

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON WEB SERVICES, INC.,
Petitioner,

v.

TOUCHMUSIC ENTERTAINMENT LLC,
Patent Owner.

IPR2026-00047
Patent: US 6,182,128
Issued: January 30, 2001
Application No.: 09/035,194
Filed: March 5, 1995

Title: Real-Time Music Distribution Systems

PETITION FOR
INTER PARTES REVIEW OF U.S. PATENT NO. 6,182,128

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LIST OF EXHIBITS

No.	Description
1001	U.S. Patent No. 6,182,128 (“ 128 patent ”)
1002	File History of U.S. Patent No. 6,182,128
1003	Declaration of Dr. Andrew Lippman (“ Lippman Decl. ”)
1004	<i>Curriculum Vitae</i> of Dr. Andrew Lippman
1005	U.S. Patent No. 5,132,992 (“ Yurt ”)
1006	U.S. Patent No. 5,732,216 (“ Logan ”)
1007	U.S. Patent No. 5,790,935 (“ Payton ”)
1008	U.S. Patent No. 5,999,970 (“ Krisbergh ”)
1009	WO96/41285 (“ Kenner ”)
1010	Intentionally left blank
1011	Intentionally left blank
1012	Intentionally left blank
1013	David Karger et al., “Consistent Hashing and Random Trees: Distributed Caching Protocols for Relieving Hot Spots on the World Wide Web,” Proc. Of the 29 th Annual ACM Symposium on Theory of Computing (1997) (“ Karger ”)
1014	“Radio Frequency Interface Specification,” Data Over Cable Interface Specifications (March 26, 1997)
1015	Gary Sager, “Time Warner Cable Full Service Network – Silicon Graphics Technology and Architecture Overview,” The Information Superhighway and Private Households (1996) (“ Sager ”)
1016	Intentionally left blank

MANDATORY NOTICES UNDER 37 C.F.R. § 42.8

1. Real Party-In-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioner Amazon Web Services, Inc. is the real party-in-interest. Petitioner is a wholly owned subsidiary of Amazon.com, Inc.

2. Related Matters

The '128 patent (EX1001) has been asserted against in the following district court litigation (the “district court case”):

- *Touchmusic Entertainment LLC v. Apple Inc.*, Case No. 1:24-cv-01787 (N.D. Il.), filed March 2, 2024, under appeal as *Touchmusic Entertainment LLC v. Apple, Inc.*, Appeal No. 2025-1733 (Fed. Cir.), filed April 29, 2025;
- *Touchmusic Entertainment LLC v. Amazon Web Services, Inc.*, Case No. 1:24-cv-01786 (N.D. Il.), filed March 2, 2024, under appeal as *Ziklag IP LLC v. Amazon Web Services, Inc.*, Appeal No. 2025-1734 (Fed. Cir.), filed April 29, 2025 (consolidated with Appeal No. 2025-1733); and
- *Touchmusic Entertainment LLC v. Netflix, Inc.*, Case No. 1:24-cv-01789 (N.D. Il.), filed March 3, 2024, under appeal as *Touchmusic Entertainment LLC v. Netflix, Inc.*, Appeal No. 2025-1960 (Fed. Cir.), filed July 21, 2025.

The '128 patent is pending in the following IPR proceeding:

- *Apple Inc. v. Ziklag IP LLC*, IPR2025-00700, filed March 11, 2025.

3. Lead And Back-Up Counsel, And Service Information

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Petitioner consents to service via email at the above email addresses.

Pursuant to 37 C.F.R. § 42.10(b), concurrently filed with this Petition is a Power of Attorney executed by Petitioner and appointing the above counsel.

Petitioner authorizes Account No. 02-4550 to be charged for any fees, including those enumerated in 37 C.F.R. § 42.15.

I. INTRODUCTION

U.S. 6,182,128 (the “’128 patent”) merely claims concepts that were already well within the public domain. The ’128 patent proposes transporting digital music over existing cable networks in real time from regional “distribution centers” (servers), where each distribution center includes a library of music. A “control center” handles music requests the regional center cannot fulfill.

This concept, however, was already well-known years before the ’128 patent was filed. For example, Yurt (U.S. 5,132,992) discloses a “system of distributing video and/or audio information” as compressed digital data files “over cable or satellite broadcast channels” in real time to subscribing receivers. Ex.1005, Abstract. Yurt’s system similarly includes regional “transmission systems,” each with a server having its own library of digital audio files. Yurt further includes a centralized database to coordinate obtaining requested files from other regional systems’ libraries. Yurt is just one example of this known concept. See also, e.g., Ex.1006 (using cable/satellite networks to distribute audio from a library).

Accordingly, pursuant to 35 U.S.C. §§ 311, 314(a), and 37 C.F.R. § 42.100, Amazon Web Services, Inc. (“Petitioner”) respectfully requests that the Board review and cancel as unpatentable under (pre-AIA) 35 U.S.C. §103(a) claims 1-4, 6, 9-14, and 17 (“Challenged Claims”) of the ’128 patent.

II. GROUND FOR STANDING PER 37 C.F.R. § 42.104(A)

Petitioner certifies that the '128 patent is available for IPR and that Petitioner is not barred or estopped from requesting an IPR challenging the patent claims on the grounds identified in this petition. Petitioner files this Petition with an accompanying motion for joinder.

III. NOTE

Petitioner cites to exhibits' original page numbers. **Emphasis** in quoted material has been added. Claim terms are presented in *italics*.

IV. BACKGROUND

As information became increasingly accessible on the Internet in the 1990s, repositories of media information including “text, graphic, audio, and video information,” became common. Ex.1006, 1:9-11, 1:17-23. Audio information (e.g., voice, music) stored and sent over networks was typically compressed by one or more algorithms (e.g., MPEG). *See* Ex.1006, 4:53-58; *see also* Ex.1005, 6:1-14 (shared online library); Ex.1007, 4:55-64 (MPEG); Ex.1003, ¶27.

One such digital compression algorithm for video and audio was MPEG. Media information (e.g., audio) was distributed over networks in the late 1990s largely via streaming or download. Streaming was associated with the Internet and included real-time consumption, with a compressed audio stream distributed, decoded and played while still being transmitted. For streaming, the communication

typically relied on bitrate (more generally, quality). *See, e.g.*, Ex.1005, 4:64-67 (decompress in real time as distributed). Downloading typically provided a perfect replica of the original file, and depended on time (e.g., the copy at the receiver not accessed until a later time). *See, e.g.*, Ex.1005, 4:68-5:3; Ex.1003, ¶¶28-30.

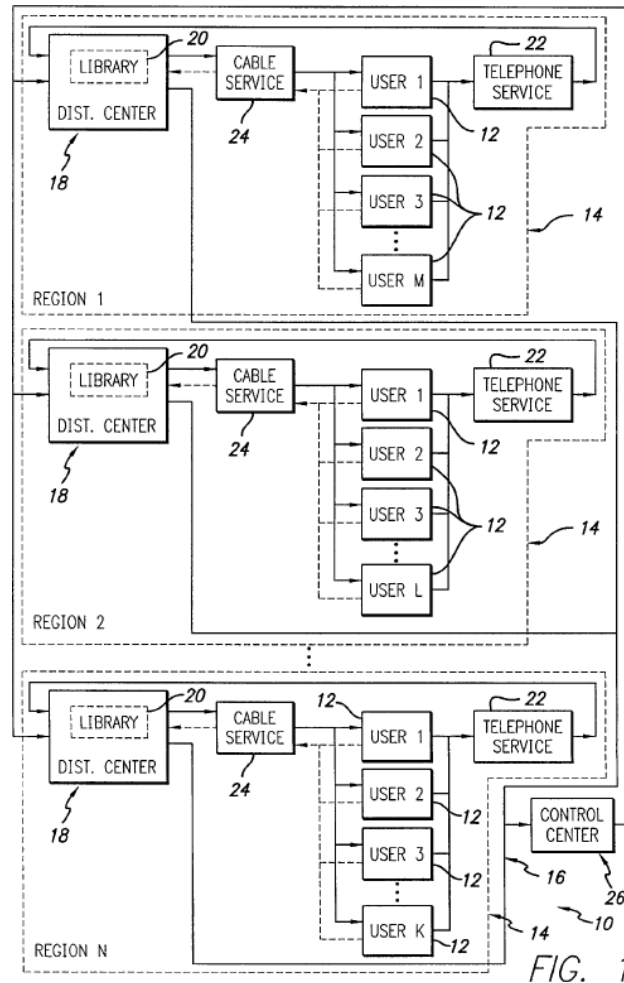
Consumer Internet access by the mid-1990s was often by dialup modem. Though speeds were increasing, many recognized that other distribution systems already existed with higher bandwidths that could be repurposed to distribute data, including “cable modem and satellite links ... to provide data communications.” Ex.1006, 6:36-44. Many thus used “cable or satellite broadcast channels to a receiver” for real-time multimedia data. Ex.1005, Abstract, 1:66-2:4. For example, POSITAs were aware of “interactive access to an information source through a television distribution system,” particularly for “providing access to the Internet through a cable television distribution system.” Ex.1008, Abstract; 1:7-12; *see also* Ex.1015 (Time Warner Cable’s Full Service Network). Moreover, CableLabs developed an industry-wide format to support Internet access over cable, called DOCSIS, that it released in 1997. Ex.1014; Ex.1003, ¶¶31-34.

With more users accessing the Internet, it became necessary to provide more efficient ways to deliver multimedia information over networks. This included providing desired data more closely to requesting users, thus reducing latency and other potential limitations that arise over longer distances. *See, e.g.*, Ex.1005, 6:23-

34 (data libraries maintained in separate regions); Ex.1009, 31:1-32:20 (libraries maintained in each region to be close to users); *see also* 8:10-15 (placing data in servers close to users to minimize network latency); *and* Ex.1013 (Tom Leighton and colleagues using distributed servers to replicate source data and deliver it locally). On-demand music delivered over networks with higher bandwidth, including cable, was therefore already known and in use with supporting compression technology. Ex.1003, ¶¶33-35.

V. SUMMARY OF THE '128 PATENT

The '128 patent describes “[a] music distribution system” with “a plurality of regional networks.” Ex.1001, Abstract. Each regional network includes “a distribution center” with a library storing music tracks, where regional users connect to the regional distribution center for desired music files. Ex.1001, 2:40-44, 3:36-40. The music distribution system also includes a control center to find files missing from a particular region. Ex.1001, Abstract; Figure 1:



Ex.1001, FIG. 1.

In use, a user sends a request to the regional distribution center via telephone line or cable, including “the user address, requested data file, and so on.” Ex.1001, 4:45-47, 3:40-47, 5:5-20. If the regional distribution center can locate the requested file in its library, it “retrieves the requested data file ... and then transmits the requested file to the user” via telephone or cable network. Ex.1001, 3:48-52; *see also* 5:5-7 (searching library). If it cannot locate the data file in “the regional library ... the distribution center routes the user request” to the control center. Ex.1001,

3:54-58; *see also* 5:33-37. If the control center 26 can locate the requested data file at another region's library, it "retrieves and routes the requested file to the user." Ex.1001, 3:58-62; *see also* 5:37-43. Upon receipt, the user's system provides "an audio/visual output of the requested data track," such as in real-time by using a cable service for transmission. Ex.1001, 3:52-54, 6:33-35; Ex.1003, ¶¶36-40.

VI. PROSECUTION HISTORY

In an Office Action rejecting claims over prior art including Verbiest (U.S. 5,550,577), McCalley (U.S. 5,113,496), and Williams (U.S. 5,867,155), the Examiner relied on McCalley's "local operating center (LOC)" and "regional operating center (ROC) to which multiplicity [sic] operating centers are connected" to assert that it would have been obvious to connect LOCs together to import files between operating centers, and thus rejected the claimed "central controller." Ex.1002, 78.

Patent Owner argued in response that McCalley's hierarchy was different, since McCalley's "hierarchy of LOCs [local operating centers]" all fed "from an ROC [regional operating center]," such that it was allegedly not possible "to identify a 'central controller'" amongst the LOCs and ROCs "that searches the libraries of the lower LOCs upon request of another LOC and initiates a file transfer." Ex.1002, 78, 97. Patent Owner also added a new claim which would eventually become issued

claim 1 and argued that neither Verbiest nor McCalley “distributes files in substantially real time” to a user. Ex.1002, 96-97.

Patent Owner further argued that Williams’ requesting distribution centers facilitated file transfers between distribution centers, whereas in the claims “a central controller ... performs a file transfer.” Ex.1002, 106-117, 120. Patent Owner also emphasized with respect to issued-claim 1 that “the central controller ... and not the distribution center, routes the data files between the distribution centers.” Ex.1002, 120. In response, the Examiner issued a Notice of Allowance. Ex.1002, 125; Ex.1003, ¶¶41-47.

VII. EFFECTIVE PRIORITY DATE OF THE '128 PATENT

The earliest possible priority date of the '128 patent is March 5, 1998. Petitioner does not waive any right or opportunity it may have to dispute the priority date of the '128 patent in this or another forum.

VIII. LEVEL OF ORDINARY SKILL IN THE ART

A Person of Ordinary Skill in The Art (“POSITA”) in March 1998 would have been someone knowledgeable and familiar with centralized and distributed database systems available in the late 1990s. A POSITA would have a bachelor’s degree in electrical engineering, computer science, computer engineering, or equivalent training, and approximately two years of experience working in the field of networked systems for distributing data files from one or more databases. Lack of

professional experience can be remedied by additional education, and vice versa. Ex.1003, ¶¶20-22.

IX. CLAIM CONSTRUCTION

Claim terms in IPR are construed according to their “ordinary and customary meaning” to those of skill in the art. 37 C.F.R. § 42.100(b). Petitioner submits that, for the purposes of this proceeding and the grounds presented herein, no claim term requires express construction. *Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co.*, 868 F.3d 1013, 1017 (Fed. Cir. 2017)¹; Ex.1003, ¶48.

X. RELIEF REQUESTED AND THE REASONS FOR THE REQUESTED RELIEF

Petitioner asks that the Board institute a trial for inter partes review and cancel the Challenged Claims in view of the analysis below.

XI. IDENTIFICATION OF HOW THE CLAIMS ARE UNPATENTABLE

A. Challenged Claims

Petitioner challenges claims 1-4, 6, 9-14, and 17, which covers all claims asserted in Patent Owner’s complaint and other claims also rendered unpatentable by the same prior art, thus obviating the need for a trial regarding the ’128 patent in

¹ Petitioner does not concede that any term in the Challenged Claims meets the statutory requirements of 35 U.S.C. § 112, or that the Challenged Claims recite patentable subject matter under 35 U.S.C. § 101.

the co-pending litigation, substantially reducing the time and expense of that litigation for all parties.

