

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

STINGRAY GROUP INC. and STINGRAY MUSIC USA, INC.
Petitioners,

v.

EDWIN A. HERNANDEZ-MONDRAGON,
Patent Owner.

Case No. IPR2025-00349
U.S. Patent No. 10,123,074

PETITIONERS' REPLY TO PATENT OWNER RESPONSE

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PETITIONERS' EXHIBIT LIST

No.	Brief Description
1001	U.S. Patent No. 10,123,074
1002	Declaration of Mr. Stuart Lipoff
1003	U.S. Patent No. 8,954,600 to Avellan, et al. (“Avellan”)
1004	U.S. Patent No. 8,819,043 to Durante, et al. (“Durante”)
1005	U.S. Patent No. 9,635,075 to Ma, et al. (“Ma”)
1006	U.S. Patent No. 6,463,445 to Suzuki, et al. (“Suzuki”)
1007	U.S. Patent Application Publication No. 2004/0031052 to Wannamaker, et al. (“Wannamaker”)
1008	U.S. Patent No. 7,778,279 to Heikens, et al. (“Heikens”)
1009	U.S. Patent No. 9,264,750 to Matthews, et al. (“Matthews”)
1010	U.S. Patent No. 9,240,966 to Wilsher, et al. (“Wilsher”)
1011	File History of the '074 Patent
1012	Declaration of Michael D. McBride in Support of Petitioners' Notice of Intent to Designate Provisionally Recognized Attorney Michael D. McBride as Backup Counsel
1013	<i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , Case No. 1:24-cv-21226, Dkt. 190 (February 12, 2025, Order Denying Motion to Stay Pending IPRs)
1014	<i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , Case No. 1:24-cv-21226, Dkt. 202 (March 10, 2025, Order Denying Motion for Preliminary Injunction)
1015	April 9, 2025, correspondence from Plaintiffs' counsel serving Third Amended Complaint and dismissing Counts 8 and 9
1016	<i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , Case No. 1:24-cv-21226, Dkt. 82 (July 15, 2024, Plaintiffs' Second Amended Complaint)
1017	<i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , Case No. 1:24-cv-21226, Dkt. 207 (March 12, 2025, Order Denying Plaintiffs' Motion to Strike Reply Brief and <i>sua sponte</i> Order Cancelling Scheduled Markman Hearing)
1018	SDFL Trial Stats

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No.	Brief Description
1019	<i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , Case No. 1:24-cv-21226, Dkt. 214 (April 9, 2025, Plaintiffs' Third Amended Complaint)
1020	<i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , Case No. 1:24-cv-21226, Dkt. 214 (April 9, 2025, Plaintiffs' Exhibit 24 to Third Amended Complaint)
1021	<i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , Case No. 1:24-cv-21226, Dkt. 215 (April 11, 2025, Defendants Stingray Group, Inc.'s and Stingray Music USA, Inc.'s Stipulation Regarding the Defense of Patent Invalidity)
1022	April 11, 2025, correspondence from Defendants AT&T Enterprises, LLC, Blue Stream Communications, LLC, and Millicom International Service, LLC's counsel serving Plaintiffs' counsel with Stipulation Regarding the Defense of Patent Invalidity.
1023	<i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , Case No. 1:24-cv-21226, Dkt. 13 (May 7, 2024, Plaintiffs Filing of Proof of Service on Defendant Stingray Music USA, Inc.)
1024	<i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , Case No. 1:24-cv-21226, Dkt. 266 (May 28, 2025, Motion for Leave to Withdraw as Counsel for Plaintiffs Dr. Edwin A. Hernandez and Egla Corp.)
1025	<i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , Case No. 1:24-cv-21226, Dkt. 258 (May 20, 2025, Order Granting Joint Motion for Continuance of Certain Pre-Trial Deadlines)
1026	Omnibus Order Granting Plaintiffs' Motion for Leave to Withdraw and Staying Case, <i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , No. 1:24-cv-21226 (June 9, 2025) (Dkt. 291)
1027	Transcript of the Deposition Dr. Edwin Hernandez, IPR2025-00349, 350, 351, December 4, 2025
1028	<i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , Case No. 1:24-cv-21226, Dkt. 3-6 at 95-104 (April 3, 2024, Exhibit to Original Complaint, Letter from EGLA to Stingray Group dated April 20, 2021)
1029	<i>Edwin A. Hernandez, et al. v. Stingray Group Inc., et al.</i> , Case No. 1:24-cv-21226, Dkt. 333 (Aug. 6, 2025, Order on Defendants' Motion to Extend Stay)
1030	Borko Furht et al., Multimedia: Broadcasting over the Internet: Part II—Video Compression, <i>IEEE MultiMedia</i> Project Reports, 1991
1031	U.S. Patent No. 11,695,967 to Furht, et al.

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Listing of Challenged Claims

Element	Claim Language
Claim 1	
Preamble 1	A computer-implemented method comprising:
Element 1a	receiving, from a content provider, a request for at least one media stream for playback on a broadcast media channel, wherein the at least one media stream includes a plurality of multimedia items of different types;
Element 1b	obtaining content corresponding to the plurality of multimedia items from at least one source offering the content in at least one first format;
Element 1c	rendering a web page by a browser using the content;
Element 1d	generating a temporal sequence of screen captures of the rendered web page, where each screen capture defines all the content of the web page at a given time, and at least two adjacent screen captures illustrate a dynamic change of at least a portion of the content over time;
Element 1e	assembling the at least one media stream using the temporal sequence of screen captures; and
Element 1f	providing the at least one media stream to the content provider for broadcast on the broadcast media channel.
Claim 2	
Element 2a	The method of claim 1, wherein the obtaining comprises: retrieving, for each of the plurality of multimedia items, at least one audio file corresponding to an audio component of the multimedia item and a plurality of screen captures corresponding to a video component of the multimedia item.
Claim 3	
Element 3a	The method of claim 2, wherein the generating comprises: combining the plurality of screen captures and the at least one audio file to create each of the plurality of multimedia items.
Claim 4	
Element 4a	The method of claim 2, wherein the retrieving of the plurality of screen captures comprises obtaining the plurality of screen captures from a playback of a video on the at least one webpage.
Claim 5	
Element 5a	The method of claim 4, wherein the combining of the plurality of screen captures comprises metadata corresponding to at least one of

