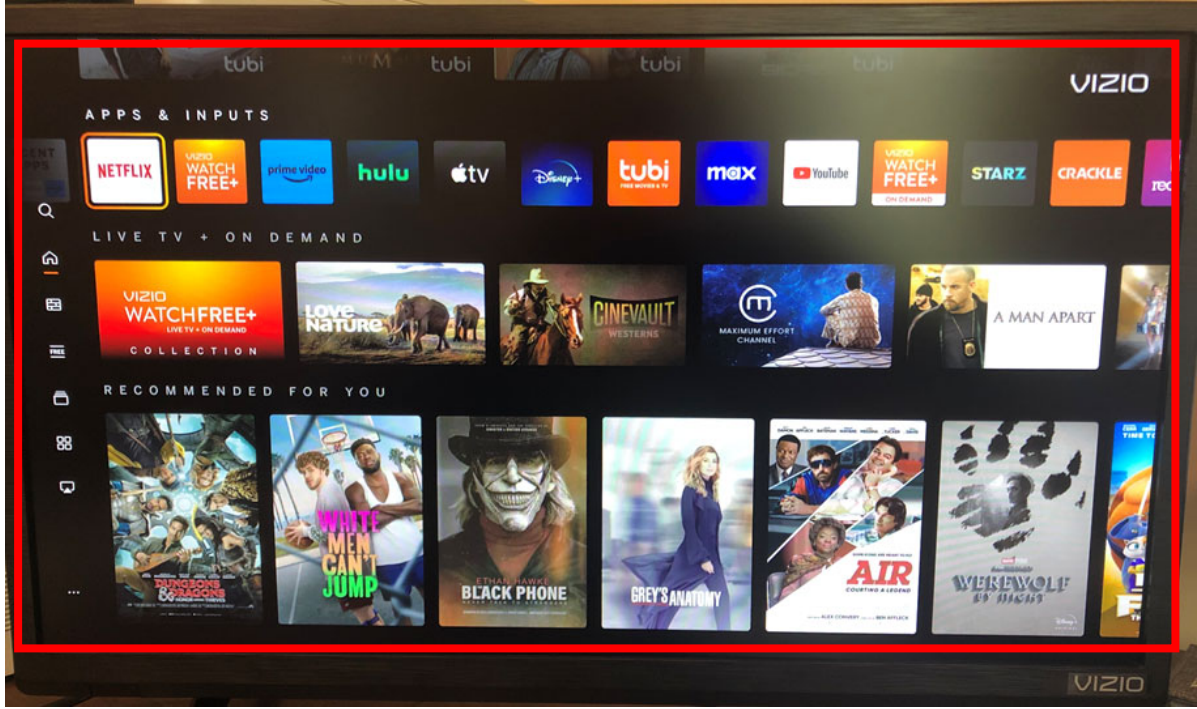


Appendix E: Claim Chart for U.S. Patent No. 9,578,384¹

Claim Number	Claim Language	
1[a]	A method for providing video-on-demand (VOD) in an intelligent television, the method comprising:	To the extent that the claim’s preamble is determined to be a limitation or otherwise limiting, Vizio and the Accused Instrumentalities perform the following steps.

¹ Pursuant to E.D. Tex. Patent Rule 3-1(c), this claim chart identifies where each element of the asserted claims of this patent is found within all models of Vizio’s currently offered lines of products—D-Series, V-Series, M-Series, P-Series, and OLED—as well as any previous versions or models of the currently offered lines of products and any other model of Vizio TV on which any version of Vizio’s SmartCast operating system SmartCast was installed (collectively, the “Accused Instrumentalities”). On information and belief, the operation of these devices with respect to these infringement contentions is substantially the same or identical, at least because each runs the Vizio SmartCast operating system—or a substantially similar predecessor or successor—which governs the functionality of these devices that is relevant to these infringement contentions. Thus, although this claim chart includes exemplary citations and images for particular devices running SmartCast, the explanations of how the Accused Instrumentalities meet each limitation of the claims charted herein are substantially the same or identical for each Vizio TV on which any version of Vizio’s SmartCast was installed, unless otherwise noted. Based on publicly available information, Multimedia expects discovery to confirm that all televisions on which Vizio’s SmartCast is installed will also infringe the asserted patent, at least due to its similarity to previous versions of SmartCast. In providing these contentions, Multimedia notes that the identification below of where each element of the asserted claims of this patent is found is exemplary; each element of the asserted claims of this patent can be found throughout the Accused Instrumentalities, and Multimedia expressly reserves the right to rely on such other applications, features of, and methods of using the Accused Instrumentalities, and on other facts adduced through discovery, in proving its case at trial. Additionally, some of the claim elements herein may be software limitations. Accordingly, Multimedia reserves the right to amend and/or supplement this claim chart after a complete production of the source code for the Accused Instrumentalities and after production of exemplary Accused Instrumentalities.