B. Statutory Grounds For Challenges

	Reference(s)	Basis	Claims
Ground 1	Yurt in view of Logan	35 U.S.C. § 103	1-4, 6, 9-14, and 17

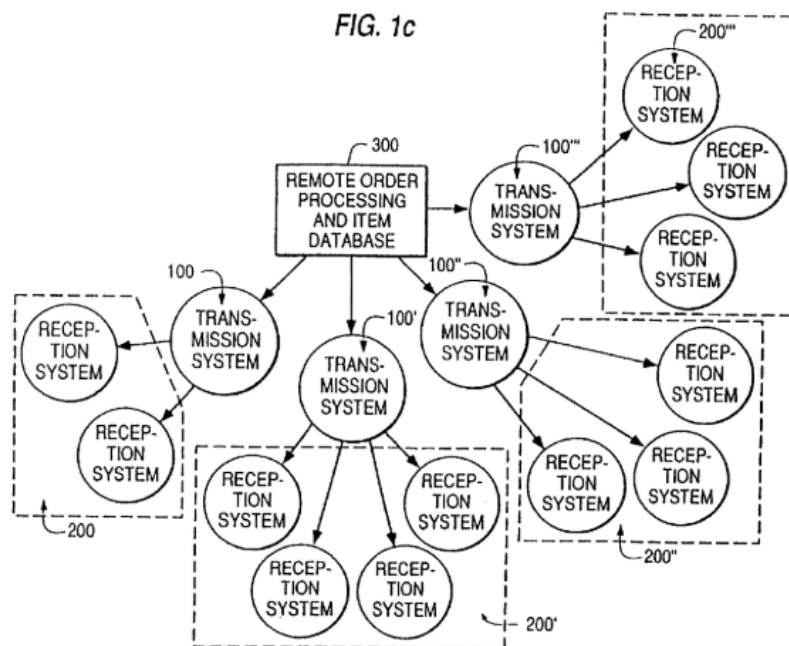
U.S. Patent No. 5,132,992 to Yurt et al. (Ex.1005, “**Yurt**”), was filed on January 7, 1991 and issued as a patent on July 21, 1992. Thus, Yurt is prior art under § 102(b). U.S. Patent No. 5,732,216 to Logan et al. (Ex.1006, “**Logan**”), was filed on October 2, 1996 and issued as a patent on March 24, 1998. Thus, Logan is prior art under § 102(e).

Petitioner’s § 103 obviousness grounds rely on the combined teachings of the references and not on a physical incorporation of elements. *See In re Mouttet*, 686 F.3d 1322, 1332 (Fed. Cir. 2012); Ex.1003, ¶73. Petitioner cites to additional prior art as evidence of the background knowledge of a POSITA and to provide contemporaneous context to support Petitioner’s assertions regarding what a POSITA would have understood from the prior art in the grounds. *See Yeda Research v. Mylan Pharm. Inc.*, 906 F.3d 1031, 1041-1042 (Fed. Cir. 2018).

**C. Ground 1: Claims 1-4, 6, 9-14, And 17 Are Obvious
Under 35 U.S.C. § 103 Over Yurt In View Of Logan**

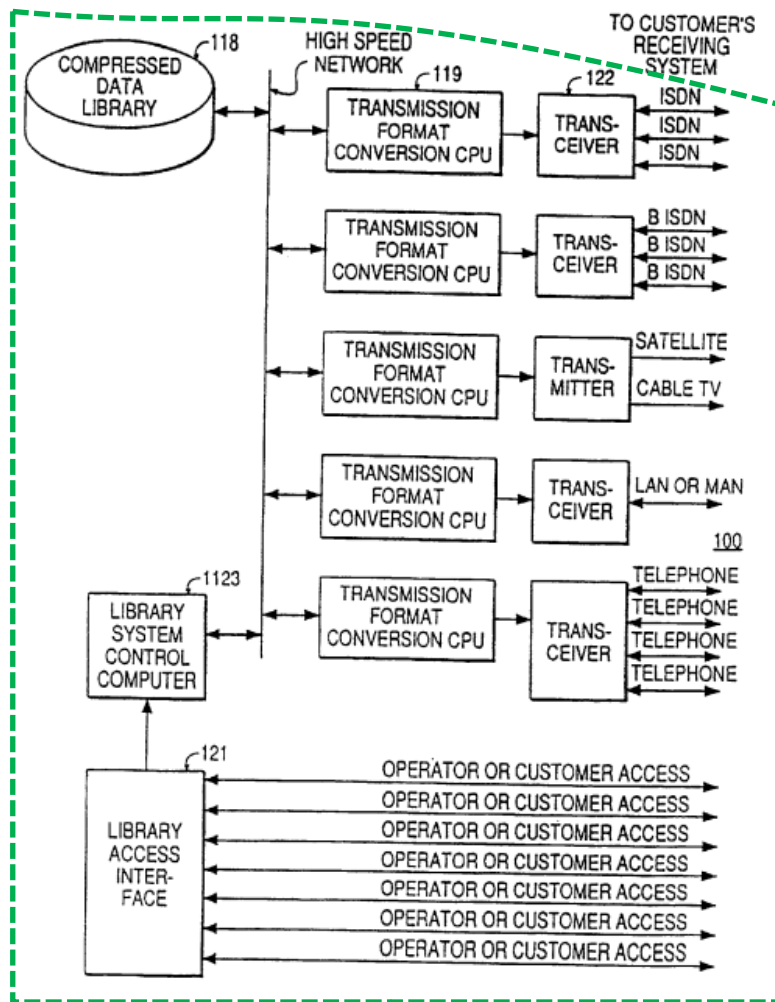
1. Yurt

Like the '128 patent, Yurt is directed to a “system of distributing ... audio information ... in less than real time.” Ex.1005, Abstract. Yurt’s system includes “remote order processing and item database 300” and “a plurality of transmission systems 100.” Ex.1005, 4:1-9. Each of the transmission systems also “communicates with a respective set of reception systems 200, 200’, 200”, and 200’”,” which each communicate with a plurality of users. Ex.1005, 4:7-13; Figure 1c:



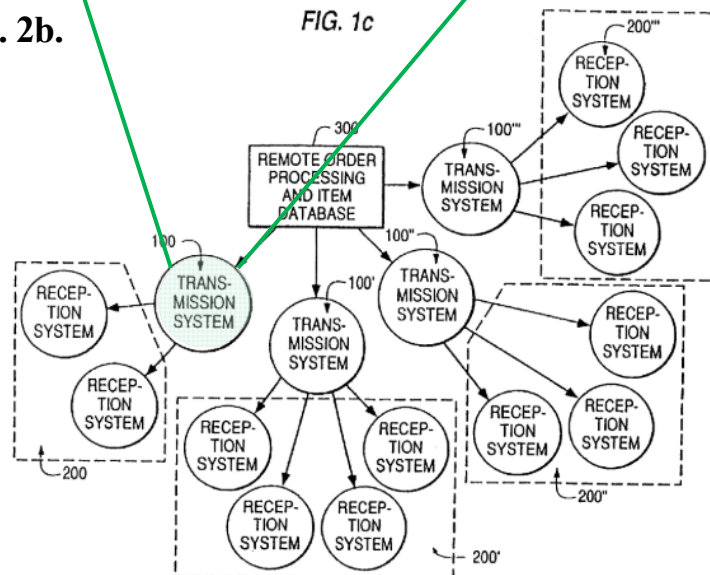
Ex.1005, Fig. 1c.

Each transmission system 100 includes a data library 118, library system control computer 1123, and multiple access interfaces:



Ex.1005, Fig. 2b.

FIG. 1c



Ex.1005, Fig. 1c (annotated).

Data library 118 stores audio and/or video files, and an “item database master” in computer 1123 tracks information about the stored files. Ex.1005, 10:31-45, 11:40-57 (“kept current to the contents of the compressed data library 118”). The database masters of each library 118 are also at the remote order processing and item database 300, along with “dispatching control software” that “keep[s] a list of the available titles in a particular compressed data library 118” in a given transmission system 100, to “coordinate network traffic” and library utilization. Ex.1005, 11:66-68, 17:54-66; Ex.1003, ¶¶52-56, 58.

A user searches for audio files via library access interface 121, and “all available titles which may be received from the available, remotely accessible libraries.” Ex.1005, 17:44-53. Once the user has found a file, the user selects it for transmission. Ex.1005, 15:20-22. The requested item is retrieved and “transfer[red] ... from the compressed data library 118 onto the communication channel.” Ex.1005, 13:29-37, 15:55-60. The user receives “the selected audio/video material ... in a fraction of real time.” Ex.1005, 13:45-46, 2:1-4. Remote order processing and item database 300 facilitates “inter-library transfer” of library files, such as “where not all items are contained in each of the compressed data libraries 118.” Ex.1005, 7:44-48, 17:57-61. Inter-library transfer includes sending a library item “to another library,” where “the other library can then distribute the compressed data to users.” Ex.1005, 7:44-48, 13:4-8; Ex.1003, ¶¶57-58.

2. Logan

Logan describes an “audio program and message distribution system” including “host server 101” storing audio data files. Ex.1006, Abstract; 4:46-52. A user at “player 103” (e.g., laptop/desktop) requests audio files from host server 101, which provides them. Ex.1006, 3:24-25, 4:40-46, 4:53-54; Figure 1:

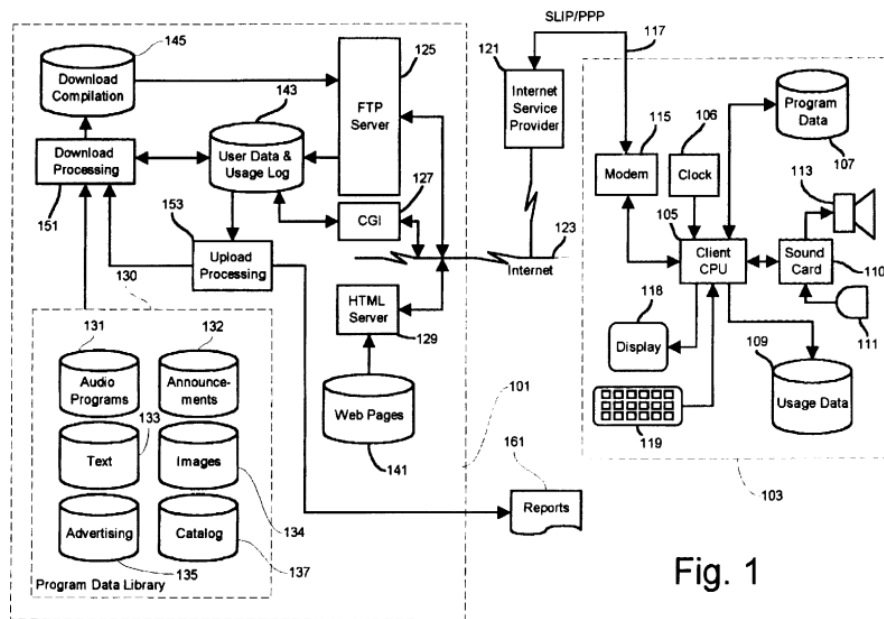


Fig. 1

Ex.1006, Fig. 1.

Host server 101 also maintains a “user data and usage log database [143].” Ex.1006, 5:35-45. User data includes “data describing the preferences, demographic characteristics and program selections unique to each subscriber.” Ex.1006, 5:35-45. Usage log data, including information from each request by the user, is recorded to the usage log 143. Ex.1006, 8:49-58. The system uses the data in log database 143 “for billing [purposes],” and adapting subscriber preferences to actual usage patterns. Ex.1006, Abstract; Ex.1003, ¶¶59-61.

3. Reasons To Combine Yurt With Logan

A POSITA would have been motivated to combine Yurt with Logan for several reasons, discussed further below. Combining Logan's usage log teachings with Yurt's improved audio file accessibility (e.g., via popularity) to track additional user request information would have been obvious, beneficial, and predictable. Ex.1003, ¶¶62-72.

A POSITA would have been motivated to turn to Logan's user data tracking teachings to track and store additional information regarding user requests, per Yurt, for implementation details about storing user tracking data. Yurt teaches that received user requests for audio files include information about the requested items and the user address. Ex.1005, 12:21-27. Yurt further teaches assigning a popularity code to each item that is dynamically updated based on request frequency. Ex.1005, 12:28-57. Yurt leaves implementation details about when to perform the updating of the user records up to a POSITA. Ex.1003, ¶67.

Logan teaches implementation details for tracking user/usage data for billing purposes and adapting preferences "based on actual usage." Ex.1006, Abstract. Logan specifically teaches storing such information in response to the user's request for the audio data. *See, e.g.*, Ex.1006, 8:49-58. A POSITA would have therefore been motivated to track and store additional information regarding user requests as the requests occur, per Logan, and it would have been obvious to do so since Yurt

already stores such information regarding user requests to track item popularity. No physical modification would have been necessary to implement Logan's teachings with Yurt's system and method teachings. A POSITA would have thus been motivated to combine Yurt's teachings (*e.g.*, tracking information about requested items like item popularity) with Logan's teachings (*e.g.*, storing user data and usage information in response to user requests). This would have been merely the use of a known technique (Logan's tracking of user and usage data in response to user requests) to improve a similar method in the same way (Yurt's tracking of information about user-requested items). Ex.1003, ¶¶67-68.

A POSITA would have had a reasonable expectation of success combining Logan's and Yurt's teachings. Their structures are compatible, with Yurt using a cable/satellite infrastructure for transmitting requested audio information and other general system components (*e.g.*, data library, item database, etc.). *See* Ex.1005, 4:1-13 (Fig. 1c), 10:31-45 (Fig. 2b). Similarly, Logan teaches relying upon a cable/satellite infrastructure for distributing requested audio information and generic computer components (*e.g.*, host server for storing user data). Ex.1006, 3:23-40, 5:33-45. Thus, implementing Logan's teachings of storing information about audio data in response to user requests with Yurt's transmitting audio information and storing information about requested items would have been straightforward. Further, a POSITA would have known that storing this information in response to each user

request is used for financial and advertising purposes, as confirmed by Logan. Ex.1003, ¶¶69-70.

