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Transcript of Henry Houh

Date: January 31, 2025
Case: Vizio, Inc. -v- Multimedia Technologies Pte. Ltd. (PTAB)

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 BEFORE THE PATENT TRIAL AND APPEAL BOARD

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4 VIZIO, INC.,)
5 Petitioner,)
6 vs.) Case No. IPR2024-00723
) Patent No. 9,578,384
7 MULTIMEDIA TECHNOLOGIES PTE.)
LTD.,)
8)
Patent Owner.)
9

10 _____

11 DEPOSITION OF

12 HENRY HOUH

13 January 31, 2025

14 _____

15

16 DEPOSITION OF HENRY HOUH, produced as a
17 witness, duly sworn by me via videoconference at the
18 instance of the PATENT OWNER, was taken in the
19 above-styled and numbered cause on January 31, 2025,
20 from 10:04 A.M. to 3:14 P.M., before BRANDON D. COMBS,
21 CSR, RPR, in and for the State of Texas, reported by
22 computerized machine shorthand via videoconference.

1 APPEARANCES
2
3 CARMICHAEL IP, PLLC, 8607 Westwood Center
4 Drive, Suite 270, Tysons, VA 22182, represented by
5 MINGHUI YANG, Attorney at Law, appeared via
6 videoconference as counsel on behalf of the Patent
7 Owner.
8 Email: mitch@carmichaelip.com
9
10
11 SKIERMONT DERBY, LLP, 601 Elm Street,
12 Suite 4400, Dallas, TX 75201, represented by REX HWANG,
13 Attorney at Law, appeared via videoconference as counsel
14 on behalf of the Petitioner.
15 Email: rhwang@skiermontderby.com
16
17
18 ALSO PRESENT:
19 Jaime Breedan
20
21
22

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7 (No exhibits marked.)

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1 HENRY HOUH,
2 having been first duly sworn, testified as follows:
3 EXAMINATION
4 Q. (BY MR. YANG) Can you please state your name
5 for the record.
6 A. My name is Henry Houh, H-o-u-h.
7 Q. And where are you located right now?
8 A. I'm currently in New York City.
9 MR. HWANG: Before we get too far, should we
10 make our appearances?
11 MR. YANG: Sure, although I don't usually do
12 that in IPRs because no one reads these things.
13 This is Mitch Yang on behalf of Patent Owner,
14 from Carmichael IP.
15 MR. HWANG: And Rex Hwang on behalf of
16 Petitioner Vizio, Inc. And with that, go ahead.
17 Q. (BY MR. YANG) Do you understand that you're
18 under oath?
19 A. Yes.
20 Q. Is there any reason that you cannot give
21 truthful, complete, and accurate testimony today?
22 A. No.

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1 Q. And can you confirm that you've closed out of
2 all of your applications other than Zoom?
3 A. I have the file share download web page open.
4 Do you want me to close that as well?
5 Q. You can keep that open. I just want to
6 confirm that you don't have any applications that would
7 enable you to communicate with anyone else other than
8 Zoom?
9 A. I don't, on this desktop. It may get a
10 pop-up, but it's not because I have -- I don't know, I
11 have closed all the windows on this desktop, all the
12 other windows.
13 Q. Okay. How many times have you been deposed?
14 A. Probably about 200 times. I've long lost
15 count though, so that's only approximate.
16 Q. And how many of them are for IPRs?
17 A. My estimate is about three-quarters of them
18 are for IPRs.
19 Q. So would it be fair to say 150 times, give or
20 take?
21 A. That's, again, an estimate. I really, I
22 don't track them that way or any way, but that's my

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1 estimate, best estimate.
2 Q. Is it fair to say that you're familiar with
3 the ground rules for testifying in an IPR?
4 A. Testifying in what?
5 Q. Testifying in an IPR?
6 A. You mean for this deposition? I generally am
7 familiar with various deposition ground rules.
8 Q. You understand that you're required to answer
9 my questions, unless your counsel instructs you not to
10 answer?
11 A. Yes.
12 Q. How many times have you been deposed on
13 behalf of a petitioner in an IPR by a patent owner?
14 A. Probably 85 to 90 percent of IPR depositions.
15 Q. Doing the math, then, you would be 10 to
16 15 percent deposed on behalf of a patent owner by the
17 petitioner?
18 A. That's an approximate estimate. Sounds about
19 right.
20 Q. When was the last time you were deposed on
21 behalf of a patent owner?
22 A. Two months ago, one or two months ago, could

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1 have been in December.
2 Q. And who was the patent owner in that case
3 that you submitted a declaration for?
4 A. It was a case, I think it's Aptiv
5 Technologies.
6 Q. How long did you spend preparing for this
7 particular deposition?
8 A. About a day's worth of time, about eight
9 hours or so.
10 Q. And what did you do to prepare for this
11 deposition?
12 A. I met with the attorneys, and I reviewed
13 documents.
14 Q. And which documents did you review?
15 A. I reviewed my declaration, I reviewed the
16 patent at issue. I reviewed a number of the
17 references. That's what comes to mind right now.
18 Q. When you said a number of references, do you
19 mean all the references or only some of the references?
20 A. I mean I reviewed portions of all of them,
21 but there's a lot of references. We can go through
22 them one by one if you want, but I looked at all the

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1 references I cited in my declaration.
2 Q. Did you review the institution decision in
3 this case?
4 A. I think that I did, yes.
5 Q. So you've read the institution decision?
6 A. I think so, yes.
7 Q. Do you have a copy of Exhibit 1004, which is
8 your 2024 CV?
9 A. I think I do. I have clean copies of all of
10 the materials for this case, but, yes, I do have it.
11 Q. If you want to use your own clean copy,
12 that's fine. Can you please open Exhibit 1004.
13 A. Okay. I have it open.
14 Q. Okay. Under experience you have two
15 positions listed under present, Houh Consulting and
16 BlocksCAD; is that correct?
17 A. Yes, that's right.
18 Q. Are these two positions your only active
19 current employment?
20 A. I mean, they're my -- mostly, yes, I would
21 say.
22 Q. Can you think of any other active current

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1 employment not listed in your 2024 CV?
2 A. I'm occasionally offered to play -- I play
3 violin and viola and I play in some groups, and I'm
4 occasionally offered pay for that work.
5 Q. Your work for Houh Consulting is consulting
6 for patent cases; is that right?
7 A. They're not always all patent cases, but most
8 of them are.
9 Q. Besides patent cases, what other types of
10 consulting do you do at Houh Consulting?
11 A. I've done trade secret cases, I've done
12 some -- I guess trade secret cases.
13 Q. In that case, your work with Houh Consulting
14 is consulting for litigation; is that right?
15 A. Yes.
16 Q. And what percentage of your income in the
17 last year has been from Houh Consulting?
18 A. I would have to say maybe 80 percent, maybe
19 80 to 90 percent.
20 Q. Would it be fair to say that about 10 to
21 20 percent came from BlocksCAD?
22 A. No.

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1 Q. And how much came from BlocksCAD?
2 A. None really.
3 Q. So what was the source of the other 10 to
4 20 percent?
5 A. I have rental income, investment income, and
6 royalty income.
7 Q. What type of royalty income is this? Is it
8 for patents or something else?
9 A. No, it's from appearing in a movie. I still
10 receive royalties for it.
11 Q. Do you mind sharing the title of that movie?
12 A. Yes, the movie was 21, a movie that was
13 released around 2007.
14 Q. And in this exhibit, your CV, it says that
15 you've been with Houh Consulting since 2009. So in the
16 past five years has the percentage of your income from
17 consulting in Houh Consulting been 80 to 90 percent
18 year to year?
19 A. It might vary by 5 or 10 percent, but roughly
20 it's been certainly the majority of my income.
21 If you're counting revenue instead of income,
22 then it would have been a lower percentage when I owned

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1 another business within the last five years.
2 Q. Okay. That also true for the last 10 years?
3 A. Yes, it would be even lower if you count the
4 last 10 years of my percentage of income -- or revenue
5 from Houh Consulting, Inc.
6 Q. Over the last year what percentage of your
7 work hours was spent with Houh Consulting?
8 A. I think nearly all of them, maybe 98 percent
9 probably or 95 percent.
10 Q. Is that true over the last five years as
11 well?
12 A. No. Four or five years ago, three, four,
13 five years ago, I did have another business that I was
14 spending some time on.
15 Early on in the business I was spending the
16 majority of the time on this other business. It was a
17 kids' education business. But it flipped over a period
18 of 10 years or so.
19 Q. So it's fair to say that the amount of time
20 that you've spent on the kids' education business
21 decreased until you're now spending 98 percent of your
22 time on Houh Consulting?

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1 A. I did sell that business about two and a half
2 years ago I think now. A little less than that. And
3 so it went from -- it was decreasing over a period of
4 10 years, and then it ceased, essentially, when I sold
5 the business.
6 Q. And that kids' education business is the one
7 that you were referring to earlier when you testified
8 that was a higher percentage of your revenue; is that
9 right?
10 A. Yes.
11 Q. Is BlocksCAD in the field of television or
12 digital video systems?
13 A. BlocksCAD -- or what was the other thing you
14 said?
15 Q. Is your work with BlocksCAD in the field of
16 television or digital video systems?
17 A. No, it's not.
18 Q. Is your work with the kids' consulting
19 business in the field of television or digital video
20 systems?
21 A. It wasn't -- it wasn't a kids' consulting
22 business, it was a kids' education business. But no,

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1 that was not either.
2 Q. So is it fair to say that your CV does not
3 list any current active work in television or the
4 digital video system industry?
5 A. Sure, today, I don't do professional work in
6 that industry, within the industry.
7 Q. And is it fair to say that you don't do
8 professional work in that industry in the last
9 10 years?
10 A. Aside from consulting work related to that
11 business, that would be fair.
12 Q. And the consulting work related to that is
13 all litigation; is that right?
14 A. Pretty much, yes.
15 Q. Besides IPRs where Multimedia Technologies is
16 the patent owner, have you submitted expert
17 declarations in IPRs where Vizio is the petitioner?
18 A. Probably have.
19 Q. Do you remember how many?
20 A. I don't offhand.
21 Q. Do you know what percentage of your total
22 IPRs are IPRs for Vizio?

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1 A. I would say probably low single-digit
2 percentage of cases I've done over my career.
3 Q. What about the past year?
4 A. Sorry, I was going to clarify, probably under
5 5 percent of my cases.
6 But in the past year, I don't remember all my
7 cases I work on and for which clients because I work on
8 a lot. So I might have done one or two in the past
9 year, but that's just an educated estimate.
10 Q. By "a lot," how many IPRs do you typically
11 work on in a year?
12 A. I guess it depends if you count matters or
13 like where there's multiple patents, where I might file
14 multiple IPRs, or cases, which I might count that as
15 one.
16 But I probably -- 30 to 50, 60 declarations
17 submitted per year, another estimate. I don't really
18 track my workload like that. But that's my best
19 estimate. Depends on the year.
20 Q. And so 30 to 60 would be for this year?
21 A. Well, no, this year since January 1 it's
22 probably been a few, one, two, three. I don't know, I

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1 don't remember.
2 Q. I apologize. Let me rephrase that.
3 By 30 to 60 declarations, did you mean 2024?
4 A. That's quite possible, but probably not on
5 the high side of that for the last calendar year. But,
6 again, that's the best estimate I can come up with.
7 Q. And what about the past five years? Did you
8 submit in that range of declarations every year in the
9 past five years?
10 A. There was probably one of those years that I
11 might have done on the higher side of that, but many
12 other years, it's been 30ish. That's my best estimate.
13 It might be lower than that in some years. I don't
14 really track these things by counting them.
15 Q. That's fair. But that still seems like
16 that's a really high number. I personally don't do
17 60 IPRs myself. How do you find the time to do
18 60 IPRs?
19 A. It's part of what I do as my job. I work
20 long hours, until 3:00 or 4:00 in the morning many
21 times, many days.
22 Q. By long hours, when do you start? Do you

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1 work 18 hours a day, 20?
2 A. I mean, there might be some days where I do
3 that, but no, generally usually not. But maybe
4 10 solid hours a day. But it takes a lot more hours
5 than that to generate 10 solid hours of work for me, to
6 do 10 solid hours of work.
7 Q. For each of these IPRs, you reviewed the
8 prior art and formed your opinions; is that right?
9 A. Well, I typically start by reviewing the
10 patent at issue, its file history, look through that
11 quite a bit, and then I look through and analyze the
12 prior art.
13 Q. And I assume at some point you draft a
14 declaration?
15 A. Yeah, at some point there's -- I sometimes,
16 many times, start the first draft. Sometimes I get a
17 draft review. It just depends.
18 Q. And you do this process for 60 IPRs a year?
19 A. Well, not every year. I think probably the
20 high number of declarations might be that. But
21 sometimes I submit multiple declarations in one IPR
22 matter, like a supplemental. They aren't typically as

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1 big as the initial declaration.
2 So I'm counting those as two declarations
3 submitted. Sometimes I'm asked to do that, not every
4 time.
5 So I don't know how many opening declarations
6 I submit out of those, but it's probably two-thirds of
7 them are -- to three-quarters, because it's not every
8 time that I'm asked to submit a supplemental.
9 And there have been times where I submitted
10 two supplementals in a case, an IPR case. So I'm
11 thinking of overall declarations, not overall IPRs.
12 Q. I see. So the 60 declarations that you do
13 per year, includes both declarations with the petition
14 and with the petitioner's reply; is that right?
15 A. Yes. I'm thinking of -- I'm counting
16 additional declarations in another case as another
17 declaration.
18 Q. And how often do you submit additional
19 declarations in an IPR?
20 A. Again, I don't track them this way, but my
21 best estimate is probably a third to half the time.
22 Q. So a third to half the time you submit more