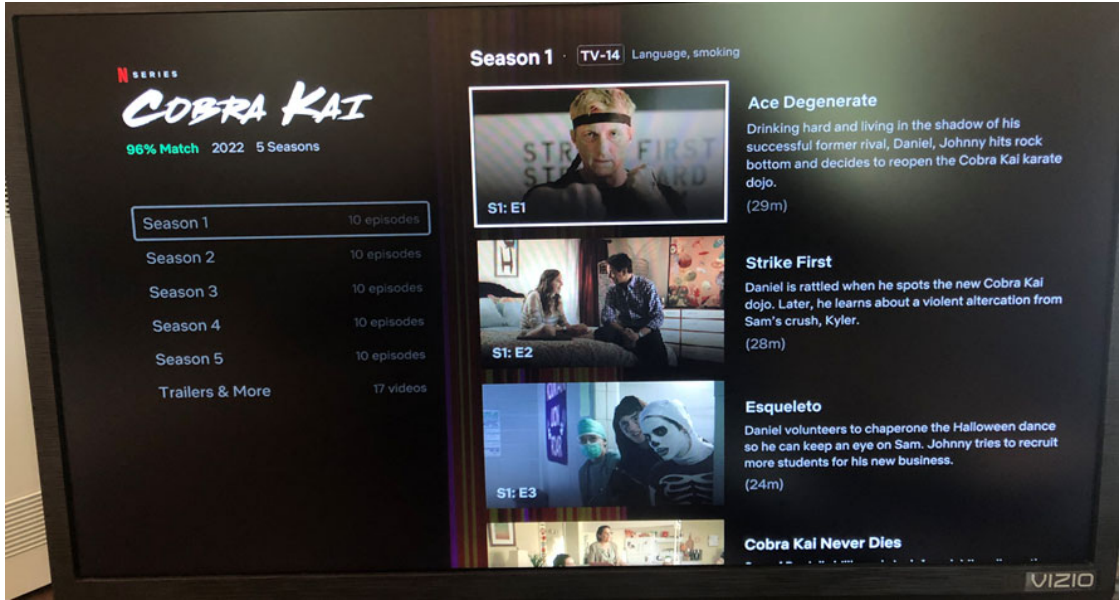
1[b]	receiving, by a processor of the intelligent television, a first selection for a VOD content;	The Accused Instrumentalities are capable of receiving, by a processor of the intelligent television, a first selection for a VOD content. For example, a user pressing the “Home” button on a remote control is a first selection for a VOD content, which calls up a global panel: 
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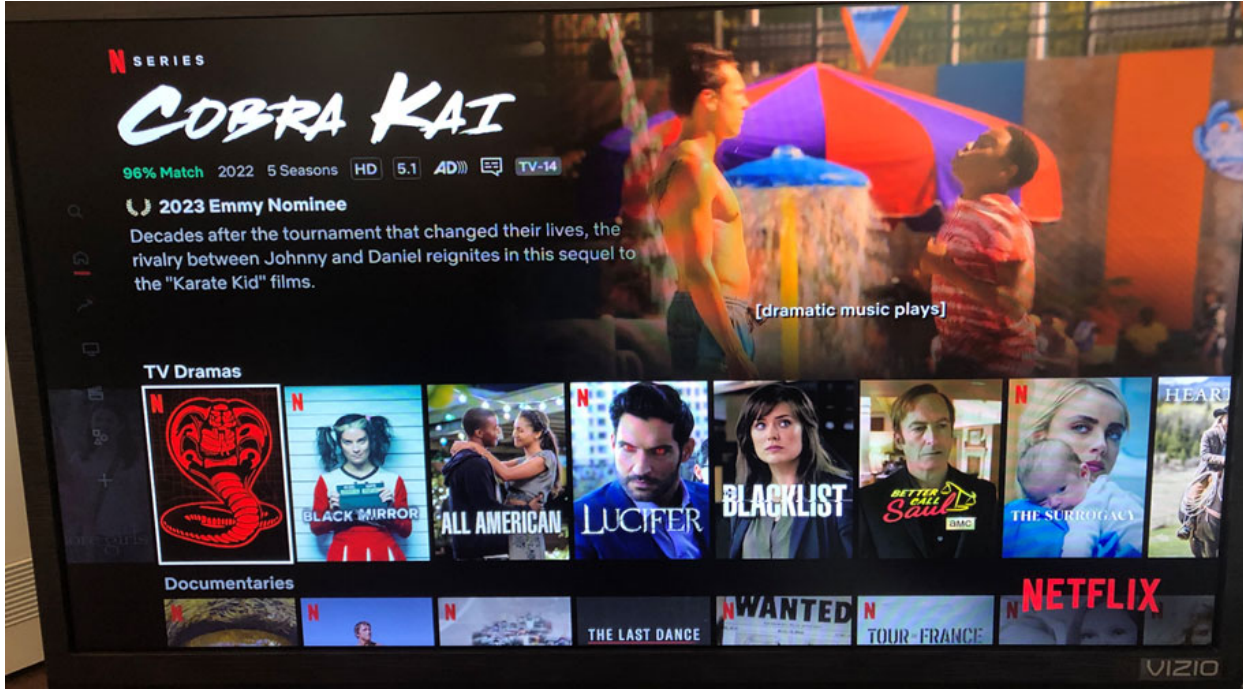
		In the alternative and as a second example, a user selecting the Netflix application (or Prime, Hulu, etc.) is a first selection for a VOD content: 
1[c]	in response to the first selection, providing, by the processor, a master view of the VOD content, wherein the master view presents two or more collections of the VOD content organized by a	The Accused Instrumentalities are capable of, in response to the first selection, providing, by the processor, a master view of the VOD content, wherein the master view presents two or more collections of the VOD content organized by a characteristic of the VOD content. In particular, the global panel comprises a “master view” with multiple collections of VOD (<i>e.g.</i>, Netflix, Prime, Hulu, etc.) organized by a characteristic of the VOD content—the service provider (<i>e.g.</i>, Netflix, Prime, Hulu, etc.) or “Recommended”. <i>See</i> Claim Limitation 1[b].