Further, a POSITA would have been motivated to combine Logan's teachings with Yurt's system and method teachings, because Logan's teaching is implementation detail that does not require any modification to Yurt's system teachings. Yurt stores information about requested items responsive to user requests (e.g., item popularity). Ex.1005, 12:28-57. A POSITA would have easily known how to store additional information about each request in Yurt's database, as Logan confirms by storing user/usage data in response to the user's request. *See, e.g.*, Ex.1005, 11:17-21 ("facts in the item database may preferably be **updated at any time**"); Ex.1006, 8:49-58. A POSITA would have further benefitted from Logan's teachings to "better select[] program material" by the tracking. Ex.1006, 21:44-51, 27:60-67; Ex.1003, ¶¶71-72.

Finally, Yurt and Logan are both analogous art to the '128 patent. Yurt and Logan both pertain to the same field of networked systems that distribute data files upon request as the '128 patent. *See* Ex.1001, 1:6-15; Ex.1005, Abstract, 1:6-10 (user controls access/playback operations of files), 2:25-61; Ex.1006, Abstract (distributing audio data), 4:46-54, 5:46-66, 7:17-31; Ex.1003, ¶63.

Yurt and Logan are also each reasonably pertinent to the problems identified by the '128 patent, including those "associated with conventional approaches of

distributing music” like “listening to high-fidelity music in real time” over the Internet. Ex.1001, 1:34-53 (disadvantages include “specialized hardware and software,” inconvenience, and being slow), 2:22-25; Ex.1003, ¶64.

Yurt provides solutions to these disadvantages. Yurt’s system allows the user “more convenient means of accessing” audio/visual material “by integrating both accessing and playback controls into a system that can use multiple existing communications channels,” such that “the user controls the access and the playback operations.” Ex.1005, 1:6-10, 1:18-20, 1:57-61. Yurt’s system removes the need for specialized hardware and software for providing audio. Further, Yurt’s system sends selected material to the user for real-time playback. Ex.1005, 1:62- 2:4. Thus, Yurt provides just the type of solutions that are reasonably pertinent to the problems identified in the ’128 patent. Ex.1003, ¶65.

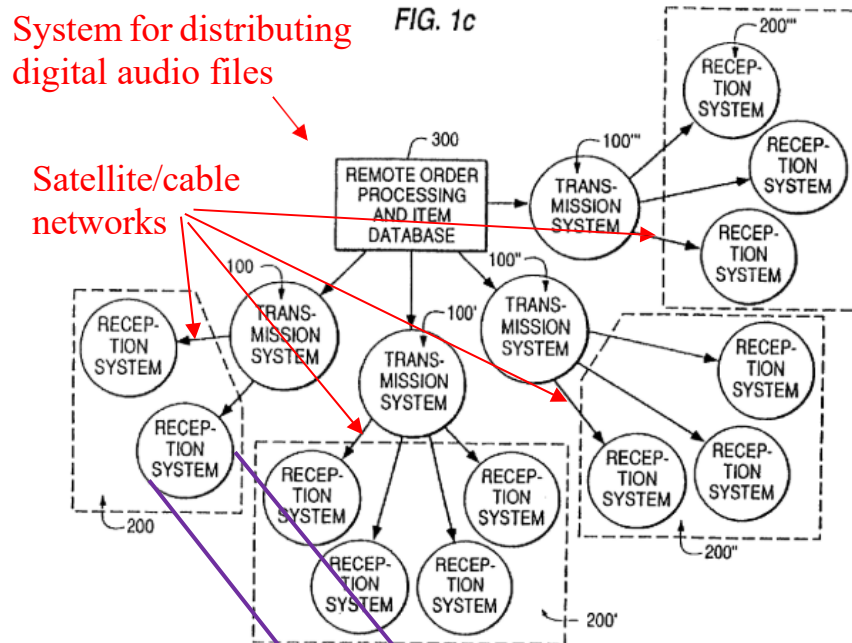
Logan is also reasonably pertinent. The ’128 patent further explains that there is a need to associate music in different “niche categories” and by user demographics associated with different types of requests/purchases. Ex.1001, 2:1-21. Logan teaches storage and maintenance of user data and usage log records, based on requested audio information, in a database, such that the data can be used “in connection with financial and accounting functions including subscriber and advertiser billing, content provider royalty payment accounting, and market analysis processing.” Ex.1006, Abstract, 5:33-42, 6:27-35. Specifically, Logan teaches that

the database based on subscriber requests is used to generate “targeted advertising” based on the subscriber’s recorded “subject matter interests ... along with personal data,” such that “particular advertising segments may be directed to only those subscribers having a likely interest in the goods or services advertised.” Ex.1006, 10:3-14. Thus, Logan’s teachings provide solutions that address the “marketing and promotional purposes” that are reasonably pertinent to the problems identified in the ’128 patent. Ex.1003, ¶66.

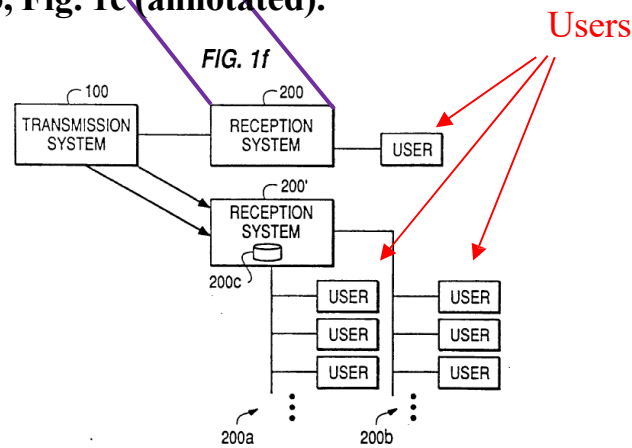
4. Claim 1

[1.0] A system for distributing digital audio files in substantially real time to users connected to a plurality of satellite or cable TV networks, said system comprising:

First, Yurt discloses “[a] **system of distributing ... audio** information” using “digital signal processing.” Ex.1005, Abstract. The system includes a “remote order processing and item database 300” communicating with “a plurality of transmission systems 100, 100’, 100”, and 100’”,” each in communication “with a respective set of reception systems 200, 200’, 200”, and 200’”,” over channels including satellite and cable networks. Ex.1005, 4:1-13; 16:62-68; see also 4:11-13 (reception systems are for users of the system); 4:19-25, 4:36-39 (reception system for one or multiple users, just like ’128 patent); FIGs. 1c, 1f:

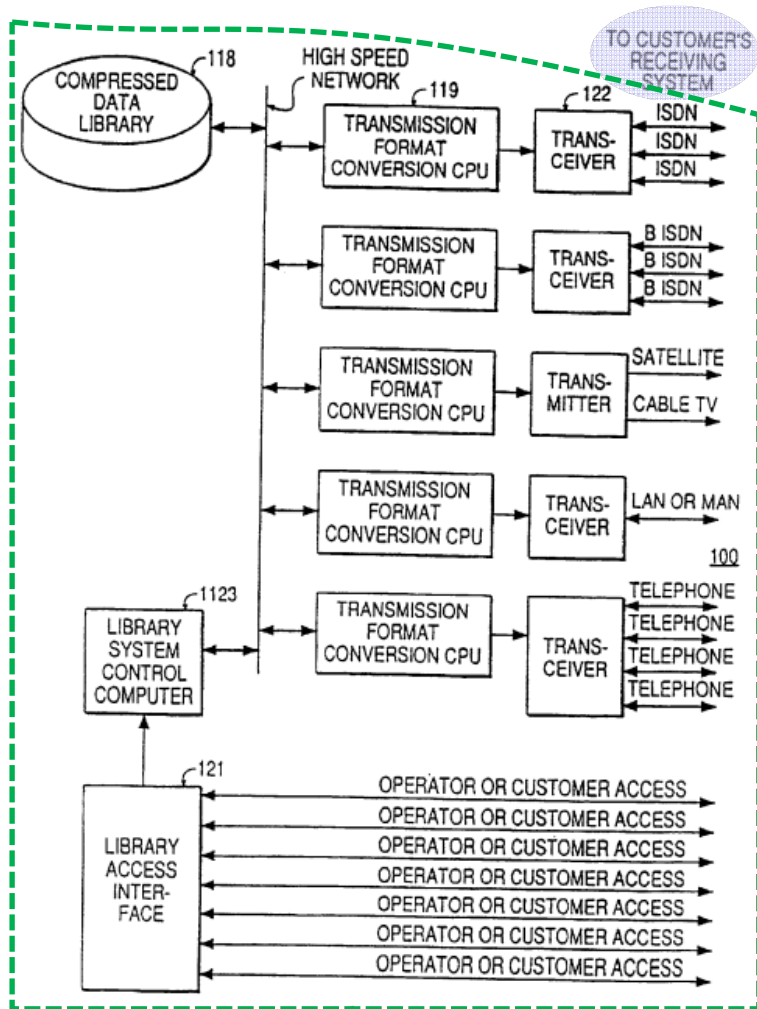


Ex.1005, Fig. 1c (annotated).

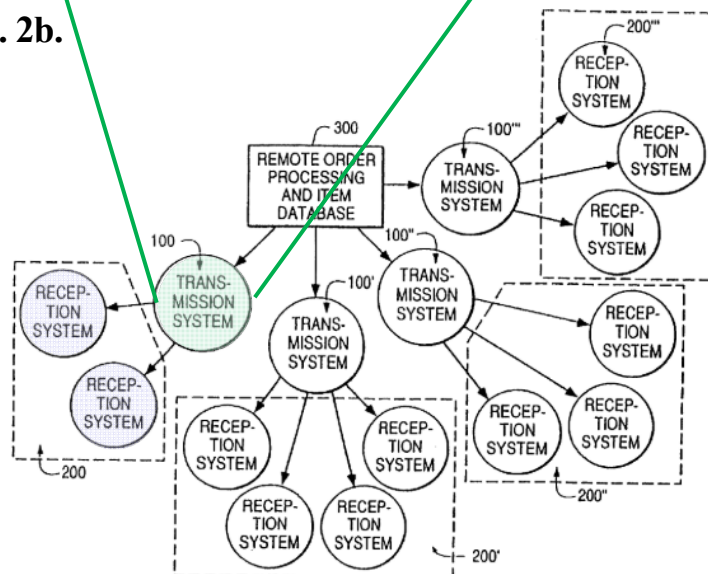


Ex.1005, Fig. 1f (annotated).

Yurt stores “digital audio” as a “file” in libraries of each transmission system 100. Ex.1005, 5:66-6:7; 2:41-47; *see also* 7:27-29. Even if audio data begins as analog data, Yurt converts it to digital for storage in library 118 of a transmission system 100. Ex.1005, 6:36-39, 7:12-26. Transmission system 100 is illustrative of each of the transmission systems in Figure 1c. *See* Ex.1005, Figure 2b:



Ex.1005, Fig. 2b.



Ex.1005, Fig. 1c (annotated).

Second, Yurt's system distributes digital audio files. Transmission system 100 "receives the request" for a digital audio file from a user "and retrieves the composite formatted data block of the requested item stored in compressed data library 118 and converts the compressed formatted data block into a format suitable for transmission." Ex.1005, 13:29-47. Yurt transmits the data by encoding it and sending it "to at least one remote location." Ex.1005, 15:55-64. Yurt therefore discloses "*a system for distributing digital audio files*" (the system of storing and transmitting digital audio files to requesting users). Ex.1003, ¶¶76-77.

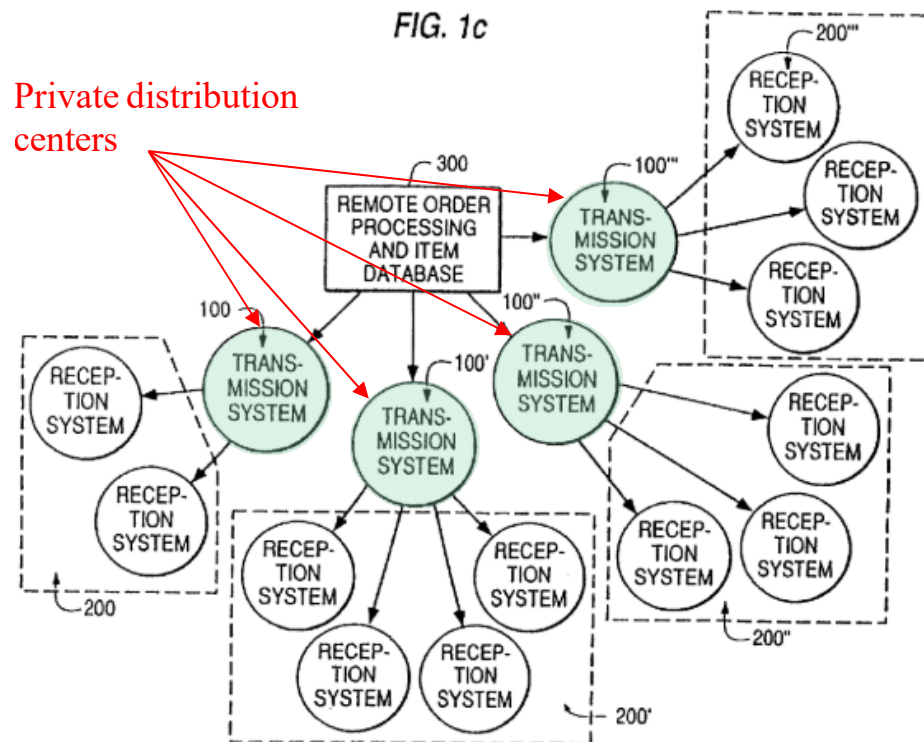
Third, Yurt's system distributes digital audio files over "**cable or satellite broadcast channels to a receiver.**" Ex.1005, Abstract. Yurt explains that "many forms of communication channels may be employed," for distribution, including "**cable television systems**, microwave, and MAN" or "**satellite.**" Ex.1005, 16:62-68; 5:59-61; *see also* Fig. 2b (implementation of one of the transmission systems 100). Thus, Yurt further teaches distributing the files "*to users connected to a plurality of satellite or cable TV networks.*" Ex.1003, ¶78.

Finally, Yurt distributes the content "in less than **real time**" which refers to transmitting the content "as a fraction of real time." Ex.1005, Abstract, 1:66-2:4. "[L]ess than real time" is even better than real-time, or faster than real-time. Ex.1003, ¶79. For example, Yurt's receiving system will "decompress in real time the requested material as it is distributed by transmission system 100." Ex.1005,

4:64-5:9. Yurt’s use of high-bandwidth cable networks for fast transmission of audio files mirrors the disclosure in the ’128 patent and achieves the same result: real-time consumption of audio by the end user. *See* Ex.1001, 2:67-3:2 (“Because of the relatively high bandwidth of existing cable systems, consumers may listen to music in full high fidelity and at real time.”); Ex.1005, 4:64-5:3; 16:62-68; 5:59-61. Moreover, by transmitting *faster* than real-time, Yurt’s system is “reasonably capable of operating so as to meet” the claimed real-time requirement. *ParkerVision, Inc. v. Qualcomm Inc.*, 903 F. 3d 1354, 1361-62 (Fed. Cir. 2018) (prior art capable of operating according to the claim language invalidates). Thus, Yurt discloses [1.0], and Yurt’s teachings would not be materially altered in the combination with Logan. Ex.1003, ¶¶79-80.