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1 than one declaration?
2 A. That could be. Again, that's my estimate. I
3 know there's tools that attorneys have access to that
4 can look up these kinds of things, but I don't have
5 those tools.
6 Q. Okay. Do you have a copy of Exhibit 1003,
7 which is your declaration?
8 A. Yes, I do.
9 Q. Can you please open that exhibit.
10 A. Yes, it's open.
11 Q. Did you write this declaration?
12 A. Actually, I did write large portions of the
13 declaration, I believe.
14 Q. I believe you testified earlier that
15 sometimes you draft the declaration and sometimes you
16 receive drafts. For this particular declaration, it
17 was one that you started the initial draft on?
18 A. I probably did and I probably wrote a large
19 portion of the analysis sections as well. That's the
20 best of my recollection.
21 Q. Did you base the declaration on a petition,
22 or did you draft the declaration without access to any

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1 other document -- access to any other drafts?
2 A. I don't think I based off the petition for
3 this case, no. I think I started fresh with many
4 sections.
5 Q. Would that include Section 9?
6 A. Yes, that would include Section 9.
7 Q. Would that include Section 6?
8 A. Maybe. I can't recall exactly those pages
9 for Section 6, but maybe.
10 Q. Okay. And what about Section 7?
11 A. Maybe and probably, but it's hard to tell.
12 Q. Okay. How long did you spend writing this
13 declaration?
14 A. I don't have a good estimate of time, but
15 it's probably scores of hours, ballpark.
16 Q. Do you remember how many hours you billed for
17 this declaration?
18 A. I wouldn't remember that offhand.
19 Q. So there's no way for you to be more specific
20 other than scores of hours?
21 A. I mean, again, I just don't -- I don't
22 remember when this was penned, I guess, but it was some

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1 time ago. And I remember spending a lot of time on it,
2 but I really can't give you a great estimate.
3 It's probably more than 60. But that's just
4 a rough estimate sitting here.
5 Q. I see. So when you're doing like
6 60 declarations a year, do they kind of start running
7 over?
8 A. Well, they do in some sense, but this one in
9 particular I know I spent a lot of time on and I wrote
10 a lot of these sections, you know, for this
11 declaration.
12 Q. And what did you do to write this
13 declaration?
14 A. I start by looking at the patent and the file
15 history, reviewing the claims that are being
16 challenged, and all the claims that are part of the
17 patent.
18 And then I look at the prior art. In this
19 case there were a bunch of videos that were submitted,
20 so I watched the videos numerous times. I read the
21 prior art documents.
22 And then I started doing analysis with

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1 respect to the -- showing how various parts of the
2 prior art that I had been analyzing met and -- met the
3 claim limitations.
4 And I would write that up, I would take
5 screenshots of the videos, paste them in, review
6 things, insert citations to support my statements,
7 things like that.
8 Q. There are screenshots of videos in this
9 declaration. Are you saying that you took those
10 screenshots yourself?
11 A. I did a lot of the screenshots myself. It
12 might not have been every one, but I remember doing a
13 lot of screenshots, particularly of videos.
14 Q. When you say screenshots, particularly of
15 videos, you're referring to the TechnoBuffalo and
16 Missing Remote videos?
17 A. That sounds about right.
18 Q. Did you also take screenshots of the patent
19 and patent application prior art?
20 A. It's possible. I'm not sure about those. I
21 don't have a distinct memory of that like I do for the
22 videos.

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1 Q. This IPR challenged all 12 claims of the
2 patent. Can you confirm that you looked at all
3 12 claims?
4 A. Yes.
5 Q. Okay. Were you familiar with the '384 patent
6 prior to your work in this case?
7 MR. HWANG: Objection. Form.
8 THE WITNESS: It's possible I saw it before
9 this case, but I don't remember that. I work on a lot
10 of video-type cases. So I definitely saw it for the
11 purposes of this case, I just can't be sure if I saw it
12 before then.
13 Q. (BY MR. YANG) In what context would you have
14 seen this patent before this case?
15 A. If I had, it would have been in some sort of
16 litigation type of, you know, context for another case
17 that I might have worked on.
18 Q. And why would this patent be relevant in
19 another litigation that you worked on?
20 A. I've done a whole lot of cases that involve
21 streaming media and video, video on demand, many other
22 systems for playback of media, things like that.

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1 Q. So is it possible that you cited this patent
2 as prior art in one of those cases?
3 A. I can't remember. I don't think it's been
4 the basis for a challenge in another case that I worked
5 on, on Petitioner's side.
6 So, but I often review a lot of different
7 prior art in the course of working on a case. But I
8 don't remember it being a basis for a challenge for
9 another IPR.
10 Q. Is it possible that this patent was cited as
11 evidence of the state of the art in another case that
12 you're working on?
13 A. That doesn't ring a bell either, but I don't
14 remember every case I worked on and what I wrote.
15 Q. So is it fair to say that you don't remember
16 whether you relied on this patent in any way in any of
17 your other cases?
18 A. I can't recall sitting here right now that I
19 did, but it's the kind of patent that might turn up in
20 some of these other cases that I've worked on.
21 Q. Did you know any of the inventors of the '384
22 patent prior to this case?

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1 A. No.
2 Q. Okay. I'd like to direct your attention to
3 Section 7 of your declaration, starting on page 28.
4 Let me know when you get there.
5 A. Okay. I'm here.
6 Q. Were you familiar with the TechnoBuffalo
7 videos prior to your work in this case?
8 A. I don't remember them before working on this
9 matter, generally.
10 Q. Have you heard of the TechnoBuffalo YouTube
11 channel prior to your work on this case?
12 A. I can't recall having done so, but can't be
13 sure, either.
14 Q. Let me rephrase it.
15 Have you heard of the TechnoBuffalo YouTube
16 channel prior to your work with Houh Consulting?
17 A. I mean, again, I can't be sure, but I
18 probably had not before I started working with
19 Houh Consulting in 2009. I don't know when this
20 channel even started off the top of my head.
21 Q. Okay. Did you personally identify the
22 TechnoBuffalo videos as prior art or were they provided

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1 to you?
2 A. I think they were provided to me.
3 Q. When you testified that you watched the
4 TechnoBuffalo video, did you watch it on YouTube or
5 watch it on a file provided to you?
6 A. I'm sure I watched it on YouTube numerous
7 times, both of them, or the ones that I listed here.
8 Q. And how can you be sure that it was YouTube?
9 A. Because I typed in the URL myself.
10 Q. So when you watched on YouTube, you watched
11 it by accessing the URL that was provided, you didn't
12 watch it by searching for it on YouTube; is that right?
13 A. That might not be entirely the only way I
14 first accessed these videos at all, because I recall
15 that I may have done a search or found the channel and
16 looked through different videos of the channel.
17 So I don't think every time I accessed the
18 videos that I accessed them directly using the URL
19 provided in my declaration. URLs, plural.
20 Q. And why did you look through the videos of
21 the TechnoBuffalo channel?
22 A. Because I generally like to look around on

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1 some of these YouTube channels. I believe before the
2 time of the TechnoBuffalo videos, I had a home media
3 server set up and I'm generally interested in these
4 types of videos.
5 Q. When you were looking for the TechnoBuffalo
6 video channel, did you just type in TechnoBuffalo and
7 that's how you saw the channel?
8 A. That might have been one way I did it.
9 Q. Do you recall doing it any other ways?
10 A. I previously searched for -- I've done a lot
11 of prior art searching on YouTube for videos about
12 video systems, so it's possible I came across this
13 while doing other searches, but I don't remember. I'm
14 not remembering every search I've done on YouTube.
15 Q. Did you look for the TechnoBuffalo channel
16 specifically, or was it part of a general search?
17 A. I probably at least looked for it
18 specifically.
19 Q. And to look for it specifically you would
20 have to know the name of the channel; is that right?
21 MR. HWANG: Objection. Form.
22 THE WITNESS: Well, given that I was looking

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1 for it specifically. But, again, I do a lot of
2 different searches on YouTube.
3 I don't remember every search I've done, but
4 there may have been other reasons videos within this
5 channel have come up in past searches. But I don't
6 remember every search I did or the results.
7 Q. (BY MR. YANG) But you testified earlier that
8 you don't recall hearing of the TechnoBuffalo YouTube
9 channel prior to your work with Houh Consulting; is
10 that right?
11 A. Well, that was 2009, that I started
12 working -- or that I set up Houh Consulting. And so,
13 yeah, from before 2009, I don't necessarily have a
14 recollection of hearing about this channel. I don't
15 even know when it started from the top of my head.
16 Q. Okay. Were you familiar with the
17 Missing Remote video prior to your work on this case?
18 MR. HWANG: Objection. Form.
19 THE WITNESS: I don't think so with respect
20 to having been working on this matter overall
21 generally. But I can't be sure about it again.
22 Q. (BY MR. YANG) Have you heard of the

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1 Missing Remote YouTube channel prior to your work on
2 this case?
3 A. I mean, I can't remember it, hearing about it
4 before working on this matter generally, but I can't be
5 sure about that.
6 Q. Did you personally identify the
7 Missing Remote video as prior art, or was it provided
8 to you?
9 A. It was provided to me.
10 Q. Just to confirm, have you heard of the
11 Missing Remote YouTube channel prior to 2012 or 2013?
12 A. I don't have a memory of having done so, but
13 I don't remember everything that I've seen.
14 Q. When you watched the Missing Remote video on
15 YouTube, you watched it by entering the hyperlink that
16 was provided to you; is that right?
17 MR. HWANG: Objection. Form.
18 THE WITNESS: Yeah, I mean, I did it by
19 copying or retyping the URL that was provided to me.
20 And at least in maybe one of the cases there
21 was some typo in the URL, but I was able to figure it
22 out or find it. I don't remember which URL it was. But

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1 I seem to recall that situation arising.
2 Q. (BY MR. YANG) And did you also look through
3 the other videos of the Missing Remote channel?
4 A. Yeah, I vaguely remember that I did, but it's
5 just a vague memory.
6 MR. HWANG: And Mitch, whenever possible, can
7 we take a five-minute break. If you want to finish
8 your little module, that's fine.
9 MR. YANG: We can take a five-minute break
10 now. You want to come back at 10:50?
11 MR. HWANG: Oh, yeah, that's fine.
12 MR. YANG: Okay. Thank you.
13 (Off the record.)
14 Q. (BY MR. YANG) Welcome back, Dr. Houh. Did
15 you speak to anyone about this IPR while we were on
16 break?
17 A. No.
18 Q. Turning back to Section 7, were you familiar
19 with the Hunt patent prior to your work on this case?
20 A. Quite possibly. I don't have an exact
21 memory, but it's quite possible.
22 Q. In what context would you have been familiar

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1 with the Hunt patent?
2 A. I think that I worked on cases involving
3 trick play before in the past, some time ago.
4 Q. And do you know the names of those cases?
5 A. I think there's a case I did involving -- it
6 might have been a case I did for Verizon, but I don't
7 remember if that's the one.
8 Q. And when you said Verizon, do you mean that
9 you did that for Verizon as the petitioner?
10 A. No, I don't think it was an IPR.
11 Q. So Verizon in that case, would have been the
12 defendant; is that right?
13 A. I think that's right. I don't remember who
14 the plaintiff was, but I think it was involving trick
15 play.
16 Q. Do you remember what district court it was?
17 A. I don't remember that offhand. It may be
18 listed on my CV. I don't know if it is or not, because
19 not all of my cases am I able to list on my CV.
20 Q. And in the Verizon case was Hunt cited as
21 prior art?
22 A. I don't remember all the details of the case.

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1 It was some time ago.
2 Q. But you do recall seeing Hunt in that case;
3 is that right?
4 A. I don't have a specific recollection sitting
5 here right now, but it's quite possible that I had seen
6 Hunt prior to working on this case, generally.
7 Q. Okay. Did you personally know Hunt or any of
8 the other inventors prior to your work on this case?
9 A. No.
10 Q. And did you personally identify the Hunt
11 patent as prior art, or was it provided to you?
12 A. I think probably it was provided to me.
13 Q. Okay. Were you familiar with the Kim patent
14 application prior to your work on this case?
15 A. I think probably not, but I'm not a hundred
16 percent sure.
17 Q. So is it fair to say that the Kim patent
18 application didn't come up in the context where you
19 remember Hunt?
20 A. That's probably true.
21 Q. Did you personally know Kim or any of the
22 other inventors prior to your work on this case?

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1 A. No.
2 Q. Did you personally identify the Kim patent as
3 prior art, or was it provided to you -- I'm sorry, Kim
4 patent application?
5 A. I think that it was provided to me.
6 Q. Okay. Were you familiar with the Hunlith
7 patent prior to your work on this case?
8 A. I don't think so, but I can't be totally
9 certain of that.
10 Q. So is it fair to say that Hunlith would not
11 have come up in the context where you recall seeing
12 Hunt?
13 A. That's probably true.
14 Q. Did you personally know Hunlith or any of the
15 other inventors prior to your work on this case?
16 A. No.
17 Q. And did you personally identify the Hunlith
18 patent as prior art, or was it provided to you?
19 A. I think that it was probably provided to me.
20 Q. Were you familiar with the Ma patent prior to
21 your work on this case?
22 A. Are you referring to the patent publication?

