

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.
Petitioner,

v.

HEADWATER RESEARCH LLC,
Patent Owner.

IPR2024-01051
Patent 8,639,811

PATENT OWNER'S PRELIMINARY RESPONSE

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TABLE OF AUTHORITIES

Cases

<i>Arendi S.A.R.L. v. Apply, Inc.</i> , 832 F.3d 1355 (Fed. Cir. 2016).....	14, 16
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PATENT OWNER'S EXHIBIT LIST

No.	Description
Ex. 2001	Declaration of Erik de la Iglesia in support of Patent Owner's Preliminary Response
Ex. 2002	<i>Curriculum Vitae</i> of Erik de la Iglesia

I. Introduction

Patent Owner will disclaim claims 1-3 and 5-30 of the '811 patent shortly after the filing of this Preliminary Response, leaving claim 4 as the only remaining claim challenged by this Petition.¹ Because the Board may not institute an *inter partes* review based on disclaimed claims,² institution of this proceeding is appropriate only if the Petition can demonstrate a reasonable likelihood of prevailing with respect to claim 4.

The Petition, however, fails to set forth a plausible claim 4 theory. Claim 4 requires, *inter alia*, “preventing communication associated with the first application over the first wireless network when the first application runs as a background process.”

The Petition’s claim 4 analysis is scant, but relies on the fact that in the “Jones” alleged prior art reference (Ex. 1006), the system can be configured to run a “data backup[]” process under certain conditions. *See* Pet. 39. The Petition apparently contends that triggering data backup to run under certain conditions will

¹ Patent Owner does not concede the merits of the Petition’s challenges as to any claims; disclaimer of the referenced claims is merely to simplify proceedings.

² 37 C.F.R. § 42.107(e) (“No *inter partes* review will be instituted based on disclaimed claims.”).

“prevent[] network access for backup processes.” However, the Petition makes no showing that Jones’ data backup process would “run[] as a background process” when it is not configured to perform its data backup task, much less that it would generate any “communication [e.g., a data packet] associated with the [data backup application]” that could be “prevent[ed]” as claim 4 requires.

The Petition also improperly incorporates by reference additional claim 4 arguments from an expert declaration, which are in several instances inconsistent with the Petition’s own invalidity theories. These improperly incorporated theories also fail, however, as they either fail to even plausibly address the plain claim language, or allege that the proposed combination of references would include functionality that *neither* of the individual references teach or suggest.

Accordingly, because the Petition (and corresponding expert declaration) fails to set forth a reasonable likelihood of prevailing with respect to claim 4, institution should be denied.

II. Level of Ordinary Skill in the Art

The Petition does allege any level of ordinary skill in the art, but Petitioner’s expert proposes that a POSITA in the field of the ’811 patent “would have been someone with (1) at least a bachelor’s degree in computer science, computer engineering, electrical engineering, or a related field, and (2) at least two years of industry experience in wireless communications security. Additional advanced

education could compensate for a deficiency in work experience, and vice-versa.” Ex. 1003, ¶24. For purposes of this Preliminary Response, Patent Owner does not challenge that definition. *See* Ex. 2001, ¶27.

III. Overview of the ’811 Patent

At a high level, claim 4 of the ’811 patent is directed to applying a policy based on user input to “restrict[] or prevent[] a first access to the first wireless network by the first application when the first application is executing,” wherein that restriction or prevention includes “preventing communication associated with the first application over the first wireless network *when the first application runs as a background process.*”³ Ex. 1001, 163:52-67, 164:12-17; Ex. 2001, ¶27. Claims 1 and 4 are reproduced below.

[1.1] A wireless device, comprising:

[1.2] one or more modems for enabling the wireless device to communicate over at least a first wireless network;

[1.3] a user interface;

[1.4] memory configured to store a control policy associated with a first application on the wireless device, the first application at least enabling the wireless device to access at least a first data service over the first wireless network; and

³ All emphases added unless otherwise noted.