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Element	Claim Language
	a song title, an artist, and a music genre.
Claim 6	
Element 6a	The method of claim 1, further comprising: identifying the at least one webpage based on a channel identifier associated with the broadcast media channel.
Claim 7	
Element 7a	The method of claim 1, further comprising: querying the content provider to determine the second format, wherein the second format corresponds to a Moving Picture Experts Group (MPEG) format.
Claim 8	
Element 8a	The method of claim 3, further comprising: detecting a change at the at least one webpage corresponding to at least one of the plurality of multimedia items;
Element 8b	in response to detecting the change, retrieving a new plurality of screen captures from the at least one webpage for the at least one of the plurality of multimedia items; and
Element 8c	reassembling the at least one of the plurality of multimedia items using the new plurality of screen captures to yield an updated multimedia item.
Claim 9	
Element 9a	The method of claim 1, wherein the content provider is a cable television operator or a satellite television operator.
Claim 10	
Element 10a	The method of claim 1, wherein providing the at least one media stream to the content provider comprises streaming the at least one media stream to an MPEG multiplexer associated with the content provider.
Claim 11	
Element 11a	The method of claim 1, further comprising: provisioning, on at least one server, at least one virtual machine for performing the receiving, obtaining, generating, assembling, and providing.
Claim 12	
Preamble 12	A system comprising:
Element 12a	at least one processor;
Element 12b	a computer-readable storage medium having stored therein instructions which, when executed by the processor, cause the at least one processor to perform operations comprising:

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Element	Claim Language
Element 12c	receive, from a content provider, a request for at least one media stream for playback on a broadcast media channel, the at least one media stream including a plurality of multimedia items of different types
Element 12d	retrieve, from a cloud based service, multimedia content corresponding to the plurality of multimedia items, the multimedia content in a first format;
Element 12e	render a web page by a browser using the multimedia content;
Element 12f	generate a temporal sequence of screen captures of the rendered web page, where each screen capture defines all the content of the web page at a given time, and at least two adjacent screen captures illustrate a dynamic change of at least a portion of the content over time;
Element 12g	merge the temporal sequence screen captures with the at least one audio file to create the media stream; and
Element 12h	send the media stream to the content provider.
Claim 13	
Element 13a	The system of claim 12, further comprising: retrieve a video from the cloud based service, wherein the screen captures correspond to a plurality of static images obtained from the video.
Claim 14	
Element 14a	The system of claim 12, further comprising: select the multimedia content from the cloud based service based on a music genre associated with the broadcast media channel.
Claim 15	
Element 15a	The system of claim 12, wherein the request comprises a request for a plurality of multimedia streams for playback on a plurality of broadcast media channels.
Claim 16	
Element 16a	The system of claim 12, wherein the media stream is sent to a broadcast internet protocol (IP) address associated with the content provider.
Claim 17	
Preamble 17	A non-transitory computer-readable storage medium having stored therein instructions which, when executed by a processor, cause the processor to perform operations comprising:
Element 17a	receiving, from a content provider, a request for at least one media stream for playback on a broadcast media channel, wherein the at

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Element	Claim Language
	least one media stream includes a plurality of multimedia items of different types;
Element 17b	obtaining content corresponding to the plurality of multimedia items from at least one source offering the content in at least one first format;
Element 17c	rendering a web page by a browser using the content;
Element 17d	generating a sequence of screen captures of the rendered web page, where each screen capture defines all of the content of the web page at a given time, and at least two adjacent screen captures illustrate a dynamic change of at least a portion of the content over time;
Element 17e	assembling the at least one media stream using the sequence of screen captures; and
Element 17f	providing the at least one media stream to the content provider for broadcast on the broadcast media channel.
Claim 18	
Element 18a	The non-transitory computer-readable storage medium of claim 17, wherein the obtaining comprises retrieving, for each of the plurality of multimedia items, at least one audio file corresponding to an audio component of the multimedia item and a plurality of screen captures corresponding to a video component of the multimedia item; and
Element 18b	wherein the assembling comprises combining the plurality of screen captures and the at least one audio file.
Claim 19	
Element 19a	The non-transitory computer-readable storage medium of claim 17, wherein the at least one media stream corresponds to at least one of an HTTP live stream (HLS), an HTTP playlist, and a Real-time Streaming Transport (RTSP) stream.
Claim 20	
Element 20a	The non-transitory computer-readable storage medium of claim 17, storing additional instructions which, when executed by the processor, result in operations comprising: detect a network failure affecting connectivity with the at least one website; and
Element 20b	in response, provide a previously recorded media stream to the content provider
Claim 21	
Element 21a	The non-transitory computer-readable storage medium of claim 17, wherein assembling the at least one media stream comprises

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Element	Claim Language
	inserting at least one MPEG packet including metadata corresponding to the multimedia item.

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I. Introduction

The Stingray Petitioners submit this Reply to Patent Owner's Response, Paper 32 ("the POR"), regarding claims 1-21 ("the Challenged Claims") of U.S. Patent No. 10,123,074 ("the '074 Patent," Ex-1001).

II. The Board Should Give Patent Owner's Opinions Little or No Weight

In an attempt to stave off invalidation, the POR relies solely on an expert report authored by the Patent Owner himself, Dr. Edwin Hernandez. However, "[i]n assessing the probative value of an expert opinion, [the Board] must consider three factors: (1) the interest in the outcome of the case, (2) the presence or absence of factual support for the expert's opinion, and (3) the strength of any opposing evidence." *eBay Inc. et al v. Global Equity Mgmt. (SA) Pty. Ltd.*, No. 2016-01829, Paper 63 at 14 (PTAB April 19, 2018) (quoting *EC Data Sys., Inc. v. J2 Global, Inc.*, No. 2014-008203, 2014 WL 7171966, at *4 (PTAB Dec. 15, 2014)); *see also* 37 C.F.R. § 42.65(a) (holding that "[e]xpert testimony that does not disclose the underlying facts or data on which the opinion is based is entitled to little or no weight").

Dr. Hernandez is ***not*** an unbiased or independent expert. As the sole owner and named inventor of the '074 Patent, as well as the majority owner of exclusive licensee EGLA Corp., Dr. Hernandez has a direct financial stake in the outcome of

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this IPR and a substantial personal interest in preserving his own patents. *See* Ex-1027 at 5:11-16 and 236:15-22.

