

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTORNICS AMERICA, INC.**

Petitioners,

v.

MAXELL, LTD.,
Patent Owner

Case: IPR2025–01308

U.S. Patent No. 11,277,650

PATENT OWNER SUR–REPLY

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PATENT OWNER'S EXHIBIT LIST

Description	Exhibit #
Notice Letter to Samsung (July 7, 2021)	2001
Follow-up Notice Letter to Samsung (December 29, 2021)	2002
Docket Navigator Time to Trial Statistics for the Eastern District of Texas	2003
Docket Control Order, <i>Maxell, Ltd. v. Samsung Elecs. Co., Ltd.</i> , No. 5:25-cv-00052-RWS (E.D. Tex.)	2004
Jury Trial Transcript, Vol. 4, <i>Maxell, Ltd. v. Samsung Elecs. Co., Ltd.</i> , No. 5:23-cv-00092-RWS (E.D. Tex.)	2005
Complaint, <i>Maxell, Ltd. v. Samsung Elecs. Co., Ltd.</i> , No. 5:25-cv-00052-RWS (E.D. Tex.)	2006
Follow-up Notice Letter to Samsung (April 21, 2025)	2007
Law360 Article, "Maxell Settles Patent Suit Against Apple Over Mobile Tech"	2008
Law360 Article, "Maxell Scores \$43M EDTX Jury Win In ZTE Patent Trial"	2009
Law360 Article, "Maxell, Huawei Reach Terms To End Smartphone Patent Suit"	2010
Hudson Institute Article, "Google's Loss to Sonos Settles It, Big Tech Has an IP Piracy Problem"	2011
PatentRenewal.com Article, "which-companies-hold-the-most-patents-in-the-world"	2012
Motion for Partial Summary Judgment of Validity Based on Sotera Stipulations, <i>Maxell, Ltd. v. Samsung Elecs. Co., Ltd.</i> , No. 5:23-cv-00092-RWS (E.D. Tex.)	2013
Declaration of Radostin Pachamanov, Ph.D.	2014
P.R. 4-3 Joint Claim Construction and PreHearing Statement	2015
Deposition Transcript of Dr. Joseph A. Paradiso dated March 13, 2026	2016

I. INTRODUCTION

Petitioners' arguments fail at the threshold because they ignore what the claims require the subsidiary displays to show. Specifically, the claims require the main terminal to store and display **the contents**, to associate **one of those contents** with device specific ID information, and to provide that to subsidiary terminals whose displays display "**the content**." EX1001, Claims. 1, 4. Patent Owner's construction gives effect to that antecedent basis. The claim language requires that subsidiary display must display the same identified content, not a different excerpt, reconstruction, memory limited segment, or category-authorized item. POR, 6-11; EX2014 ¶¶67-72; EX1044 31:23-34:3.

Ground 1 fails because Shindo does not display **the claimed content** on the subsidiary terminals. Shindo's main device displays the live program content, while its mobile terminals display after the fact replays or highlights generated from selected portions of that program. EX1004 ¶¶5-8, 33-38, 49. Dr. Pachamanov's testimony and Dr. Paradiso's testimony confirm the same point. Shindo's mobile terminal displays a different replay or highlight, not the content displayed by the main device. EX1044 164:12-165:7; EX2016 95:9-97:24.

Ground 2 fails for the same reason. Sasaki is a segmented delivery system built around PDA memory limits, not a system that causes the PDA to display the same electronic newspaper content displayed by the main terminal. POR, 41–58; EX2014 ¶¶141–184. Its CPU and delimiter information only manage which segment comes next, and Dr. Pachamanov's testimony confirms that Sasaki sends portions one by one rather than the claimed content. EX1006 ¶¶57, 71–72, 132, 139; EX1044 95:23–98:23.

Ground 3 fails because Futa's judgment tables are permission filters and McClellan's operating system teachings do not cure that defect. Futa determines whether a device is authorized to receive a content category. It does not associate first and second displayed contents with first and second device specific ID information so that the subsidiary displays display "the content." EX1009 ¶¶169–172, 176–180, 211–212; EX2014 ¶¶187–215. Dr. Paradiso's testimony further confirms that the '650 Patent is not concerned with terminal operating systems. EX2016 79:3–6.

Petitioners' remaining arguments do not change the outcome. Dr. Paradiso's institutional relationship with Samsung bears on the weight of his opinions, particularly where his testimony confirms the display mismatches in the prior art.