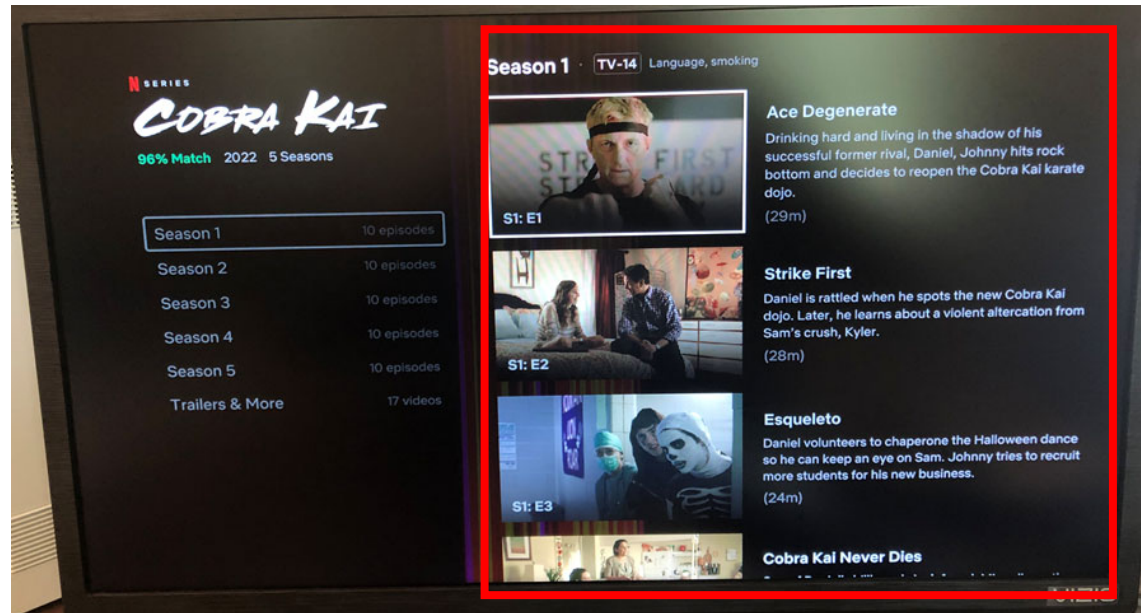
	characteristic of the VOD content;	In the alternative and as a second example, the Netflix interface comprises a “master view” with multiple collections of VOD accessible and organized by a characteristic of the VOD content—genre, type of media (TV or movie), etc.
1[d]	receiving, by the processor, a second selection for a VOD content;	The Accused Instrumentalities are capable of receiving, by the processor, a second selection for a VOD content. For example, a user selecting a given application (e.g., Netflix) comprises a second selection for VOD content that the Accused Instrumentalities are capable of receiving:  (Netflix selection) In the alternative and as a second example, a user selecting a genre, type of media (TV or movie), etc. within the App—accessible via the menu bar on the left of the screen—comprises a second selection for VOD content that the Accused Instrumentalities are capable of receiving.