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1 Q. Yes, I'm sorry.
2 A. I don't think so, but I can't be 100 percent
3 sure about that.
4 Q. So is it fair to say that you don't recall
5 seeing Ma in the context where you recall seeing Hunt?
6 A. That's probably true.
7 Q. And did you personally know Ma or any of the
8 other inventors prior to your work on this case?
9 A. I do know someone by the name of Jeffrey Ma,
10 but I don't know if it's the same person or not. So I
11 don't know for sure.
12 Q. Did you personally identify the Ma
13 application as prior art or was it provided to you?
14 A. I think that it was provided to me.
15 Q. Okay. Have you ever had a Netflix
16 subscription?
17 A. Yes.
18 Q. And how long have you had this Netflix
19 subscription?
20 A. Well, since the time Netflix was actually
21 DVDs in the mail continuously pretty much until today.
22 I think continuously.

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1 Q. So you can't recall ever stopping the
2 subscription since you've had it?
3 A. I might have paused the subscription during
4 the DVD days for a short time, but it wasn't a very
5 long time, I don't think. So yeah, that's probably
6 true, is I don't think I've not had one for a long
7 time.
8 Q. So is it fair to say that since Netflix went
9 to streaming you've always had a Netflix subscription?
10 A. That's probably true, yes.
11 Q. Do you own Netflix stock?
12 A. No, I do not, at least not that I know of
13 directly, but I have mutual fund holdings that I don't
14 know what stocks those funds hold.
15 Q. Do you own Walmart stock?
16 A. Not directly, but I don't know if there's any
17 ownership through other funds or investments.
18 Q. Have you ever owned Vizio stock?
19 A. Never directly, and I don't know what the
20 holdings of other investments are.
21 Q. Approximately how many hours have you watched
22 Netflix?

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1 A. Yeah, personally, I don't think I watch more
2 than one movie a month for a while. There may have
3 been times where I watched more, but these days I
4 barely even watch one Netflix movie a month.
5 So it's hard to estimate an average over the
6 entire subscription time. I used to watch a lot more
7 movies, and I remember in the DVD days I did, but it's
8 much less now.
9 Q. Is it fair to say that you maintain a Netflix
10 subscription for a service that you rarely use?
11 A. That's not exactly fair because members of my
12 family will use Netflix.
13 Q. And who else uses your Netflix account?
14 A. My wife and two of my kids.
15 Q. Okay. I'd like to direct your attention to
16 Section 8, starting on page 36. Let me know when
17 you're there.
18 A. I'm here.
19 Q. In paragraph 97 you testify that the claim
20 terms are given their ordinary and customary meaning as
21 would be understood by one of ordinary skill in the art
22 in light of the specification and prosecution history.

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1 Do you see that?
2 A. I do. And I would add that that would be at
3 the time of the invention, of the '384 patent.
4 Q. Okay. Did you consider anything besides the
5 '384 specification and prosecution history in
6 understanding the claim terms?
7 A. I have to consider what I know about the
8 English language generally and what a POSITA would have
9 known because there are plenty of words used in the
10 claims.
11 Q. So that would be in addition to what you
12 testified in paragraph 97; is that right?
13 A. I wouldn't call it that because it's in the
14 light -- it definitely is the claim terms are
15 interpreted by a POSITA at the time of the invention in
16 light of the specification and prosecution history, but
17 it's not like they don't know how to use English words.
18 Q. Do any of the terms of the '384 patent have a
19 particular meaning in the field of television or
20 digital video systems?
21 MR. HWANG: Objection. Form.
22 THE WITNESS: I don't remember all of those

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1 words, but if you want to go through them we can look
2 at it. But I've applied the plain, ordinary meaning in
3 the context of the specification and prosecution
4 history, at the time of the invention, as would have
5 been understood by a POSITA.
6 (Off the record.)
7 Q. (BY MR. YANG) Does the term "series" have a
8 particular meaning in the field of television?
9 MR. HWANG: Objection. Form.
10 THE WITNESS: In what again?
11 Q. (BY MR. YANG) Does the term "series" have a
12 particular meaning in the field of television?
13 A. Well, I think it would depend the context in
14 which it's used when talking in that domain.
15 Q. You would agree that the word "series" as
16 used in the claims refer to a TV series and not a
17 series as in a series of numbers; right?
18 MR. HWANG: Objection. Form.
19 THE WITNESS: Could you repeat the question,
20 please.
21 Q. (BY MR. YANG) Let me rephrase it.
22 One of the definitions of series is a line of

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1 products. You would agree that in the context of these
2 claims, a series is not a product line. Would you
3 agree with that?
4 MR. HWANG: Objection. Form.
5 THE WITNESS: I guess it depends if people
6 think of products broadly to include a television show
7 being a product.
8 Q. (BY MR. YANG) Well, another definition of
9 series is a group of chemicals with common properties.
10 You would agree that, as used in these claims, that is
11 not the definition of series that applies; right?
12 MR. HWANG: Objection. Form.
13 THE WITNESS: I don't think this patent is
14 about chemicals.
15 Q. (BY MR. YANG) So would you agree that the
16 definition of series refers to TV series?
17 MR. HWANG: Objection. Form.
18 THE WITNESS: Well, I think in the claim
19 there was the word "series" that's used, and there's
20 also the phrase "television series" are used. So I
21 think if they use two different phrases, that they
22 should not necessarily have the same meaning.

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1 But I think that series could include the
2 notion of a television series as an example.
3 Q. (BY MR. YANG) Is it your testimony that the
4 word "series" is broader than the term "television
5 series"?
6 MR. HWANG: Objection. Form.
7 THE WITNESS: Well, there's a series used,
8 for example, in Claim 1, and then I see that the phrase
9 "television series content" and "television series
10 content" in other claims.
11 And so I think that if a series were to be
12 only a television series, then the patentee would have
13 used the phrase "television series."
14 Q. (BY MR. YANG) Well, what other series are
15 included within the term "a series" besides television
16 series?
17 A. Are you referring to the claim terms as used
18 or are you referring generally to how series is used in
19 the specification at different places?
20 Q. I'm referring to the word "a series" as it's
21 used in the claims. Besides television series what
22 other series are included within a series, the term "a

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1 series"?
2 MR. HWANG: Objection. Form.
3 THE WITNESS: For the purposes of my
4 declaration I'm not sure I considered that question
5 you're asking, because, I'm looking through it now, and
6 the series that I've identified from within the prior
7 art, appear to all be with respect to television
8 series.
9 So at least television series would have been
10 understood to be within the scope of a series by a
11 person of ordinary skill in the art, in the context of
12 the specification and prosecution history.
13 Q. (BY MR. YANG) So based on that answer, is it
14 fair to say that you haven't considered series that are
15 not television series?
16 MR. HWANG: Objection. Form.
17 THE WITNESS: With respect to the prior art
18 and the challenges, I believe I pointed to series which
19 are really, are all television series. We can look
20 through each of the prior art references, but they
21 appear all to be television series.
22 So for my analysis it wasn't necessary to

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1 consider what you're asking about because there was no
2 reference with some other series that I pointed to that
3 was not a television series.
4 Q. (BY MR. YANG) You agree that television
5 series fall within the scope of the term "a series";
6 right?
7 A. I think the specification gives examples of
8 television series as an example of what it talks about
9 as series. For example, I think it specifically
10 mentions Game of Thrones, and having aired on HBO as a
11 series of episodes, many seasons, I think.
12 That's an analogous example in the
13 specification of what's considered a -- can't remember
14 what phrase they used, but series or television series.
15 But I think they just used the word "series."
16 If you look at Column 51, at line 48, it
17 says, the User Interface 3500 can display a series,
18 e.g., Game of Thrones. The season listing is shown in
19 Section 3504 -- and goes on. But it gives an example
20 of a series, Game of Thrones.
21 And I think, as shown, analogous series
22 within the prior art that are parallel with that

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1 example, given the specification of a series.
2 Q. Is Game of Thrones a television show?
3 A. My understanding is it aired on HBO and it
4 had specific airtimes on HBO channels. I watched it.
5 I also recorded it and watched it, and sometimes I
6 watched it during its time it was being shown on HBO.
7 So it has the characteristics, as other
8 series that I pointed to in the prior art, like
9 The Office and Parks and Recreation.
10 Q. That wasn't my question.
11 My question is, is Game of Thrones a
12 television show? I have to establish what it is.
13 A. Well, the example in the specification says
14 it's a series, so Game of Thrones would be understood
15 by a person of ordinary skill to be an example of
16 something that's a series.
17 Q. And I believe you testified that you
18 personally watched it; is that right?
19 A. Yes.
20 Q. And so when you watched it, did you watch it
21 with the understanding that it was a television show?
22 A. I don't typically think about things that I

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1 watch in that manner. I turn on my TV, I tune to an
2 HBO channel and I watch, if I'm going to watch it as
3 it's being broadcast, which I know that I did for
4 Game of Thrones.
5 Q. Do you think of it as a movie?
6 A. You know, I don't know that I specifically
7 think of things like that when I'm watching them. I
8 turn on the TV, I watch a Game of Thrones episode. I
9 think of it as an episode. I don't actively think
10 about it as some of the things you're asking about.
11 Q. I have to establish what category
12 Game of Thrones falls under. When you're watching Game
13 of Thrones, as a person watching TV, do you think of
14 Game of Thrones as a TV show or movie?
15 MR. HWANG: Objection. Form.
16 THE WITNESS: In the specification, Game of
17 Thrones is given as an example of a series.
18 Q. (BY MR. YANG) I'm asking you in the context
19 of you watching Game of Thrones, which you testified
20 that you did. When you were watching Game of Thrones,
21 did you consider it to be a movie?
22 A. When I'm watching these things, I don't think

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1 of that necessarily in that manner that you're asking
2 about. I'm just watching something on TV. Thoughts
3 like that don't really enter my head while I'm watching
4 something like Game of Thrones.
5 Q. Okay. I'm asking you now, as you think of
6 Game of Thrones, do you think of it as a movie?
7 A. I mean, I think it depends when I'm watching
8 and how I'm watching it. Sometimes I know that I've
9 watched episodes of a -- like, for example, Battlestar
10 Galactica I used to watch.
11 And they've actually taken multipart episodes
12 of Battlestar Galactica and packaged it as a
13 full-length feature DVD, which I've watched both.
14 So I guess it depends on the context and how
15 I'm -- you know, I just am saying that in the context
16 of the specification, Game of Thrones is given as an
17 example of a series.
18 And the prior art that I pointed to has other
19 series with the same characteristic, like I pointed to
20 The Office as example of a series. I pointed to, I
21 think, Parks and Recreation somewhere as an example of
22 a series.

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1 And those have the same characteristics as
2 Game of Thrones in terms of they have episodes and
3 seasons, they were often broadcast at a certain time,
4 at a regular time interval.
5 So with respect to my analysis and my
6 declaration, I didn't write about what I personally
7 think about when I'm watching Game of Thrones. I wrote
8 about the prior art and the -- what I mapped to things
9 like a series in the prior art.
10 Just like the example gives of a series, it
11 gives the example of Game of Thrones, the prior art --
12 in the prior art I found things that are analogous to
13 Game of Thrones that have similar characteristics as
14 that series in the specification.
15 Q. Are you personally aware of anyone that
16 considers Game of Thrones, the HBO show, a movie?
17 A. I'm pretty sure I've never talked to anyone
18 and asked them that question.
19 Q. So the answer is no, you're not aware; is
20 that right?
21 A. That's not -- that may be technically
22 accurate, but it's because why would I ever talk to

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1 anyone and ask them that question. I never have in my
2 life.
3 Q. Sure, you didn't ask anybody. But my
4 question was, are you aware of anybody. And so the
5 answer is no, you are not?
6 A. Well, I can't know what people think without
7 talking to them about what they think.
8 Q. Does the specification provide examples of
9 series that are not television series?
10 A. Well, the specification in a few places does
11 seem to distinguish the phrase "variety series" with
12 the phrase "television series" or "TV series," for
13 example.
14 If you look at the top of Column 52, at
15 line 2 it talks about, in this way for TV series or
16 variety series, the user may easily navigate between
17 episodes in a season with those controls in the
18 playback view.
19 And you look at Column 50 at line 18, it
20 talks about, an embodiment of a Method 3200 for
21 providing a catalog view and subsequent detail and
22 series use for TV series and a variety series as shown

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1 in Figure 32.
2 So -- and then again in paragraph -- sorry,
3 in Column 51, around line 47, it says, another example
4 of a digest view for a series of television shows or
5 variety shows is shown in Figure 35 -- that's not
6 series, sorry. That's shows.
7 So there were at least two places I mentioned
8 earlier about using the phrase "TV series" or "variety
9 series," so the specification seems to distinguish
10 those two.
11 And I believe the claims also distinguish
12 television series content or variety content.
13 Q. Okay. Is it your testimony that a variety
14 series is not a TV series?
15 MR. HWANG: Objection. Form.
16 THE WITNESS: Well, I simply stated that the
17 claims views TV series content and variety content
18 separately, as separate phrases, for example, in
19 Claim 8.
20 But my analysis, I think I am -- you know, for
21 example, Claim 8 lists a bunch of things that content
22 include, A, B, C, or D. I don't think I relied on

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1 pointing to anything as variety content.
2 I relied on -- in the prior art my analysis
3 was relying on, I believe, we can look at the
4 declaration to be sure, I rely on the television series
5 content.
6 Q. (BY MR. YANG) Okay. I'll get back to your
7 declaration in a while.
8 I asked you to provide an example of a series
9 that is not a TV series, and you gave me as an example
10 variety series; is that right? Is that what you
11 testified?
12 A. I said that the specification itself uses and
13 seems to distinguish TV series from variety series.
14 Q. So when I asked you to give me an example of
15 a series that is not a TV series you gave me variety
16 series. Is that your testimony?
17 MR. HWANG: Objection. Form.
18 THE WITNESS: I think you're -- I'm saying
19 that the specification itself appears to distinguish TV
20 series from variety series.
21 Q. (BY MR. YANG) The words "variety series" was
22 in your answer to my question; right?

