IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

ANONYMOUS MEDIA RESEARCH HOLDINGS, LLC, Plaintiff, v. ROKU, INC., Defendant.	**Case No. 1:23-cv-01143-DII** JURY TRIAL DEMANDED

DEFENDANT ROKU, INC.'S IDENTIFICATION OF PROPOSED TERMS FOR CONSTRUCTION

Pursuant to the Court's Scheduling Order (Dkt. 29), Defendant Roku, Inc. hereby discloses a list of claim terms to be construed.

Roku's proposal of any claim term for construction is not a waiver of its right to argue that such term is indefinite or otherwise not capable of construction, and Roku explicitly reserves the right to make any such arguments with regard to all claim terms. This disclosure is based upon information currently available to Roku and Roku reserves the right to supplement, revise, modify, or otherwise finalize this list. Roku further reserves the right to propose constructions for any additional claim terms identified by other parties.

Claim Language	Patents / Claims
"audio data samples"	'768 claims 1, 9 '791 claims 1, 9
"video data samples"	'848 claims 1, 9 '896 claims 1, 9

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"data samples"	'622 claims 1, 5, 6, 9, 10, 13 '849 claims 1, 5, 6, 9, 10, 13 '791 claims 1, 9 '896 claims 1, 9
"in view of a pattern of the sample sequence data of the raw play stream compared to an expected pattern of sample sequence data"	'768 claims 1, 9 '848 claims 1, 9
"expected pattern of sample sequence data"	'768 claims 1, 9 '848 claims 1, 9
"raw play stream"	'768 claims 1, 3, 4, 9, 11, 12 '848 claims 1, 3, 4, 9, 11, 12 '622 claims 2, 3, 7, 8, 11, 12 '849 claims 2, 3, 7, 8, 11, 12 '791 claim 5 '896 claim 5
"clean play stream"	'768 claims 1, 5, 9, 13 '848 claims 1, 5, 9, 13
"clean play list"	'768 claims 5, 13 '848 claims 5, 13
"play stream"	'622 claims 1, 5, 6, 9, 10, 13 '849 claims 1, 5, 6, 9, 10, 13 '791 claims 1, 5, 9 '896 claims 1, 5, 9, 12, 13
"play list"	'622 claims 3, 8, 12 '849 claims 3, 8, 12

"media monitoring device"	'768 claims 1, 9 '848 claims 1, 9 '622 claims 1, 6, 10 '849 claims 1, 6, 10
"monitoring device"	'791 claims 1, 9 '896 claims 1, 9
"channel"	'622 claims 1, 2, 5, 6, 7, 9, 10, 11, 13 '849 claims 1, 2, 5, 6, 7, 9, 10, 11, 13 '768 claims 3, 11 '848 claims 3, 11
"the at least two different obtained content identifiers identifying different media content items"	'622 claim 1, 6, 10 '849 claim 1, 6, 10
"a format usable for searching channel data to identify a channel to associate with content of the raw play stream"	'622 claim 2 '849 claim 2

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Respectfully submitted,

PERKINS COIE LLP

/s/ *Patrick J. McKeever*

Matthew C. Bernstein, CA Bar No. 199240
MBernstein@perkinscoie.com
Patrick J. McKeever (*Pro Hac Vice*)
PMcKeever@perkinscoie.com
Ji Wang, CA Bar No. 345211
JiWang@perkinscoie.com
11452 El Camino Real, Ste 300
San Diego, California 92130-2080
Tel. (858) 720-5700

Martin E. Gilmore (*Pro Hac Vice to be submitted*)
MGilmore@perkinscoie.com
Rachel Dalafave (*Pro Hac Vice to be submitted*)
RDalafave@perkinscoie.com
405 Colorado Street, Suite 1700
Austin, TX 78701
Tel. (737) 256-6100

Maria A. Stubbings (*Pro Hac Vice submitted*)
MStubbings@perkinscoie.com
Perkins Coie LLP
700 13th St., NW, Suite 800
Washington, D.C. 20005
Tel. (202) 654-6200

Attorneys for Defendant Roku, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served upon Plaintiff's counsel of record by email on July 3, 2024.

/s/ Patrick J. McKeever
Patrick J. McKeever