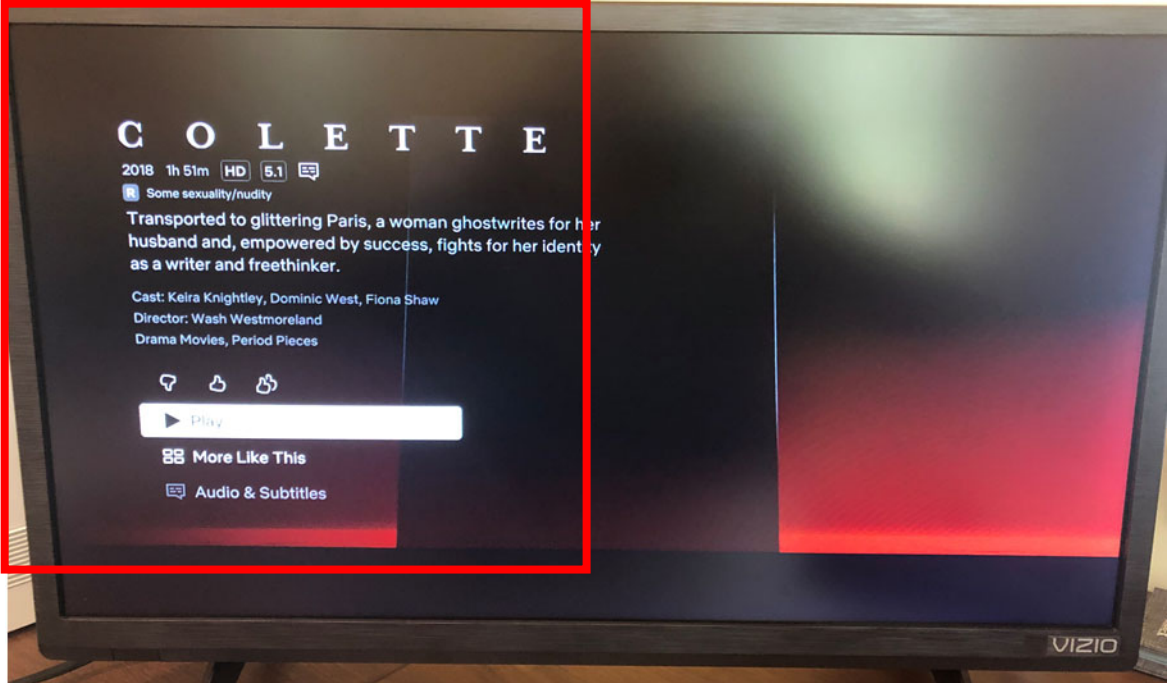
1[e]	in response to the second selection, providing, by the processor, a collection view of VOD content, wherein the collection view presents two or more items of the VOD content having the characteristic;	The Accused Instrumentalities are capable of, in response to the second selection, providing, by the processor, a collection view of VOD content, wherein the collection view presents two or more items of the VOD content having the characteristic. For example, as shown above, in response to the second selection the Vizio Smart TV provides a collection view of the VOD content, including multiple items of VOD content offered that service provider. <i>See</i> Claim Limitation 1[d].
1[f]	receiving, by the processor, a third selection for a VOD content;	The Accused Instrumentalities are capable of receiving, by the processor, a third selection for a VOD content. For example, within the collection view, a user choosing the specific content comprises the third selection that the Accused Instrumentalities are capable of receiving.
1[g]	in response to the third selection, providing, by the processor, either a detail view or a digest view of VOD content, wherein the detail view presents information about a selected item of the VOD content, and wherein the digest view presents information about a set of the VOD content that are associated with a	The Accused Instrumentalities are capable of, in response to the third selection, providing, by the processor, either a detail view or a digest view of VOD content, wherein the detail view presents information about a selected item of the VOD content, and wherein the digest view presents information about a set of the VOD content that are associated with a series.

	series, wherein providing either a detail view or a digest view of the VOD content comprises:	For example, the Accused Instrumentalities provide either a detail view or a digest view of VOD content. For example, using Netflix, when a movie or singular show is selected, a detailed view is presented with information about the item: 
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		Alternatively, when a series is selected, a digest view is presented with information about the set of episodes: 
1[h]	determining, by the processor, if the selection in the collection view is for a series or one of a movie or single show;	The Accused Instrumentalities are capable of determining, by the processor, if the selection in the collection view is for a series or one of a movie or single show. For example, the differential presentations of information and hierarchical menus shown for detail views versus digest views shows that the processor is treating the two differentially depending on whether they are a series or a single show.