[1.5] one or more processors configured to execute one or more machine-executable instructions that, when executed by the one or more processors, cause the one or more processors

to:

[1.6] assist in obtaining a user input through the user interface,

[1.7a] determine at least an aspect of the control policy based on the user input,

[1.7b] the at least an aspect of the control policy for at least assisting in restricting or preventing a first access to the first wireless network by the first application when the first application is executing,

[1.7c] the at least an aspect of the control policy enabling a first control of the first access to the first wireless network by the first application when the first application is executing that differs from a second control of a second access to the first wireless network by a second application on the wireless device, and

[1.8] apply the control policy, thereby at least assisting in restricting or preventing the first access to the first wireless network by the first application when the first application is executing.

[4] The wireless device recited in claim 1, wherein restricting or preventing the first access to the first wireless network by the first application comprises preventing communication associated with the first application over the first wireless network when the first application runs as a background process.

Ex. 1001, 163:39-67, 164:12-17.

As explained by the '811 patent, this solution can be implemented through a “policy implementation agent” that can apply “policy rules,” including a “firewall function” which a POSITA would have understood would prevent communications associated with certain running applications in their entirety:

In some embodiments, a policy implementation agent 1690 implements traffic shaping and QoS policy rules for the device 100. In some embodiments, the policy implementation agent 1690 provides a firewall function.

Ex. 1001, 51:40-43; Ex. 2001, ¶29.

Alternatively or in addition, policies can be applied through “application layer based traffic monitoring and shaping,” which can perform functions “similar to the functions described for the policy implementation agent, such as pass, block, buffer, delay, burst, etc.” Ex. 1001, 56:11-34. The queues can be “associated with one or more additional classifications for that application.” *Id.*, 56:11-25. Accordingly, the claimed invention allows the system to not merely deprioritize network traffic sent by an application classified as running in the background, but to prevent all access of that background application to the wireless modem depending on the applicable policies. Ex. 2001, ¶30.

IV. Claim Construction

The Petition states that “[n]o formal claim constructions are necessary.” Pet.

3. For purposes of this preliminary response, Patent Owner agrees.

V. The Petition fails to show a reasonable likelihood of prevailing on claim 4.

As noted above, claim 4 will be the sole non-disclaimed claim. Thus, in order for institution to be proper, the Petition must demonstrate a reasonable likelihood of prevailing as to claim 4.

Claim 4 depends from claim 1, and further recites “preventing communication associated with the first application... when the first application runs as a background process.” The Petition does not allege that Rao (Ex. 1005) alone discloses or renders obvious this limitation. Instead, the Petition proposes combining Rao with Jones (Ex. 1006) to arrive at a combined “Rao-Jones device (RJD)” which would “first determine[] whether the transfer is allowed (per Jones), and if so, assign[] the corresponding packets to a priority-based queue (per Rao).” Pet. 35. The Petition alleges that claim 4 would have been obvious in view of Rao and Jones. *See* Pet. 38 (“RJD renders [claim 4] obvious.”).

However, the Petition and corresponding expert declaration do not show how Rao and Jones even in combination would render the claim requirements obvious. *See* Ex. 2001, ¶¶32-61.

A. Overview of the Petition's Claim 4 Theory

The Petition contends that “RJD evaluates policies relating to factors including ‘whether an application is running in the foreground or the background,’” to “determin[e] if the transfer is allowed or prohibited.” Pet. 38-39. On this basis the Petition concludes that “RJD prevents network access when the application runs as a background process.” Pet. 39.

The Petition identifies two examples of what the “first application” can be in the context of its claim 4 combination a “video streaming” or “backup” application. Pet. 38 (“The first application can be a non-interactive application such as video streaming (Rao) or backup (Jones).”). However, the Petition only describes (and only in cursory detail) how the latter “backup” application would allegedly be prevented from communicating when it is running in the background, and is completely silent regarding how a “video streaming” application would be prevented from communicating in when running in the background in the combined system.

The Petition's complete and only discussion of **how** the combined system would allegedly “prevent[] communication associated with the first application... when the first application runs as a background process” is reproduced in its entirety below:

For example, Jones teaches that “data protection software ... may execute in the background to perform data backups” and the “[b]ackup

frequency ... may depend on ... enterprise policies.” SAMSUNG-1006, 3:45-51. A POSITA would have recognized that preventing network access for backup processes (in the background) leaves additional bandwidth for other applications, avoiding cases where background packets are processed in lieu of or “processed ahead of the real-time network packets,” as described in Rao. SAMSUNG-1005, [0003]; SAMSUNG-1003, ¶¶[316]-[317].

