

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA, INC.,**

Petitioners

v.

MAXELL, LTD.,
Patent Owner

Inter Partes Review No.: IPR2024-00777
U.S. Patent No. 11,017,815

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

PETITIONERS’ EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 11,017,815
1002	File History of U.S. Pat. 11,017,815
1003	Declaration of Dr. Benjamin Bederson
1004	CV of Dr. Benjamin Bederson
1005	U.S. Patent No. 7,275,063 (“Horn”)
1006	U.S. Patent No. 7,970,240 (“Chao”)
1007	U.S. Patent No. 7,650,361 (“Wong”)
1008	Declaration of Nathaniel E. Frank-White
1009	<i>Fandango Media, LLC v. Maxell, Ltd.</i> , IPR2018-01432, Paper 32 (PTAB Feb. 10, 2020) (“01432FWD”)
1010	WinTV Installation and Reference Manual (June 30, 1999) (“WinTV”)
1011	Archived Specifications - WinTV PCI boards including the WinCast/TV and WinTV-pci (November 10, 1999) (https://web.archive.org/web/19991110153658/http://hauppauge.com:80/html/wc_data.htm)
1012	Bt848/848A/849A - Single-Chip Video Capture for PCI – Datasheet (“BT848”)
1013	U.S. Patent Application Publication No. 20030174844A1 (“Candelore”)
1014	U.S. Patent Application Publication No. 20010056434A1 (“Kaplan”)
1015	U.S. Patent Application Publication No. 20040201691 (“Bryant”)
1016	U.S. Patent Application Publication No. 20050160458A1 (“Baumgartner”)
1017	Appendix 5 to PO’s January 11, 2024 Infringement Contentions
1018	U.S. Patent No. 6,259,418 (“Jones”)
1019	U.S. Patent No. 5,911,129 (“Towell”)
1020	JP-A-2000-152180
1021	Machine Translation of JP-A-2000-152180
1022	U.S. Patent No. RE32,632 to Atkinson
1023	Brent Ethington, <i>Introducing Microsoft Windows 95</i> , Microsoft Press (1995), with authenticating declaration of Carmen Debord
1024	U.S. Patent No. 6,493,006 to Gourdol et al.
1025	Microsoft Computer Dictionary, 4th Ed., Microsoft Press (1999)

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Exhibit No.	Description
1026	James Cohoon & Jack Davidson, C++ Program Design: An Introduction to Programming and Object-Oriented Design, 3rd Ed., McGraw Hill (2002)
1027	George W. Furnas and Jeff Zacks, 1994, <i>Multitrees: Enriching and Reusing Hierarchical Structure</i> , In Proceedings of the SIGCHI Conference on Human Factors in Computer Systems (CHI 1994), Beth Adelson, Susan Dumais, and Judith Olson (Eds.), ACM, New York, NY, USA, 330-336. DOI http://dx.doi.org/10.1145/191666.191778 , with authenticating declaration of Scott Delman.
1028	U.S. Patent Application Publication No. 2004/0064476 to Rounds ("Rounds")
1029	U.S. Patent Application Publication No. 2002/0082730 to Capps et al. ("Capps")
1030	U.S. Patent No. 6,166,735 to Dom et al. ("Dom")
1031	U.S. Patent No. 5,884,056 to Steele ("Steele")
1032	U.S. Patent No. 5,442,744 to Piech et al. ("Piech")
1033	U.S. Patent Application Publication No. 2006/0107289 to DeYonker et al. ("DeYonker")
1034	Benjamin B. Bederson, 2001, PhotoMesa: A Zoomable Image Browser Using Quantum Treemaps and Bubblemaps, In Proceedings of the 14th annual ACM symposium on User Interface Software and Technology (UIST 2001), ACM, New York, NY, USA, 71-80. DOI http://dx.doi.org/10.1145/502348.502359
1035	U.S. Patent No. 6,609,253 to Swix et al. ("Swix")
1036	U.S. Patent Application Publication No. 2004/0078383 to Mercer et al. ("Mercer")
1037	WIPO Patent Publication No. WO 02/32122
1038	U.S. Patent No. 5,767,897
1039	"Windows XP Media Center Exposed" (AnandTech, January 8, 2003)
1040	File History of U.S. Patent No. 10,679,674
1041	File History of U.S. Patent No. 10,199,072
1042	File History of U.S. Patent No. 9,818,449
1043	File History of U.S. Patent No. 9,384,783
1044	File History of U.S. Patent No. 8,644,684
1045	File History of U.S. Patent No. 7,613,383