[1.1] a) a plurality of private distribution centers, each including:

First, Yurt discloses a system for distributing audio information to requesting users via a plurality of “transmission systems” communicating with respective users. Ex.1005, 4:1-13, Abstract; [1.0]. Each of Yurt’s plurality of transmission systems 100 “receiv[es] transmission requests to transmit items and [retrieve] formatted data blocks stored in the compressed data library 118 corresponding to the requests from users.” Ex.1005, 13:29-37; Figure 1c:



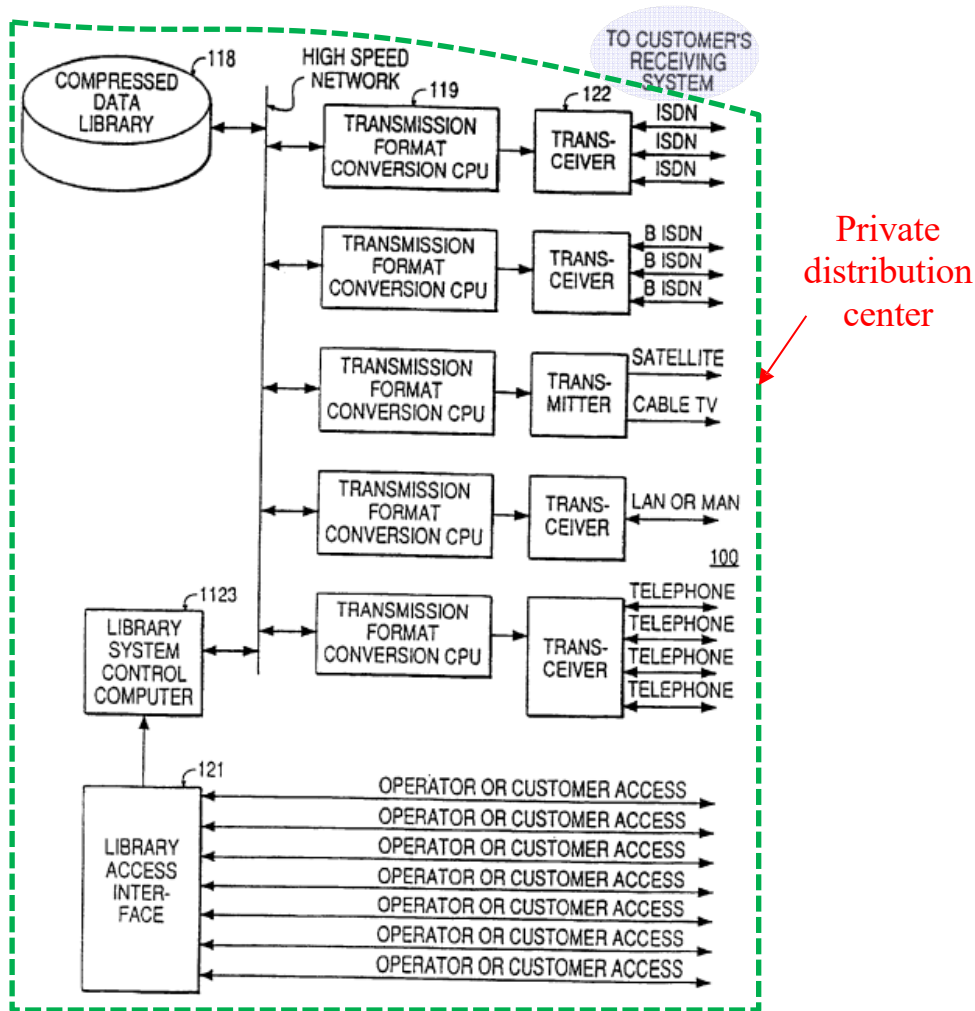
Ex.1005, Fig. 1c (annotated); Ex.1003, ¶¶81-82.

Further, Yurt teaches a “distribution method” that is “responsive to requests identifying information to be sent from the transmission system 100 to remote locations.” Ex.1005, 18:46-52. Such a method is described with respect to an exemplary transmission system 100, with each such system capable of the same approach. Ex.1003, ¶82.

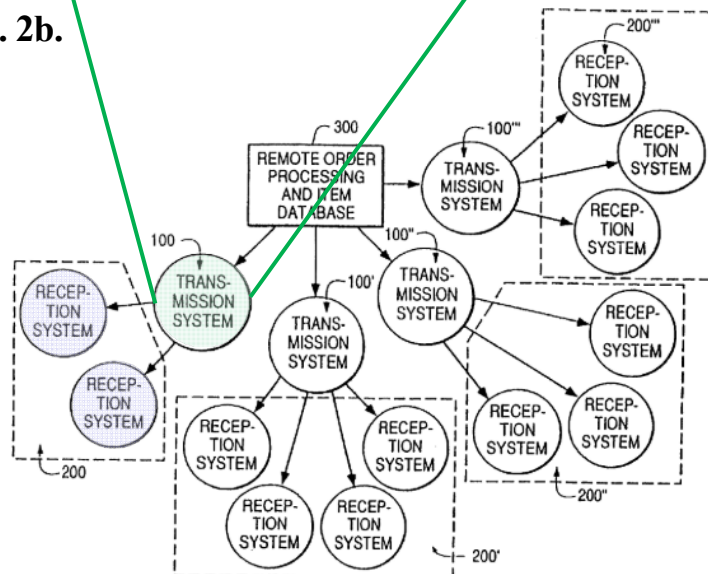
Second, Yurt’s teachings demonstrate “*private*” distribution centers. While the claim recites that the distribution centers are “*private*,” the ’128 patent does not clarify what constitutes “*private*” distribution centers (it does not mention the term “private” at all). Instead, the ’128 patent merely describes users communicating with distribution centers, each of which “is provided with a library,” which “store[s] a

plurality of music titles.” Ex.1001, Abstract; *see also*, e.g., 3:36-40. Accordingly, the disclosure in the prior art of a “*distribution center*” likewise demonstrates a “*private distribution center*.” Ex.1003, ¶83.

In view of this context, Yurt’s transmission system 100 discloses a “*private distribution center*,” because each system includes the same components: a library storing audio files, and communication (and provision of) the audio files to requesting users. Ex.1005, 6:8-22; *see also* Figures 1c, 2b (which illustrates one example of a transmission system in Figure 2b, with multiple such systems shown in Figure 1c):



Ex.1005, Fig. 2b.



Ex.1005, Fig. 1c (annotated).

Therefore, each “transmission system 100” discloses a “*private distribution center*” and, with multiple such transmission systems, a plurality of such centers. Thus, Yurt discloses [1.1], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶82-85.

[1.1.1] 1) a network interface including an input and an output for connecting to one of the satellite or cable TV networks;

Yurt combined with Logan renders [1.1.1] obvious.

First, Yurt discloses a digital audio information distribution system with multiple transmission systems 100 (a plurality of “*private distribution centers*”). See [1.1]; Ex.1003, ¶¶86-87.

Second, each transmission system 100 in Yurt includes a “transmitter 122,” which sends requested digital audio information (also referred to as an “item” in Yurt, see [1.0]) from the data library 118 to the customer’s receiving system 200 via a communication channel. Ex.1005, 15:61-16:13; 16:53-56. Yurt contemplated various types of connections to a customer’s receiving section are shown, including specifically **satellite and cable TV** connections. See Ex.1005, Fig. 2b; 16:62-68; 5:59-61. Requested audio data from the compressed data library 118 is encoded for transmission by “transmission data converter 119” prior to transmission via transmitter 122 (a “*network interface*”) to the customer. Ex.1005, 15:55-60; Figure 2b:

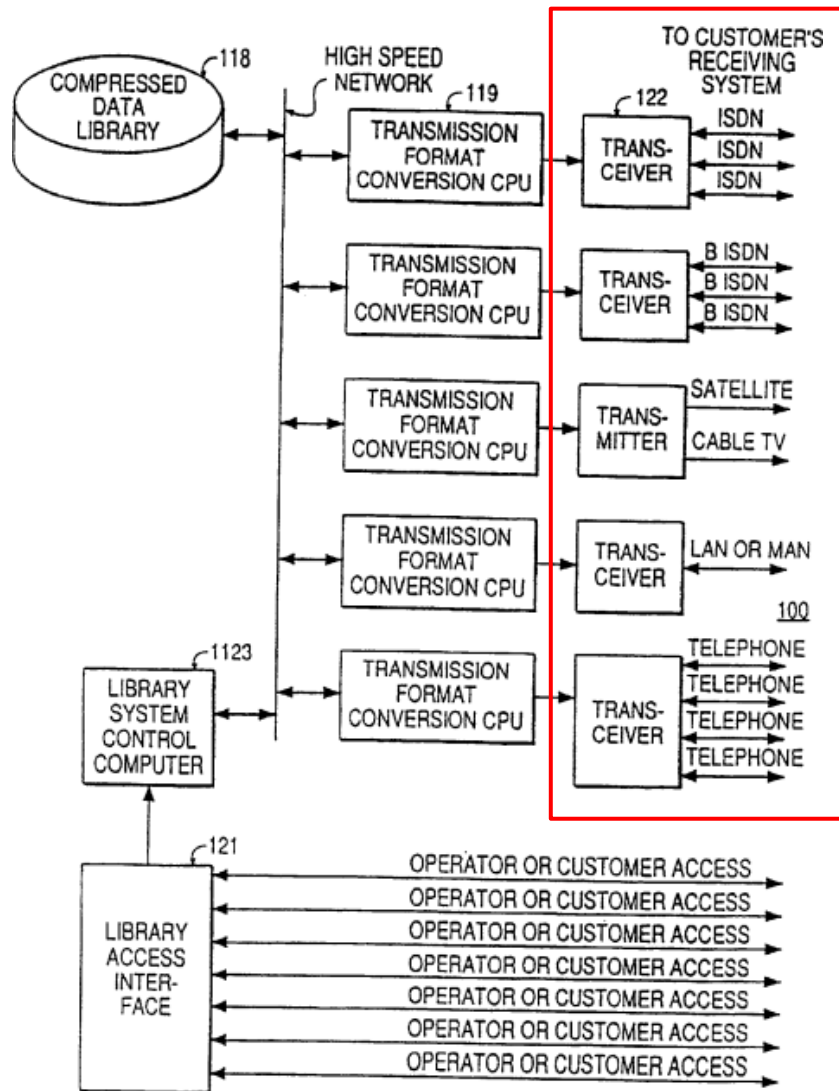


FIG. 2b

Ex.1005, Fig. 2b (annotated); Ex.1003, ¶88.

Third, Yurt combined with Logan renders obvious a “*network interface*” with an input and output. The transmitter 122 (“*network interface*”) sends the audio information to the customer’s receiving system via satellite or cable TV connections (“*and an output for connecting to one of the satellite or cable TV networks*”). Ex.1005, 15:61-16:13; Ex.1003, ¶89.

It would have been obvious that Yurt's transmission system 100 receives and transmits data via the satellite/cable interface. Ex.1003, ¶¶91-93. This was a well-known manner to bidirectionally communicate using cable/satellite. Logan confirms this, teaching bidirectionally communicating between a host server 101 (file requests) and client systems 103 ("player 103", e.g., laptops, desktops) via Internet 123. Ex.1006, 5:46-54, 3:24-25. Logan particularly teaches using "**cable modem and satellite links** ... to provide data communications" for Internet 123. Ex.1006, 6:36-44. Logan explains that cable or satellite links offer "higher speed access" that "substantially" reduce upload and download times. Ex.1006, 8:67-9:5; Ex.1003, ¶90.

It would have been obvious to implement Yurt's cable/satellite transmitters to be bidirectional (i.e., a cable or satellite transceiver) for receiving and transmitting data, as Logan teaches. Ex.1003, ¶¶91-93. As a result, when Yurt teaches receiving user access/requests via a "user terminal interface ... from various terminals including personal computers," the communication links between the user's terminal and the transmission system 100 would be via "cable modem" or "satellite" links, per Logan. Ex.1005, 14:64-67, 15:3-32. Based on these combined teachings, the "*network interface*" (122) would include an "*input*" from a cable or satellite network, and an "*output*" to the cable or satellite network. Ex.1003, ¶¶91-93.

