 FWD, Kaplan discloses in FIG. 4 a menu display outlined in green below that includes a first area in blue. EX1014, FIG. 4; EX1009, 26; EX1003, ¶379.



777 Petition at p. 77

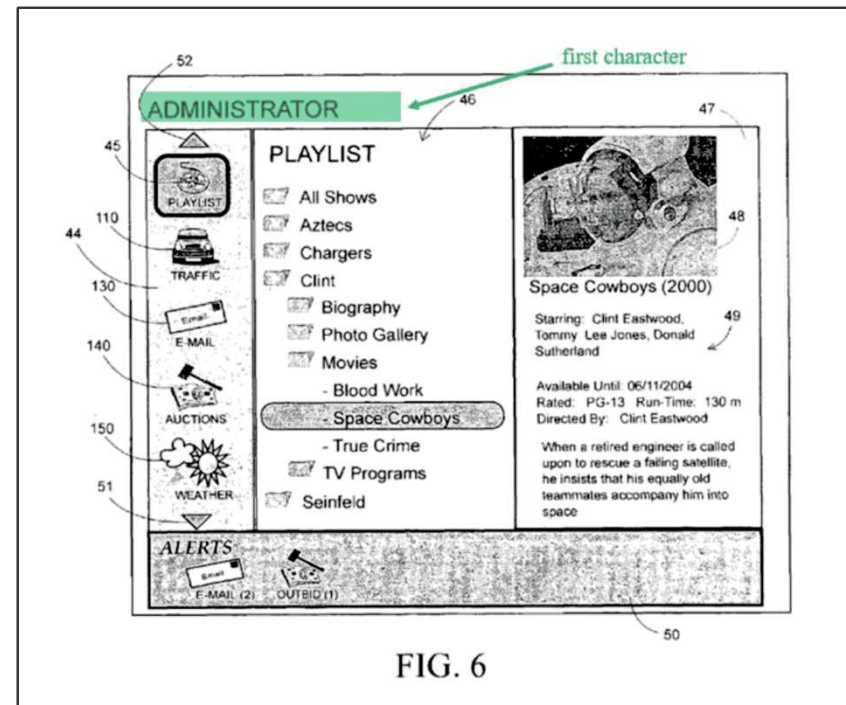


FIG. 6

777 Petition at p. 79

777 POR at 62, 64; Sur-Reply at 25

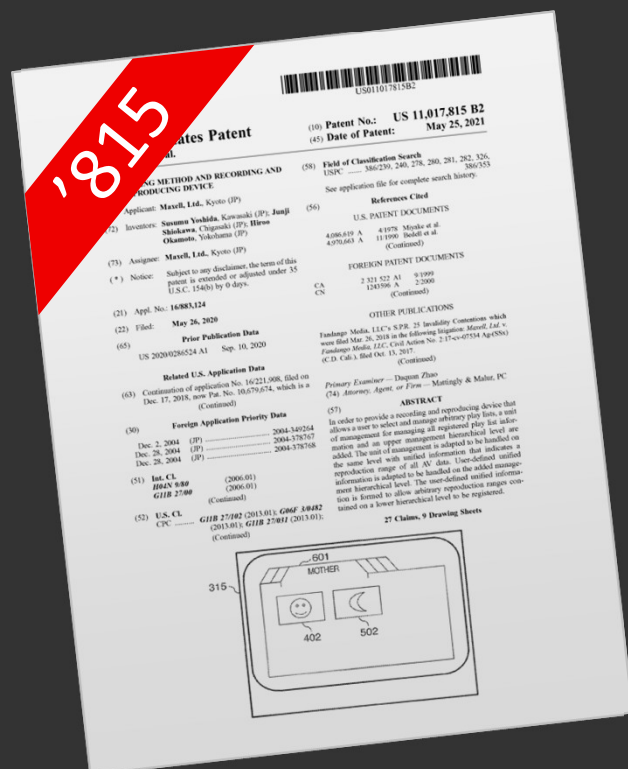
777 EX2040 at ¶¶ 278-79

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DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



DEFICIENCIES OF ADDING WINTV TO KAPLAN & BRYANT (AND WONG & CANDELORE) (GROUNDS 5 & 10)



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

30



WinTV Is Not Prior Art

99. For example, I navigated within the Internet Archive to the Hauppauge web site around the time Petitioner contends the WinTV manual was available (in August or September 2003) (*see, e.g.*, Exs. 2022 and 2023). I explored some links present at the time within those web pages, for example:

Exhibit	Link
2027	https://web.archive.org/web/20031001191953/http://www.hauppauge.com:80/html/tech.htm
2028	https://web.archive.org/web/20031001185005/http://www.hauppauge.com:80/html/specs.htm
2029	https://web.archive.org/web/20031011045622/http://www.hauppauge.com:80/manuals/

100. With respect to the link at Exhibit 2029, it is the next higher level directory where one would expect the manuals to be accessible. However, as can be seen from Exhibit 2029, that access was denied.