Pet. 39.

To the extent that the Petition provides any indication of how “preventing network access for backup processes” would occur at all, the Petition appears to contend that configuring a backup process to execute according to enterprise policies would constitute *preventing* communications associated with that process at other times when it is not executing.⁴ See Ex. 2001, ¶¶35-37.

B. The Petition’s claim 4 theory fails.

The Petition’s claim 4 theory fails for at least two reasons.

First, configuring a backup process to execute only under certain conditions as taught by Jones does not constitute “preventing communication associated with the first application,” because there is no indication that there *would* be any

⁴ As explained below in Section V.C, Petitioner’s expert provides a *different* theory wherein communications are not *prevented* but merely *restricted* by being assigned a low priority. Patent Owner addresses that theory in Section V.C, after addressing in Section V.B the Petition’s theory which involves “*preventing* network access for backup processes.”

communication (such as, e.g., a data packet) to even arguably prevent other than when the backup process is configured to execute. *See* Ex. 2001, ¶¶39-40 (contrasting an application simply not issuing a communication with the ‘811 patent, which discusses blocking *packets* that were previously generated by an application). Instead, “communication[s] associated with” a backup application would **only** exist when the backup application is attempting to perform communications for data backup, so scheduling the backup process to only at certain times or under certain conditions as the Petition suggests (e.g., according to “enterprise policies”) would cause the application to not generate any communications that **could be** prevented at other times. Ex. 2001, ¶39.

In other words, at times when the data backup process is not configured to execute, there would simply be no “communication associated with” the backup process to prevent, nor would there be any attempted “access to the first wireless network” as recited by claims 1 and 4 that could be restricted or prevented. Ex. 2001, ¶40 (contrasting Jones’ backup process which simply does not issue any communications when it’s not configured to run, with, e.g., Ex. 1001 at 51:40-43, 56:11-34, and 103:54-58 which makes clear that the system is operable to prevent communications issued by applications).

Second, the Petition’s theory fails to even consider the requirement that the “communication associated with the first application” must be prevented “**when the**

first application runs as a background process.” Ex. 1001, 164:12-17. Neither the Petition nor the corresponding expert declaration provides any evidence or reasoning that the backup application would be running or executing when it is not supposed to be communicating over the network. Indeed, the portion of Jones relied on by the Petition itself states that “data protection software... may *execute* in the background *to perform data backups*” (Ex. 1006, 3:45-47), and does not provide any reason *other than* network communications (such as data backups) for the data protection software to be executing. *See also* Ex. 2001, ¶41 (explaining that “a niche application such as a data backup process would only need to run when it is actually performing network communications”).

A POSITA would understand that the activity of backing up data occurs in the background, but would not have understood that the data protection software would be *constantly* running in the background (i.e., even when no data backups or other network communication was desired) and thus constantly consuming memory and processing resources. Ex. 2001, ¶42. Accordingly, even if having the backup application perform data backups only under certain conditions *could* satisfy the remainder of the claim language, it would not “prevent communication associated with the first application when the first application *runs*” because there would be no need for the backup application to be running or executing when its backup services were not desired. *Id.* Again, this is contrary to the operation of the ’811 patent, which

teaches that communications (e.g., packets generated by *running* applications) will be prevented. *See* Ex. 2001, ¶43.

Accordingly, because the data backup process would not be issuing communications when inconsistent with the policy, and would also not be running when no data backup is occurring, the Petition’s backup data process example from Jones cannot constitute “preventing communication associated with the first application... when the first application runs as a background process” as claim 4 requires. *See* Ex. 2001, ¶¶38-43.

C. Petitioner’s expert declaration does not cure the deficiencies of the Petition.

As noted above, the Petition’s claim 4 theory cannot succeed. The Petition’s claim 4 theory, however, is not entirely the same as the theories of Petitioner’s expert, Dr. McDaniel. For instance, while the Petition relies on the example of Jones’s backup process to allege it would entail “*preventing* network access for backup processes” (Pet. 39), Dr. McDaniel’s discussion of Jones’ backup process does not address preventing network access at all, and instead contends that access would have merely been “restrict[ed]” “by assigning [the backup process’s] packets lower priority.” Ex. 1003, ¶316. Not only does Dr. McDaniel present this contradictory analysis, he also presents analysis not discussed in the Petition. *See* Ex. 1003 ¶317 (discussing a “second example” not discussed in the Petition).