POR, 11–13; EX2016 13:23–15:10, 17:21–18:19. Petitioners' waiver arguments likewise fail because they cannot supply the missing proof that the prior art displays the claimed content. The POR squarely contested the dispositive limitations for all three grounds, and the claimed “controller” terms under their plain and ordinary meaning do not cure Petitioners' failure to show that Shindo, Sasaki, or Futa display “the content” on subsidiary terminals. POR, 6–11, 20–70; EX2014 ¶¶97–215.

II. CLAIM CONSTRUCTION

Petitioners' claim construction argument conflicts with the claim language. Patent Owner asks the Board to give effect to the antecedent basis that links “the content” displayed by the subsidiary terminal to the same “one of the contents” identified, associated, and displayed by the main terminal. POR, 6–11; EX2014 ¶¶69–72; EX2015, 22. Dr. Pachamanov's testimony supports that reading because he explained that the subsidiary device displays the same content that was routed to it, and that “the content” is not divorced from the claim's earlier references to “one of the contents.” EX1044 31:23–34:3, 38:16–39:4.

A. “a [second/third] display displaying the content” Requires Displaying the Same Identified Content

Petitioners argue that Patent Owner's construction would require every subsidiary content item requested by every hypothetical subsidiary terminal to be displayed on the main display at the same time. Reply, 1–7. That is a strawman. The POR argued that “the content” in the second and third display limitations takes antecedent basis from the same “one of the contents” associated with device specific ID information and displayed by the main terminal. POR, 6–11. Dr. Pachamanov's declaration explained that the subsidiary terminal must display the “one of the contents” displayed in the main terminal, and his testimony confirmed that the second device displays the content. EX2014 ¶¶69–72; EX1044 31:23–34:3.

The claim language itself resolves the issue. Claim 1 first recites storage storing “the contents,” a first display displaying “the contents,” association information for transmitting “one of the contents” to one subsidiary terminal, and association information defining that “one of the contents” is associated with device specific ID information. The same claim then recites a second display displaying “the content.” EX1001, cl. 1. Claim 4 uses the same structure for first

and second content and then requires the second and third displays to display “the content.” EX1001, cl. 4. Petitioners’ position would allow the subsidiary display to show something different from “the content,” which reads out the antecedent basis and divorces the display limitation from the association limitation. POR, 6–11; EX2014 ¶¶69–72.

Petitioners’ reliance on hypotheticals involving multiple EPGs or subtitles does not change the claim construction. Dr. Pachamanov testified that under the claim language, the same EPG or subtitle data requested and displayed on a subsidiary terminal must also be the content displayed on the main display, and that the claim requires display of the content rather than a different unrelated item. EX1044, 112:18–114:24, 123:13–124:18. Dr. Pachamanov’s testimony makes clear that Petitioners’ “clutter” caricature regarding the main terminal display is without merit. Reply, 5. Petitioners fail to consider that nothing prevents multiple subsidiary terminals to display the same “one of the contents,” which essentially eliminates Petitioners manufactured main terminal display “clutter” “problem only get[ting] worse if additional subsidiary terminals are added” Reply, 4–5. Dr. Pachamanov’s testimony confirms the narrower point that the subsidiary terminal cannot satisfy the claim by displaying a replay, highlight, segment, or other item

that is not the same identified content on the main display. EX2014 ¶¶69–72; POR, 6–11.

Nor does the specification support Petitioners' attempt to sever "the content" from the content displayed by the main terminal. The specification identifies the problem that simultaneous display of main and subsidiary content on a television narrows the available display areas. EX1001, 1:37–41. The solution is not to allow a subsidiary terminal to display any later-created or merely related data. The solution is to permit each subsidiary terminal to display the requested content corresponding to its ID information while the main display continues to show the main content, thereby preserving the claim's requirement that the subsidiary display show the identified content. EX1001, 3:11–47, 4:19–46, 12:40–52.

