

Filed on behalf of: fuboTV Media Inc. and Yanka Industries, Inc.

Entered on: August 19, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FUBOTV MEDIA INC., YANKA INDUSTRIES, INC., WEBGROUP
CZECH REPUBLIC, A.S., and NKL ASSOCIATES, S.R.O.,¹
Petitioner,

v.

DISH TECHNOLOGIES L.L.C.,
Patent Owner

IPR2024-00918
Patent 9,407,564

PETITIONER'S UPDATED EXHIBIT LIST

¹ Webgroup Czech Republic, a.s. and NKL Associates, s.r.o. filed a petition in IPR2025-00347 and have been joined as parties to this proceeding.

Pursuant to 37 C.F.R. § 42.63(e), Petitioners fuboTV Media Inc. and Yanka Industries, Inc. *d/b/a* MasterClass (collectively, “Petitioners”), respectfully submit the following updated Exhibit List:

Exhibit Number	Description
1001	U.S. Pat. 9,407,564 (“’564 Patent”)
1002	File History of U.S. Pat. 9,407,564
1003	Declaration of Dr. Henry Houh including Curriculum Vitae (“Houh declaration”)
1004	International P.C.T. Publication WO 2002049343 to Leaning et al. (“Leaning”)
1005	<RESERVED>
1006	<RESERVED>
1007	U.S. Patent No. 6,848,004 to Chang (“Chang”)
1008	WO1997044942 to Kliger (“Kliger”)
1009	337-TA-1265 ITC Investigation Initial Determination
1010	337-TA-1265 ITC September 11, 2023 Enforcement Complaint
1011	<RESERVED>
1012	<RESERVED>
1013	U.S. Patent No. 6,637,031 to Chou (“Chou”)
1014	<RESERVED>
1015	<RESERVED>
1016	<RESERVED>
1017	<RESERVED>
1018	File History of U.S. Patent No. 8,868,772
1019	<RESERVED>
1020	U.S. Patent Publication No. US 2004/0093420 to Gamble (“Gamble”)

Exhibit Number	Description
1021	Transcript of Conference Call Before the Patent Trial and Appeal Board, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. Sept. 18, 2024)
1022	Decision on Appeal, <i>Ex Parte Major</i> , No. 2011-008734 (PTAB July 23, 2014) (Application No. 11/116,783)
1023	U.S. Patent No. 11,991,234 File History
1024	Order Granting Request for Ex Parte Reexamination, Reexam Control No. 90/019,671 (U.S.P.T.O. Dec. 9, 2024)
1025	Transcript of Conference Call Before the Patent Trial and Appeal Board, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 29, 2025)
1026	Supplemental Declaration of Dr. Henry Houh in Support of Petitioner's Reply ("Houh2")
1027	Transcript of the Deposition of Kevin Jeffay, Ph.D., <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 8, 2025) ("Jeffay")
1028	T. Berners-Lee et al., <i>Hypertext Transfer Protocol – HTTP/1.0</i> , Network Working Grp. Request for Comments: 1945 (May 1996) (Exhibit 1 to the Deposition of Kevin Jeffay, Ph.D., <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 8, 2025) ("Jeffay-Ex.1")
1029	U.S. Patent No. 11,991,234 B2 (Brueck) (Exhibit 2 to the Deposition of Kevin Jeffay, Ph.D., <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 8, 2025) ("Jeffay-Ex.2")
1030	Transcript of the Deposition of David Ericson, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 9, 2025) ("Ericson")

Exhibit Number	Description
1031	Tom Risen, <i>Dish Network Joins Web-TV Trend With Sling: The New Service Will Include ESPN and Offers Another Alternative to Cable</i> , U.S. NEWS & WORLD REP. (Jan. 5, 2015) (Exhibit 4 to the Deposition of David Ericson, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 8, 2025) (“Ericson-Ex.4”))
1032	Transcript of the Deposition of R. Drew Major, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 14, 2025) (“Major”)
1033	Transcript of the Deposition of Robert Drew Major, <i>Aylo Freesites, Ltd. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00431, -00044, -00045, -00046, -00146 (P.T.A.B. Sept. 17, 2024) (“Major-Aylo”) (Exhibit 1 to the Deposition of R. Drew Major, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 14, 2025) (“Major-Ex.1”))
1034	Transcript of the Deposition of Mark Mitchell, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 30, 2025) (“Mitchell”)
1035	Transcript of the Deposition of Peter Ratcliffe, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 15, 2025) (“Ratcliffe”)
1036	<i>Instant Video Streaming: Video Without the Waiting</i> , 1.7 BT Innovative Research: BT Research & Venturing: IPR Overview (Feb. 23, 2007) (Exhibit 1 to the Deposition of Peter Ratcliffe, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 15, 2025) (“Ratcliffe-Ex.1”))
1037	<i>Declaration of Peter Ratcliffe Esq., fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , No. IPR2024-00917 (P.T.A.B. Mar. 18, 2025) (Exhibit 2 to the Deposition of Peter Ratcliffe, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 15, 2025) (“Ratcliffe-Ex.2”))