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1 MR. HWANG: Objection. Form.
2 THE WITNESS: Because I'm reciting what the
3 specification says and appears to distinguish TV series
4 from variety series.
5 Q. (BY MR. YANG) And you cited the portion of
6 the specification in response to my question; right?
7 MR. HWANG: Objection. Form.
8 THE WITNESS: I did point to specific
9 passages in the specification.
10 Q. (BY MR. YANG) In response to my question?
11 MR. HWANG: Objection. Form.
12 THE WITNESS: Yes, it followed your question.
13 Q. (BY MR. YANG) Okay. Does the term "episode"
14 have a particular meaning in the field of television?
15 MR. HWANG: Objection. Form.
16 THE WITNESS: I think it would depend on the
17 context in which it's used in that field.
18 Q. (BY MR. YANG) The context is in the claims
19 of the '384 patent. Does that change your answer?
20 A. Did you say the context was in the claims of
21 the '384 patent? Is that what your question was?
22 Q. The context is the use of the term "episode"

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1 in the claims of the '384 patent, yes.
2 A. In the context of the claims and my analysis
3 with respect to prior art, I think episode includes the
4 things I pointed to, and a POSITA would recognize that.
5 I literally, for example, on the figure on
6 page 63 of my declaration, you know, for The Office,
7 Series 2, it literally says Episode 1, Episode 2,
8 Episode 3.
9 And I think I pointed to episodes for other
10 shows, like Parks and Recreation, where it might not
11 use episode, the word "episode," but it lists like a
12 number of the shows within a season, as episodes.
13 It would be understood by a person of
14 ordinary skill in the art to be included in, as an
15 example, the episode as claimed.
16 Q. Did you just give episodes of shows as
17 examples of episodes in response to my question?
18 A. I did. My mapping was of episodes of the
19 television series. And maybe, if you're asking about
20 the word "shows," what I mapped to the television
21 series or a series are things like The Office, Parks
22 and Recreation. I just saw House.

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1 And so within seasons of those series, as
2 I've mapped those to the series, I talked about
3 episodes within various seasons of those series.
4 Maybe I didn't mean to use the word "show."
5 If it's a claim term I don't want to use it without
6 being specific about it. But I may have said "show."
7 But more accurately I would say it's talking
8 about the episodes within those series for particular
9 seasons, for example.
10 Q. I was asking about episodes because I wanted
11 to make sure it was being used in the claims in the
12 context of television. For example, I looked at the
13 definitions of episode and one of them is a period of
14 time when someone is suffering from an illness.
15 You would agree that that definition, a
16 period of time when someone is suffering from an
17 illness, is not the meaning of episode as used in these
18 claims; right?
19 MR. HWANG: Objection. Form.
20 THE WITNESS: As I mentioned earlier, depends
21 on the context. When you ask about in television,
22 there are plenty of medical shows. If you're talking

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1 about that in a medical show, then that word may appear
2 in the context of a television series.
3 But what I'm referring to as episodes here I
4 think are examples of, a person would understand are --
5 episodes as claimed, are within the series that I
6 pointed to within the prior art, like The Office, like
7 Parks and Recreation, I think like House.
8 That listings of different episodes within a
9 season are an example of episode as used in the claim.
10 Q. (BY MR. YANG) I'm asking about episode as
11 used in the claim. Even if a medical show had someone
12 suffering from an illness, that episode would not be
13 the claimed episode; right?
14 MR. HWANG: Objection. Form.
15 THE WITNESS: I was not pointing in the prior
16 art to the use of the phrase "episode" in the medical
17 context, even in a medical show, to show that any of
18 the prior art disclosed episode of the claim.
19 So that's an issue I'm not considering in my
20 declaration because it's not an issue that arose with
21 respect to what I did point to as episodes, which are
22 literally things labeled episode in, for example, the

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1 interface on page -- was it 63? Sorry. 63 of my
2 declaration for this case.
3 And the parallel ones, in for example, in
4 Parks and Recreation, it doesn't list Episode 1, 2, 3,
5 4, but it has a number where there's a title. And
6 oftentimes episodes of a series will have these titles,
7 and that's reflected in the example on page 65.
8 So I'm not considering -- I'm not relying on
9 your use in your question of the word "episode" as a
10 disclosure in the prior art. So that's not a specific
11 issue I considered for my analysis of the prior art in
12 the challenges.
13 Q. (BY MR. YANG) I wasn't suggesting that you
14 pointed to a medical episode in the prior art.
15 You testified as to the meaning of the
16 claims, and you considered what the meaning of the term
17 "episode" is. And I just want to make sure that your
18 meaning is TV episodes and not medical episodes. Is
19 that right?
20 MR. HWANG: Objection. Form.
21 THE WITNESS: If you're asking about my
22 analysis in my declaration, I'm pointing to the

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1 disclosures of things like an episode within a season
2 of Netflix, and for me to show that the prior art
3 disclosed the episodes of the claim.
4 I didn't consider in my analysis whether some
5 medical show used the phrase "episode" in reference to
6 an illness and said that that was the claimed mapping.
7 That's not what I did.
8 What I did was I pointed to things that
9 literally said Episode 1, Episode 2, Episode 3, in that,
10 for example, that screenshot that I put at the top of
11 page 63.
12 And it's -- those are episodes of a series
13 where I did the mapping in my analysis of The Office,
14 for example, to the claim series.
15 And the episodes of The Office and other
16 series like Parks and Recreation, House, and we can
17 look through the different challenge grounds and
18 references there, but that's the mapping I did.
19 I didn't -- I did not rely on some alternate
20 definition of episode that you asked about in my
21 declaration.
22 Q. (BY MR. YANG) My question wasn't asking

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1 about your analysis, my question is asking about your
2 understanding of the term "episode."
3 Is your understanding of the term "episode"
4 TV episodes and not medical episodes, or do you
5 understand the term "episode" to also include medical
6 episodes?
7 A. You had asked earlier about what episode
8 means in the field of television or something like
9 that, and I said it depends on the context.
10 If you're talking about the claims, examples
11 of episodes in the claim, as claimed, would be things
12 like an episode of a series like The Office. And so
13 that's what I did my mapping to.
14 Outside the context of the claims, sure,
15 there are other -- there could be other definitions of
16 episode. But examples of episode that I mapped episode
17 of the claims to in my analysis, I mapped them to
18 episodes of series like The Office,
19 Parks and Recreation, and House.
20 Q. I'm talking about your understanding of the
21 term "episode" as used in the claims of the
22 '384 patent, not what you mapped them to.

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1 Is your understanding of the term "episode"
2 TV episodes and not medical episodes? Or do you
3 understand episodes to also include medical episodes as
4 used in the claims of the '384 patent?
5 A. A person would understand the term "episode"
6 as used in -- in the claims of the '384 patent to cover
7 things like an episode of a series, like The Office,
8 Parks and Recreation, or House.
9 Q. And would a person of ordinary skill
10 understand the term "episode" as used in the claims of
11 the '384 patent to cover medical episodes?
12 MR. HWANG: Objection. Form.
13 THE WITNESS: That's not a specific issue
14 that I considered for the purpose of my declaration,
15 because I wasn't pointing to that use of episode in a
16 medical show as evidence that the prior art disclosed
17 the claim elements.
18 What I pointed to in the prior art were
19 actually episodes, as would have been understood, would
20 be an example of what an episode would be in a series
21 like The Office or Game of Thrones.
22 I didn't point to Game of Thrones, but like

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1 the specification uses Game of Thrones as an example of
2 a series, and there are -- a person would understand
3 that there are episodes of the Game of Thrones series
4 and different seasons.
5 And so I pointed to analogous things in the
6 prior art, like an episode of, in one season, of
7 The Office or Parks and Recreation or House.
8 Q. (BY MR. YANG) Did you consider the meaning
9 of the term "episode" as used in the claims of the
10 '384 patent?
11 A. I considered -- when I do my analysis, I
12 consider all the words of the challenged claims. And
13 one thing I do when examining what they -- the things
14 that would be included in the scope of those claims as
15 I review the specification and prosecution history.
16 And oftentimes I find examples of claim terms
17 that are given in the specification. For example, as
18 we talked about earlier, the claim -- the specification
19 gives an example of a series in the specification. And
20 one example is Game of Thrones.
21 And so Game of Thrones would be an example of
22 a series that a person of ordinary skill would

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1 recognize as to be a claimed series, and one example.
2 And so I do consider that.
3 And then I consider, looking at the prior
4 art, are things -- are there examples that match up
5 with examples given in the specification.
6 So I consider -- and that's how I map --
7 that's part of my analysis as to mapping the prior art
8 to the claim elements and how they disclose those claim
9 elements.
10 Q. My question was directed to the term
11 "episodes" and you gave me an answer with the term
12 "series." Can you rephrase your answer to answer my
13 question to the term "episode" and not the term
14 "series"?
15 MR. HWANG: Objection. Form.
16 THE WITNESS: If you look at one example of
17 a -- where series is used in the specification, if you
18 look at --
19 Q. (BY MR. YANG) I was asking about episode.
20 MR. HWANG: Counsel, can you please let him
21 answer the question, and then you can move on.
22 THE WITNESS: I meant the word "episode." So

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1 one use of the word "episode" is in Figure 32. And if
2 you look at Figure 32, the box says, provide series
3 view with -- Box 3236 says, provide series view with
4 episodes arranged in ascending order.
5 And then if you look at Column 51, at line 13,
6 it talks about Step 3236. It says, the
7 VOD Subservice 620 can provide the series with the
8 episodes arranged in ascending order, if all the series
9 have been archived in Step 3236.
10 So, for example, that's an example of the use
11 of series in the specification. And what I provided,
12 for example, if you look at the top of page 63, is
13 there's a series, The Office, that's what I've mapped
14 series to in this part of this analysis.
15 And there's a list of episodes, Episode 1, 2,
16 3, 4, 5, 6. And that is -- that matches what a person
17 of ordinary skill would recognize are examples of how
18 episodes are used within the specification.
19 Which is, you're providing a series view of
20 The Office, for example, in the top of 63. That's a
21 series, with episodes arranged in ascending order. And
22 that -- that screenshot on 63 literally has Episode 1,

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1 2, 3, 4, 5, 6, arranged in ascending order.
2 And if you look similarly at, I think House,
3 there are series -- the Parks and Recreation series has
4 a 3, 4, 5, 6, 7, 8, 9, 10, 11, listing of things in
5 ascending order with titles of each of the episodes.
6 So the way that episode is described in the
7 specification is -- those are examples, and I found
8 similar examples in the prior art that a person of
9 ordinary skill would recognize are examples of the claim
10 terms, like episode in the claims.
11 MR. HWANG: Just one thing again for the
12 court reporter. I don't mean to interrupt, but the
13 word "VOD" was used. I think he was -- that refers to
14 V-O-D, like video on demand, just so when you're typing
15 it, it helps.
16 THE WITNESS: I should be more clear when I
17 use acronyms like that. I'll try to be in the future.
18 Q. (BY MR. YANG) I'm sorry, I want to clarify
19 something with your last answer.
20 Are you saying you looked for teachings in
21 the prior art that was analogous to teachings in the
22 '384 patent?