B. "Content" Does Not Encompass A Different Excerpt, Reconstruction, Or Segment

Petitioners argue that Dr. Pachamanov admitted that a frame, line, or any data can be "content," and then leap to the conclusion that Shindo's replays, Sasaki's segments, and Futa's permissioned categories can satisfy "the content." Reply, 7–8. That argument ignores the claim language and takes his testimony out of context. Dr. Pachamanov testified that a frame could be content at a particular

level of abstraction because it is data, but he also explained that **the question is whether that content satisfies the claim limitations**, including storage, association, transmission, and display of the same thing. EX1044 100:11–15, 107:7–108:25 (asserting “[t]he question is: How does fit . . . into the requirements of Claim 1, the limitations of Claim 1, and all the other things in addition to the fact that you have content”), 58:2–18 (clarifying that “any kind of data that is **suitable . . . to the invention claimed in Claim 1 and 4**”), 45:6–25 (asserting that “[t]he reality, though, is again one person has to carefully review the claim and see that what’s written there actually allows the content to be of a certain type” or “[i]n the context of Claim 1, that’s analysis that we have to do”). Petitioners’ reliance on a hypothetical question regarding “buffer . . . hold[ing] a hundred frames of data” is misplaced because that hypothetical was posed untethered from the claim as a whole. EX1044 106:22–108:6. When questioned about what the claims actually require, Dr. Pachamanov confirmed that Petitioners’ hypothetical does not fit within the claim limitations. EX1044 108:12–109:23. The testimony does not permit Petitioners to substitute a later excerpt, reconstructed replay, or memory limited segment for the content displayed by the main terminal. EX2014 ¶¶106, 111–112, 147–158.

The same-frame point illustrates the error in Petitioners' argument. If the "one of the contents" displayed on the main terminal is a particular frame, the content displayed on the subsidiary terminal must be that same frame in its entirety, not a later-created excerpt, a reordered set of scenes, or a segment selected by a memory bookmark. POR, 9; EX2014 ¶¶70. That is why the POR stated that a POSITA would understand from the claim context that "the content" displayed on the subsidiary terminal includes the entire "one of the contents" displayed in the main terminal. POR, 9. Petitioners' contrary rule would eliminate the word "the" from "the content" and allow the subsidiary display limitation to be met by different content.

III. GROUND 1 FAILS TO RENDER OBVIOUS CLAIMS 1–4

Petitioners' Shindo arguments fail because Petitioners never show that Shindo's mobile terminal displays the same content displayed by the stand alone display device. Shindo's display unit 107 displays the program content received from the video processing unit. EX1004 ¶¶20, 24, 41. The mobile terminal display unit 109 receives and displays reconstructed program content generated after trigger information identifies a replay or highlight. EX1004 ¶¶5–8, 33–38, 49. Petitioners' attempt to reframe the dispute as one about routing or terminal

adaptation cannot cure that display mismatch. EX2014 ¶¶106, 111–112; EX1044 164:12–165:7.

A. Shindo's Replays And Highlights Are Not The Same Displayed Content

Petitioners argue in §III.A that Shindo's replays and highlights are “one of the contents” because they are **sub**–program units and because Dr. Pachamanov testified that content can exist at different granularities. Reply, 8–10. **But Shindo does not display the same identified content on the main and subsidiary displays.** Shindo receives and displays the current program content on the stand alone display device, then uses trigger information and index information to extract, rearrange, and reconstruct partial program content for mobile terminal display. EX1004 ¶¶5–8, 33–38, 49. The reconstructed replay or highlight is not the content displayed by display unit 107. EX2014 ¶¶106, 110–112; EX1044 164:12–165:7.

Petitioners' reliance on a single–frame hypothetical does not rescue Shindo. Dr. Pachamanov testified that a frame could be content only in the sense that data can be content at a chosen level of abstraction. EX1044 100:11–15, 107:7–108:25. He did not testify that a replay assembled after the fact from selected scenes is the

same “one of the contents” displayed by the main device as required by the claim as a whole. To the contrary, he testified that Shindo’s replay is generated post factum from the live stream and is not “the content.” EX1044 164:12–165:7.

Petitioners therefore prove only that a different thing can be data, not that Shindo displays the claimed content. Petitioners’ attempt to invoke the hypothetical regarding “an entire movie displayed on the display at the same time” fares no better. Reply, 15 (“a single frame of video “could be content . . . because it’s data). Dr. Pachamanov repeatedly made clear that the proper analysis requires examining how any hypothetical fits within the context of the actual claim limitations.