For example, prior to filing his underlying lawsuit, Dr. Hernandez sent Stingray a demand letter seeking \$25 million for a license to his Challenged Patents. Ex-1028 at 10. Since filing his lawsuit, that demand has now increased to over \$100 million for Stingray's alleged infringement. Given that the district court has stayed Dr. Hernandez's infringement claims pending this IPR, he knows that prevailing in this proceeding is a prerequisite to pursuing any patent royalties from Stingray. *See* Ex-1029 at 7. Dr. Hernandez also testified that he has been trying to monetize his Challenged Patents, including the '074 Patent, in negotiations with third parties, such as Google. Ex-1027 at 13:7-25. However, Dr. Hernandez conceded that those negotiations are currently "on hold" pending this IPR process, delaying what he believes could result in substantial royalties from licensing his Challenged Patents. Ex-1027 at 15:1-15 and 13:24-25.

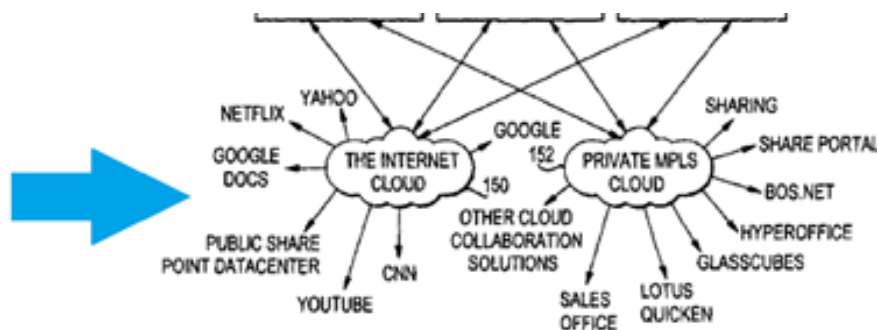
Accordingly, Dr. Hernandez's opinions should be given less weight than those of a *bona fide* independent expert. *See eBay Inc. et al*, No. 2016-01829, Paper 63 at 14-15 (PTAB 2018) (holding that because the expert is "the sole named inventor" and has a "personal and financial interest in the outcome of this case, we give his testimony less weight"). Indeed, the POR itself directly reflects Dr. Hernandez's substantial bias by: (1) repeatedly trying to rewrite the actual

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claim language to add new claim requirements that Dr. Hernandez contends are missing from a given reference, and/or (2) repeatedly ignoring a given reference's plain language and instead relying on Dr. Hernandez's conclusory assertions of what that reference does (or does not) disclose.

For example, one of Dr. Hernandez's primary arguments is that the cited Avellan reference is "specifically structured to **NOT** RENDER A WEB PAGE BY A BROWSER" (POR at 57, capitalization in original) despite Avellan's explicit disclosure of "remote browser 106," which can "render pages, images, and documents from the networks 150, 152." Ex-1003 at 4:62-65. Dr. Hernandez further asserts that Avellan is not capable of retrieving multimedia content "from a cloud based service" (POR at 35) despite Avellan's Figure 1 depicting the retrieval of such content from "Internet Cloud 150" and "Private MPLS Cloud 152."



Ex-1003 at Fig. 1. Similarly, despite Avellan explicitly stating that it can broadcast "live streaming television feeds" and other media (Ex-1003 at 8:18-21), Dr. Hernandez asserts that "there is no media stream" in Avellan. POR at 54.

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Given the plain disclosures of Avellan, these are not positions that a *bona fide* expert would reasonably take, and Dr. Hernandez’s combative responses during his deposition rebut any notion that he is a neutral or dispassionate expert. *See, e.g.*, Ex-1027 at 233:8 (telling Petitioners’ counsel that “all your questions are dumb”). Accordingly, his subjective opinions on what a reference discloses or a POSITA’s motivation or ability to combine any cited references should be given little or no weight, especially when they conflict with the actual disclosures and evidence. *See Mercedes-Benz USA, LLC v. Deadalus Prime LLC*, No. IPR2023-01335, 2025 WL 395548, at *9-10 (P.T.A.B. Feb. 4, 2025) (not crediting testimony that “makes an overly semantic argument” that “ignores the actual arrangement of components of the [challenged patent] and the prior art”); *see also TV Mgmt., Inc. v. Perdiemco LLC*, No. IPR2016-01278, 2017 WL 6418915, at *24 (PTAB Dec. 15, 2017) (finding that Patent Owner’s analysis “ignores critical portions of the record evidence” and affording their arguments “little weight”).

III. The Board Should Give Claim Terms Their Ordinary Meanings

Neither Petitioners nor the POR advance any specific claim constructions. As a result, Board should give the claim terms their ordinary and customary meaning as understood by a POSITA.

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IV. The Challenged Claims are Unpatentable

A. Ground 1: Claims 1-6, 8, 9, 12-15, 17, 18 and 20 are anticipated by Avellan.

a. Claim 1

Preamble 1

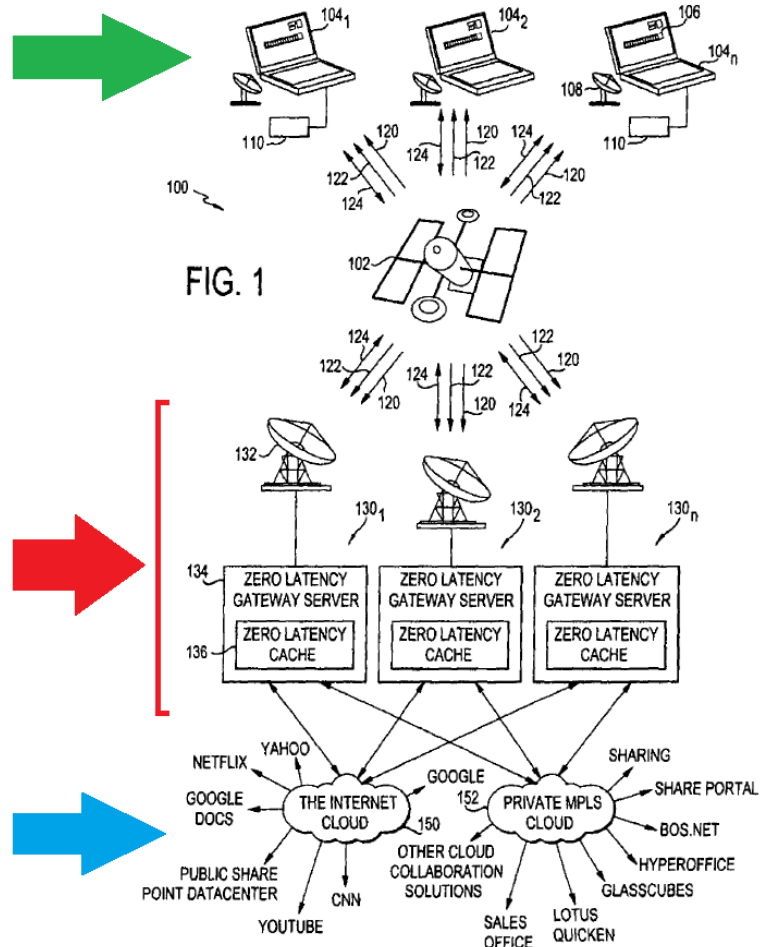
The POR does not dispute that Avellan discloses Preamble 1.