Exhibit Number	Description
1038	World Intellectual Property Organization, International Publication No. WO 02/49343 A1 (Leaning) (Exhibit 3 to the Deposition of Peter Ratcliffe, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 15, 2025) (“Ratcliffe-Ex.3”))
1039	European Patent Office, European Patent Specification, EP 1 342 363 B1 (Leaning) (Exhibit 4 to the Deposition of Peter Ratcliffe, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 15, 2025) (“Ratcliffe-Ex.4”))
1040	U.S. Patent No. 7,447,791 B2 (Leaning) (Exhibit 5 to the Deposition of Peter Ratcliffe, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 15, 2025) (“Ratcliffe-Ex.5”))
1041	M.D. Walker et al., <i>Mobile Video-Streaming</i> , 21 BT TECH J. 192 (July 2003) (Exhibit 6 to the Deposition of Peter Ratcliffe, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 15, 2025) (“Ratcliffe-Ex.6”))
1042	Hiroyuki Kasai et al., <i>The Development of a Multimedia Transcoding System for Mobile Access to Video Conferencing</i> , E85-B IEICE TRANSACTIONS COMMC'NS 2171 (Oct. 2002) (Exhibit 7 to the Deposition of Peter Ratcliffe, <i>fuboTV Media Inc. v. DISH Techs., L.L.C.</i> , Nos. IPR2024-00917, -00918, -00919 (P.T.A.B. May 15, 2025) (“Ratcliffe-Ex.7”))
1043	<RESERVED>
1044	European Patent Office, Preliminary Opinion: Application/Patent No. 20216568.4 – 1207/3822805 (Mar. 26, 2025) (“EPO Prelim. Op.”)
1045	U.S. Patent Application Publication No. 2003/0135631 A1 (“Li”)
1046	Frédéric Dufaux & Touradj Ebrahimi, <i>Motion JPEG2000 for Wireless Applications</i> , IEEE Proc. 1st Int’l JPEG 2000 Workshop (2003), https://infoscience.epfl.ch/server/api/core/bitstreams/6bf509c6-9aa9-49aa-b41a-4016ec3fbd21/content (last visited June 5, 2025)

Exhibit Number	Description
1047	R. Fielding et al., <i>Hypertext Transfer Protocol – HTTP/1.1</i> , Network Working Grp. Request for Comments: 2616; Obsoletes: 2068 (June 1999)
1048	<RESERVED>
1049	U.S. Patent No. 6,304,297 B1 (“Swan”)
1050	Supavadee Aramvith & Ming-Ting Sun, <i>MPEG-1 and MPEG-2 Video Standards</i> (1999), https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=f499594b35c573dd2296aa567ff16688bb972e3b (last visited June 5, 2025)
1051	T. Berners-Lee et al., <i>Hypertext Transfer Protocol – HTTP/1.0</i> , Network Working Grp. Request for Comments: 1945 (May 1996), https://datatracker.ietf.org/doc/html/rfc1945 (last visited June 4, 2025, 7:33 P.M.)
1052	Ramesh Yerraballi, <i>Multimedia Systems Concepts Standards & Practice</i> ch. 5.3 (Univ. of Tex., Austin), https://users.ece.utexas.edu/~ryerraballi/MSB/Contents.html (last visited June 6, 2025, 10:02 A.M.) (excerpt)
1053	Andrew Davis, <i>An Overview of Video Compression Algorithms</i> , EE TIMES (Feb. 3, 1998), https://www.eetimes.com/an-overview-of-video-compression-algorithms/ (last visited June 4, 2025, 7:37 P.M.)
1054	Elise A. Couper et al., <i>Boom and Bust in Telecommunications</i> , 89/4 Fed. Rsrv. Bank Richmond Econ. Q. 1–24 (2003), https://www.richmondfed.org/~media/richmondfedorg/publications/research/economic_quarterly/2003/fall/pdf/wolman.pdf (last visited June 6, 2025)
1055	EBU•UER, <i>EBU Subjective Listening Tests on Low-Bitrate Audio Codecs</i> (June 2003), https://tech.ebu.ch/docs/tech/tech3296.pdf (last visited June 5, 2025)
1056	Dapeng Wu et al., <i>Streaming Video Over the Internet: Approaches and Directions</i> , 11 IEEE Transactions Circ. Sys. Video Tech. 1–20 (Feb. 2001)
1057	Hun-Cheol Lee & Seong-Dae Kim, <i>Iterative Key Frame Selection in the Rate-Constraint Environment</i> , 18 SIGNAL PROCESSING: IMAGE COMM’N 1–15 (2003)

Exhibit Number	Description
1058	Yu Yuan, David Feng & Yuzhuo Zhong, <i>A Novel Method of Keyframe Setting in Video Coding: Fast Adaptive Dynamic KeyFrame Selecting</i> , IEEE Proc. 2003 Int'l Conf. Comput. Networks Mobile Computing 428, Shanghai, China (Oct. 20–23, 2003)
1059	U.S. Patent No. 8,868,772 (“’772 Patent”)
1060	Info. Scis. Inst., Univ. of S. Cal., <i>Transmission Control Protocol: DARPA Internet Program Protocol Specification</i> , RFC: 793 (Sept. 1981), https://www.ietf.org/rfc/rfc793.txt (last visited June 7, 2025)
1061	Video segment: akiyo_segment_cif-30_001.h261.mp4 (encoding with I-frames every 30 frames)
1062	Video segment: akiyo_segment_cif-60_001.h261.mp4 (encoding with I-frames every 60 frames)
1063	Video segment: akiyo_segment_cif-120_001.h261.mp4 (encoding with I-frames every 120 frames)
1064	<i>Curriculum Vitae</i> of Henry H. Houh (June 2025)
1065	Declaration of Inge A. Osman In Response to Patent Owner's Objections to Evidence [<i>served, not filed</i>]
1066	Petitioners' Demonstratives

Respectfully submitted,

Dated: August 19, 2025

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 19th day of August, 2025, a true and correct copy of the foregoing **Petitioner's Updated Exhibit List and Exhibit 1066** were served by electronic mail on Patent Owner's lead and backup counsel at the following email addresses:

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