[1.1.2] 2) a library including a plurality of digital audio files;

Each transmission system 100 includes a “compressed data library 118” with “audio” stored in “digital” format. Ex.1005, 6:8-22; *see also* [1.0], [1.1] (multiple transmission systems, each with its own library 118); Ex.1005, 6:35-38; Figure 2b:

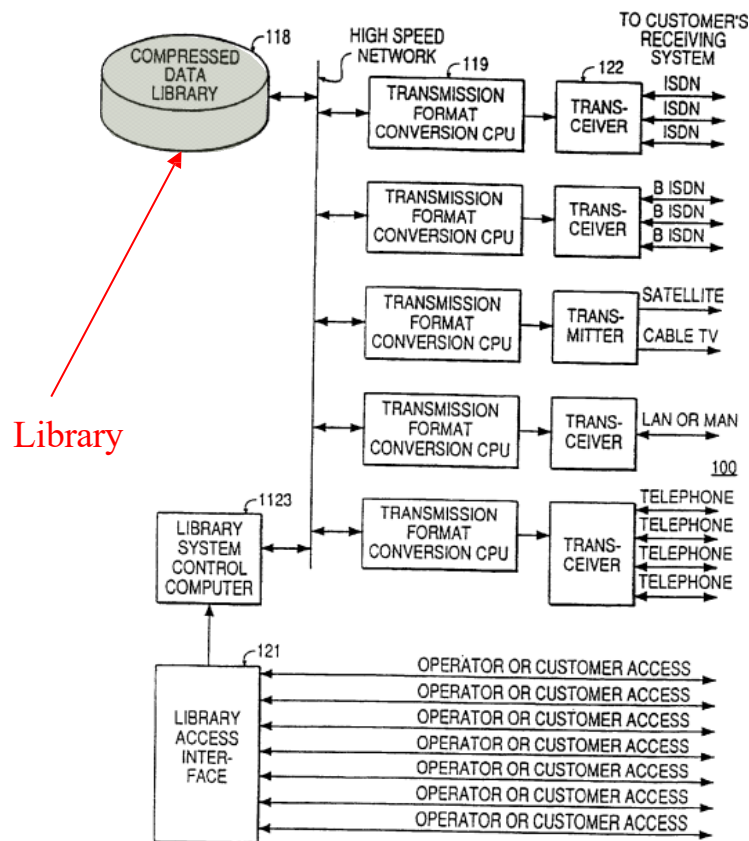
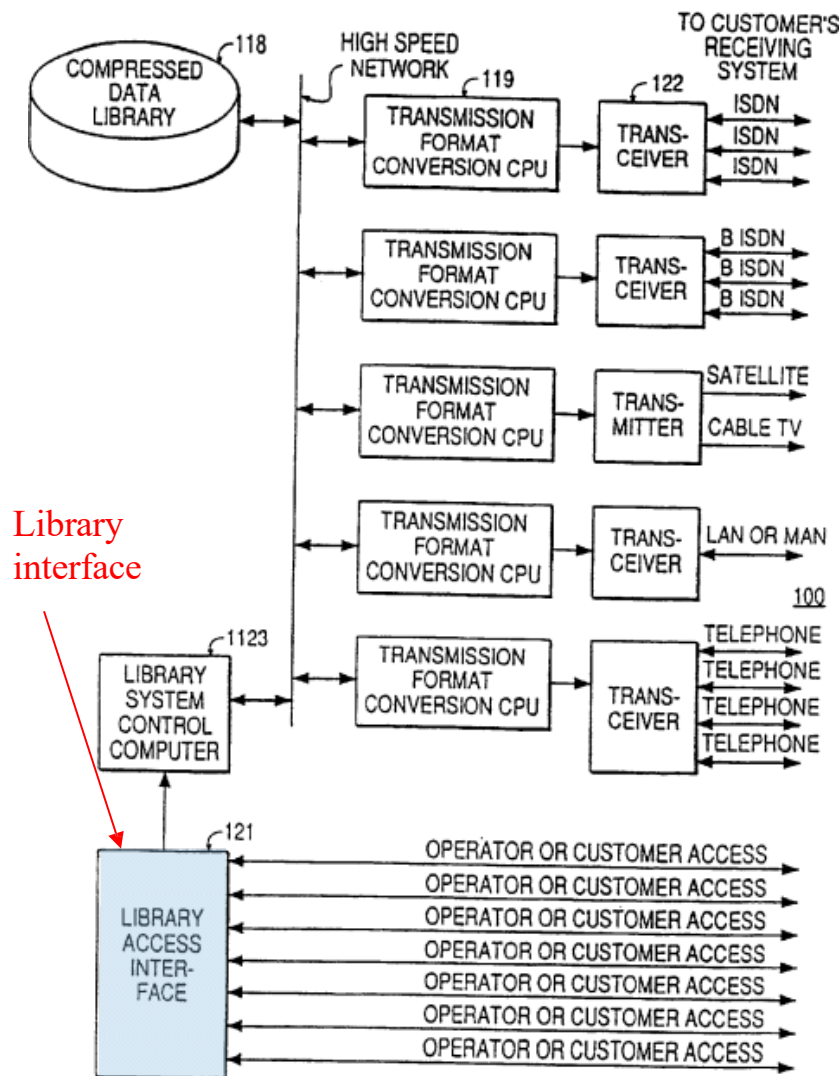


FIG. 2b
Ex.1005, Fig. 2b (annotated).

Thus, Yurt discloses [1.1.2], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶94-97.

[1.1.3] 3) a library interface including an input and an output connected to said library; and

Yurt's transmission system 100 includes a “**library access interface 121,**” a “library access/interface means for receiving transmission requests to transmit items and for retrieving formatted data blocks stored in the compressed data library 118 corresponding to the requests from users” (“*a library interface . . . connected to said library*”). Ex.1005, 13:29-34; Figure 2b:



Ex.1005, Fig. 2b (annotated); Ex.1003, ¶¶98-100.

Yurt teaches that “[t]he library access interface 121 **receives** transmission requests either directly from the users or indirectly by remote order processing and item database 300.” Ex.1005, 13:29-40. The library interface 121 accesses “compressed **audio ... data blocks** ... in the compressed data library 118.” Ex.1005, 13:34-47. Thus, because the interface receives the audio data in the library, Yurt teaches that the library interface includes an “*input*.” Ex.1003, ¶101.

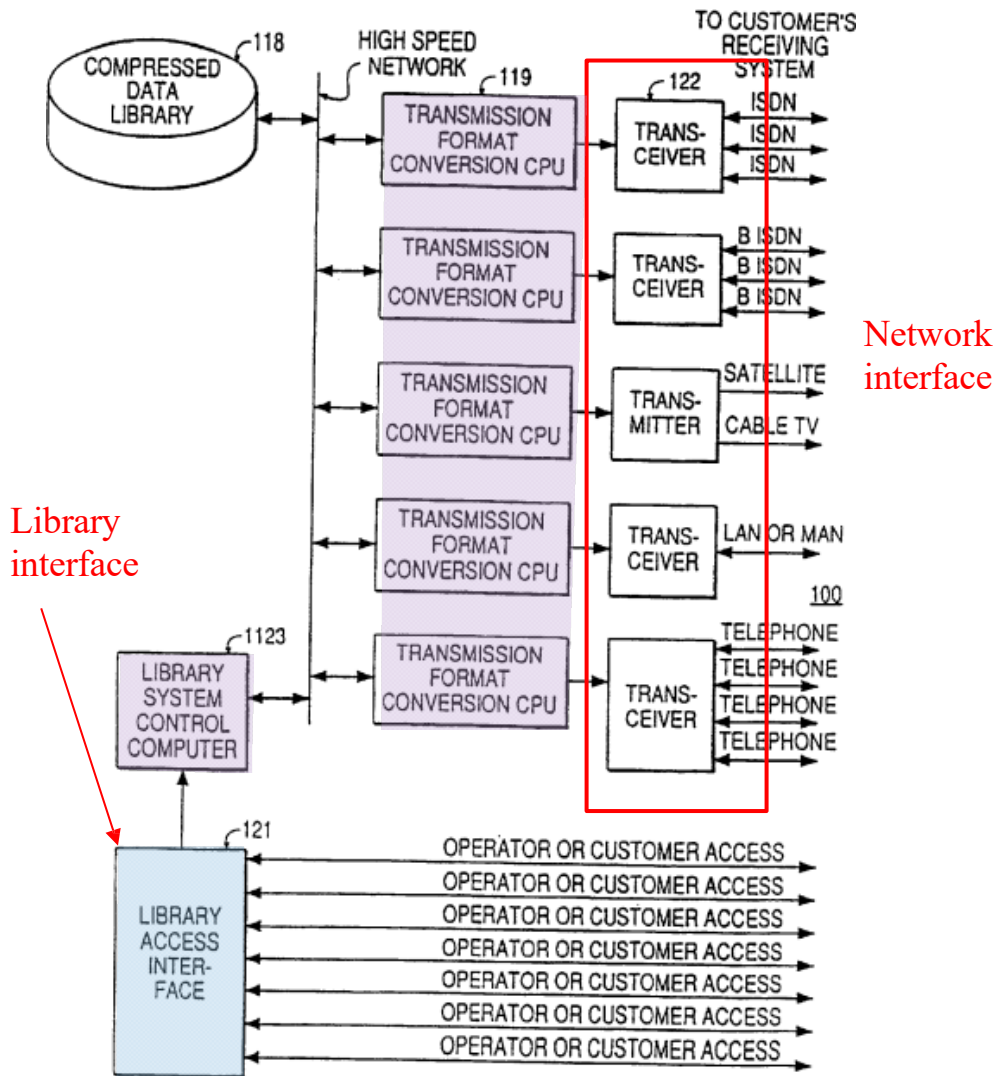
After formatting the data blocks “into a format suitable for transmission,” “[t]he requested item is then sent to the user via the transmitter 122 or **directly via interface 121**” (“*an output*”). Ex.1005, 13:29-47. Moreover, because Yurt teaches “access[ing]” the data blocks in the library “via library access interface 121,” Yurt therefore further teaches an output from the interface to the library. Thus, Yurt discloses [1.1.3], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶101-102.

[1.1.4] 4) a processor connected to said network interface and said library interface, said processor for:

Yurt’s transmission system 100 includes “library system control computer 1123” which receives “[a]ll transmission requests from the access methods” in a transmission queue it manages. Ex.1005, 15:33-37. It was well-known and obvious that a “computer” (e.g., computer 1123) includes a processor. Ex.1003, ¶¶103-105. Yurt’s transmission system 100 also includes a “transmission format

conversion CPU 119,” which converts data blocks from the library 118 “into a format suitable for transmission” to the requesting user “via the transmitter 122 or directly via interface 121.” Ex.1005, 13:40-47. Accordingly, in Yurt computer 1123’s processor, via transmission format CPU 119, is “*connected to said network interface and said library interface.*” See Ex.1005, Figure 2b (below). This teaching alone in Yurt renders [1.1.4] obvious. Ex.1003, ¶¶105-106.

Further, the processor of computer 1123 and the transmission format conversion CPU 119 collectively teach “*a processor*” connected to transmitter 122 (“*said network interface*”) and to library access interface 121 (“*library interface*”):



Ex.1005, Fig. 2b (annotated).

The processor of computer 1123 together with CPU 119 in Yurt therefore further renders obvious [1.1.4]. Thus, Yurt teaches [1.1.4], and Yurt's teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶106-107.

[1.1.4.1] (a) displaying to a user a menu of said audio files;

First, Yurt's transmission system 100 includes library system control computer 1123 and transmission format conversion CPU 119 (separately as well as together "*a processor*") connected to library interface 121 ("*library interface*") and transmitter 122 ("*network interface*"). See [1.1.4]. Further, Yurt's digital audio recordings ("*said audio files*") are stored in a compressed data library 118. See [1.1.2]; Ex.1003, ¶¶108-109.

Second, Yurt's library interface 121 maintains a "*menu*" of audio files. Yurt teaches maintaining "facts about the items [in library 118] ... in files as a part of the items or the facts may be kept separately ... to inform users of the available items." Ex.1005, 11:40-45. These facts about the items (e.g., audio files) are stored in separate files from the audio files themselves "in systems which have portions split in separate locations"; as a result, user orders for audio files are distributed "to other portions of the transmission and receiving system for ultimate distribution to the requesting user." Ex.1005, 11:44-53. Yurt teaches specifically storing these facts about the library's audio files in an "item database master ... resid[ing] **in the system control computer 1123.**" Ex.1005, 11:54-60. The database master is "updated and kept current to the contents of the compressed data library 118." Ex.1005, 11:54-60. Yurt therefore discloses that the processor, via system control computer 1123, maintaining "*a menu of said audio files*" (the item database master about digital audio recordings in library 118). Ex.1003, ¶110.

Third, Yurt teaches displaying the menu of audio files to users that access the library interface. Users access the item database master “via application programs, running **on the system control computer 1123.**” Ex.1005, 11:57-60. Yurt expressly discloses access to the item database master “by a user terminal interface method,” which “provides the user with **access from various terminals including personal computers, and specialized interfaces built into the reception system 200** for the user.” Ex.1005, 14:64-67. When the user accesses the database master via a terminal, the user is thus able “to do a **search of available programs from a computer screen.**” 14:67-15:1. This list of programs on the user’s screen is thus a “*menu*” that is displayed by the processor of the system control computer 1123. Ex.1003, ¶111.

The user accesses the library menu via the “user terminal interface,” and “select[s] a desired item by **searching the database of available titles in the library system control computer 1123.**” Ex.1005, 15:6-13; *see also* 13:48-60. Again, because access is by searching the database(s) in the library system control computer 1123, the menu presented to the user performing the search would be by the computer 1123’s one or more processors. Yurt therefore discloses “*displaying to a user.*” Thus, Yurt teaches [1.1.4.1], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶111-112.

[1.1.4.2] (b) receiving requests from a user for a plurality of said digital audio files and a user address;
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First, Yurt's user requests for digital audio files include a user address. Once the user has searched a transmission system 100's library 118, "the user **selects the item for transmission** at a specific time and **location**." Ex.1005, 15:20-22. The selection is a "*request*" (a "transmission request") for the item (e.g., digital audio file), that the processor of the computer 1123 receives and places into a queue "**managed by the library system control computer 1123**." Ex.1005, 15:33-37. A program on computer 1123 manages the queue to control "distribution of the requested items to the reception system 200 of the user." Ex.1005, 15:35-37. Yurt discloses the computer 1123's processor receiving multiple requests for "items" (digital audio files) from a given user. Ex.1005, 15:35-37. Thus, Yurt discloses receiving requests for digital audio files and the location of the user. Ex.1003, ¶¶113-115.

Second, Yurt also renders [1.1.4.2] obvious. When a user "selects the item or items that he or she desires ... **a request for transmission of a particular item or items** is sent to the distribution manager program of the system control computer 1123." Ex.1005, 12:20-24. The request "contains **the address of the user**, the address of the item, and optionally" additional information. Ex.1005, 12:24-26; 15:20-22. These teachings, together, render obvious receiving a request for multiple "items" (e.g., digital audio files) as well as an address of the user at which to receive

the requested items. Thus, Yurt teaches [1.1.4.2], and Yurt's teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶116-117.