EX1044 107:7–108:25 (asserting “[t]he question is: How does fit . . . into the requirements of Claim 1, the limitations of Claim 1, and all the other things in addition to the fact that you have content”), 58:2–18 (clarifying that “any kind of data that is **suitable . . . to the invention claimed in Claim 1 and 4**”), 45:6–25 (asserting that “[t]he reality, though, is again one person has to carefully review the claim and see that what’s written there actually allows the content to be of a certain type” or “[i]n the context of Claim 1, that’s analysis that we have to do”).

B. Petitioners Cannot Avoid The Same-Content Display Requirement

Petitioners argue in §III.B that Shindo need not concurrently display the transmitted content on the main device. Reply, 10–11. That argument attacks a strawman and ignores the actual display limitation. Patent Owner's position is that the same content identified by the association information and displayed by the main terminal must be the content displayed by the subsidiary terminal. POR, 6–11; EX2014 ¶¶69–72, 111–112. Shindo fails because the stand alone device displays the live program while the mobile terminal displays a reconstructed replay or highlight. EX1004 ¶¶5–8, 49; EX2016 95:9–97:24.

Petitioners' position also contradicts its own expert's testimony. Dr. Paradiso testified that Shindo's main display shows the game while the mobile terminal looks at a highlight, replay, or other requested item, **and that those two contents are not the same**. EX2016 95:9–21. That testimony confirms the POR's point. Even if Shindo displays something on the mobile terminal, it does not display "the content" required by limitations [1j], [4k], and [4m]. EX2014 ¶¶108–112, 126–131.

C. Shindo's Trigger Information-To-Mode Processing Does Not Create Same-Content Display

Petitioners argue in §III.C that Shindo is not “blind” because paragraph 49 processes a stream according to terminal display size, resolution, and encoding before sending it to mobile terminal A. Reply, 11–13. That terminal adaptation does not supply the missing association information, and it does not make the mobile terminal display the same content displayed on the main device. EX1004 ¶49. Dr. Pachamanov acknowledged that paragraph 49 says the stream is processed according to the mobile terminal, but he explained that his “blind” point concerns Shindo's selection of replay or highlight content based on trigger mode, not whether Shindo later adapts the generated stream for a device. EX1044 136:11–140:1, 147:19–148:7.

Shindo's own disclosure confirms the distinction. Mode information in trigger information is compared with mode information in mobile terminal management information to decide whether a terminal has selected a matching replay or highlight mode. EX1004 ¶¶28, 33. The terminal ID appears in management information, but the operative comparison Petitioners identify is a mode match, not a content to device ID association that defines which displayed

content must be transmitted to which subsidiary display. EX1004 ¶¶28, 33, 40, FIGS. 7, 9; EX2014 ¶¶99–104. The result remains a replay or highlight display, not display of the same content displayed by the main terminal.

IV. GROUND 2 FAILS TO RENDER OBVIOUS CLAIMS 1–4

Ground 2 fails because Sasaki also fails to disclose the subsidiary terminal display requirements when considering the claim as a whole. Petitioners' CPU theory, content–segment theory, and delimiter–information theory all depend on treating a memory limited PDA segment as the claimed content. But Sasaki uses delimiter information to send portions of an electronic newspaper according to PDA memory and display constraints, **and the PDA displays those portions** rather than the same electronic newspaper content displayed by the PC home server device. EX1006 ¶¶57, 71–72, 132, 139; POR, 41–58; EX2014 ¶¶141–184; EX1044 95:23–98:23.

A. Sasaki's CPU Theory Does Not Cure The Failure To Display The Claimed Content

Petitioners argue in §IV.A that the Petition identified CPU 101 rather than display controller 104 as the first controller. Reply, 14. Even accepting that characterization, Petitioners still do not show that CPU 101 stores association

information that causes a subsidiary display to display the claimed content.

Sasaki's CPU uses a delimiter or bookmark to send the next memory limited content segment to a PDA. EX1006 ¶¶57, 71–72, 78, 132, 139. A bookmark identifying where the last segment ended is not the claimed association information defining that one displayed content is associated with one device specific ID. EX2014 ¶¶143–154.

Petitioners' controller point is therefore immaterial to the display limitation. Sasaki may identify a requested electronic newspaper and a PDA, but the PDA displays a segment sized to its available memory and display capabilities, not the entire electronic newspaper displayed by the PC home server device. EX1006 ¶¶71–72, 101–104, 132, 139. Dr. Paradiso confirmed that Sasaki's PDAs receive portions because the devices could not support an entire newspaper, book, or manga volume. EX2016 114:20–116:13. That is the opposite of a subsidiary terminal displaying "the content" under the claims.