Element 1a

Referring to Figure 1 below, Avellan teaches that “the system 100 provides for the user computers 104₁-104_n [green arrow] to access the Internet 150 and/or private network cloud 152 [blue arrow] through a virtual browser 106 of the gateway 130 [red arrow].” Ex-1003 at 4:18-25 and 6:22-25. As disclosed by Avellan, “the browser software 106 resides at the gateway 134, and is configured to run as a virtual browser as a remote client of the gateway server 134.” Ex-1003 at 4:56-58. The browser “resolve[s] and render[s] pages, images, and documents from the networks 150, 152” and “[t]he gateway server 134 then images those web pages (which are typically in an HTTP format) to a video or image frame format.” Ex-1003 at 4:62-67 and 5:20-22 (stating that the gateway can “compress the data into a compressed digital video format that can be sent to the user computer 104 for display in the browser 106”).

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Ex-1003 at Fig. 1.

Avellan states that “suitable sites for the broadcast mode are news sites like CNN, BBC, newspaper, live streaming television feeds, movies, music downloads, or ESPN.” Ex-1003 at 8:18-21 and 8:27-31 (stating that “the broadcast channel can be configured here to receive live content”) Ex-1003 at 8:27-31. Similarly, Avellan discloses that the requested media stream can include a plurality of multimedia items of different types. Ex-1003 at 8:25-27 (stating that “there can be

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a number of broadcast channels and each channel can have a specific theme, such as country music, military television, etc.”).

Despite this disclosure, the POR asserts that Avellan does not disclose Element 1a because “Petitioners treat web pages as media streams.” POR at 25 and 26 (arguing that “a web page requested via HTTP format are not media streams”). The POR misunderstands the Petition and Avellan, which as detailed in the Petition for Elements 1a-1f discloses a method that can generate requested media streams—such as the aforementioned broadcast channels—using content obtained from the web. Indeed, the ’074 Patent itself discloses that “contents corresponding to the multimedia items can be retrieved, downloaded, or otherwise obtained from one or more websites . . .” Ex-1001 at 7:55-57. And according to the process described in Elements 1b-1e, the media stream itself is “assembled” in Element 1e from screen captures of a web page rendered using that content. As detailed in the Petition for those elements (and addressed below), Avellan discloses that exact same process for assembling the requested media stream.

Similarly, there is no requirement in the ’074 Patent that the request *originates* from the content provider. *See* POR at 25. Previously, the Board held that the plain language of Claim 1 “does not limit the requests origin in any way” and, as a result, preliminarily agreed with Petitioner that “gateway server 134 receives a request for a media stream for playback on a broadcast channel from

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broadcast device 102.” Paper 19 at 12-13. Patent Owner fails to provide any basis for requiring that the request originates at the content provider as opposed to merely being “receiv[ed] from” the content provider, as recited in the claim language. Given that the POR does not dispute that Avellan discloses a “broadcast transmitter/receiver” that receives a request for the generated media stream from broadcast device 102, the Board should maintain its original finding that Avellan discloses this element.

There is also no requirement in the claim that the plurality of multimedia items be “compressed” or “uncompressed” as alleged by the POR, and the POR does not even attempt to justify such a new claim requirement. *See* POR at 26. Similarly, the POR’s conclusory assertion that Avellan’s process of converting web content into media streams is “not enabled” (*see* POR at 26-27) completely ignores the disclosures of Avellan cited for Elements 1a-1f in the Petition.

Element 1b

In an attempt to distinguish Avellan, the POR asserts that “Element 1b is a *separate request* to the ‘web page’.” POR at 27 (emphasis added). Although unclear, Patent Owner appears to be arguing that Claim 1 requires two separate requests: (1) a first request to obtain content corresponding to a plurality of multimedia items; and (2) a second request to obtain content corresponding to a web page. *See* POR at 27-28. For example, during his deposition, Dr. Hernandez

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asserted that “the web page is one request separate from the obtaining request” and attempted to distinguish Avellan on the basis that it “can only retrieve items that are embedded as part of a web page only.” Ex-1027 at 90:21-92:5.

However, the plain language does not require two separate “requests” or “obtaining” steps or otherwise suggest that “content corresponding to the plurality of multimedia items” cannot be obtained from retrieval of a web page. As quoted above, the ’074 Patent itself discloses that “contents corresponding to the multimedia items can be retrieved, downloaded, or otherwise obtained from one or more websites . . .” Ex-1001 at 7:55-57. Instead, Patent Owner appears to confuse the relationship between Element 1b’s “obtaining content” and Element 1c’s “rendering a web page . . . using the content” by incorrectly suggesting that Element 1c *further requires* obtaining content separate from the content obtained in Element 1b. But Element 1c simply requires rendering a web page “using the content,” which under the principles of antecedent basis clearly refers to “the content” obtained in Element 1b. Because Avellan explicitly discloses obtaining “full multimedia web page[s],” including audio and video, Avellan discloses Element 1b. *See* Ex-1003 at 5:5-19.

Element 1c

Avellan states “browser software 106 resides at the gateway 134 and “may rely upon the computing power and very high-speed connection of the gateway

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server 134 to resolve and *render pages*, images, and documents from the networks 150, 152.” Ex-1003 at 4:56-65 (emphasis added). “The gateway server 134 then images those web pages (which are typically in an HTTP format) to a video or image frame format.” Ex-1003 at 4:65-67.

In light of this plain disclosure, Dr. Hernandez’s claim that “Avellan is specifically structured to **NOT** RENDER A WEB PAGE BY A BROWSER” (POR at 57, capitalization in original) defies logic. Avellan’s explicit reference to “browser”—a term already well-understood in the art to refer to applications that can render HTML—is accompanied by an explicit disclosure that this browser can “render pages” to produce “images” that can be “captured.” *See* Ex-1003 at 5:5-15. No *bona fide* expert could reasonably conclude that Avellan does not disclose Element 1c.