[1.1.4.3] (c) retrieving said requested digital audio files from said library via said library interface;

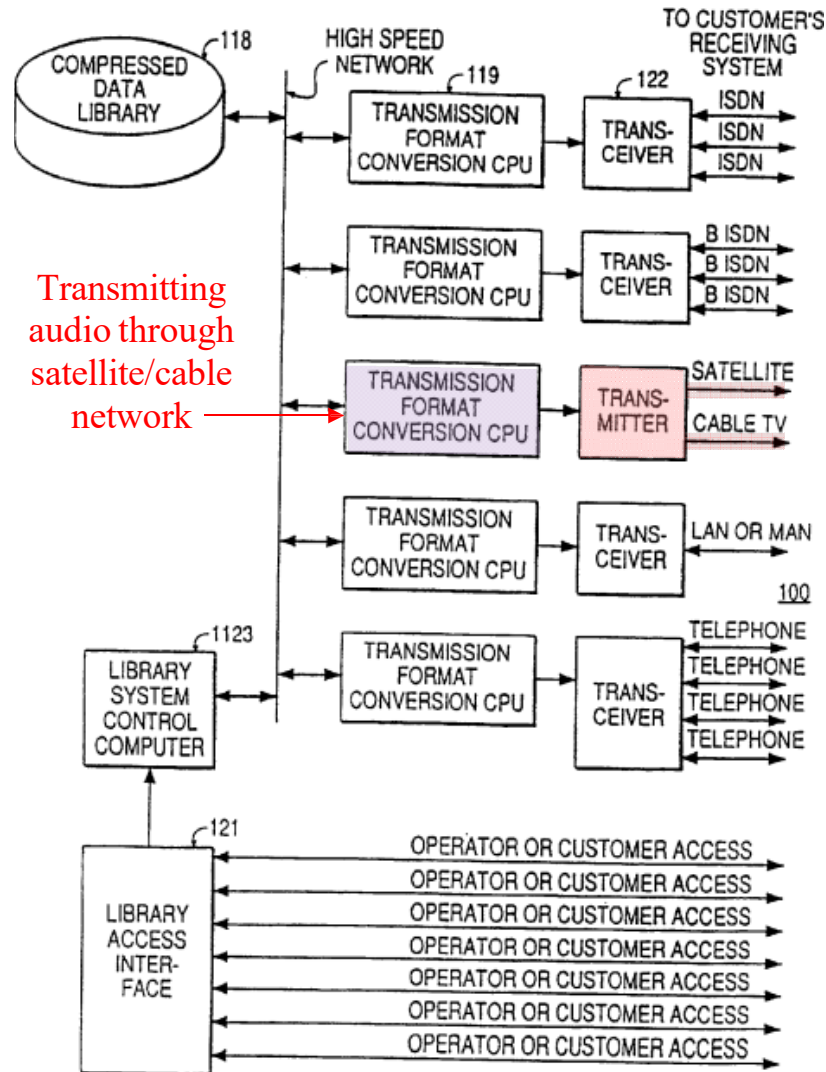
Yurt discloses “**customer access** of an item stored in compressed data library 118 **via the library access interface 121.**” Ex.1005, 13:48-60 (analogizing customer access “to making an airline reservation or transferring funds between bank accounts,” using “telephone tone decoders and voice response hardware,” or “operator assisted service” or “user terminal interfaces” to request an item). Files are retrieved from the library after they have been requested (*see, e.g.*, analysis at [1.1.4.2]). In particular, transmission system 100 “include[s] library access/interface means” for receiving requests for items “and **for retrieving formatted data blocks** stored in the compressed data library 118 **corresponding to the requests** from users.” Ex.1005, 13:29-37; Ex.1003, ¶¶118-120.

Yurt discloses retrieving requested audio files for distribution. After the system receives a request, the first method step “involves **retrieving the information** for selected items in the source material library.” Ex.1005, 18:53-67. This retrieval is of the audio file, not just data about the file. *See id.* Since the actions are implemented within the computer 1123 (and, thus, its processor, *see* [1.1.4]), the retrieval is likewise performed by the processor. Thus, Yurt discloses [1.1.4.3], and

Yurt's teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶121-122.

[1.1.4.4] (d) sequentially transmitting said requested digital audio files in substantially real time to said user through one of the satellite or cable TV networks via said output of said network interface; and

First, after receiving a request and retrieving the desired audio files from the library, Yurt's transmission format conversion CPU 119 “**transfers the desired segments of data** from the compressed data library 118 onto the communication channel” for delivery to the user's reception system 200. Ex.1005, 15:55-60; *see also* 4:36-39 (users receive the requested items via the reception system 200, in similar configuration as the '128 patent's system). The “**requested item** is then **sent to the user** via the transmitter 122, e.g., through satellite/cable TV networks (*“through one of the satellite or cable TV networks via said output of said network interface”*). Ex.1005, 13:45-46; Figure 2b:



Ex.1005, Fig. 2b (annotated); Ex.1003, ¶¶123-125.

Second, the user receives the audio information via transmitter 122 in real time or “preferably in less than real time,” which means transmission of the audio content **“in a fraction of real time.”** Ex.1005, 2:1-4; 4:64-5:9 (decompressed in “real time” as distributed by the transmission system). As discussed in [1.0], Yurt’s use of high-bandwidth cable networks for fast transmission of audio files mirrors the disclosure in the ’128 patent and similarly enables real-time consumption of audio

by the end user. *See* Ex.1001, 2:67-3:2; Ex.1005, 4:64-5:3; 16:62-68; 5:59-61. By transmitting *faster* than real-time, Yurt's system is "reasonably capable of operating so as to meet" the claimed real-time requirement. *See ParkerVision*, 903 F. 3d at 1361-62. Thus, Yurt discloses "*transmitting said digital audio files in substantially real time to said user.*" Ex.1003, ¶126.

Third, Yurt transmits the requested digital audio files "*sequentially.*" When a request is on the transmission queue and ready for transmission to a reception system (and, thereby, to a "*user*"), "the data stored in compressed data library 118 is preferably transferred in data blocks to the communications controller," which buffers the data blocks and sends them "down the communications channel to the reception system 200 by the transmitter 122." Ex.1005, 16:46-52, 17:1-11 (data blocks sent to reception system); *see also* 9:50-57 (audio information as organized as blocks of data into groups), 10:31-34 (stored as data blocks in the library); Ex.1003, ¶127.

When the reception system starts receiving, it "confirms reception of the **initial data block before receiving the remaining data blocks.**" Ex.1005, 17:1-4. "After **all data blocks have been received** and reception is confirmed, the communications controller breaks the physical connection." Ex.1005, 17:4-7. This demonstrates "*sequential*" transmission, which repeats for next items on the queue. Thus, Yurt teaches or it would have at least been obvious that each audio file on

the queue would likewise be transmitted sequentially. Thus, Yurt teaches [1.1.4.4], and Yurt's teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶128-129.

[1.1.4.5] (e) recording the digital audio files requested by said user and said user address in a data base; and

Yurt, alone and combined with Logan, renders obvious [1.1.4.5].

First, Yurt teaches that the user's request "contains the **address of the user**, the address of the item [e.g., audio file]" among other parameters. Ex.1005, 12:24-27. Yurt maintains databases that track information about the audio files at the library 118 for each transmissions system. *See, e.g.*, Ex.1005, 7:50-55 ("item database records"), 8:45-47 ("system item database" containing audio file records), 10:66-11:4 (details regarding the item "are kept in an **item database**"), 11:9-21 (recording facts about the items). As such, Yurt's system already has the address of the user ("*said user address*") and the information about what audio file was requested ("*the digital audio files requested by said user*"). Recording this request information along with the other tracked information in a database would help make items more accessible, a goal of Yurt, e.g., to "keep[] track" of information related to requests of user files, such as about the user and the files. Ex.1005, 15:38-41; Ex.1003, ¶¶130-131.

Indeed, Yurt teaches the desirability of tracking audio file popularity, including “**how often the corresponding item is expected to be requested** from the compressed data library 118.” Ex.1005, 12:28-32. Yurt uses this information to determine how and where to store the requested audio file, with less popular files on slower media (cheaper) and more popular files on faster (more expensive) media for easier access. Ex.1005, 12:28-57; *see specifically* 12:42-46. Therefore, [1.1.4.5] is obvious in view of Yurt alone, given that Yurt (1) already has all the information, and (2) uses that information to store information based on frequency of requests. It would have been specifically obvious to store the information about the user’s request to update and keep track of the popularity. Ex.1003, ¶¶132-133.

Second, it would have been further obvious to expressly store Yurt’s already-present information to assist with tracking item popularity, as confirmed by Logan and explained above in Section XI.C.3. Ex.1003, ¶¶62-72, 134-135. Logan discloses an “audio program and message distribution system” with a “host server 101” providing requested audio files to a “player 103” (e.g., laptop or desktop computer). Ex.1006, Abstract, 3:24-25, 4:40-46. The host server stores “a plurality of data files” including “compressed audio program segments” comprising audio and music files. Ex.1006, 4:46-54. Requested information is compiled and downloaded from the server to the client. *See, e.g.*, Ex.1006, 5:46- 66, 7:17-31; Ex.1003, ¶¶134-135.

Logan's "host server 101" "stores and maintains a **user data and usage log database indicated at 143** which **stores uploaded usage data**" from the player 103." Ex.1006, 5:35-39. The user data log 143 "**contains additional data describing the preferences, demographic characteristics and program selections unique to each subscriber.**" Ex.1006, 5:35-45; *see also* Figure 1:

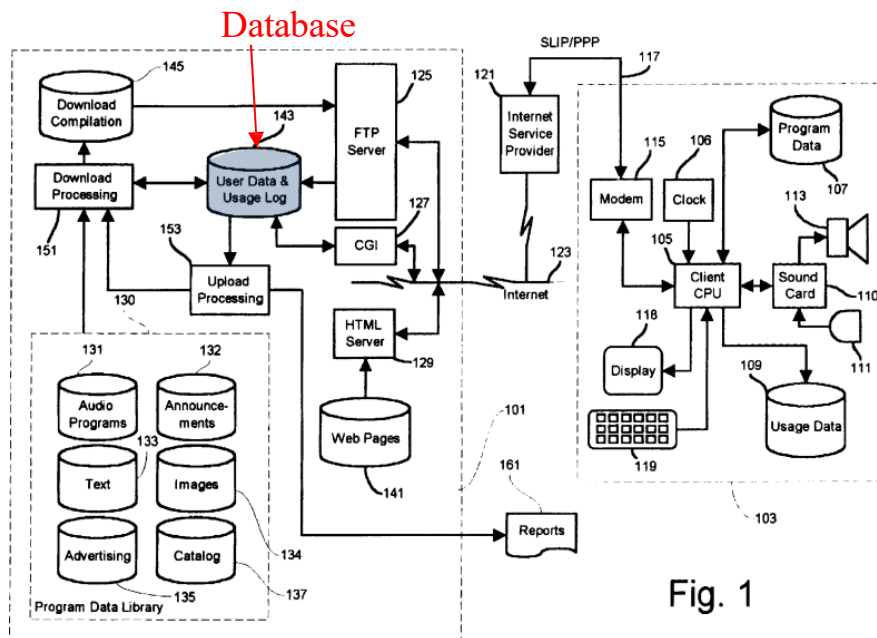


Fig. 1

Ex.1006, Fig. 1 (annotated); Ex.1003, ¶136.

Logan's "user data & usage log 143" is thus a database with information about requested audio data. This includes updating the database in response to a new user request. Logan teaches that after a user browses selection forms and locates desired audio files, "the user's additional preferences and selections **may be posted into the user data file 143.**" Ex.1006, 8:49-58. Logan thus teaches storing the information about the selection into the database 143 responsive to the user making

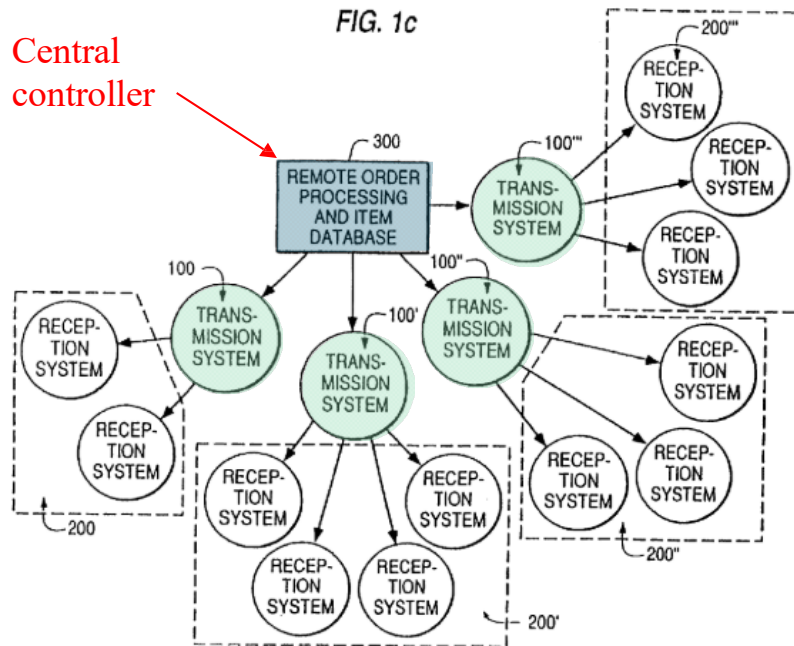
a selection of an audio file. Logan further teaches using the database 143 “to return data to the host for billing, [and] to adaptively modify the subscriber’s preferences based on actual usage.” Ex.1006, Abstract; Ex.1003, ¶137. It would have been obvious to use Logan’s teaching of recording information about a user’s request in a database (usage log) for billing, logging, and adapting system settings based on actual usage, including to record Yurt’s user address information, with information about the requested audio files, in Logan’s usage log database. *See, e.g.*, Ex.1005, 12:24-27; Ex.1006, 8:49-58; Ex.1003, ¶¶62- 72, 138-139. Yurt already teaches the use of an item database that records information about items of interest, and tracking popularity; Yurt’s item database would be modified to implement a usage log as well. *See* Ex.1005, 10:66-11:4,11:9-21; Ex.1003, ¶¶138-139.

[1.2] b) a central controller connected to said network interface of each of said distribution centers for routing digital audio data files between said distribution centers.

First, each transmission system 100 (“*private distribution centers*”) of Yurt’s overall audio distribution system is connected to “a remote order processing and item database 300.” Ex.1005, 4:1-13. A POSITA would have recognized that the “remote order processing” and “item database” would be implemented on the same entity, e.g., a server, to achieve the remote order processing and database functions. Thus, when Yurt refers to “remote order processing and item database 300” in the

figures, it is with respect to the hardware platform that implements both functions.

See, e.g., Ex.1005, Figure 1c:



Ex.1005, Fig. 1c (annotated); Ex.1003, ¶¶140-142.

The remote order processing and item database 300 “enables users to access desired items by remote communication.” Ex.1005, 4:6-7. Yurt’s system further includes “dispatching control software” for “receiv[ing] input from the remote order processing and item database 300 and send[ing] distribution requests to the distribution systems.” Ex.1005, 17:54-57. If “not all items are contained in each of the compressed data libraries 118, **the dispatching software will keep a list of the available titles in a particular compressed data library 118**” and “coordinate network traffic, source material library 111 utilization, source material library 111 contents, and connection costs.” Ex.1005, 17:57-64; Ex.1003, ¶¶141-142.

In Yurt, the overall “system” includes the “dispatching control software.” Ex.1005, 17:54-57. Otherwise, Yurt leaves it up to a POSITA for placement of the “dispatching control software.” Given the centralized roles that the dispatching control software and the remote order processing and item database 300 both have (e.g., at a level above the transmission systems and their respective libraries, coordinating titles, distribution, and connections between the different transmission systems), it would have been obvious to implement the database 300 and dispatching software at the same physical entity (e.g., server). Ex.1003, ¶142. Thus, the server implementing the remote order processing and item database 300 and dispatching software renders obvious the “*central controller*.” Ex.1003, ¶142.