B. Sasaki's Segments Are Not The Same Content Displayed By The Main Terminal

Petitioners argue in §IV.B that Sasaki's lines, paragraphs, chapters, or articles are "one of the contents" because content can exist at a lower granularity.

Reply, 14–16. But Sasaki's segment is expressly generated to fit the PDA's free memory capacity and display capabilities. EX1006 ¶¶71–72, 101–104, 132, 139. The PDA receives a segment and later requests the next segment, while the server stores delimiter information so it can resume from the prior endpoint. EX1006 ¶¶57, 71–72, 78, 132, 139. That process does not display the same electronic newspaper displayed by the main terminal. EX2014 ¶¶146–158; EX2016 114:20–116:13. Petitioners reliance on Dr. Pachamanov's testimony regarding data to analogize that “a frame is content, then article, paragraph, chapter, or line of an electronic newspaper is content” is misplaced. Reply, 15. As stated above in Section II.B, Dr. Pachamanov was responding to a hypothetical regarding “an entire movie displayed on the display at the same time,” which he repeatedly asserted that the proper analysis is to see how these hypotheticals fit in the context of the claims. EX1044 107:7–108:25 (asserting “[t]he question is: How does fit . . . into the requirements of Claim 1, the limitations of Claim 1, and all the other things in addition to the fact that you have content”), 58:2–18 (clarifying that “any kind of data that is **suitable . . . to the invention claimed in Claim 1 and 4**”), 45:6–25 (asserting that “[t]he reality, though, is again one person has to carefully review the claim and see that what's written there actually allows the content to be

of a certain type” or “[i]n the context of Claim 1, that’s analysis that we have to do”).

Petitioners also argue that Sasaki can eventually distribute all information. Reply, 15–16. That is not the claim. The claim requires the subsidiary display to display “the content,” not to receive fragments over time as earlier fragments are erased or replaced. EX1001, Claims. 1, 4. Sasaki’s ability to deliver successive segments only confirms that the PDA display is segment based. EX1006 ¶¶141–142. A sequence of memory limited displays is not the same as displaying the claimed content on the subsidiary terminal. EX2014 ¶¶154–158.

C. Sasaki’s Delimiter Information Does Not Make The PDA Display The Claimed Content

Petitioners argue in §IV.C that Sasaki’s delimiter information is the claimed association information because it is stored with content identification information and terminal identification information. Reply, 16–18. That argument fails because it treats a memory–management bookmark as if it were the claimed information that causes a subsidiary terminal to display “the content.” The POR explained that Sasaki divides content into segments because PDA 2 has limited memory, sends only a segment to PDA 2, and records the last part of that segment as previous

delimiter information. POR, 41–49. Sasaki's own disclosure confirms that the PC home server device generates a segment that fits the PDA's free memory capacity and later stores the last paragraph, chapter, article, or one to several lines as previous delimiter information. EX1006 ¶¶57, 71–72, 132, 139.

Dr. Pachamanov's testimony confirms and clarifies his declaration on this point. He testified that Sasaki is directed to a system that divides content into portions according to the PDA's free memory capacity and that the PC home server transmits a segment such as a paragraph, chapter, article, or one to several lines of an electronic newspaper. EX1044 95:23–96:10. He further explained that Sasaki teaches dividing the content into portions and sending only portions, and that those portions are deleted and replaced as new portions are requested. EX1044 96:21–98:23. That testimony directly supports his declaration that Sasaki's delimiter information is a bookmark for segmented delivery and not the claimed association information. EX2014 ¶¶144–155.

Petitioners' reliance on the '650 Patent's Figure 8 does not help. Figure 8 illustrates table information in the main content receiving display unit that associates subsidiary content control receivers with requested information and IP addresses so that the system can provide desired content information to a

corresponding receiver. EX1001, FIG. 8, 14:51–16:3. It does not teach that any stored identifier paired with any content marker is sufficient. The specification ties the table to display of requested content by subsidiary receivers while the main terminal displays main content. EX1001, 3:11–47, 4:19–46, 12:40–52. Sasaki instead displays a segment on the PDA, not the electronic newspaper content displayed by the PC home server device. POR, 49–53; EX2014 ¶¶156–163; EX1044 108:12–109:23.