Element 1d

The POR does not actually dispute that Avellan discloses Element 1d. *See* POR at 29. As detailed in Avellan, the screen capture process “is preferably done by taking an image of the entire web page from top to bottom, including any portion that would normally be accessed by scrolling up/down or left/right but not immediately displayed on the screen because it is too long for a single screen.” Ex-1003 at 4:67-5:4. Avellan also teaches that “web pages often have information which is rendered over a period of time, such as a video, streaming information, or

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an animated display. Accordingly, the gateway server 134 *continuously captures images of the web page* until it detects a repeating pattern of the information in the web page.” Ex-1003 at 5:5-5:10 (emphasis added). Thus, for content that includes playback of video, streaming information or animations, Avellan generates a temporal sequence of screen captures that will illustrate a dynamic change of at least a portion of that content over time. Ex-1002, ¶111.

Instead, the POR simply asserts that this process “best provides ‘compressed video files’ not media streams” for purposes of Element 1e, which is addressed below. *See* POR at 29.

Element 1e

Following the screen capture process described above, Avellan teaches that it can then “compress the data into a *compressed digital video format* that can be sent to the user computer 104 for display in the browser 106.” Ex-1003 at 5:20-5:22 (emphasis added).

Although Avellan explicitly states that it can broadcast media such as “live streaming television feeds” (*see* Ex-1003 at 8:18-21), the POR nonetheless concludes that Avellan’s reference to a “compressed” video format inherently means generating a ZIP or TAR file that presumably cannot be streamed to a user. As asserted by Dr. Hernandez, “[t]here is a distinction on creating a ‘*compressed video file*’ that requires the use of ZIP or TAR files, as opposed to *encoding and*

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decoding of video frames,” such as through the MPEG standard. *See* Ex-2039, ¶126 (emphasis in original); *see also* Ex-1027 at 155:10-20 and 156:11-18.

But Avellan says nothing about requiring “ZIP” or “TAR” files and does not support Dr. Hernandez’s artificial distinction between generating a “compressed video format” and “encoding video.” Although Dr. Hernandez suggests that a POSITA would view “compressing” video as distinct from “encoding” video (*see* Ex-2039 at ¶117 and ¶126), this assertion defies the understanding of his *own* technical expert in the underlying litigation. In particular, Dr. Borko Furht of Florida Atlantic University—who is engaged by Patent Owner in the district court proceeding—has authored academic papers referring to “the MPEG *compression* standard” and has authored patents stating that “[a] video codec can include an electronic circuit or software that *compresses or decompresses* digital video.” *See* Ex-1030 and Ex-1031 at 1:23-24 (emphasis added); Ex-1027 at 39:18-21. Similarly, the POR’s own exhibits refer to “MPEG video compression” (Ex-2040 at Chapter 5) and “the processes of compression (encoding) and decompression (decoding)” of video data (Ex-2042 at 2). As a result, the POR has no basis to restrict Avellan’s reference to broadcasting “live streaming television feeds” using a “compressed digital video format” to merely sending ZIP or TAR “file snippets” that presumably would not satisfy the claimed “media stream.”

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Similarly, the '074 Patent also does not exclude the generation and storage of a “compressed video *file*” prior to broadcast. For example, Claim 20 recites providing a “previously recorded media stream” to the content provider, which would necessitate storage of that stream. Similarly, the '074 Patent recites embodiments where files are stored for subsequent streaming. Ex-1001 at 11:25-26 (disclosing a “caching server” from which “a file can then be streamed”) and 7:32-34 (“The output format can be an MPEG Transport Stream file that can be *retrievable* or streamed to the multicasting embodiment.”). As a result, the POR’s insinuation that generation of a compressed “file” is somehow incompatible with a “media stream” is contrary to the '074 Patent.

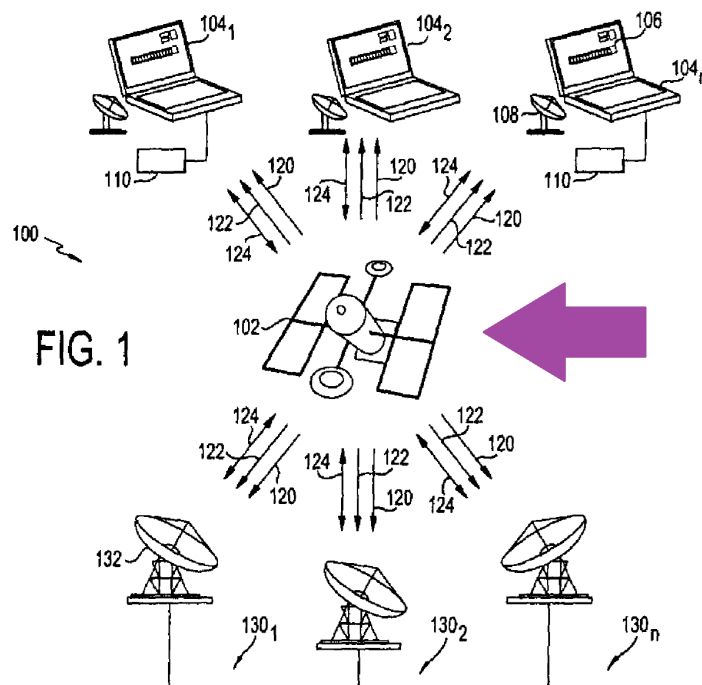
Element 1f

There is also no reasonable dispute that Avellan discloses providing the assembled media stream to the content provider for broadcast. Avellan states that once the video frame format is generated, it “sends it to the browser 106 via the satellite 102.” Ex-1003 at 5:12-5:15 and 8:54-56 (“Once the broadcast data is stored in the gateway cache 136, the gateway server 134 then transmits that data to the multiple user computers 104”). The POR does not dispute that this process involves providing the identified media stream to Avellan’s disclosed broadcast transmitter and device 102 for broadcast on the broadcast media channel.

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Instead, the POR suggests that the “content provider is the same as the gateway platform.” POR at 30. But this misunderstands Avellan and the Petition. The gateway platform 130 “includes a respective satellite antenna 132 or a broadcast transmitter/receiver, and a gateway server 134.” After the gateway server 134 assembles the identified media stream, Avellan uses the broadcast receiver/transmitter (i.e., satellite antenna 132) to transmit the media stream to satellite 102 of Figure 1 for broadcast.



Given that the '074 Patent explicitly states that a content provider can include a “satellite” operator (Ex-1001 at 1:18 and Claim 9), Avellan’s disclosure of using the broadcast receiver/transmitter (i.e., satellite antenna 132) to send the stream to satellite 102 for broadcast satisfies element 1f.