Second, Yurt’s remote order processing and database 300 and dispatching control software “enables users to access desired items by remote communication,” coordinates network traffic, and dispatches distribution requests to other distribution systems (particular transmissions systems 100) where not all items are contained in a given data library 118 (“*for routing digital audio data files between said distribution centers*”). Ex.1005, 4:5-7; 17:54-66 (dispatching control software may “coordinate network traffic, **source material library 111 utilization**, [and] source material library 111 contents,” to achieve “efficient use of the available distribution channels”). Indeed, Yurt’s database 300 is connected to each transmission system 100 in Figure 1c above. Ex.1003, ¶143.

This is illustrated with an example from Yurt. When there are “multiple compressed data libraries 118”—which occurs when there are multiple transmission systems 100, as in Figures 1c and 2b—an item’s popularity (e.g., a digital audio file popularity) “dictate[s] distribution” of that item “to multiple distribution systems” (transmission systems 100). Ex.1005, 13:1-8. Based thereon, **“a copy of the compressed data is sent to another library”** for the other library (part of another transmission system 100, or “*private distribution center*”) to distribute “to users concurrently with the **original compressed data library 118.**” Ex.1005, 13:4-8. In view of these teachings, and Yurt’s further teaching of the dispatching software/database 300 coordinating titles and connections between transmission systems, it would have been obvious that the dispatching software/database 300 is responsible for directing the copy of the audio file to be sent between the libraries of respective transmission systems 100 (thus, “*between said distribution centers*”). Ex.1003, ¶144. Indeed, Yurt teaches expressly that it provides “**inter-library transfers**” of items. Ex.1005, 7:44-48. This would be accomplished via the dispatching control software/database 300. Ex.1003, ¶144.

Third, it would have been obvious that each transmission system 100 is connected via its respective transmitter to the system. Yurt mechanism for transmitting digital audio information is transmitter 122 (“*network interface*”) of transmission system 100 (“*connected to said network interface of each of said*

distribution centers”). See Ex.1005, 17:67-18:8 (digital audio files are “**transmitted by transmitter 122 of the transmission system 100**”); see also 16:31-37 (“the data awaits transmission by the transmitter 122”), 15:61-65 (transmission system 100 “includes **transmitter means 122 ... for sending at least a portion of a specific file to at least one remote location**”); Ex.1003, ¶145. Based on these teachings of Yurt, it would have been obvious that dispatching control software/database 300 (together, “*a central controller*”) would be connected to the transmitter 122 (“*connected to said network interface*”) of each transmission system 100 (“*of each of said distribution centers*”) to facilitate the “inter-library transfers” of audio files (“*for routing digital audio data files between said distribution centers*”). Ex.1003, ¶¶146-147. Thus, Yurt teaches [1.2], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶146-147.

5. Claim 2

[2.0] A system for distributing data files to users connected in a plurality of independent networks, said system comprising:

To the extent that the preamble is limiting, Yurt discloses a system for distributing data files to users connected in a plurality of independent networks. See [1.0] (audio files being examples of data files, and satellite and cable networks being independent networks). Ex.1003, ¶148.

[2.1] a) a plurality of distribution centers, each including:

See [1.1]. Ex.1003, ¶149.

[2.1.1] 1) a network interface including an input and an output for connecting to a single one of the networks;

See [1.1.1] (any of the networks demonstrated, e.g., cable or satellite, demonstrates “a single one of the networks”); Ex.1003, ¶150.

[2.1.2] 2) a library including a plurality of data files;

See [1.1.2] (audio, video as two examples of data files); Ex.1003, ¶151.

[2.1.3] 3) a library interface including an input and an output connected to said library; and

See [1.1.3]. Ex.1003, ¶152.

[2.1.4] 4) a processor connected to said network interface and said library interface, said processor for:

See [1.1.4]. Ex.1003, ¶153.

[2.1.4.1] (a) receiving a request from a user via said input of said network interface, said request including information on one or more data files and a user address;

Yurt combined with Logan renders obvious [2.1.4.1].

First, Yurt discloses a “*processor for ... receiving requests from a user for a plurality of said digital audio files and a user address.*” *See* [1.1.4.2]. Thus, Yurt

discloses receiving a request that has information on “one or more data files” as well as a user address. Ex.1003, ¶¶154-155.

Second, Yurt combined with Logan further renders obvious receiving the request “*via said input of said network interface.*” Yurt teaches using cable and satellite networks. *See* Ex.1005, Figure 2b. It would have been obvious to further use cable and satellite links for bidirectional communication. *See* [1.1.1]. This is further confirmed by Logan, which teaches receiving audio data file requests via cable/satellite network and transmitting audio data files via the cable/satellite network. *See* Ex.1006, 5:46-54, 6:36-44; Ex.1003, ¶156.

Yurt’s transmission system 100 receives requests for data files from user terminals. *See* [1.1.1]; Ex.1005, 14:64-67, 15:3-32. In combination, it would have been obvious for Yurt’s requests from terminals to be via cable/satellite networks, with Yurt’s transmitter 122 further configured to receive requests according to Logan’s “cable modem” teachings. Ex.1003, ¶¶157-158.

[2.1.4.2] (b) determining which of said requested data files are available in said library (“available requested data files”), and which of said requested data files are unavailable in said library (“unavailable requested data files”) and

First, Yurt teaches receiving requests for data files. *See* [2.1.4.1], [1.1.4.2]; Ex.1003, ¶¶159-160.

Second, Yurt’s process of computer 1123 determines whether the requested file is available at local library 118. A user searches the database “in the library

system control computer 1123” and/or at a remote database 300, which includes “available titles at multiple locations remote of the source material library 111.” Ex.1005, 15:4-15. Thus, Yurt’s processor (1) searches for a “title” at library system control computer 1123 (library 118), and also (2) searches for titles at locations beyond library 118. It would have been obvious that the user’s search includes determining which data files are at the local library 118 and which are not (instead must be obtained from other locations’ libraries). *See* Ex.1005, 15:3-32; Thus, Yurt teaches [2.1.4.2], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶161-163.

[2.1.4.3] for each of said available requested data files, retrieving said available requested data file from said library via said library interface; and

Yurt retrieves each available requested data file from the library via the library interface. *See* [1.1.4.3]; Ex.1005, 17:44-50 (user selects from a list of locally-available materials). Since these are retrieved from Yurt’s local library 118, a POSITA would have recognized that these were the requested data files available at the local library 118. *See* Ex.1005, 13:48-60, 15:3-32, 17:55-67. Thus, Yurt teaches [2.1.4.3], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶164.

[2.1.4.4] for each of said unavailable requested data files, sending a file import request to a central controller requesting said unavailable requested data files and receiving said unavailable requested data files through said network interface;

First, Yurt maintains “a database of available titles at multiple locations,” since different data files are “stored in one or more compressed data libraries.” Ex.1005, 11:13-17, 15:10-15. Yurt thus teaches storing data files at different local libraries of different transmission systems (“locations”). Ex.1003, ¶¶165-166.

Second, Yurt’s system performs “inter-library transfers”; when doing so, data files that were already compressed at one library 118 in one transmission system 100 are not re-compressed when transferred to another library 118 in another transmission system 100. Ex.1005, 7:44-50; Ex.1003, ¶167.

Third, Yurt teaches a “*central controller*.” See [1.2]; Ex.1005, 4:5-7, 17:54-66 (dispatching control software), 17:44-53 (list of titles available at each library 118). Yurt’s central controller is thus used to transfer “a copy of the compressed data ... to another library” for distribution. Ex.1005, 13:4-7; Ex.1003, ¶168.

In combination, the above-noted teachings from Yurt demonstrate that the remote order processing and database 300 system facilitates transfers of data files between local libraries 118 in different transmission systems, both for data files not available locally and for simultaneous access of in-demand data files via multiple transmission systems. Based on the combination of these teachings, a POSITA would have found [2.1.4.4] obvious. It would have been obvious, specifically, to obtain data files at a local library 118 in one region where the requesting user is from another region’s library, such as to use more distribution channels to increase system

throughput and efficiency. *See, e.g.*, Ex.1005, 19:66-68. Thus, Yurt teaches [2.1.4.4], and Yurt's teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶169-170.

[2.1.4.5] (c) transmitting said requested data files to said single one of the networks via said output of said network interface; and

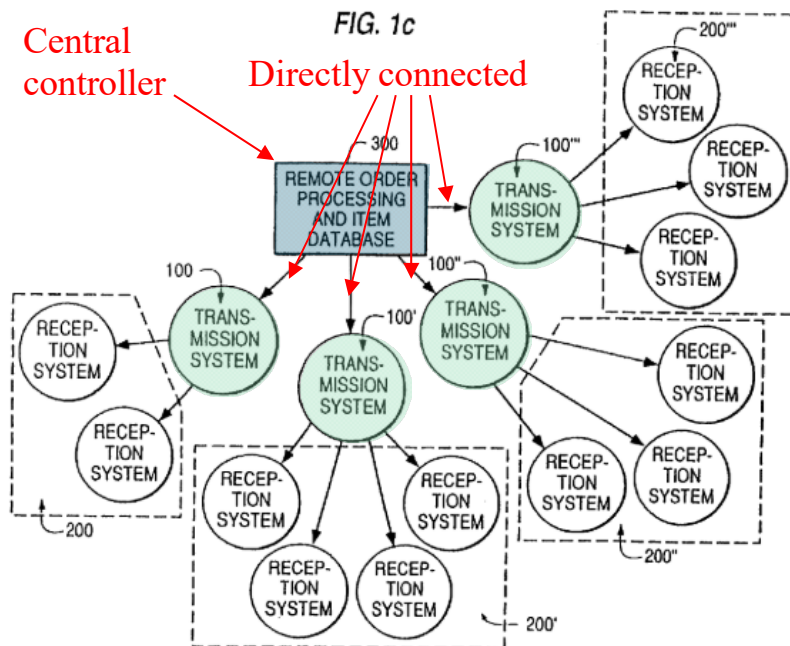
See [1.1.4.4]. Ex.1003, ¶171.

[2.1.4.6] (d) recording request information indicative of said requested data file and said user address; and

See [1.1.4.5]. Ex.1003, ¶172.

[2.2] b) a central controller directly connected to said network interface of each of said distribution centers for:

See [1.2]. Further, *see* Ex.1005, Figure 1c:



Ex.1005, Fig. 1c (annotated).

Thus, Yurt teaches [2.2], and Yurt's teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶173.

[2.2.1] 1) receiving file import requests from a requesting distribution center, said file import requests including information relating to requested data files;

Yurt provides a central controller (dispatching software/database 300) that facilitates requests for inter-library transfers between local libraries at different transmissions systems 100. *See, e.g.*, Ex.1005, 12:40-43; 17:54-66, 7:44-50; [2.1.4.4]. It would have been obvious that requests for inter-library transfers transmitted from transmission systems 100 would have been received at the database 300 (“*receiving file import requests*”). Ex.1003, ¶¶174-175.

Yurt further teaches that transferred data files have “item database records” associated with them. *See* Ex.1005, 7:50-55. Requests that are passed on to the appropriate library (e.g., Yurt’s “compressed data library 118 of choice”) include “the user’s account ID, identification of the item for transmission and the chosen destination for the item.” Ex.1005, 15:27-29. Thus, a POSITA would have understood that requests for inter-library transfers would include identifying information including account ID, item identification, and destination. Thus, Yurt teaches [2.2.1], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶176-177.

[2.2.2] 2) searching the library within at least one other of said distribution centers to locate at least one requested data file of said requested data files; and

Yurt's database 300 maintains "a database of available titles at multiple locations remote of the source material library 111." Ex.1005, 15:10-15; [2.1.4.2]; *see also* Ex.1005, 15:44-53 (database 300 sends a list of available titles at remote libraries to the interface for the user to browse as well). Yurt also teaches transferring items between libraries. Ex.1005, 7:44-50. It would have therefore been obvious that the database 300 ("*central controller*") searches for available titles at other transmission systems' libraries for the requested data files, supporting Yurt's express purpose to "process orders and operate a database of available titles at multiple locations." Ex.1005, 15:10-15. Thus, Yurt teaches [2.2.2], and Yurt's teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶178-180.

[2.2.3] 3) instructing said other distribution center to retrieve and transmit the requested data file that was located therein to said requesting distribution center.

As explained with respect to [2.1.4.2], Yurt also teaches transferring items between libraries. Ex.1005, 7:44-50 ("*inter-library transfers*"). Since the library 118 in each area operates in the same manner, and Yurt teaches retrieving and transmitting requested data files, it would have been obvious for the transmission system at a remote location to access requested data files from that system's library

118 and transmit them to the requesting, local library 118 to accomplish “inter-library transfers.” *See* analysis at [1.1.4.3] (retrieving files from library), [1.1.4.4] (transmitting retrieved files). Indeed, Yurt further teaches distributing files ordered via database 300 “to the appropriate libraries.” Ex.1005, 15:18-20. Thus, Yurt teaches [2.2.3], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶181-183.

6. Claim 3

[3.0] A system as claimed in claim 2,

See [2.0]-[2.2.3]. Ex.1003, ¶184.

[3.1] wherein said network interface is a cable television interface.