The potential for this type of inconsistency and ambiguity regarding what the Petition's theories actually are is presumably one reason why "[a]rguments must not be incorporated by reference from one document into another document." 37 C.F.R. §42.6(a)(3).

Setting aside the impropriety of different and additional theories set forth by Dr. McDaniel, Patent Owner addresses Dr. McDaniel's theories separately from the Petition's theories. Dr. McDaniel sets forth three substantive paragraphs regarding claim 4, which are addressed in turn. *See* Ex. 2001, ¶¶44-61.

First, Dr. McDaniel contends that a POSITA would have been motivated to "prevent[] network access when the application runs as a background process" because "preserving bandwidth for foreground application[s] by disallowing traffic of background application[s] is preferred":

For example, for example [sic], RJD uses foreground/background conditions of Rao, and disallows network traffic of background traffic using the action (prohibit transfer) of Jones. *A POSITA would have recognized that* foreground applications are more likely to have user attention, and therefore preserving bandwidth for foreground application by *disallowing traffic of background application is preferred. Thus, RJD prevents network access when the application runs as a background process.*

Ex. 1003, ¶315.

The problem with Dr. McDaniel’s theory in this regard is that it is not supported by any evidence, and instead appears to be based on impermissible hindsight. *See* Ex. 2001, ¶¶46-48. For instance, Dr. McDaniel’s motivation is to “preserv[e] bandwidth for foreground application[s],” but Rao *already* teaches that bandwidth for foreground applications can be preserved by assigning packets of those applications a higher priority than background packets. *See, e.g.*, Ex. 1005 ¶189 (“[T]he agent 326 may use characteristics of the application 338a-338n, such as running in the foreground or background, to indicate priority for a network packet of the application.”); *id.* ¶3 (expressing a desire to avoid background packets from being transmitted ahead of foreground packets); Ex. 2001, ¶47 .

Furthermore, Dr. McDaniel provides no evidence from *either* Rao or Jones (or any other reference) that describes preventing communication by an application that would in any way relate to whether that application running in the background. *See* Ex. 2001, ¶47. For instance, Jones does not satisfy the claim language for the reasons set forth in Section V.B, *supra*. And Dr. McDaniel does not allege that Rao itself prevents communications on behalf of background applications. To the contrary, he acknowledges that assigning lower priority merely “restrict[s]” (rather than prevents) “network access.” *See* Ex. 1003, ¶316 (discussing “restricting network access for the backup process... by assigning its packets lower priority”).

Because Dr. McDaniel does not present evidence from *either* reference disclosing preventing communication associated with applications when they are running in the background, his conclusory testimony that a POSITA would have found this approach to be obvious should be given little weight. *Xerox Corp. v. Bytemark, Inc.*, IPR2022-00624, Paper 9 (PTAB Aug. 24, 2022) (precedential) (finding conclusory expert testimony “particularly problematic in cases where, like here, expert testimony is offered not simply to provide a motivation to combine prior-art teachings, but rather to supply a limitation missing from the prior art”); *see also Arendi S.A.R.L. v. Apply, Inc.*, 832 F.3d 1355, 1361-62 (Fed. Cir. 2016) (recognizing that although “common sense” may be used in an obviousness analysis, it “is typically invoked to provide a known *motivation to combine*, **not** to supply a missing claim limitation”) (first emphasis in original).

Second, Dr. McDaniel discusses the example of Jones’ “data protection software” which “execute[s] in the background to perform data backups” that was addressed in the Petition. Ex. 1003, ¶316; *see also* Pet. 39 (addressing this same example). However, while the Petition seems to contend that Jones itself “prevent[s] network access” (Pet. 39), Dr. McDaniel appears to propose that in the combined RJD system, a POSITA would have assigned the backup process’s “packets lower priority” such that its “network access” would be “restrict[ed].” Ex. 1003, ¶316.