The Wayback Machine - <https://web.archive.org/web/20031011045622/http://www.hauppauge.com:80/manuals/>

Directory Listing Denied

This Virtual Directory does not allow contents to be listed.



Ravin Balakrishnan, Ph.D.

Q. Does the link in paragraph 97 match the link that you're currently displaying on the screen now?

A. Sorry. It's a long link.

Q. Yeah. Take your time.

A. It's slightly different. There is a colon in the link -- in the URL link in paragraph 97 of my report, it has a Hauuppauge.com:80/. The link I'm seeing up here on the screen in front of me doesn't have that, so in that sense it is a different link.

Q. I see. Okay.

A. And that's the -- yeah, there's a bit of a difference in the URL.

EX2040 (Balakrishnan Declaration) at ¶¶ 99-100

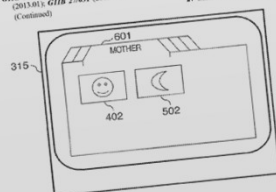
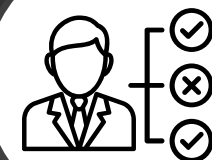
EX1072 at 67:3-15

735 POR at 25-30; Sur-Reply at 11-13

777 POR at 43-48; Sur-Reply at 18-20

31

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



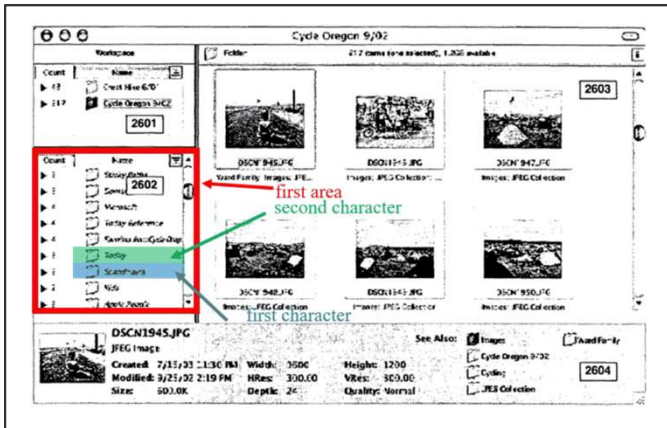
SAMSUNG LATE INCONSISTENT CLAIM CONSTRUCTION POSITIONS

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

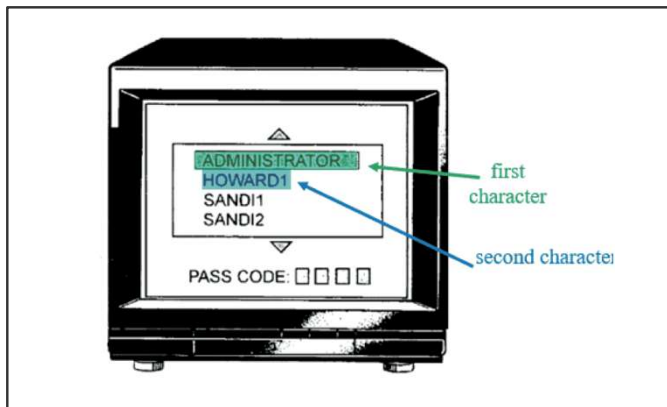


Samsung Makes Inconsistent Arguments About First and Second Characters

- Petitioner has made late-arising claim interpretation arguments in EDTX relevant to claim elements 16(b) and 21(b)
 - Affects all claims in Grounds 6-10



777 Petition at p. 33 (annotating EX1005 (Horn) at Fig. 26)



777 Petition at 71 (annotating EX1007 (Wong) at Fig. 3)

The Character Selection limitations require selecting a first/second character in a first area of a display in order to display a group of thumbnails corresponding to video information in a second area of the screen. The Court construed “character” as “a letter, number, punctuation mark, or other symbol or control code that is represented to a computer by one unit of information.” Docket No. 107. Thus, the Character Selection limitations are not satisfied by selecting an area of a display because that is not a “character.”