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b. Claim 2

Avellan states “gateway server 134 retrieves the desired data from the networks 150, 152, captures that data (*including audio*) to a video (or image) frame format, compresses that video data and stores the compressed video data in the gateway 130 at the cache 136.” Ex-1003 at 8:42-46 (emphasis added). Avellan further notes that it can “capture and transmit *images/audio of a web page, including a full multimedia web page*, regardless of its size or original format (e.g., HTTP).” Ex-1003 at 5:16-5:19. The POR’s conclusory claim that Avellan “simply returns video from the web captures” and not a “corresponding audio component” (POR at 31) is contradicted by the plain disclosure in Avellan.

c. Claim 3

Avellan states “gateway server 134 retrieves the desired data from the networks 150, 152, captures that data (including audio) to a video (or image) frame format.” Ex-1003 at 8:42-46. Avellan further states “suitable sites for the broadcast mode are news sites like CNN, BBC, newspaper, *live streaming television feeds, movies*, music downloads, or ESPN,” which a POSITA recognizes would include the combination of audio and visual data. Ex-1003 at 8:18-21 and Ex-1002, ¶112. Similarly, “there can be a number of broadcast channels and each channel can have a specific theme, such as country music, military television, etc.” Ex-1003 at 8:25-27.

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Although unclear, Dr. Hernandez states in his declaration that Avellan falls short of Element 3a because Avellan “cannot have ‘*one audio file*’ to create each of the plurality of multimedia items.” Ex.-2039 at ¶151 (emphasis added). Presumably, Dr. Hernandez is contending that Claim 3 requires multiple multimedia items to be created from a single audio file. However, the actual claim language recites “*at least* one audio file,” which would include using one or more audio files to create each of the plurality of multimedia items. As a result, Avellan discloses Claim 3.

d. Claim 4

Avellan teaches that “web pages often have information which is rendered over a period of time, *such as a video*, streaming information, or an animated display. Accordingly, the gateway server 134 *continuously captures images of the web page* until it detects a repeating pattern of the information in the web page.” Ex-1003 at 5:5-5:10. “Thus, gateway server 134 will be certain to capture all the information on the web page even if that information continues over a period of time.” Ex-1003 at 5:10-5:12 and 8:18-21 (stating that suitable content includes “live streaming television feeds [and] movies”). Given Avellan’s disclosure of capturing video information that “continues over a period of time” on a webpage, there is no reasonable dispute that the screen captures are obtained from the “playback” of video on the webpage.

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e. Claim 5

As stated in the Petition, a POSITA would understand that a music channel “such as country music”—as disclosed in Avellan—would include metadata corresponding at least to either the song title, the country music artist, or the music genre. Ex-1002, ¶113. The POR does not dispute this statement. Instead, the POR argues that this would not satisfy element 5a because it requires that “the information will be visible to a human eye.” POR at 33. However, the visibility of metadata to the human eye is not required by the claim language, and the ’074 Patent does not define “metadata” as visible data. Instead, the ’074 Patent discloses that “[i]n some instances, metadata can be added to the stream as an additional PID (Program Identifier) in the MPEG Transport Stream,” which means that the metadata would be used to identify packets in the transport stream and would not be visible to the human eye. Ex-1001 at 11:29-31.

f. Claim 6

The POR does not dispute that Avellan discloses Claim 6.

g. Claim 8

Element 8a

Avellan discloses that “the gateway server 134 can *continuously or periodically compare* the broadcast data stored in the cache 136 with the broadcast data at the networks 150, 152 and re-capture any broadcast data which is updated.”

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Ex-1003 at 8:65-9:3. In response, the POR and Dr. Hernandez repeat their argument for Element 1b that the claim language requires the “separate downloading” of the plurality of multimedia items. *See* Ex-2039 at ¶170. For the reasons above, however, this argument is without merit.

Element 8b

Despite the disclosures of Avellan cited in the Petition, the POR concludes that Element 8b is not met because “in Avellan, a song per web page is the only option.” POR at 34. Neither the POR nor Dr. Hernandez explain what this means or how this alleged statement relates to Element 8b. Instead, the POR simply suggests that the ’074 Patent allows that “the same song could be used as music for the old and new webpage.” POR at 34. But this is not required (or even mentioned) by the claim language, which says nothing about using “the same song” or a different song in the event a change in the webpage is detected.

Element 8c

For Element 8c, the POR and Dr. Hernandez appear to again repeat their argument for Element 1b that the claim language requires separately obtaining the plurality of multimedia items in a separate request or obtaining step. *See* POR at 34. For the reasons above, however, this argument is without merit.

h. Claim 9

The POR does not dispute that Avellan discloses Claim 9.

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i. Claim 12

Preamble 12 and Elements 12a and 12b

The POR does not dispute that Avellan discloses Preamble 12 and Elements 12a and 12b.

Element 12c

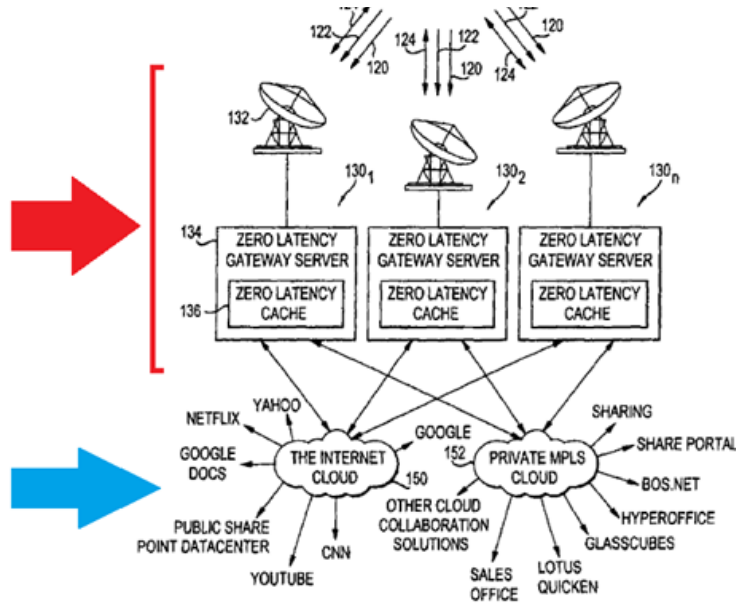
For Element 12c, the POR relies on its arguments for Element 1a. POR at 35. Accordingly, Avellan discloses Element 12c for the same reasons as above.