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1046	Ex. 2002 from IPR2018-01432
1047	Excerpt from American Heritage Dictionary (4 th ed. 2000)
1048	Excerpt from Microsoft Computer Dictionary (5 th ed. 2002)
1049	U.S. Patent No. 7,292,692 to Bonan et al. (“Bonan”)
1050	Printout of https://www.atsc.org/news/security-content-protection-high-priorities-for-nextgen-tv/ (visited April 18, 2024)
1051	U.S. Patent No. 5,746,656
1052	U.S. Patent No. 5,729,741
1053	U.S. Patent Appl. Publication No. 2002/0077170
1054	Where to Buy WinTV. VideoTalk and VideoMagic Products
1055	Archived web page — Hauppauge (September 15, 1999)
1056	Archived web page — Hauppauge (November 17, 1999)
1057	Internet Archive Declaration
1058	11/8/24 email from Roshan Bhattarai to Patron Services Peach (Affidavits)
1059	11/12/24 email from Tanya Blue (Affidavits) to Roshan Bhattarai
1060	12/3/24 email from Roshan Bhattarai to Affidavits
1061	12/11/24 email from Roshan Bhattarai to Affidavits
1062	12/20/24 email from Patron Services Blue (Internet Archive) to Roshan Bhattarai
1063	Declaration of Roshan Bhattarai
1064	Exhibit 1064 from April 1, 2025 Balakrishnan Deposition
1065	Exhibit 1065 from April 1, 2025 Balakrishnan Deposition
1066	Exhibit 1066 from April 1, 2025 Balakrishnan Deposition
1067	Exhibit 1067 from April 1, 2025 Balakrishnan Deposition
1068	Exhibit 1068 from April 1, 2025 Balakrishnan Deposition
1069	Exhibit 1069 from April 1, 2025 Balakrishnan Deposition
1070	Email from Dr. Benjamin Bederson dated April 15, 2004
1071	Excerpts from PC World Magazine, Vol. 21, Num. 10, October 2003
1072	Deposition Transcript of Dr. Ravin Balakrishnan dated April 1, 2025
1073	Internet Archive Declaration
1074	Excerpts from Maxell’s Reply Claim Construction Brief (5:23-cv-00092-RWS (E.D. Tex.), Dkt. 78)
1075	Excerpts from District Court Order (5:23-cv-00092-RWS (E.D. Tex.), Dkt. 285)
1076	Excerpts from Trial Transcript (5:23-cv-00092-RWS (E.D. Tex.))

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Exhibit No.	Description
1077	Excerpts from Singh Direct Demonstratives (5:23-cv-00092-RWS (E.D. Tex.))
1078	Petitioner's Demonstratives

Petitioner makes the following objections to Patent Owner's demonstratives:

- 1) On slide 5, there is no cite to Horn at 6:40-47 in the 735 POR at 9-11 or
in the 777 POR at 20-22
- 2) On slide 6, there is no cite to Baumgartner paragraph 008 or
Balakrishnan paragraph 95 in the 735 POR at 9-11 or in the 777 POR at
20-22
- 3) On slide 11, there is no cite to Candelore paragraph 72 in the 777 POR at
38-41 or the 777 Su-reply at 17
- 4) On slide 18, there is no identification of a brief that cites Kaplan's Fig. 8
or paragraph 004
- 5) On slide 21, there is no citation to Bryant at paragraph 33 in the 735 POR
at 44 or the sur-reply at 19-20
- 6) On slide 26, there is no citation to EX2019 Fig. 1 from the Japanese
priority application in the 777 POR at 9-10
- 7) On slide 28, there is no citation to Pet. at 64-65 or 74 in 777 POR at 62,
64 or Sur-Reply at 25
- 8) On slide 29, there is no citation to Pet. at 79 in 777 POR at 62, 64 or Sur-
Reply at 25

- 9) On slide 32, there is no identification of a paper in which the argument at the top of the slide is made with respect to claims 7, 8, 14 and 15 or claims 20, 26 and 27 for the Kaplan-Bryant based combinations.

Date: September 23, 2025

Respectfully submitted,

/s/ James Heintz

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CERTIFICATE OF SERVICE

The undersigned certifies that on September 23, 2025, a true and correct copy of the Petitioners' Objections To Patent Owner's Demonstratives was served by emailing a copy of same (by agreement) to the following attorneys for the Patent Owner:

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