Dkt 390 at 10-11

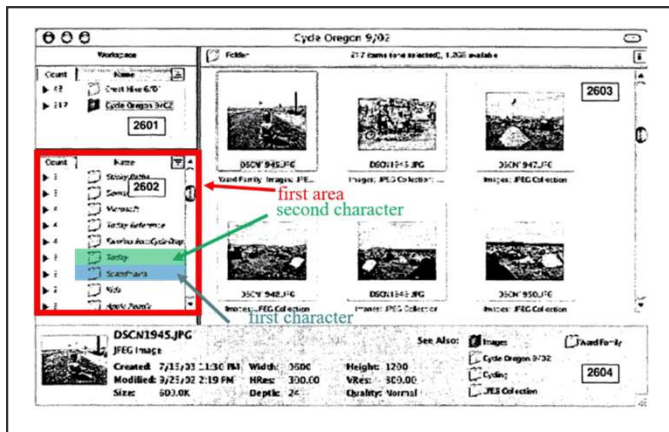
735 Paper 38 at 6-9
777 Paper 39 at 6-9

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

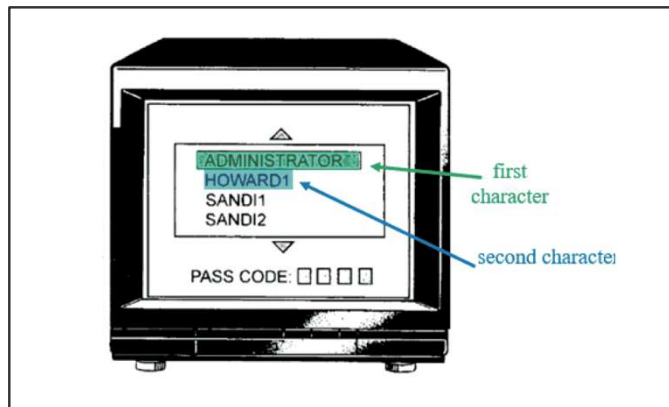
33



Samsung Makes Inconsistent Arguments About First and Second Characters



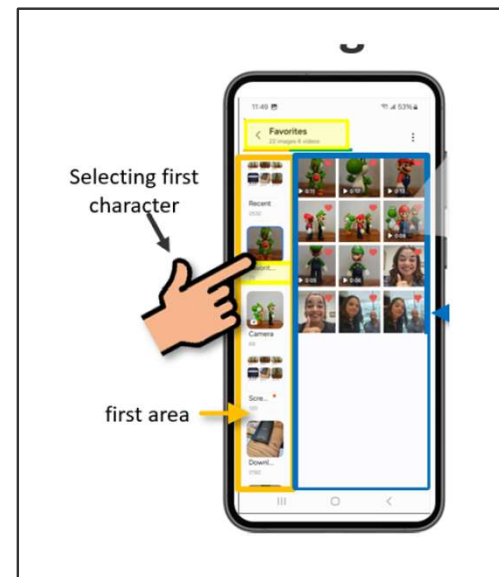
777 Petition at p. 33 (annotating EX1005 (Horn) at Fig. 26)



777 Petition at 71 (annotating EX1007 (Wong) at Fig. 3)

Indeed, the demonstratives incorrectly equate the claimed first character with the album titles “Favorites” (PDX-7-44) and “Camera” (PDX-7-45), neither of which qualifies as a “character” as construed by the Court because they are represented to a computer by more than one unit of information. Trial Tr. At 750: 20-23.

Dkt 412 at 8



735 Paper 38 at 6-9
777 Paper 39 at 6-9
735 Paper 38 at 8
777 Paper 39 at 8
(showing the characters Samsung attacked as contrary to claim construction)

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Samsung Makes Inconsistent Arguments About First and Second Characters



Samsung bears the burden to set forth and meet applicable claim construction.

No invalidity absent a clear position, which is not provided.



“Ultimately, it is the petitioner’s burden to present a clear argument.”

Netflix, Inc. v. DivX, LLC, 84 F.4th 1371, 1374 (Fed. Cir. 2023)

735 Paper 38 at 9

777 Paper 39 at 9