Element 12d

In addition to the prior arguments for Claim 1, the POR argues that “[t]he low bandwidth channel on Avellan’s satellite system simply makes it unpractical to ‘retrieve from a cloud based service, multimedia content.’” POR at 35 (stating that “Avellan can[not] suggest the use of a satellite link” to perform this retrieving step). However, Figure 1 of Avellan explicitly shows that the multimedia content is retrieved from a “cloud” based service (see blue arrow).

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Ex-1003 at Fig. 1 and 4:14-18.

Avellan retrieves the multimedia content from these clouds *prior* to Avellan providing any generated media stream to the broadcast transmitter/receiver of the satellite system. In other words, Avellan does not (necessarily) use the satellite link to access either clouds 150 or 152. But even assuming that Avellan accesses content purely through a satellite link, the claim language does not exclude use of satellite links and Avellan explicitly discloses retrieving content from cloud based services. In essence, Dr. Hernandez's argument is that Avellan does not disclose what it plainly discloses because he, personally, does not believe that it would work adequately for all web-based content. That is not the test for anticipation and does not nullify Avellan's disclosures.

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Element 12e

For Element 12c, the POR relies on its arguments for Element 1c. POR at 36. Accordingly, Avellan discloses Element 12e for the same reasons as above.

Element 12f

The POR does not dispute that Avellan discloses Element 12f.

Element 12g

For Element 12g, the POR relies on its arguments for Element 1f that Avellan does not disclose a media stream. POR at 36. Accordingly, Avellan discloses Element 12g for the same reasons as above.

Element 12h

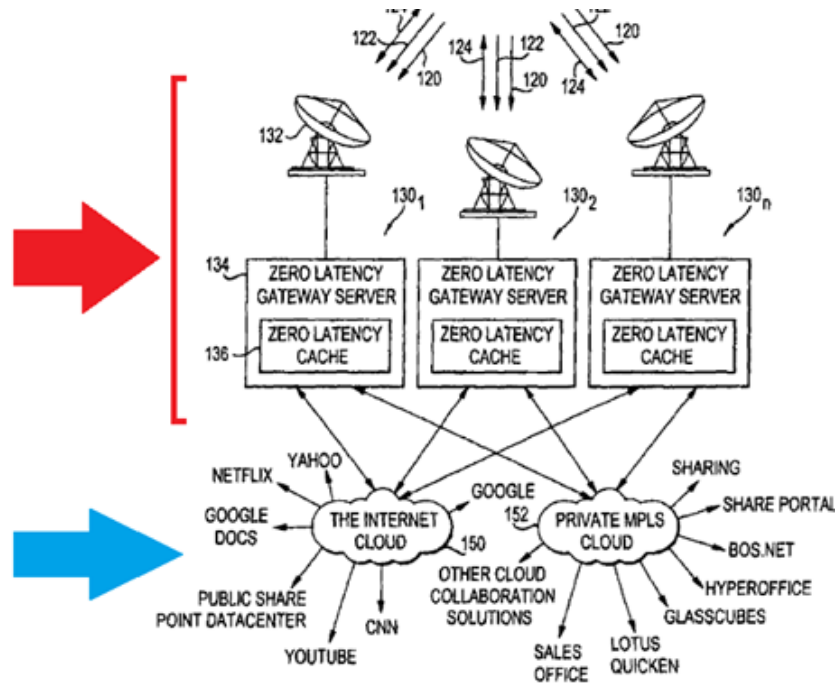
To the extent the POR disputes Element 12h, this appears to be the same argument made for Element 1f. POR at 36.

j. Claim 13

Avellan states “gateway server 134 retrieves the desired data from the networks 150, 152” and that “suitable sites for the broadcast mode are news sites like CNN, BBC, newspaper, live streaming television feeds, movies, music downloads, or ESPN.” Ex-1003 at 8:42-46; 8:18-21; and Fig. 1 (showing, for example, “YouTube” and “Netflix” as cloud-based sources of video data).

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Ex-1003 at Fig. 1. Additionally, Avellan discloses that the screen captures are static images obtained from the video. Avellan teaches that “web pages often have information which is rendered over a period of time, such as a video, streaming information, or an animated display. Accordingly, the gateway server 134 *continuously captures images of the web page* until it detects a repeating pattern of the information in the web page.” Ex-1003 at 5:5-5:10.

The POR’s assertion that “Avellan cannot provide a way to retrieve a video . . . or show how to obtain images from the video” (POR at 37) ignores Avellan’s clear disclosure. Similarly, Dr. Hernandez’s claim that “[t]his dependent claim involves the *video on its own*, not a web page” has no support in the claim language or specification. See Ex-2039 at ¶189 (emphasis in original). In contrast, the ’074 Patent states that “contents corresponding to the multimedia items can be

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retrieved, downloaded, or otherwise obtained from one or more websites.” Ex-1001 at 7:55-57.

k. Claim 14

The POR does not actually dispute that Avellan discloses the requirements of Claim 14 and appears to instead copy-and-paste its argument above for Claim 13. *See* POR at 37.

l. Claim 15

For this claim, Dr. Hernandez asserts without basis that Avellan shows “at best a single ‘broadcast channel’.” Ex-2039 at ¶194. However, Avellan explicitly states “there can be a number of broadcast channels” and “it is advantageous to broadcast as many sites as possible in the broadcast mode to as many user computers as possible.” Ex-1003 at 8:25-29 and 10:18-20.

m. Claim 17

For the same reasons addressed above for Claims 1 and 12, the POR is incorrect (see POR at 38-39) and Avellan discloses Claim 17.

n. Claim 18

For Claim 18, the POR relies on its arguments for Claims 2 and 3. POR at 39. Accordingly, Avellan discloses Claim 18 for the same reasons as above.

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o. Claim 20

The POR does not dispute that a POSITA would understand Avellan’s reference to “redundancy” to mean, for example, gateway platform 130₂ can substitute for gateway platform 130₁ when system 100 detects a failure at gateway platform 130₁ that impacts communication between the user and the content networks—*i.e.*, affects connectivity with a website. Ex-1002, ¶116. Although the POR argues that “Claim 20 requires that a network failure to be detected of at least one website,” this is not accurate. Instead, Claim 20 requires detecting a network failure that *affects connectivity* with a website—which would include a failure at the website itself or a failure with a gateway server. Both failures would affect connectivity with a website.

B. Ground 2: Claim 5 is obvious in view of Avellan and Durante.

The POR essentially argues that Claim 5 requires visually displaying the metadata (see POR at 33 and 41-42). However, this is not required by the plain language of Claim 5. Nonetheless, to the extent this is required, Durante explicitly states that “various metadata associated with the music video can be displayed, such as the name of the artist.” Ex-1004 at 7:33-35.