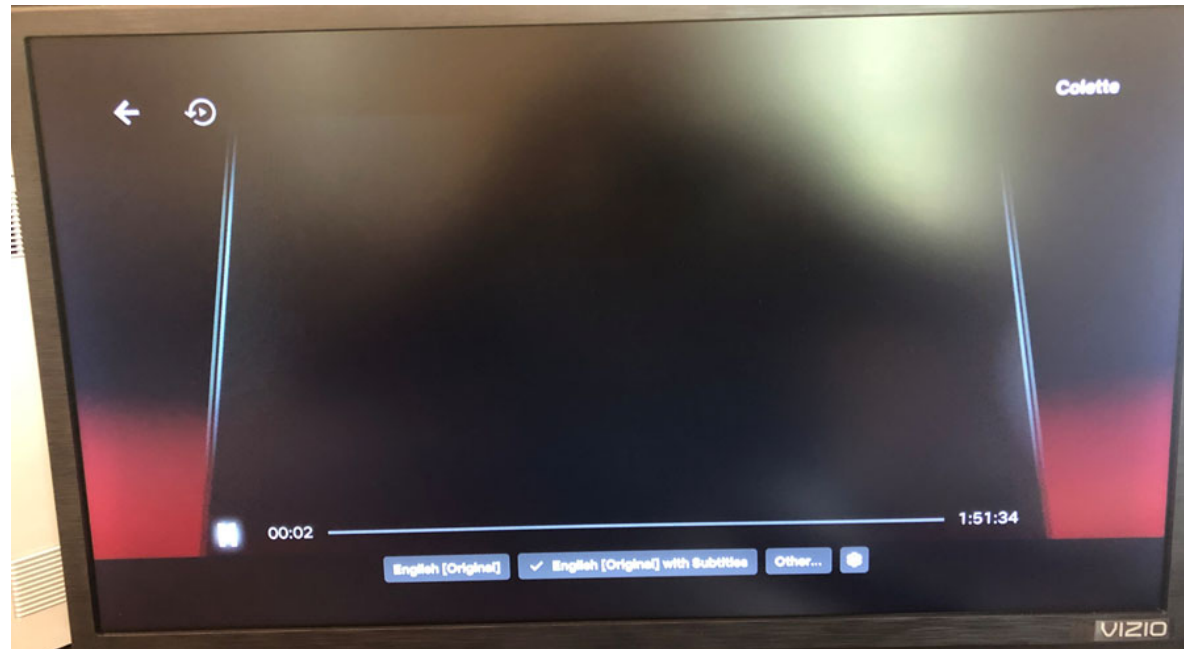
1[i]	if the selection in the collection view is for a series, providing, by the processor, the digest view; and	The Accused Instrumentalities are capable of, if the selection in the collection view is for a series, providing, by the processor, the digest view. For example, if the Accused Instrumentalities determine the selection in the collection view is for a series, it provides, by the processor, the digest view. For example, for a series in Netflix, the Accused Instrumentalities display the digest view: 
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1[j]	if the selection in the collection view is for one of a movie or single show, providing, by the processor, a detail view,	The Accused Instrumentalities are capable of, if the selection in the collection view is for one of a movie or single show, providing, by the processor, a detail view. For example, if the Accused Instrumentalities determine the selection in the collection view is for one of a movie or single show, providing, by the processor, a detail view. For example, for a movie in Netflix, the Accused Instrumentalities display the detail view: 
1[k]	wherein a navigation to view VOD content is an ordered set of user interfaces, and wherein the order includes a master	The Accused Instrumentalities are capable of, wherein a navigation to view VOD content is an ordered set of user interfaces, and wherein the order includes a master view at a top level, a collection view at a second level, displaying either a digest view or detail view at a third level, and a player view at a fourth and bottom level.

view at a top level, a collection view at a second level, either a digest view or detail view at a third level, and a player view at a fourth and bottom level.