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1 A. My process is I map the claims to the prior
2 art and one way to understand the scope of the claim
3 terms in the claims themselves is to look -- is --
4 they're understood in the context of the specification.
5 So the specification may give examples of how
6 those claim terms are used, arranged or examples of the
7 claim terms themselves.
8 For example, the spec, when it refers to a
9 series in the claim, you can look -- you can find that
10 it gives an explicit example of a series, like
11 Game of Thrones, in the specification.
12 So a person of ordinary skill would recognize
13 that Game of Thrones is within the scope of a series as
14 used in the claim. And then there are lots of other
15 series that are analogous to Game of Thrones, like
16 Office and Parks and Recreation and House, that I
17 mapped to a series within the prior art.
18 So it's understanding -- you know, using the
19 plain, ordinary meaning of the claim terms in the
20 context of the specification and prosecution history.
21 And examples in the specification that are
22 listed as examples of a claim term, like a series, are

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1 understood by POSITA to be in the scope of the claim
2 term as used in the claims.
3 And so then I map the -- the prior art to the
4 claims. And if I could find literally the same thing,
5 like Game of Thrones, in the prior art, that would be
6 something that clearly is within the scope of a series.
7 But I think these videos predated
8 Game of Thrones, I think. I'm not totally sure about
9 the timeline. But these -- the prior art used
10 analogous series, like The Office,
11 Parks and Recreation, and House.
12 And so I did that mapping, but I'm mapping it
13 to the claim terms. And based on their plain, ordinary
14 meaning, understood in the context of the specification
15 and the prosecution history at the time of the
16 invention.
17 Q. Okay. Did you just say that Game of Thrones
18 is within the scope of the claim term "series"?
19 A. I think a person of ordinary skill would have
20 understood that Game of Thrones is explicitly listed as
21 an example of a series.
22 So the series Game of Thrones is -- would be

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1 understood by a person of ordinary skill in the art to
2 be in the scope of a series as used in the claims.
3 Q. And you would also say The Office is within
4 the scope of the claim term "a series"?
5 A. I do, because literally that's how I do my
6 analysis in my declaration, which I pointed to
7 The Office as disclosing a series.
8 Q. And what about The Office is within the scope
9 of the claim term "episode"?
10 A. It's the episodes listed that are part of
11 different seasons of the series The Office that I have
12 mapped to episodes as claimed.
13 Just, you can look at my analysis if you want
14 to look at a specific portion, but I've done at least
15 that mapping and shown how those meet the requirements
16 that -- of the claims that use the claim term
17 "episode."
18 Q. We'll get to your analysis. I'm trying to
19 understand your understanding of the claim terms right
20 now.
21 So let's look at Claim 2 of the '384 patent.
22 Can you explain what video on demand, VOD, content is

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1 in the preamble?
2 A. Could you repeat your question, please.
3 Q. Yeah. What is video on demand, parentheses,
4 VOD, content in the context of the preamble of Claim 2
5 of the '384 patent?
6 MR. HWANG: Objection. Form.
7 THE WITNESS: I'm looking at Claim 2, and I
8 recognize that there's two lines at the beginning of
9 Claim 2, line 6 and 7 of Column 57.
10 But I'm not a lawyer, so I don't know if the
11 definition of the preamble includes all the lines up to
12 the break. But it feels like the preamble is ending a
13 the colon. When I look at other preambles, they
14 typically end at the colon.
15 The preamble would be, an intelligent
16 television system comprising, colon, up to the colon.
17 And I know that it's listed there as two lines that
18 appear to be where you would expect to see the preamble
19 without a break, the line break.
20 But it feels to me like the line break is
21 simply missing from here and the preamble really ends at
22 the colon. So, I'm not a lawyer, I don't know the

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1 significance of line break or not.
2 But it doesn't feel like the colon -- preamble
3 actually includes video on demand content to me.
4 Q. (BY MR. YANG) Let's ignore the fact that --
5 whether there's a line break there or not.
6 In the first element -- in that element where
7 it says, a memory operable to store video on demand,
8 parentheses, VOD, content, what is video on demand,
9 parentheses, VOD, content there?
10 MR. HWANG: Objection. Form.
11 THE WITNESS: Well, the claim itself lays out
12 requirements for VOD content, or VOD content for short,
13 to pronounce the acronym.
14 And it has things like, you have to have a
15 master view of the VOD content on two or more
16 collections of the VOD content organized by a
17 characteristic of the VOD content. You have to receive
18 a second selection for a VOD content.
19 So VOD content, as claimed here, are -- would
20 be things that meet the requirements of Claim 2.
21 MR. YANG: We've been on the record for over
22 an hour. Do you want to take a break?

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1 THE WITNESS: Sure.
2 (Off the record.)
3 Q. (BY MR. YANG) Dr. Houh, did you speak to
4 anyone about this IPR while we were on lunch?
5 A. No.
6 Q. Okay. Can I direct you back to Claim 2 of
7 the '384 patent.
8 A. Okay. I have that up.
9 Q. Claim 2 uses the term "episode," and it also
10 uses the term "single show."
11 Do you see those two terms?
12 A. Yes, I do.
13 Q. Okay. Is a single show one episode, like one
14 episode of Game of Thrones? Or is a single show one
15 show, like Game of Thrones and not The Office?
16 MR. HWANG: Objection. Scope -- sorry,
17 withdrawn. Objection. Form.
18 THE WITNESS: Within Claim 2, I only see the
19 phrase "single show" used in conjunction with the
20 overall phrase "movie or single show."
21 And if you look back at my analysis for what I
22 did with respect to the prior art, is that I think this

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1 is part of Limitation 1.7, but it refers back to
2 Limitation 1.6, in which I focus on things that are
3 movies.
4 So, for example, if you look at page 113,
5 there's a list of movies, one of which is a large
6 Figure 8 from Exhibit 1020. On page 114 is a movie, and
7 the next page, 115, shows more movies.
8 And so I think that's the mapping of
9 disclosure movie or single show. That's pretty clear
10 those are movies. And I wasn't relying on any analysis
11 that pointed to anything but a movie there, which
12 discloses the phrase "movie or a single show."
13 So I didn't focus on the issue that you asked
14 about because I focused on the movie portion of the
15 claim.
16 Q. (BY MR. YANG) Okay. When you were analyzing
17 Claim 2, did you have -- form an understanding of the
18 term "a single show"?
19 MR. HWANG: Objection. Form.
20 THE WITNESS: The Claim 2, I focus and refer
21 back to analysis for Claim 1, which I just pointed out
22 for 1.6, because Claim 2 only uses the phrase "single

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1 show" in conjunction with movie or single show.
2 And I focused on the disclosure of movie,
3 which discloses the overall phrase "movie or single
4 show."
5 I didn't have to focus on the aspect of a
6 single show part of that because the prior art clearly
7 discloses, with respect to movie or single show, how the
8 claims meet the requirements when it's a movie. And
9 that's what I focused on.
10 If you look back at least 1.6, that's part of
11 my analysis, which I refer back to in at least
12 paragraph 308 and 309 of my analysis for Claim 2.
13 Q. (BY MR. YANG) Okay. I understand that you
14 considered the meaning of the term "movie." Did you
15 consider the meaning of the term "single show" at all?
16 A. With respect to the prior art, I focused on
17 the movie aspect. I didn't point to anything with
18 respect to single show because everything I pointed to
19 in 1.6, they're clearly movies.
20 And so when pointing to the movies and
21 analyzing the prior art with respect to movies,
22 discloses the overall phrase "movie or single show."

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1 Q. I'm not asking about your analysis of the
2 prior art, I'm asking about your understanding of the
3 claim language.
4 Did you form an understanding of the term
5 "single show," or are you saying that you're not
6 required to because you feel like movies is disclosed
7 in the art?
8 MR. HWANG: Objection. Form.
9 THE WITNESS: I reviewed the claim language.
10 But with respect to the analysis, it was not -- since I
11 didn't point to anything that I called a single show.
12 Everything I pointed to was a movie. That clearly
13 discloses the overall phrase "movie or single show."
14 So that's the only way single show is used in
15 Claim 2 that I saw, which is in conjunction with movie
16 in the phrase "movie or single show."
17 So simply pointing to the things that are
18 movies in my analysis, which I did in Claim 2 with
19 reference to analysis in Claim 1, discloses the movie
20 portion of that, which is sufficient to show how the
21 prior art discloses the claim element.
22 So it wasn't necessary to do additional

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1 analysis because the movie part of it was clearly
2 disclosed in the prior art with reference to the way
3 movies or movie or single show are used in Claim 2.
4 Q. (BY MR. YANG) You just said that it wasn't
5 necessary to do additional analysis. By that do you
6 mean additional analysis on the meaning of single show?
7 A. Or defined anything that might have been
8 considered a single show in the prior art was not
9 necessary because the prior art already discloses the
10 movie part of that, which then fully discloses movie or
11 single show.
12 Q. Okay. Could I direct you back to Claim 2.
13 The fourth element says, the system provides either a
14 detail view or a digest view of VOD content based on
15 whether the selection in the collection view is for a
16 series or one of a movie or single show.
17 Do you see that?
18 A. No, I did not see where you were starting to
19 read from.
20 Q. Sorry. So going to Claim 2, ignoring the
21 fact that there's a colon in the middle of the
22 preamble. So the first element is a processor, and

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1 then there's execute, then there's receive, followed by
2 end response.
3 Do you see those?
4 A. Yes.
5 Q. So then the next element says, receive a
6 third selection for a VOD content. And then there's a
7 semicolon. In response to the third selection, provide
8 either a detail view or a digest view of VOD content.
9 Do you see that?
10 A. Yes.
11 Q. And then at the end of that it says,
12 providing either a detail view or a digest view of the
13 VOD content comprises determine if the selection in the
14 collection view is for a series or one of a movie or
15 single show.
16 Do you see that?
17 A. Okay. Yes, maybe around lines 28 to 30 I
18 think --
19 Q. Right.
20 A. -- when you started reading it, but I think I
21 see that, where you were.
22 Q. Right. And next clause says, if the

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1 selection in the collection view is for a series,
2 provide the digest view.
3 A. I see that.
4 Q. So if the third selection is for a series,
5 the system provides a digest view; is that right?
6 MR. HWANG: Objection. Form.
7 THE WITNESS: It doesn't use the word
8 "system" in that claim element. Line 31 of Column 57
9 simply says -- what line did -- I kind of lost my place
10 because I had to find the column number.
11 Line 31 says, if the selection in the
12 collection view is for a series, provide the digest
13 view, wherein the digest view provides a listing of two
14 or more episodes associated with the series. And that's
15 what is required -- that's what that claim element says.
16 Q. (BY MR. YANG) So would you agree that the
17 claim says if the user selects a series, then it shows
18 a digest view?
19 MR. HWANG: Objection. Form.
20 THE WITNESS: I mean, I don't understand why
21 you need to reword it. It says -- the claim says what
22 it says, if the selection in the collection view is for

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1 a series, provide the digest view, and then it goes on.
2 But that's what has to happen.
3 There has to be an action of -- there has to
4 be a selection in the collection view. And if that
5 selection in the collection view is for a series, then
6 the digest view is provided. And that's what's required
7 by the first part of the claim element.
8 Q. (BY MR. YANG) So if the selection is for a
9 series, would you agree that providing a detail view
10 instead of a digest view doesn't satisfy this claim?
11 MR. HWANG: Objection. Form.
12 THE WITNESS: Well, if the prior art -- doing
13 other things that aren't required by the claim, still
14 doesn't mean that you can't satisfy the claim.
15 But if the selection in the collection view is
16 for a series, and a digest view is provided, then the
17 claim can be shown to be met, or that part of the claim
18 element can be shown to be met.
19 Q. (BY MR. YANG) Okay. Can you use a teaching
20 of providing a detail view for a selection of a series
21 as teaching this claim element for providing a digest
22 view?

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1 MR. HWANG: Objection. Form.
2 THE WITNESS: I think with respect to
3 digest -- was the question about digest view?
4 Q. (BY MR. YANG) The question was about the
5 claim element, if the user selects a series that
6 provides a digest view.
7 My question is, can you use a teaching of
8 providing a detail view for a selection of a series to
9 satisfy this claim element requiring providing a digest
10 view for selection of a series?
11 A. Well, what the view is -- digest view must
12 also meet further requirements imposed by Claim 2 of --
13 on digest view.
14 So, for example, it talks about, in line 25
15 of Column 57, wherein the digest view presents
16 information about a set of the VOD content that are
17 associated with the series.
18 And that's what it says about the digest
19 view, where that's part of a claim element, I guess you
20 would call it the fifth one, but in Column 57, lines 21
21 through 30 which says, starting at line 22, provide
22 either a detail view or a digest view of VOD content.

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1 And then it goes on to -- skipped a few lines
2 down to say, wherein -- to line 25, wherein the digest
3 view presents information about a set of the VOD
4 content that are associated with a series.
5 And then -- that's one further requirement
6 imposed by what -- to require what is required by a
7 digest view in Claim 2.
8 So within the claim itself there are those
9 requirements imposed on digest view that they --
10 they're shown at certain times, that what the digest
11 view presents as information on the view.
12 And so -- and so if you were -- if whatever
13 view has -- does not meet that further requirement,
14 then it wouldn't be considered a digest view.
15 So that's part of how I did my analysis of
16 what meets a digest view. And what I believe I mapped
17 the digest view to in my declaration, was correct in
18 that it met all the requirements of digest view as
19 required by Claim 2.
20 Q. You didn't answer my question. My question
21 isn't what meets a digest view.
22 My question is, can you use a teaching of

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1 providing a detail view to satisfy that requirement of
2 providing a digest view?
3 MR. HWANG: Objection. Form.
4 THE WITNESS: Well, whatever you're calling
5 it, I understand the Claim 2 does use a separate
6 phrase, "detail view." And it imposes restrictions on
7 what additional requirements are needed within Claim 2.
8 Claim 2 imposes further restrictions as to
9 what meets a detail view.
10 So, for example, on 27, at line 23, talks
11 about wherein the detail view presents information about
12 a selected item of the VOD content and wherein -- that's
13 it. So that's a selected item for the VOD content that
14 detail view presents information about.
15 So those are labels given in claim element --
16 in Claim 2. But the digest view would be something that
17 would meet all the requirements imposed by Claim 2,
18 which is, for example, when it appears, or conditions
19 under which the digest view was presented, or provided.
20 And a listing, which is not -- which is --
21 which can be inclusive. It says a digest view presents
22 information about a set of VOD content that are

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1 associated with a series. It's permissive in the sense
2 that other information can be part of the digest view.
3 But all that's required to be part of the
4 digest view to meet limitation of Claim 2, is that the
5 digest view presents information about a set of the VOD
6 content that are associated with the series.
7 So as long as it meets that and all the
8 requirements of Claim 2 for digest view, whatever you
9 label the digest view to be, so long as it meets the
10 elements in the way that it's ordered and arranged in
11 Claim 2, with respect to detail view -- or sorry, digest
12 view, then it would be a digest view as claimed in
13 Claim 2.
14 Q. (BY MR. YANG) So is it your testimony that
15 the claim -- Claim 2 allows providing a digest view
16 regardless of whether you select a series or one of a
17 movie or single show?
18 MR. HWANG: Objection. Form.
19 THE WITNESS: I don't think I understand what
20 you're actually asking in that question.
21 Q. (BY MR. YANG) Let me repeat it.
22 Does Claim 2 allow providing a digest view if

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1 you select a series and if you select a movie or a
2 single show?
3 MR. HWANG: Objection. Form.
4 THE WITNESS: There are two separate elements
5 for that.
6 I think you're referring to maybe the elements
7 at Column 57, starting at line 31, if the selection in
8 the collection view is for a series, provide the digest
9 view, wherein the digest view provides a listing of two
10 or more episodes associated with the series.
11 And that's a further requirement of digest
12 view. That's slightly different than the digest view
13 requirement at line 25 through 27.
14 And so, again, whatever the view is provided
15 there, so long as it meets the requirements of a digest
16 view, as in further elements require of a digest view,
17 then I would say it would be the claimed digest view.
18 And so the detail view, I think you're
19 referring to in the next part, element starting at
20 Column 57, line 35, is, if the selection in the
21 collection view is for one of a movie or single show,
22 provide a detail view.