Although it is unclear why Dr. McDaniel sets forth a *different* theory than the Petition in this regard, his theory does not succeed for the simple fact that he does not allege (much less provide any evidence that) a POSITA would have understood assigning packets a lower priority would “**prevent**” communication associated with the first application” as required by claim 4. Instead, he asserts only that this would constitute “restricting” access (Ex. 1003, ¶316), which is plainly insufficient as claims 1 and 4 draw a distinction between “restricting” and “preventing,” such that they should not be understood to mean the same thing. *See* Ex. 1001, 163:64-65 (“assisting in *restricting* or *preventing* the first access”); *id.* 164:12-17 (“wherein *restricting* or *preventing* the first access... comprises...”); Ex. 2001, ¶50.

Finally, Dr. McDaniel provides an example in paragraph 317 of his declaration of how the combined system might hypothetically operate to “prevent[a] video stream [in the background] from competing for device resources with [a] video call [in the foreground].” Dr. McDaniel’s testimony regarding this example is reproduced in its entirety below:

In a second example, if a user is streaming a video, then opens a video call (which moves the streaming video to the background), ***a POSITA would have recognized that it is preferable for RJD to block the video stream*** to prevent the video stream from competing for device resources with the video call (which is an interactive application). Since video streams contain large amounts of data (as described in §IX.E), if

RJD used priority queuing to hold the data instead of blocking it, RJD would expend considerable resources to store the data in the queue, especially if the video call lasted for more than a few seconds. Such an approach quickly becomes impractical. Therefore, it is preferable for RJD to block the transmission rather than expend device resources to queue what can be a large amount of data.

Ex. 1003, ¶317. There are several problems with Dr. McDaniel’s opinion in this regard. *See* Ex. 2001, ¶¶51-60.

As an initial matter, Dr. McDaniel’s opinion is not supported by any evidence—it just rests on his blanket assertion that a “POSITA would have recognized that it is preferable” for the combined system to block the video stream when it moves from the foreground to the background. Ex. 1003, ¶317; Ex. 2001, ¶52. His analysis contains *no* citations to any prior art systems actually implementing such a solution, and neither Rao nor Jones are alleged to actually prevent communication from background applications to free up device resources. The fact that this solution might be obvious to *Dr. McDaniel*, who has the benefit of hindsight and is presumably a person of greater than ordinary skill in the art, is not evidence that it would have been obvious to a *POSITA at the time of the invention*. *See KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 421 (2007) (“A factfinder should be aware, of course, of the distortion caused by hindsight bias and must be cautious of arguments reliant upon ex post reasoning.”); *Arendi S.A.R.L. v. Apply, Inc.*, 832 F.3d

1355, 1361-62 (Fed. Cir. 2016) (recognizing that although “common sense” may be used in an obviousness analysis, it “is typically invoked to provide a known *motivation to combine*, **not** to supply a missing claim limitation”) (first emphasis in original); *Xerox Corp. v. Bytemark, Inc.*, IPR2022-00624, Paper 9 (PTAB Aug. 24, 2022) (precedential) (finding conclusory expert testimony “particularly problematic in cases where, like here, expert testimony is offered not simply to provide a motivation to combine prior-art teachings, but rather to supply a limitation missing from the prior art”).

Furthermore, Dr. McDaniel’s testimony—that the combination of Rao and Jones would be configured to implement a feature not taught by *either* Rao or Jones (i.e., blocking a video stream when it moves from the foreground to the background)—is contrary to ***the Petition’s*** proposed combination, in which “the components of RJD each operate as they would in isolation.” Pet. 38. Neither Rao nor Jones discloses blocking a video stream when it moves to the background, and Dr. McDaniel does not explain how their combination could include this entirely new feature consistent with the Petition’s allegation that the components of Rao and Jones would simply “operate as they would in isolation.” *See* Ex. 2001, ¶53.