V. GROUND 3 FAILS TO RENDER OBVIOUS CLAIMS 1–4

Ground 3 fails because Petitioners try to convert an authorization system into a content–display system. Futa's judgment tables decide whether a device category may receive content having additional information, not whether the same displayed content is associated with a device specific ID and displayed on the corresponding subsidiary terminal. EX1009 ¶¶169–172, 176–180, 211–212. McClellan's set-top box operating system teachings do not supply the missing association information or display limitations, and Dr. Paradiso's testimony confirms that the '650 Patent is not concerned with terminal operating systems. EX2016 79:3–6; EX2014 ¶¶187–215.

A. Futa's Judgment Tables Are Permission/Authorization Filters, Not The Claimed "Association Information"

Petitioners argue in §V.A that Futa's judgment tables are association information because they store additional information and device IDs. Reply, 18–20. That ignores what the tables do and what they display. Futa's tables identify which devices are permitted to receive content having additional information "1" or "2," and the communication controlling unit checks whether the target device ID appears in the corresponding table. EX1009 ¶¶169–172, 176–180, 211–212, FIGS. 8A–8B. This is a category based authorization check. It does not define that a particular displayed content is associated with a particular subsidiary terminal so that the terminal displays the same content required by the claims. EX2014 ¶¶187–195.

Petitioners' effort to characterize a permission table as an association table also fails because the claim is tied to display of content, not merely permission to transmit content. Claim 4 requires stored association information for transmitting one of the first content or second content to one subsidiary terminal and then requires the second and third displays to display "the content." EX1001, cl. 4. Futa's judgment table says only whether a device category may receive a content

category. EX1009 ¶¶172, 211–212. It does not establish that the subsidiary terminal displays the same first or second content displayed by the main terminal. EX2014 ¶¶187–195, 212–215.

B. Petitioners Still Have No Motivation To Combine Futa And McClellan

Petitioners argue in §V.B that a POSITA would combine Futa and McClellan because both involve television systems. Reply, 20–21. Petitioners' high-level approach fails to establish a motivation to combine—a detailed review of the references reveals a POSITA would **not** be motivated to combine them. *See* POR, 19–20, 59–70. Futa addresses category based authorization for content protection, using judgment tables to permit or prohibit transmission. EX1009 ¶¶10, 12, 169–171. McClellan is invoked for a set-top box operating system, not for any content-to-device association that causes a subsidiary display to display the claimed content. EX2014 ¶¶82–83, 92–94, 190. Combining a permission filter with a set-top box operating system still yields a permission filtered system, not the claimed display of associated content on subsidiary terminals.

Dr. Paradiso's testimony reinforces the point. He agreed that the '650 Patent does not talk about terminal operating systems. EX2016 79:3–6. That admission

undercuts Petitioners' attempt to use McClellan's operating system upgrades to fill Futa's missing association information and display limitations. EX2014 ¶¶82–83, 92–94, 190. Petitioners identify no teaching in McClellan that would transform Futa's permission tables into a stored content-to-device association that causes subsidiary terminals to display the claimed content.

C. Futa Does Not Satisfy The Display And Cross-Display Limitations

Petitioners assert in §V.C that limitations [1j], [4k], [4m], [4o], and [4p] are met because Futa transmits different categories of content to different devices depending on judgment table membership. Reply, 21–22. The premise is wrong. Futa's table determines whether a device may receive content with additional information “1” or “2,” not whether a first content or second content displayed by the main terminal is associated with a first or second device specific ID so that the corresponding subsidiary terminal displays “the content.” EX1009 ¶¶172, 176–180, 211–212. A permission check is not one-to-one mapping. EX2014 ¶¶212–215.

Petitioners' “dynamic cross-routing” response fails for the same reason. Reply , 21. The challenged claims recite first and second contents associated with first and

second device specific ID information and displayed on the corresponding subsidiary displays, and then a reverse association under limitation [4p]. EX1001, cl. 4. Futa's judgment tables do not define a reversible display configuration for first and second displayed contents. They only identify device IDs permitted for content categories. EX1009 ¶¶169–172, FIGS. 8A–8B. Because Futa never supplies the claimed association information, it cannot satisfy the display or cross–display limitations. EX2014 ¶¶212–215.