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1 Receiving a fourth -- does it go on to say
2 anything else about detail view there? I think
3 that's -- I think the latter part -- well, I guess it's
4 kind of another action, which of receiving a fourth
5 selection of an episode in the digest view.
6 And in response to the fourth selection,
7 providing a player to present the episode to the user.
8 Perhaps that should be a new line, because there's a
9 semicolon there.
10 So there is -- if the -- requirement that is,
11 if the selection in the collection view is for one of a
12 movie or single show, provide a detail view.
13 And so -- and so that detail view, further
14 requirement at Column 57, line 25 -- sorry, 23, wherein
15 the detail view presents information about a selected
16 item of the VOD content.
17 So long as whatever view it is meets those
18 requirements and are shown in appropriate places based
19 on selections that -- that Claim 2 requires, then it
20 would be the claimed detail view.
21 So whatever labels those are, if you actually
22 show the views with the content, at least the content

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1 that's shown and required by Claim 2, then that would
2 satisfy the claimed views, I think under their plain,
3 ordinary meaning.
4 Q. (BY MR. YANG) Okay. You said claimed views.
5 You agree that there is more than one view in this
6 claim; right?
7 A. Claim 2 does recite separately a detail view
8 and a digest view. And then it, furthermore, goes into
9 a little more detail about what those views present,
10 what information they present.
11 So I think under the plain, ordinary meaning
12 of the terms, the views that meet that, as required by
13 Claim 2, would be the respective digest view or detail
14 view.
15 Q. Okay. And for the third selection, third
16 selection is either selection of a series or selection
17 of a movie or single show; right?
18 A. So with respect to third selection, I assume
19 you're referring to Column 57 -- in Claim 2, Column 57,
20 starting at line 21.
21 Where it says, receive a third selection for
22 a VOD content; in response to the third selection

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1 provide either a detail view or a digest view of the
2 VOD content.
3 And so, wherein the detail view presents
4 information about a selected item of the VOD content
5 and wherein the digest view presents information about
6 a set of the VOD content that are associated with a
7 series.
8 So I think those are maybe some examples that
9 a person of ordinary skill, looking in the context of
10 the specification, would understand that if the third
11 selection were for a series, like Game of Thrones.
12 And then there is a digest view presenting
13 information about a set of the VOD content associated
14 with the series Game of Thrones, that would be an
15 example of something understood to be within the scope
16 of one possibility of a third selection.
17 And the latter part of that claim element,
18 starting at line 27, where providing either a detail
19 view or a digest view of the VOD content comprises
20 determine if the selection in collection view is for a
21 series or one of a movie or single show.
22 So I think the determination there, we looked

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1 at the Game of Thrones example, that you're determining
2 now it's a series, the Game of Thrones was an example
3 of a series given in the specification.
4 And then I think it would, if one had
5 selected a movie, the detail view would be -- a movie
6 detail view would be one example a person of ordinary
7 skill in the art would understand would be in the scope
8 of a detail view.
9 So long as the detail view presents
10 information about a selected item of the VOD content.
11 So as long as it presented information about
12 the movie selected, and met in all other respects the
13 elements of Claim 2 with respect to detail view, then
14 it would be understood that that's the detail view
15 example.
16 Q. Yeah, that's exactly what I was asking for.
17 Starting at line 21, I just wanted to confirm
18 that your understanding of the third selection is a
19 binary selection. You only have two choices.
20 You're selecting either between -- you're
21 either selecting a series on one hand, or you're
22 selecting a movie or single show on the other hand,

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1 there's no third option?
2 MR. HWANG: Objection. Form.
3 THE WITNESS: If you're asking whether
4 providing one of the views comprises determining if the
5 selection in the collection view is for a series or a
6 movie or single show, I would say that part of the
7 claim lists those two.
8 But as long as that's met, even if there are
9 other possibilities, so long as that claim element is
10 met, it's met. So claims are not exclusive, unless I
11 understand that they specifically say that they're
12 exclusive of other steps or other options.
13 And this doesn't appear to exclude other
14 options, it simply describes a situation of determining
15 what the selection is and then providing a view --
16 providing a view of either a detail or digest comprises
17 determining if the selection in the collection view is
18 for a series or one of a movie or single show.
19 But I wouldn't call that claim language
20 exclusively binary to the exclusion of anything else.
21 Q. (BY MR. YANG) I'm asking about performing
22 this claim language. In order to perform the claim

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1 language, you make one of these two choices; right?
2 A. If there were --
3 MR. HWANG: Form. Sorry, just need to get my
4 objection. Objection. Form.
5 THE WITNESS: If there were a number of other
6 choices that led to other views, so long as providing
7 either a detail view or digest view of the VOD content
8 comprises determining whether the selection in the
9 collection view is for a series or one of a movie or
10 single show is met, it's met.
11 Regardless of how many other potential options
12 there might be and what views they lead to. Because
13 this is not excluding the possibility of other potential
14 views and other selection options.
15 Q. (BY MR. YANG) But you would agree that if
16 there were other selection options, that would --
17 identifying those selection options wouldn't meet this
18 claim language; right?
19 MR. HWANG: Objection. Form.
20 THE WITNESS: Yeah, but your question was
21 about whether there's only a binary choice. And my
22 point is that claim language is not exclusionary that I

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1 understand unless there's language to exclude.
2 That a system that includes other options that
3 lead to other views based on other selection types can
4 still meet this claim language.
5 But I don't think I -- you can look at what
6 I -- how I did this analysis in my declaration with
7 respect to this element, and I think I show how it's met
8 in the prior art.
9 Q. (BY MR. YANG) Okay. So I just want to
10 confirm. When you have a selection for a series, then
11 you're provided the digest view, not the detail view?
12 MR. HWANG: Objection. Form.
13 THE WITNESS: I don't think the last part of
14 that claim language says explicitly which view must be
15 shown for which collection, whether the collection view
16 is for a series or one of a movie or single show.
17 Q. (BY MR. YANG) Well, let me direct you to
18 line 27. On line 27 it says, providing either a detail
19 view or a digest view. You agree that either is not
20 both; right?
21 MR. HWANG: Objection. Form.
22 THE WITNESS: I don't think I provided a

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1 construction of this phrase that would be anything
2 other than plain, ordinary meaning, which is just what
3 it says.
4 Q. (BY MR. YANG) And you agree it says either
5 and doesn't say both; right?
6 A. It says either. The word is "either," not
7 "both."
8 Q. Okay. Let me direct your attention to
9 Claim 5. Let me know when you get to Claim 5.
10 A. Okay.
11 Q. You agree with that Claim 5 depends on
12 Claim 4; right?
13 A. Yes.
14 Q. And Claim 4 says, receiving a fourth
15 selection of an episode in the digest view.
16 Do you see that?
17 A. Yes.
18 Q. Because Claim 5 depends on Claim 4, would you
19 agree that the digest view in Claim 4 is a requirement
20 of Claim 5?
21 A. Well, all the requirements, that whole chain
22 of dependent claims down to the independent claim, are

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1 part of Claim 5.
2 Q. Okay. And then looking at Claim 5, does the
3 step of providing a player in Claim 5 have to occur
4 after the step of receiving a fifth selection?
5 MR. HWANG: Objection. Form.
6 THE WITNESS: My understanding of claim
7 ordering is that elements may be -- unless there's an
8 explicit or implied ordering based on responsiveness of
9 later elements to things that happened in earlier
10 elements, that the ordering is not required.
11 I'm not a lawyer, I'm not sure if I'm using
12 the right words there, but as I presented the analysis
13 with respect to the claim elements in 2, for the fourth
14 and fifth selections, I think they're -- I'm showing
15 that they're in the order of the claims anyway.
16 But I don't think I provided a position about
17 whether those are required to be in that order. But I
18 think if you look at the analysis, the steps as
19 disclosed in the prior art happen to be in that order.
20 Q. (BY MR. YANG) I'm just asking because I want
21 to nail down your construction so there's no issues
22 with the reply declaration.

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1 If I could direct you to line 60. It says,
2 in response to the fifth selection providing a player.
3 Do you see that?
4 A. Yes.
5 Q. So based on that language, wouldn't you agree
6 that providing a player happens after the fifth
7 selection?
8 MR. HWANG: Objection. Form.
9 THE WITNESS: I mean, in Element 5 for a
10 selection of -- the fifth selection, where the player
11 is now to present the movie or single show, that
12 providing a player would be in response to the fifth
13 selection.
14 In my understanding that's -- there would be a
15 required ordering, that is, there -- there has to be a
16 fifth selection before a player is provided.
17 Because the player provided to present the
18 movie or single show to the user is provided in response
19 to the fifth selection. So that's an example of what I
20 would say are required ordering of certain parts of the
21 claim as arranged.
22 And I think I've done the proper analysis to

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1 show that there's a fifth selection and there's a player
2 presented to play a movie in my analysis, because I
3 relied on the movie aspect of the prior art.
4 Q. (BY MR. YANG) Okay. I'd like to direct you
5 to line 55, with respect to Claim 4. Line 55 says, in
6 response to the fourth selection providing a player.
7 Wouldn't you agree based on that language
8 that providing a player in Claim 4 occurs after the
9 fourth selection?
10 MR. HWANG: Objection. Form.
11 THE WITNESS: Yeah, the claim language in
12 Claim 4 at line 55 is, in response to the fourth
13 selection providing a player to present the episode to
14 the user. That's the full claim language.
15 And that is another example of things that do
16 require an ordering and that there is a fourth selection
17 before there can be the player providing -- player
18 provided to present the episode to the user.
19 That would be after the fourth selection is
20 made because it has to be in response to the fourth
21 selection.
22 So that's another example of certain steps in

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1 the claim language requiring an ordering because of the
2 response nature to the fourth selection for providing a
3 player to present the episode to the user.
4 Q. (BY MR. YANG) Okay. And because Claim 5
5 depends on Claim 4, would you agree that the fifth
6 selection happens after the fourth selection?
7 MR. HWANG: Objection. Form.
8 THE WITNESS: So I'm not a lawyer, but my
9 understanding is the labels, first, second, third,
10 fourth, fifth, are the labels that are distinguishing
11 the selections from each other as a convenient way of
12 saying -- distinguishing the selections.
13 And just because Claim 5 occurs after Claim 4,
14 I don't see a requirement that a fifth selection occur
15 after the fourth selection.
16 Those are simply labels to distinguish
17 selections from each other, as opposed to what would be
18 understood as imposing an ordering on the elements.
19 Q. (BY MR. YANG) Okay. Would you agree the
20 fourth selection and fifth selection are different
21 selections?
22 A. Well, I think the reason that the -- that

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1 they're labeled, such as first selection, second
2 selection, third selection, fourth selection, fifth
3 selection, is to distinguish the selections from each
4 other as I just stated.
5 Q. I just want to confirm that the claims
6 require five selections, and the prior art that only
7 treated it as one selection wouldn't meet all five
8 selections; is that right?
9 A. I've shown where the prior art discloses all
10 five selections based on -- if you look in the
11 analysis, including meeting elements -- Claims 4 and 5.
12 So, I mean, I'm sure that I did the proper
13 analysis with respect to analysis of Claim 5, which is
14 dependent on 4, which is dependent on 3, which is
15 dependent on 1.
16 Q. Let me rephrase my question.
17 To satisfy the five selections, your analysis
18 has -- of the prior art has to identify five different
19 selections; is that right?
20 A. I believe I have properly identified all of
21 the required selections that show why Claim 5 is
22 disclosed by the prior art.