For example, the VOD navigation view is an ordered set of interfaces, starting with the global panel (master view) then the collection view (e.g., Netflix, Prime or Hulu) then either a digest view or a detail view when specific content is selected, followed by a fourth level player view when the content is selected for playback:



(4th level player view for “Collette”)

As noted in footnote 1, *supra*, Multimedia contends, and expects that discovery will show, that other versions of SmartCast infringe Claim 1 (and all subsequent charted claims below) for substantially the same or identical reasons, at least because, as Multimedia expects discovery to show, the relevant functionality of each version of SmartCast is substantially the same or

		identical. ² For example, Accused Instrumentalities running other versions of SmartCast also have the Netflix, Prime, and other VOD applications pre-installed and have substantially the same or identical functionality as described above.
3	The method as defined in claim 1, wherein the digest view provides a listing of two or more episodes associated with the series.	The Accused Instrumentalities are capable of performing the method as defined in claim 1, wherein the digest view provides a listing of two or more episodes associated with the series. <i>See Claim 1[i].</i>
4[a]	The method as defined in claim 3, further comprising:	The Accused Instrumentalities are capable of performing the method as defined in claim 3. <i>See Claim 3.</i>
4[b]	receiving a fourth selection of an episode in the digest view; and	The Accused Instrumentalities are capable of receiving a fourth selection of an episode in the digest view. For example, when a user selects an episode in the digest view, as shown in Claim 1[i], the Accused Instrumentalities receive a fourth selection in accordance with this claim.
4[c]	in response to the fourth selection, providing a player to present the episode to the user.	The Accused Instrumentalities are capable of having, in response to the fourth selection, providing a player to present the episode to the user. For example, when a user selects an episode in the digest view, as shown in Claim 1[i], the Accused Instrumentalities play the episode in a provided player.

² Again, the identification herein of where each element of the asserted claims of this patent is found is exemplary; each element of the asserted claims of this patent can be found throughout the Accused Instrumentalities, and Multimedia expressly reserves the right to rely on such other applications, features of, and methods of using the Accused Instrumentalities, and on other facts adduced through discovery, in proving its case at trial.

6	The method as defined in claim 1, wherein a master view includes at least two user-selectable devices to view a collection view based on one of two or more criteria.	The Accused Instrumentalities are capable of having the method as defined in claim 1, wherein a master view includes at least two user-selectable devices to view a collection view based on one of two or more criteria. For example, as shown in Claim 1[c], the global panel provides user-selectable devices to access applications such as Netflix, Hulu, Prime, etc. so as to view a collection view based on criteria such as type of media and source. In the alternative, within the Netflix application, for example, the left menu provides user-selectable devices to view a collection view based on one of two or more criteria (e.g., TV or Movies). User-selectable devices are also available to view a collection view based on one of two or more criteria (e.g., “Cerebral Political TV Shows” or “Trending Now”). 
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7	The method as defined in claim 6, wherein the master view includes a navigation bar to select between types of content.	The Accused Instrumentalities are capable of having the method as defined in claim 6, wherein the master view includes a navigation bar to select between types of content. For example, as shown in Claim 1[c], the global panel provides navigation bar to select between content, such as Netflix, Prime, etc. In the alternative, within the Netflix application, for example, the left menu comprises a navigation bar to select between types of content, as does the navigation bar presenting media. <i>See Claim 6.</i>
8	The method as defined in claim 7, wherein the types of content include showcase content, movies content, television series content, or variety content.	The Accused Instrumentalities are capable of having the method as defined in claim 7, wherein the types of content include showcase content, movies content, television series content, or variety content. For example, as shown in Claim 1[c], the global panel provides content that includes at least television and movies content, via various applications such as Netflix, Prime, etc. In the alternative, the Netflix application provides at least television and movies content.

9	The method as defined in claim 8, wherein the master layout includes user-selectable devices for viewing a collection of content based on special topics, newest content, top watched content, recommended content, or favorites content.	The Accused Instrumentalities are capable of having the method as defined in claim 8, wherein the master layout includes user-selectable devices for viewing a collection of content based on special topics, newest content, top watched content, recommended content, or favorites content. For example, as shown in Claim 1[c], the global panel includes user-selectable devices for viewing a collection of content based on at least recommended content or favorites content, based at least on the organization of the applications and presentation of “Recommended For You” content. In the alternative, the Netflix application includes user-selectable devices for viewing a collection of content based on special topics, newest content, top watched content, recommended content, or favorites content. For example, Netflix includes “Trending Now” content: 
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