Dr. McDaniel’s proposed modification—in addition to being inconsistent with the Petition’s theory and unsupported by teachings in Rao and Jones—is also not motivated, because Dr. McDaniel’s stated motivation for implementing it is

contrary to a POSITA's understanding of how Rao's priority queuing system would operate in practice. *See* Ex. 2001, ¶¶54-60. In particular, Dr. McDaniel contends that one option to address the video stream would be to use "priority queuing" to assign a lower priority to traffic associated with the video stream. Ex. 1003, ¶317. He asserts that the problem with this approach, however, is that "video streams contain large amounts of data," so "if RJD used priority queuing to hold the data instead of blocking it, RJD would expend considerable resources to hold the data in the queue." *Id.*

The problem with Dr. McDaniel's analysis in this regard is that he does not consider or acknowledge Rao's priority queuing in this context would be applicable to **outbound** network packets (i.e., packets that have yet to be communicated), not **inbound** network packets (i.e., packets that have already been communicated). *See, e.g.,* Ex. 1005, FIG. 5B (showing first "[s]toring the network packets to a queue" in step 560 before "[c]ommunicating network packets according to determined priority" in step 575"); *id.* ¶184 ("[T]he **outbound** network packets generated by an application 338a-338n on the client 105 are prioritized by the client 105 prior to transmission based on the type and/or priority of the application 338a-338n."). A POSITA have understood that assigning low priority to **inbound** network packets as a means of managing usage of limited network resources would not make sense. Specifically, in order to place any inbound packets in a queue on Rao's device, those

packets would necessarily *already* have been received by that device, and the network resources required to receive those packets would have *already* been consumed. Ex. 2001, ¶¶55-56.

As explained by Patent Owner’s expert, “if a user is streaming a video” in the RJD combination, there would be no reason to “expend considerable resources to store the [large amounts of video] data in the queue” as Dr. McDaniel alleges. *See* Ex. 2001, ¶58 (quoting Ex. 1003, ¶317). Instead, because Rao’s priority queuing is applicable to *outbound* packets, a POSITA would have recognized that Rao’s priority queuing would work in a much more efficient manner as applied to a user streaming a video. Ex. 2001, ¶57. Specifically, a POSITA would have recognized that a video streaming application would only need to transmit a relatively small amount of outbound data, limited to packets necessary to keep the data connection open and to request more content from the content server providing the video stream (or at least confirm receipt of inbound packets). Ex. 2001, ¶57. As such, a POSITA would have recognized that Rao’s priority queuing system would simply queue the video streaming application’s outbound packets to the content server, which would require minimal resources. *Id.* This would not **prevent** the video application from communicating, and would instead assign a lower priority to those communications to ensure that the higher priority video call would have sufficient network resources. *Id.* And it would not be “impractical” at all as Dr. McDaniel suggests, because it

would not involve queuing *any* video data, and would instead only need to queue outbound control packets requesting additional video data from the content server.

Id. ¶59.

Accordingly, Dr. McDaniel’s sole motivation for his “second example” is based on a misunderstanding of how Rao’s prioritization queues would operate in practice as applied to a video streaming application that is moved to the background. A POSITA would not have recognized any problem with Rao’s priority queuing approach in this regard, and certainly would not have believed, as Dr. McDaniel asserts, that such a queuing system would need to “expend considerable resources” to store large amounts of incoming video data, because only small amounts of control data would need to be queued in order to avoid deteriorating the quality of the foreground video call. *See* Ex. 2001, ¶¶59-60. And as Dr. McDaniel concedes, this approach of assigning packets from a video streaming application that has switched from the foreground to the background would not only be a workable solution, but indeed it would have been “obvious” in view of Rao alone. *See* Ex. 1003, ¶¶277-278 (Dr. McDaniel alleging that a POSITA would have “found it obvious to... assign[] packets from the first application (e.g., video streaming) when it is running as a background application to lower-priority queues, thus restricting its communication”).

In sum, Dr. McDaniel proposes a solution (preventing network access to applications when they enter the background) that is not taught by either Rao or Jones, in a manner that is both inconsistent with the Petition's invalidity theory and contrary to the understanding of a POSITA.

VI. Conclusion

For the foregoing reasons, Patent Owner respectfully requests that institution be denied.

Date: September 20, 2024

Respectfully submitted,

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CERTIFICATION REGARDING WORD COUNT

Pursuant to 37 C.F.R. §42.24(d), Patent Owner certifies that there are 4,531 words in the paper excluding the portions exempted under 37 C.F.R. §42.24(a)(1).

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e)(1))

The undersigned hereby certifies that the above document was served on September 20, 2024, by filing this document through the Patent Trial and Appeal Case Tracking System as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

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