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1 Q. I'm not asking how many selections you
2 identified. I'm asking, in order to meet this claim
3 language, you have to identify five; right?
4 MR. HWANG: Objection. Form.
5 THE WITNESS: And I've shown how the claim
6 language meets -- the prior art meets and discloses and
7 renders obvious this claim, Claim 5, which has five
8 selections -- or has a first selection, a second
9 selection, a third selection, a fourth selection, and a
10 fifth selection.
11 Q. (BY MR. YANG) Okay. You said earlier that
12 you reviewed the institution decision. I just want to
13 confirm that; right?
14 A. Yes.
15 Q. The institution decision found that a digest
16 view is any view that presents information about a set
17 of the VOD content that are associated with a series.
18 Do you agree with that?
19 MR. HWANG: Objection. Form.
20 THE WITNESS: Can you point me to where that
21 statement is so I can see the exact language, please.
22 Q. (BY MR. YANG) I'm just asking, assuming the

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1 institution decision made that statement, do you agree
2 with it?
3 MR. HWANG: Objection. Form.
4 THE WITNESS: If you look at the claim
5 language of Claim 2, for example, line 25 through 27 of
6 Column 57, it says, wherein it requires, wherein the
7 digest view presents information about a set of the VOD
8 content that are associated with a series.
9 And I did find it in the institution decision
10 on page 27 at the bottom. It says -- oh, sorry, that's
11 what that Petitioner says. Hold on a second.
12 I don't see where the -- I might be missing it
13 just looking at the institution decision right now. But
14 I don't see where the PTAB laid out a construction.
15 It merely cited to Petitioner's arguments
16 about the presence of a digest view because it presents
17 information, and then sometimes there's examples given
18 about a set of VOD content that are associated with a
19 series. And instituted.
20 So I don't see right now, I'm looking at it,
21 that the PTAB said that on its own.
22 Q. (BY MR. YANG) Okay. Let me rephrase my

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1 question.
2 Is a digest view any view that presents
3 information about a set of VOD content that are
4 associated with a series?
5 MR. HWANG: Objection. Form.
6 THE WITNESS: Well, one of the requirements
7 imposed by, for example, Claim 2, is that the digest
8 view presents information about a set of the VOD
9 content that are associated with series.
10 But there are other limitations imposed on
11 digest view, such as when it's displayed. So the
12 claimed digest view has to meet all the requirements of
13 the claims imposed, for example, in Claim 2, on the
14 digest view.
15 So long as a digest view meets all of those
16 requirements it would be a claimed digest view.
17 Q. (BY MR. YANG) Okay. Can a view that has
18 information about a set of VOD content associated with
19 a series, but also having other information, still be
20 the claimed digest view?
21 A. My understanding is limitations are not
22 exclusive of other additional things unless there isn't

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1 express exclusion somehow with a negative limitation.
2 And it's -- the -- one portion I think you're
3 referring to of other connect to the digest view is
4 simply that it presents information about a set of the
5 VOD content that are associated with a series.
6 And it doesn't -- it's not to the exclusion
7 of any other possible information, as recited in the
8 claim element, for example, in Claim 2 at lines 25
9 through 27 of Column 57.
10 Q. So you would agree that if I added other
11 information to a digest view it would still be a digest
12 view?
13 A. Claim language, as I understand it, is
14 permissive of additional things so long as -- and
15 they're met so long as they include at least the things
16 that are required and in the way arranged as required
17 by the claims.
18 Q. And I'd like to ask the same question about a
19 detail view. If I added other information to a detail
20 view, would it still be a detail view?
21 MR. HWANG: Objection. Form.
22 THE WITNESS: Well, one of the requirements

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1 around detail view, for example, in Claim 2, is found
2 in lines 57 -- Column 57, lines 34 and -- sorry, 23 to
3 25, wherein the detail view presents information about
4 a selected item of the VOD content.
5 And there's no further exclusionary language
6 that excludes any other possible information. So long
7 as it met that item and was arranged in a way that the
8 detail view met all the requirements of what is claimed,
9 then it would be a claimed detail view.
10 But the language is permissive about -- does
11 not exclude other potential information on the view, as
12 written in Claim 2.
13 Q. (BY MR. YANG) The claim says the master view
14 presents two or more collections of the VOD content
15 organized by a characteristic of the VOD content. If I
16 added other information to the master view, would it
17 still be a master view?
18 MR. HWANG: Objection. Form.
19 THE WITNESS: Well, I mean, one of the
20 requirements, say, for example, in Claim 2 for master
21 view, is found in Column 57, lines 13 through 15.
22 It does say, wherein the master view presents

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1 two or more collections of the VOD content organized by
2 a characteristic of the VOD content. There's no
3 exclusionary language there that limits it only to that
4 information and excludes any other possible information.
5 And as I understand it, claim language is
6 permissive in the sense that it doesn't restrict or
7 limit the master view to only this information and only
8 these things that are presented.
9 And so long as the master view meets all of
10 the elements of master view as claimed in Claim 2, and
11 is arranged in the way and appears where, you know, in
12 the situations that Claim 2 requires it to appear, and
13 be provided, then it would be a master view.
14 Even if there are other elements or the master
15 view appeared in other places that were not required by
16 the claims for it to appear, as long as it met what
17 already exists in the claim language.
18 As I understand it, I'm not an attorney, but
19 the claim language permissive unless there's
20 exclusionary language.
21 And there can be additional steps in the
22 method claim as practiced, there can be additional

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1 components and apparatus, and there can be additional
2 information where it claims to have some set of
3 information in a view.
4 Q. (BY MR. YANG) Okay.
5 Can we take a brief break until 2:00 P.M.?
6 A. Sure.
7 MR. YANG: Okay. Thank you.
8 (Off the record.)
9 Q. (BY MR. YANG) Dr. Houh, did you speak with
10 anyone about this IPR while we were on break?
11 A. No.
12 Q. Okay. Could I direct your attention to your
13 declaration. And let me know when you get to page 49.
14 A. Okay.
15 Q. In paragraph 133, do you see Figure 19 of
16 Kim?
17 A. Yes.
18 Q. In Figure 19 of Kim, do you know what
19 Item 1342 is?
20 MR. HWANG: I'm sorry, I was looking at page
21 numbers. What was the question again?
22 Q. (BY MR. YANG) Looking at paragraph 133 of

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1 the declaration, where it reproduces Figure 19 of Kim,
2 what is Item 1342?
3 A. One description of what 1342 is in
4 publication, is if you look in paragraph 205, it says
5 that this Card Object 1340 may include a card object
6 name, 1342, in paren, channel browser, and a thumbnail
7 list of broadcast channels, 1345.
8 Elsewhere it also uses the label 1342 in
9 other paragraphs within Kim to talk about hidden
10 objects, hidden thumbnail images or partially displayed
11 objects.
12 But at least the discussion 205 is consistent
13 with the figure on that page in my declaration, which
14 is 1342 pointing to this little text object that says
15 channel browser.
16 Q. Okay. And can you describe what Item 1362
17 is?
18 A. Look at paragraph 208 of Kim.
19 It talks about how the Card Object 1360,
20 which represents a reserved, in paren, e.g., a
21 scheduled recording, close paren, or recorded program
22 list may include a card object named 1362, in paren,

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1 reservation/rec, close paren, and a Scheduled or
2 Recorded Program List 1365.
3 So that's what Kim has to say about 1362,
4 calling it a card object name, and in this example, in
5 the title of Figure 19, is reservation/rec.
6 Q. And paragraph 208 says that that's a reserved
7 recorded program list; is that right?
8 A. Not 1362 strictly, but it's the Object 1360
9 represents a reserved or recorded program list and may
10 include a card object name and a Scheduled or Recorded
11 Program List 1365.
12 Q. Can a reserved or recorded program list be
13 considered a collection of VOD content?
14 MR. HWANG: Objection. Form.
15 THE WITNESS: I think my report will stand
16 for itself. I don't think I mapped that category for
17 the card in Kim, under reservation or rec. Was that
18 the right language? Yeah. To the challenged claims.
19 I think I relied on other mappings in the combination.
20 Q. (BY MR. YANG) So is it fair to say that you
21 have no opinion of whether a recorded program list can
22 be a collection of VOD content?

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1 A. Well, in my declaration I don't think I
2 mapped that collection of recorded content to the
3 claims in supporting my obviousness positions. If I'm
4 wrong and I do, you can point me there and I can look
5 at it, but I didn't see that just now.
6 Q. My question wasn't whether you mapped it.
7 My question was, do you have an opinion on
8 it?
9 A. My written opinions are contained in my
10 report. I don't think I did that mapping in my report
11 of the recorded content to the -- to categories in the
12 challenged claims.
13 Q. Okay. Let's turn to page 50 of your
14 declaration then, specifically, paragraph 135.
15 A. Okay. I'm there.
16 Q. Is it your testimony that the image in
17 paragraph 135 is a master view?
18 MR. HWANG: Objection. Form.
19 THE WITNESS: On page 50, that is not what
20 I'm mapping to a master view. That's what I'm mapping
21 to, say, for example, clicking on the Netflix icon
22 would be the -- would be a first selection.

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1 If you go down to page 52, at the top, the
2 right-hand image is one example of what a person of
3 ordinary skill would have considered a master view. The
4 right-hand image that comes from Exhibit 1011 at time
5 32 seconds.
6 Q. (BY MR. YANG) Okay. Thanks for pointing me
7 there. That was going to be my next question.
8 On page 52 at the top where it has those two
9 screenshots, what's the relationship between the screen
10 on the left and the screen on the right?
11 A. So I think the problem is that these images
12 got separated from the descriptions. If you look at
13 paragraph 138 on the previous page.
14 It says, similarly, in TechnoBuffalo clicking
15 on Netflix from the global menu, below left, would have
16 resulted in Netflix master view being displayed, below
17 right.
18 So the relationship would be that there's a
19 little Netflix icon you can see on the lower left
20 within the annotated rectangle that I put there.
21 Clicking on that would result in Netflix master view
22 being displayed, and that's the screen on the right.

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1 Q. Okay. Can I direct you then to page 54.
2 A. Okay.
3 Q. And there's another screen at the top of
4 page 54.
5 Do you see that?
6 A. Yes.
7 Q. How would you get to that the screen from the
8 two previous screens?
9 MR. HWANG: Objection. Form.
10 THE WITNESS: That screen is actually the
11 same as the right-hand screen. It's from Exhibit 1011
12 at 32 seconds.
13 The way you get to this screen, as I say in
14 paragraph 138, is that from the screen on the left,
15 above, on page 52, Exhibit 1010, if you clicked on that
16 Netflix icon in that menu in the rectangle in their
17 annotation, that would bring up -- that would have
18 resulted in Netflix master view being displayed.
19 And that's what was on the right of the dual
20 image figure. And that's the same as what's at the top
21 of 54, from Exhibit 1011 at time 32 seconds.
22 Q. (BY MR. YANG) Okay. At the bottom of

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1 page 54 in paragraph 146 there is another screen.
2 Do you see that?
3 A. Yes.
4 Q. How do you get to that screen from the two
5 screens on page -- on the top of page 52?
6 MR. HWANG: Objection. Form.
7 THE WITNESS: I'm pointing to Missing Remote
8 for disclosure of the first selection, which is in
9 response for -- I think that's -- get the language
10 right. Providing by the processor master view of the
11 VOD content from Claim 1.
12 I'm simply showing an example from
13 Missing Remote of the master view. But in combination
14 it's just simply showing another example of a master
15 view.
16 And I don't explicitly say how in
17 Missing Remote what that is providing in response to for
18 Missing Remote, but the analysis with respect to the
19 combination of a number of different references that I
20 render that challenge claims obvious.
21 Q. (BY MR. YANG) Okay. Can I direct your
22 attention to pages 60 and 63 of your declaration. On

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1 page 60 there is, in paragraph 160, a screenshot.
2 Do you see that?
3 A. On page 60, screenshot?
4 Q. Right. On page 6-0 in paragraph 160, there
5 is a screenshot at the top of page 60.
6 Do you see that screenshot?
7 A. Yes, I do.
8 Q. And then on page 63, at the top of page 63,
9 there's another screenshot in paragraph 164.
10 Do you see that?
11 A. Yes.
12 Q. Can you describe the relationship between
13 these two screenshots. How do you get from the first
14 one to the second one?
15 A. So the figure on page 60, there is a way of
16 selecting, for example, The Office, which appears in
17 the top column, top row of -- the row of television --
18 images under television label. The second one over is
19 The Office.
20 And so, selecting The Office or another one,
21 in TechnoBuffalo's collection view, that would satisfy
22 the third selection for a VOD content limitation.