VI. DR. PARADISO'S BIAS UNDERMINES THE WEIGHT OF HIS OPINIONS

Petitioners dismiss Dr. Paradiso's bias in §VI as a distraction because Samsung allegedly funds the MIT Media Lab as a whole rather than Dr. Paradiso individually. Reply, 22–23. But Dr. Paradiso testified that Samsung is a Media Lab member company, that member companies fund research at the Media Lab as a whole, that Samsung has been a member for approximately ten to fifteen years, and that Samsung remains a member. EX2016 13:23–15:10. He further testified that member fees are annual and generally range from approximately \$250,000 to \$500,000. EX2016 17:21–18:19. Those facts bear directly on weight and

credibility, especially where Petitioners rely on Dr. Paradiso's declaration to excuse prior art that does not display the claimed content. POR, 11–13.

VII. PETITIONERS' WAIVER ARGUMENTS CANNOT SUPPLY THE MISSING PROOF ON DISPLAY OF THE CLAIMED CONTENT

Petitioners' waiver arguments are an effort to avoid the merits. The POR contested the constructions and limitations that matter to the instituted grounds, including the display of “the content,” the claimed association information, and the transmission of the same identified content to subsidiary terminals. POR, 6–11, 20–70.

Patent Owner did not need to propose separate constructions for “first controller,” “second controller,” and “third controller” to defeat the Petition. The POR's claim construction dispute concerned “a [second/third] display displaying the content,” and the POR explained why the Petition's invalidity theories fail under the correct reading of “the content.” POR, 6–11. The claimed “controller” using plain and ordinary meaning do not cure Petitioners' failure to show that Shindo, Sasaki, or Futa display the claimed content on subsidiary terminals. EX2014 ¶¶69–72, 106, 111–112, 146–158, 187–195.

The Petition's Shindo ground fails if Shindo does not disclose the association information and display limitations that link an identified content to a device specific ID and require the subsidiary display to display "the content." POR, 20–41; EX2014 ¶¶97–140. Petitioners' cannot supply the missing display of the claimed content. EX1004 ¶¶5–8, 33–38, 49.

The POR squarely challenged the limitations that defeat Ground 2, including the alleged association information, the alleged "one of the contents," and the display of "the content." POR, 41–58. Sasaki's delimiter based segment system cannot satisfy those limitations because the PDA displays memory limited segments rather than the same electronic newspaper displayed by the PC home server device. EX1006 ¶¶57, 71–72, 78, 132, 139; EX2014 ¶¶141–184..

The POR challenged the limitations that are dispositive of Ground 3 because Futa and McClellan do not disclose the claimed association information and therefore cannot satisfy the related transmission and display limitations. POR, 59–70. The Petition cannot prove unpatentability by declaring waiver where the challenged limitations depend on the same missing content-to-device association. EX2014 ¶¶185–215.

The POR's Ground 3 arguments preserved that point by explaining that Futa's judgment tables are permission filters and that the combination lacks the claimed content-to-device association. POR, 59–70; EX2014 ¶¶187–215.

The Petitioners cannot supply what Futa and McClellan do not disclose. Futa's judgment tables decide whether a device may receive content having additional information “1” or “2,” and the communication controlling unit checks whether a device ID appears in the corresponding judgment table. EX1009 ¶¶169–172, 176–180, 211–212. That permission check does not establish that a first content or second content displayed by the main terminal is associated with first or second device specific ID information and then displayed on the corresponding subsidiary terminal. EX2014 ¶¶187–215. McClellan adds no such display-based association, and Dr. Paradiso's testimony confirmed that the '650 Patent is not concerned with terminal operating systems. EX2016 79:3–6.

VIII. CONCLUSION

The Board should confirm the patentability of Claims 1–4.

Dated: August 13, 2026

Respectfully submitted,

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Case IPR2025-01308
Patent No. 11,277,650
Patent Owner's Sur-Reply

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August, 2026, a copy of the attached
PATENT OWNER'S SUR-REPLY was served by electronic mail to the
attorneys of record, at the following addresses:

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CERTIFICATION PURSUANT TO 37 C.F.R. § 42.24(d)

Pursuant 37 CFR 42.24(d), the undersigned certifies that this Patent Owner's Response complies with the type-volume limitation of 37 CFR § 42.24(a). The word count application of the word processing program used to prepare this Patent Owner's Response indicates that it contains 4909 words, excluding the parts of the brief exempted by 37 C.F.R. § 42.24(a).

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