C. Ground 3: Claim 6 is obvious in view of Avellan and Ma.

The POR does not actually dispute that Avellan and Ma render Claim 14 obvious. Instead, the POR’s section for Ground 3 actually addresses Ground 2 (see

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above). *See* POR at 41-42.

D. Ground 4: Claim 7 is obvious in view of Avellan and Suzuki.

Claim 7 merely recites “querying the content provider to determine the second format” which “corresponds to [an MPEG] format.” The POR’s argument that Suzuki allegedly requires “standard video format encoding sizes” (POR at 43) is wholly irrelevant to the claim language or the combination of Suzuki’s querying process with Avellan. The POR fails to explain what “Suzuki’s size requirements” refer to or why this impacts the Petition.

E. Ground 5: Claims 10, 11, and 21 are obvious in view of Avellan and Wannamaker.

a. Claim 10

The POR asserts that “Wannamaker’s MMS and MMS_OC1000 device do not support sending a multicast, *hence an MPEG Multiplexer at a ‘Content Provider’ is not possible.*” POR at 44 (emphasis added). However, Wannamaker explicitly discloses that “[a] multimedia streamer (MMS) consists of the audio/video/terminal server (AVTS) that delivers the units of audiovisual information sent by the system to the user’s set-top box.” Ex-1007 at [0193]. “A special *MPEG multiplexer (MUX) card*, controlled by the AVTS, streams data onto the cable network.” Ex-1007 at [0195] (emphasis added) and [0599] (disclosing that “MediaCast/MMS” is equipped with a “multiplex card”).

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b. Claim 11

Wannamaker discloses that its system is implemented as a “virtual machine (VM)” that is “compatible with the JVM defined in the Java Virtual Machine Specification.” Ex-1007 at [0354]. Whether or not “a virtual machine implies security certificates, IP address, and automation for DevOps” that are allegedly not disclosed by Wannamaker (see POR at 45) is irrelevant to the claim language and does not nullify the plain disclosure.

c. Claim 21

The POR argues that “Avellan and Wannamaker are competing technologies” because Avellan is “based on image captures” while Wannamaker is allegedly “based on server transcoding.” POR at 45. However, Wannamaker explicitly discloses embodiments where the server “fetches content from the Web and performs the initial translation, layout, and rendering.” Ex-1007 at [0270]. Then, “[t]he server puts images of the rendered Web page in MPEG I-frames and MPEG P-frames” for transmission to the set-top boxes. Ex-1007 at [0271]. As a result, like Avellan and the ’074 Patent, Wannamaker is also “based on image captures” of web pages and is not a competing technology.

F. Ground 6: Claim 16 is obvious in view of Avellan and Heikens.

For this claim, Dr. Hernandez argues that the cited broadcast address of Heikens is “compatible with Ethernet, not with satellite networks” and thus the

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Petition's combination allegedly fails. Ex-2039 at ¶230. However, Avellan is not restricted to use of a satellite system. For example, the Abstract of Avellan recites that it can broadcast data to user computers "over a broadcast device (*such as* a satellite)," which means that a satellite is just one type of broadcast device. Ex-1003 at Abstract (emphasis added) and 2:34. Similarly, "connection 108" is not limited to a satellite antenna and can be "any other wired or wireless medium which facilitates broadcasting of information." Ex-1003 at 3:48-52 and 4:49-55 (stating that "a satellite 102 need not be used"). In short, Avellan is not limited to a satellite network or otherwise "incompatible" with Ethernet.

G. Ground 7: Claim 19 is obvious in view of Avellan and Matthews.

Matthews teaches that "video content may be delivered over content delivery network 110 using a packet streaming protocol, *such as the known HTTP Live streaming protocol.*" Ex-1009 at 5:29-32. Given that Avellan's system can be used for "live streaming television feeds" and "live broadcasting" (Ex-1003 at 8:18-21, 8:29-31, and 12:37), Avellan is perfectly suited for a protocol that "works on segments of video in real time." Ex-1002, ¶¶150-151. The POR fails to explain why Avellan would not or could not be combined with Matthews' known HTTP Live Streaming protocol for the media stream and, confusingly, appears to conflate Grounds 6, 7 and 8 without any analysis. *See* POR at 46.

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H. Ground 8: Claim 20 is obvious in view of Avellan and Wilsher.

For Claim 8, the POR cryptically states that “the recorded media is generated upon a server ping timeout, a 404 error, when Wilsher uses a ‘secondary URL’ instead.” POR at 47. However, neither the POR nor Dr. Hernandez explain why Wilsher’s use of a secondary URL in the event of network failure to retrieve a previously recorded media stream does not literally disclose the elements of Claim 20. Neither Wilsher nor the ’074 Patent refer to any requirement of a “server ping timeout” or a “404 error,” and the claim does not require “creating” the recording in response to the failure. Instead, the recorded stream is merely “provid[ed]” to the content provider in response to the detected failure.

I. Ground 9: Claim 20 is obvious in view of Avellan and the General Knowledge of a POSITA.

Dr. Hernandez argues that Avellan’s disclosure of redundancy “adds more servers to the pool of servers provided by Avellan and will not fix a web-server with a web-page being unavailable.” Ex-2039 at ¶243. However, the claim language does not require detecting (or fixing) a problem with a web-server, only detecting a network failure “affecting connectivity” with a website. As previously mentioned, this would include a failure at the website itself or a failure with a gateway server; both failures would affect connectivity with a website.

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V. CONCLUSION

Accordingly, Petitioners respectfully request cancelation of the Challenged Claims.

Dated: December 12, 2025

Respectfully submitted,

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VI. CERTIFICATE OF WORD COUNT

Pursuant to 37 C.F.R. §42.24(d), Petitioners hereby certify, in accordance with and reliance on the word count provided by the word-processing system used to prepare this petition, that the number of words in this paper is 5,561. Pursuant to 37 C.F.R. §42.24(d), this word count excludes the table of contents, table of authorities, mandatory notices under §42.8, certificate of service, certificate of word count, appendix of exhibits, and any claim listing.

Dated: December 12, 2025

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CERTIFICATE OF SERVICE

The undersigned certifies that on the twelfth day of December, 2025, a complete and entire copy of the foregoing “PETITIONERS’ REPLY TO PATENT OWNER RESPONSE” including exhibits, if any, was served on the date below on the following counsel of record via email per Patent Owner’s consent to electronic service.

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