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1 And so if the third selection in
2 TechnoBuffalo 2 is for a TV series, The Office, then a
3 digest view is provided. And that's what at the top of
4 60 -- 62 is, at the end of paragraph 163.
5 So the relationship is that there is a view
6 at the top of page 60, whereby when you select
7 The Office then you're provided with the view at the
8 top of page 62.
9 Q. Looking at the screenshot in paragraph 164 at
10 the top of page 63. Let me know when you get there.
11 A. Could you repeat that, please.
12 Q. Sure. On page 63, 6-3, at the top of the
13 page, there's a screenshot that is in paragraph 164.
14 Do you see that?
15 A. Yes.
16 Q. And is it your testimony that this screenshot
17 is a digest view because it has information on all of
18 Season 2 of The Office?
19 A. So in paragraph 165 I say this is a digest
20 view because of the -- it presents information, e.g.,
21 year; rating; number of episodes, six; episode lengths,
22 about a set of VOD content, for example, episodes in

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1 Season 2, that are associated with a series, for
2 example, The Office.
3 And presenting either of these -- of the
4 digest views shown above in response to the third
5 selection, would have been obvious as mere design
6 choices of known UI presentations. And there's another
7 one at the top of page 62.
8 You're asking about the one at the top of
9 page 63; right? And that is shown, I think --
10 Oh, by the way, at the top of 63, it was an
11 alternative that would have been obvious in response to
12 the third selection. I'm not sure if I said that
13 earlier, but that's what it says at the bottom of
14 paragraph 164, before -- just before the figure.
15 So that was the relationship. It was an
16 obviousness position.
17 And either of the two screens, either the one
18 shown at the top of 62, or the one shown at top of 63,
19 would have been obvious to show, in response to the
20 third selection, as a mere design choice of known UI
21 presentations.
22 Q. And I'm trying to confirm that your testimony

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1 is that the screenshot on page 63 is a digest view; is
2 that right?
3 A. As I say in paragraph 165, this is a digest
4 view because it presents information, for example,
5 year; rating; number of episodes, six; episode lengths,
6 about a set of VOD content, e.g., episodes in Season 2
7 that are associated with the series, e.g. The Office.
8 Q. Okay. Looking at this screenshot on top of
9 page 63, would you agree that it also shows information
10 on a single episode of The Office, Episode 1?
11 A. Well, in addition to what's on this page up
12 here, which is in this Figure 2002, the rating; the
13 number of episodes, six. But the rating, which is NR.
14 Number of episodes and episode lengths, which you can
15 see the minutes next to each episode.
16 About that whole set of the VOD content,
17 which is at least six episodes within Season 2 that are
18 associated with The Office, there is additional
19 information under there that says Episode 1.
20 And provides, I think, a brief synopsis of
21 just Episode 1 as additional information, in addition
22 to the existing information that's there that presents

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1 information about a set of VOD content.
2 Q. That was actually going to be my next
3 question. On there, there's a description that starts,
4 on merger day, David prepares the troops in Slough for
5 the arrival of the Swindon branch, et cetera.
6 That is a description of Episode 1, not a
7 description of Series 2; is that right?
8 A. As I said, in addition to the information
9 about Series 2, which I think this must be the British
10 versions of The Office.
11 There's the year, a rating for the entire set
12 of VOD content associated with the series The Office,
13 the lengths for individual episodes. 1, 2, 3, 4, 5,
14 and 6, each have their own lengths.
15 There is this additional information
16 describing Episode 1, which appears to be a brief
17 synopsis of just Episode 1, which is in addition to the
18 information that's already there on this view that
19 includes information about a set of VOD content
20 associated with the series The Office.
21 Q. Would you agree that this additional
22 information of just Episode 1 also makes this screen a

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1 detail view?
2 MR. HWANG: Objection. Form.
3 THE WITNESS: I don't think in my analysis I
4 made the same screenshot to the detail view. I
5 provided other mappings to detail view.
6 If you look down starting around
7 paragraph 175, in my declaration, going through probably
8 end of that section, up to paragraph 176, for example.
9 Q. (BY MR. YANG) Okay. Do you have an opinion
10 of whether this screen on page 63 is a detail view or
11 not?
12 A. I'm not using the same screen as disclosure
13 of detail view in my analysis. As I pointed out,
14 that's later, and there are different screens that I
15 show that are detail views, and for the reasons that I
16 give in the section below.
17 Q. Well, my question is -- was slightly
18 different.
19 Have you considered whether the screen on
20 page 63 is a detail view?
21 MR. HWANG: Objection. Form.
22 THE WITNESS: In my declaration, I don't

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1 think I have mapped this to a detail view. There are
2 other screens that I've pointed to as the detail view.
3 So my written opinions I don't think map this to a
4 detail view.
5 Q. (BY MR. YANG) When you were drafting your
6 declaration, did you consider whether this screen was a
7 detail view?
8 MR. HWANG: Objection. Form.
9 THE WITNESS: This is the final version of my
10 declaration submitted. It's the only set of written
11 opinions I have on this case.
12 Q. (BY MR. YANG) I'm asking about the process
13 that led you to your conclusion. Did you consider
14 whether this screen was a detail view when you were
15 analyzing the prior art for your declaration?
16 MR. HWANG: Objection. Form.
17 THE WITNESS: In my written opinions in this
18 case, I don't present this screen as support for detail
19 view. There are other, different screens I point to
20 with respect to the detail view.
21 Q. (BY MR. YANG) That wasn't my question.
22 My question is, did you consider whether the

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1 screen is a detail view when forming your opinions for
2 this declaration?
3 MR. HWANG: Objection. Form.
4 THE WITNESS: I wouldn't remember everything
5 I considered in the process of this. All I know is
6 this is the final written declaration as submitted, and
7 in this declaration, I don't see that I cited this
8 screen as evidence of a detail view in the prior art.
9 Q. (BY MR. YANG) Okay. Let me direct your
10 attention to page 64.
11 A. Okay.
12 Q. In the middle of page 64, paragraph 167,
13 there are two screenshots.
14 Do you see those?
15 A. Yes.
16 Q. Did you consider whether the screenshot on
17 the left is a detail view when forming your opinions?
18 MR. HWANG: Objection. Form.
19 THE WITNESS: Look at page 70. I show those
20 same figures, Figures 11 and 12 at the top, and those
21 are the mappings where I say Hunt discloses two digest
22 view embodiments that are displayed in response to a

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1 selection for a series.
2 And then in paragraph 182 I say that Hunt --
3 in paragraph 182, I say that Hunt teaches that a
4 different detail view is displayed in response to a
5 selection for a movie. And those are different screens.
6 In this final written preparation my opinions
7 are I'm not using Figure 11 as support for a detail
8 view. I'm using it as support for a digest view.
9 And it's Figure 7 and 8 from Hunt that
10 disclose a detail view displayed in response to a
11 selection for a movie. That is, the selection on the
12 left, if you select a movie, Figure 8 is the resultant
13 detail view.
14 So that's the sequence of the selection. I
15 can't remember if that's the third selection. It's one
16 of the selections. Selecting secondhand lines, that big
17 icon, results in a detail view on the right.
18 Q. (BY MR. YANG) Let me clarify. I'm not
19 asking whether the screens in paragraph 167 are digest
20 views.
21 I'm asking, did you consider whether those
22 screens in paragraph 167 are detail views when forming

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1 your opinion?
2 MR. HWANG: Objection. Form.
3 THE WITNESS: I don't remember everything
4 that was considered, but these are my written
5 decisions -- written opinions that were submitted in
6 this declaration. These are my only written opinions
7 that I have submitted.
8 Q. (BY MR. YANG) Okay. Do you remember whether
9 you considered the screens in paragraph 167 to be
10 detail views? Do you have any recollection?
11 MR. HWANG: Objection. Form.
12 THE WITNESS: I don't remember everything I
13 considered. I don't have -- this was almost a year ago
14 that I submitted this, so I don't remember everything I
15 thought about back then.
16 But these are my written opinions and they're
17 contained in this one declaration.
18 Q. (BY MR. YANG) Okay. Let me direct you to
19 paragraph 170 on page 65.
20 A. Okay.
21 Q. When forming your opinions, did you consider
22 whether the screenshot in paragraph 170 is a detail

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1 view?
2 MR. HWANG: Objection. Form.
3 THE WITNESS: I don't remember everything I
4 considered, and these are my final and only written
5 opinions in this case, where I map the screenshot to
6 the digest view.
7 Q. (BY MR. YANG) Is it fair to say that you
8 have no memory of whether you considered whether this
9 is a detail view?
10 MR. HWANG: Objection. Form.
11 THE WITNESS: This goes back to early last
12 year that I worked on this. I certainly wouldn't have
13 memories of thought processes leading up to written
14 opinions. That's why they're put on paper and
15 submitted in written form as the declaration in this
16 case.
17 These are the only written opinions that I
18 have submitted in this IPR.
19 Q. (BY MR. YANG) Let me direct you to page 69.
20 A. Oh, by the way, at some point can we take a
21 little break?
22 Q. Yeah. Let me ask two questions about page 69

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1 and we can take a break.
2 A. Okay. Thank you.
3 Okay. I'm on page 69.
4 Q. Okay. Looking at the first screenshot at the
5 top of page 69, do you have any opinion whether this
6 screenshot is a detail view?
7 MR. HWANG: Objection. Form.
8 THE WITNESS: This is the same screenshot as
9 on top of page 63, which I think we've already talked
10 about. And so it's the same answer, which is really, I
11 mapped this screenshot and this screen to a digest
12 view.
13 These are my only written opinions in this
14 case, in this declaration. I would not have a
15 recollection of any thought processes. It was almost a
16 year ago that I worked on this.
17 Q. (BY MR. YANG) Okay. My final question
18 before the break, looking at the bottom of page 169,
19 paragraph 180, do you have any opinion of whether this
20 screenshot is a detail view?
21 MR. HWANG: Objection. Form.
22 THE WITNESS: Again, the exact same

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1 screenshot from one minute, 54 seconds of Exhibit 1018.
2 We talked about this exact same screenshot that
3 appeared on a different page. Be really the same
4 answer I gave earlier.
5 Q. (BY MR. YANG) Okay.
6 Let's take a break. Can we get back at 3:05?
7 A. Sure.
8 (Off the record.)
9 Q. (BY MR. YANG) Dr. Houh, can I direct your
10 attention to page 84 of your declaration, and let me
11 know when you're there.
12 A. I'm there now.
13 Q. Looking at paragraph 218 on page 84, there
14 are two figures from Hunt.
15 Do you see those?
16 A. Yes.
17 Q. And looking specifically at Figure 8 on the
18 right, does Figure 8 show a player?
19 A. This is not the screen I'm mapping to the
20 player element. This is a presentation of a detail in
21 response to a third selection as taught by Hunt.
22 So there is a button labeled 808 that says

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1 play, but that would cause the movie to play because of
2 the ultimate desire of a user is to watch VOD content.
3 And then in response to the fifth selection
4 it would have been obvious to provide a player, for
5 example, one shown in Exhibit 1011 at one minute, nine
6 seconds, to present the movie to the user, as taught by
7 TechnoBuffalo.
8 I'm not relying on this image from Hunt to
9 show evidence of a player. This is evidence of
10 presenting, that it would have been obvious to present
11 a detail view in response to a third selection as
12 taught by Hunt.
13 Q. Your testimony is that the player will
14 only -- will appear after pressing the play button in
15 Figure 8; is that right?
16 A. It's my testimony that a POSITA would have
17 understood that receiving a fifth selection of a UI
18 device, which is the selection of the play button in
19 Figure 8, that is the one we're looking at, would have
20 caused the movie to play. Because the ultimate desire
21 of a user is to watch VOD content.
22 And that in response to the fifth selection,

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1 which is the user selecting the play button, it would
2 have been obvious to provide a player, such as one
3 shown in, for example, Exhibit 1011 at one minute, nine
4 seconds, to present the movie to the user as taught by
5 TechnoBuffalo.
6 Q. Okay. Let me direct you to page 112, and let
7 me know when you get there.
8 A. Okay, I'm there.
9 Q. Okay. So on page 112, I think you'll see
10 paragraph 288. And in paragraph 288, there is a figure
11 from Ma.
12 Do you see that?
13 A. Yes, I do.
14 Q. Okay. Did you consider whether this
15 screenshot in paragraph 288 is a detail view when
16 forming your opinions?
17 MR. HWANG: Objection. Form.
18 THE WITNESS: In my written opinions in this
19 declaration, I only cite and use this Figure 5C from
20 Exhibit 1022 as evidence of a digest view. And again,
21 I don't remember everything I considered leading up to
22 the submission of this, of what I considered.

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1 But my ultimate opinions that were submitted
2 as written opinions in this case in this declaration,
3 are that Figure 5C discloses -- is mapping to a digest
4 view.
5 Q. (BY MR. YANG) So to be clear, you don't
6 remember forming an opinion that this figure in
7 paragraph 288 is a detail view; is that right?
8 A. There is no formed opinion in my written
9 declaration that this is a detail view. My opinion is
10 that this maps only to a digest view.
11 MR. YANG: I have no further questions, thank
12 you.
13 MR. HWANG: I have nothing further. We can
14 stop there then.
15 THE REPORTER: Counsel, do you want a copy of
16 the transcript?
17 MR. HWANG: Yeah, but not rushed, and I don't
18 need a rough or anything. Just in regular, like in a
19 regular time frame.
20 MR. YANG: I would like a rough. I'd like a
21 rough and get it by February 7, if possible.
22 (Whereupon, the deposition adjourned at 3:14 P.M.)

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1 --oOo--
2 I declare under penalty of perjury that the
3 foregoing is true and correct. Subscribed at
4 _____, this ____ day of
5 _____, 2025.
6
7
8 _____
9 HENRY HOUH
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1 CERTIFICATE OF REPORTER

2 I, BRANDON D. COMBS, a Certified Shorthand Reporter, hereby certify:
3 That HENRY HOUH, the witness whose deposition is hereinbefore set forth, was duly sworn by me before
4 the commencement of such deposition and that such deposition was taken before me and is a true record
5 of the testimony given by such witness.
I further certify that the adverse party,
6 VIZIO, INC., was represented by counsel at the deposition.
7 I further certify that the deposition of HENRY HOUH, occurred virtually on Friday, January
8 31, 2025, commencing at 10:04 AM to 3:14 PM.
I further certify that I am not related
9 to any of the parties to this action by blood or marriage, I am not employed by or an attorney to
10 any of the parties to this action, and that I am in no way interested, financially or otherwise, in
11 the outcome of this matter.
IN WITNESS WHEREOF, I have hereunto set
12 my hand this 6th day of February, 2025.

13

14 Brandon Combs

15 _____

16 BRANDON D. COMBS

17 RPR, Texas CSR 10927, California CSR 12978

18

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20

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22

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