Yurt combined with Logan renders obvious [3.1]. Yurt’s network interface includes an interface for “cable television systems.” *See* [1.1.1]; *see also, e.g.*, Ex.1005, 16:64-68; *see also* Figure 2b:

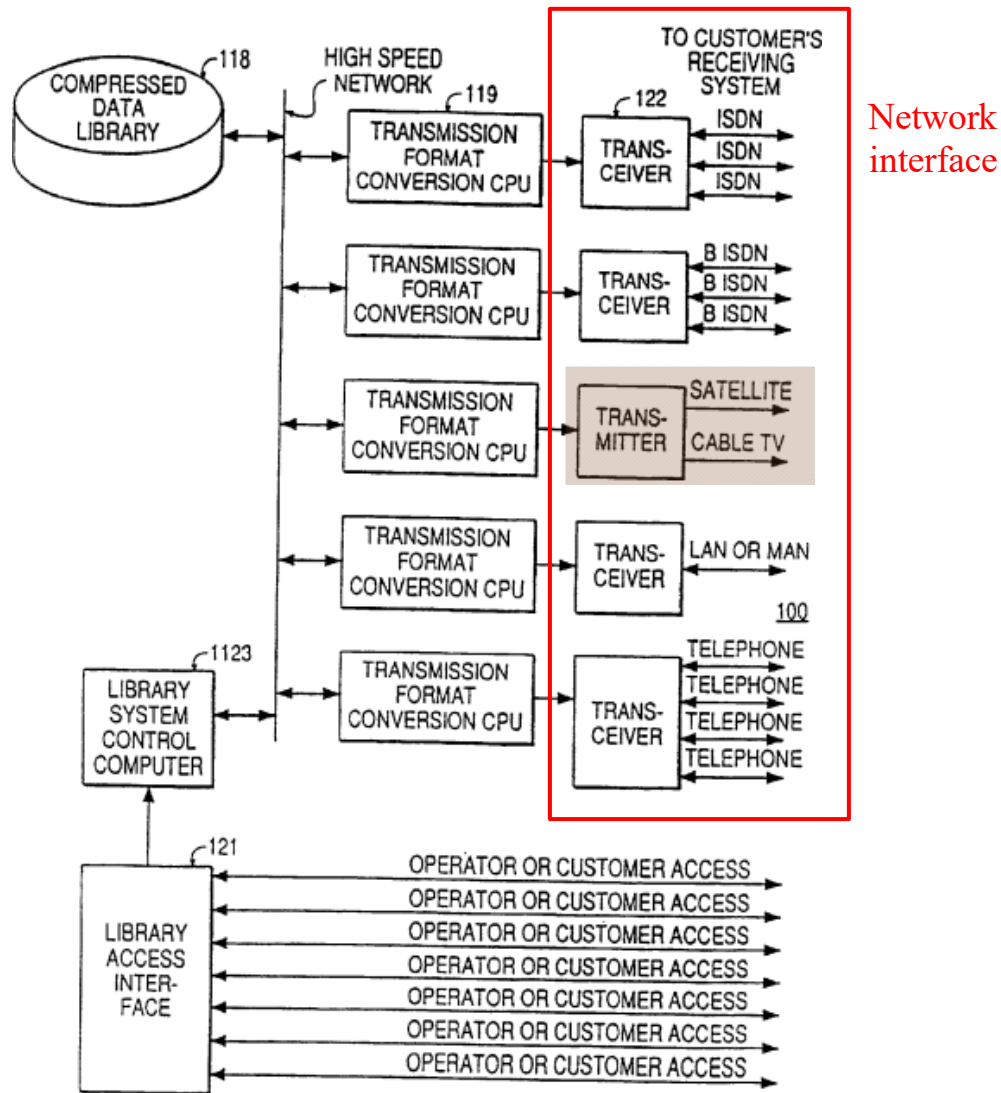


FIG. 2b

Ex.1005, Fig. 2b (annotated).

As further explained with respect to [1.1.1], Logan teaches transmitting requested audio files between a server and client using “cable modems.” See Ex.1006, 5:46-54, 6:36-44. It would have been obvious for Yurt’s cable interface to be a “cable modem,” as Logan teaches. Ex.1003, ¶¶185-189.

7. **Claim 4**

[4.0] A system as claimed in claim 2,

See [2.0]-[2.2.3]. Ex.1003, ¶190.

[4.1] wherein said data files include digitized music tracks.

As explained with respect to [1.0], Yurt discloses “[a] **system of distributing** video and/or **audio** information” using “digital signal processing.” Ex.1005, Abstract; [1.0]. Yurt’s system stores “audio information” as “digital audio” in a “file.” Ex.1005, 5:66-6:7; 2:41-47. Yurt also teaches digitizing audio data that is originally in analog format before library storage. Ex.1005, 7:12-18. Thus, Yurt alone discloses this limitation. Ex.1003, ¶¶191-192.

Further, Logan teaches storing and distributing “audio voice and music files” at the receiving player. Ex.1006, 4:53-58. It would have been obvious for Yurt’s digital audio files to include music tracks, as Logan confirms and is a well-known type of audio file. *See, e.g.*, Ex.1007, 4:55-5:5 (storing music in distribution server); Ex.1003, ¶¶193-194.

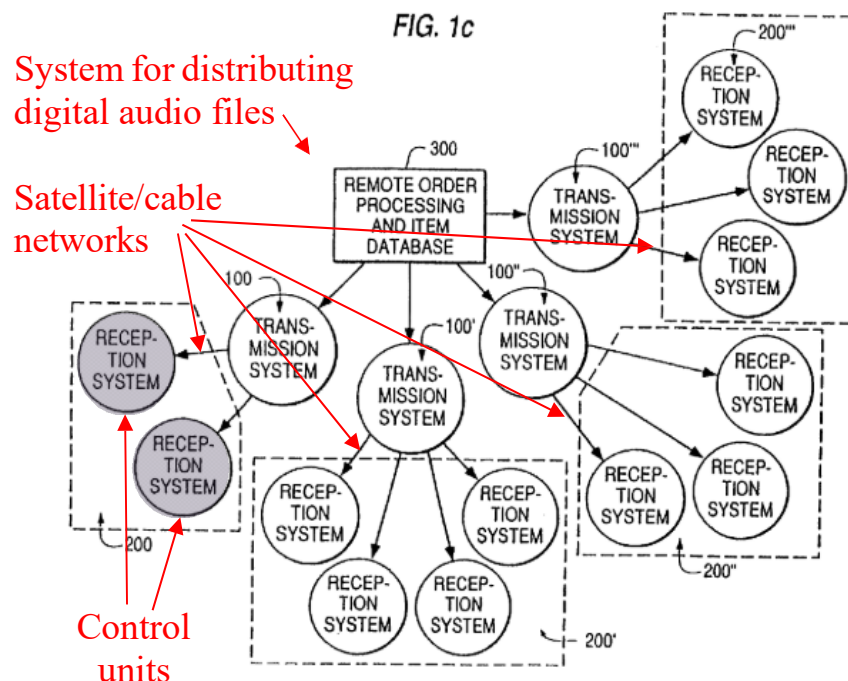
8. **Claim 6**

[6.0] A system as claimed in claim 2,

See [2.0]-[2.2.3]. Ex.1003, ¶195.

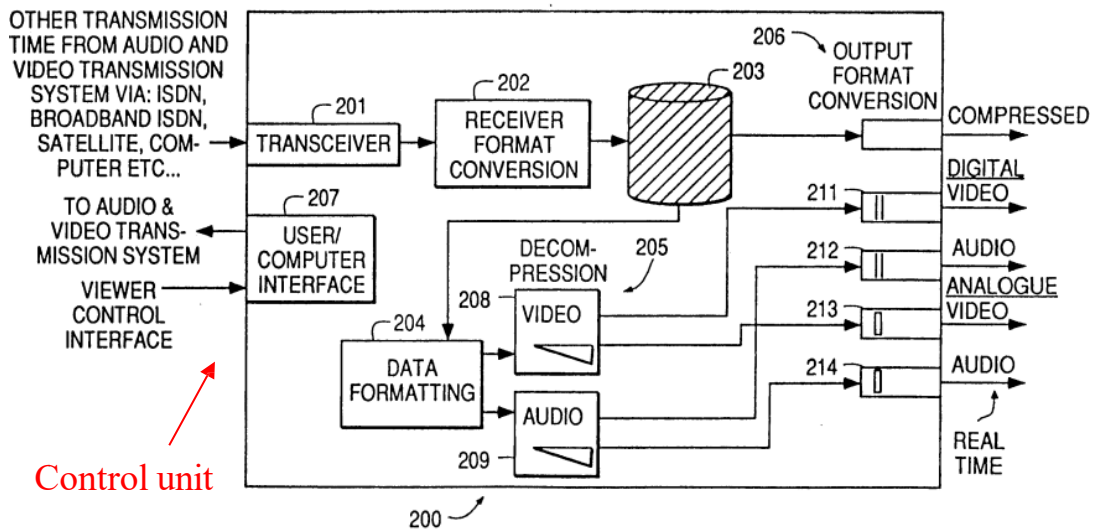
[6.1] further comprising a plurality of control units each having a user address and including:

According to the '128 patent, a “control unit” is at the user’s location and aids in connecting with the cable system and the audio/visual system of the user (e.g., a TV). Ex.1001, 5:48-67. The control unit is activated for a user, displaying information about available data files at various libraries to the user to browse and select. Ex.1001, 6:1-6. Yurt teaches a “control unit” at the user’s location, is connected between the user’s cable system and output system. *See* Ex.1005, Figure 1c (below). Yurt’s distribution system has multiple reception systems 200 (“control units”) connected with respective transmission systems 100. Ex.1005, 4:1-13; Figure 1c:



Ex.1005, Fig. 1c (annotated).

Each reception system 200 includes “user/computer interface 207” connected to a “viewer control interface” and “audio & video transmission system,” thus enabling the reception systems to operate as “*control units*.” Ex.1005, Figure 6:



Ex.1005, Fig. 6 (annotated).

User requests are made “via a user interface,” such as user/computer interface 207, after browsing a list of available titles locally and remotely. Ex.1005, 15:3-10. The user’s request “contains the address of the user, the address of the item” among other parameters. Ex.1005, 12:24-27; *see also* 15:20-22 (user makes selection, identifies when/where to deliver); [1.1.4.5]. It would have been obvious to maintain the “address of the user” anywhere at the reception system 200, including at the user/computer interface 207. Moreover, since Yurt teaches a plurality of reception systems, each with user/computer interface 207, Yurt teaches a plurality of control units. Finally, per [1.0], Yurt’s reception system 200 includes embodiments located

with users, and others shared among many users. Thus, Yurt teaches [6.1], and Yurt's teachings would not be materially altered in the combination with Logan. Ex.1003, ¶¶196-202.

[6.2] a user input for connecting to one of the networks;

The '128 patent's "user input" is "for connecting to one of the networks" and "receiving said requested data file via said user input." Ex.1001, claim 6. Thus, the "user input" functions as a transceiver. Likewise, in Yurt the reception system 200 includes a "transceiver 201 which receives the audio and/or video information" transmitted from transmission system 100's transmitter 122. Ex.1005, 18:3-8. Thus, Yurt teaches [6.2], and Yurt's teachings would not be materially altered in the combination with Logan either. See also Figure 6:

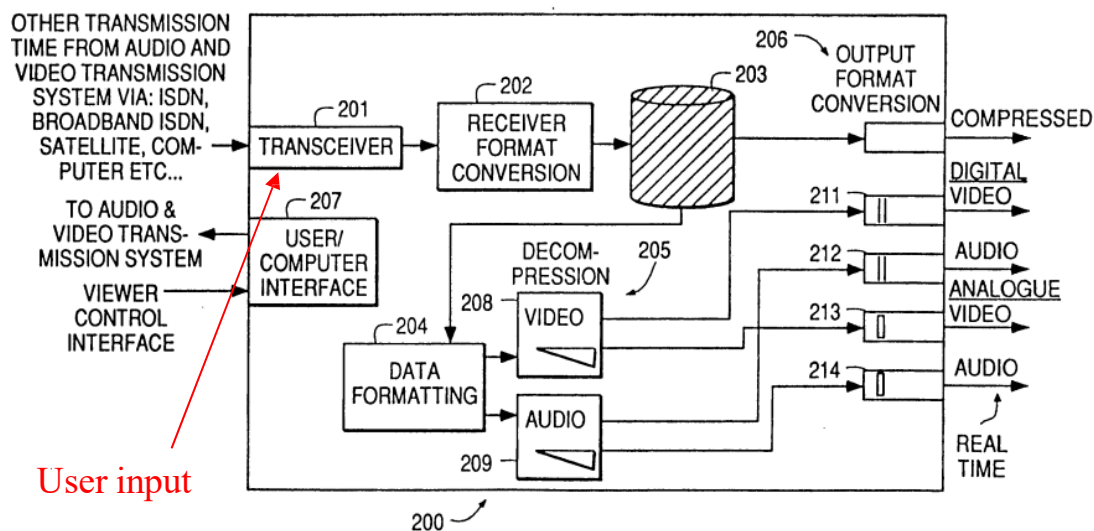


FIG. 6

Ex.1005, Fig. 6 (annotated); Ex.1003, ¶¶203-206.

[6.3] a user output for connecting to an output device; and

The '128 patent's "user output" is "for connecting to an output device," so the data file is "provid[ed] ... to the output device via said user output" after receipt. Ex.1001, claim 6; Yurt's converters 211-214 in reception system 200 teach this very same concept. The video and audio "output converter[s]" provide at their outputs "decompressed audio data." Ex.1005, 18:27-34. These outputs at the converters "are produced in real time" and are provided "to a playback system such as a TV or audio amplifier." Ex.1005, 18:34-37; *see also* Figure 6:

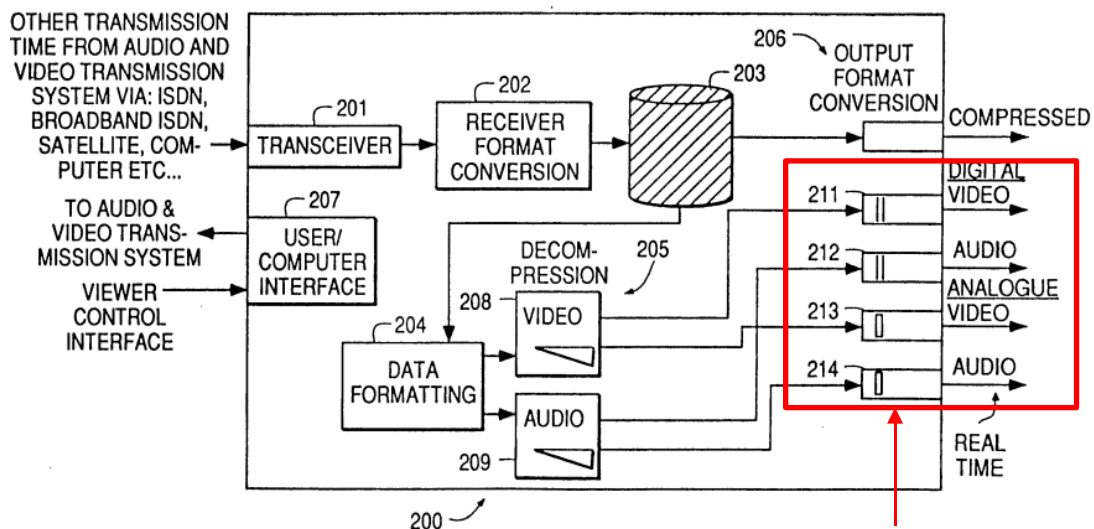


FIG. 6

User output

Ex.1005, Fig. 6 (annotated); Ex.1003, ¶¶207-209.

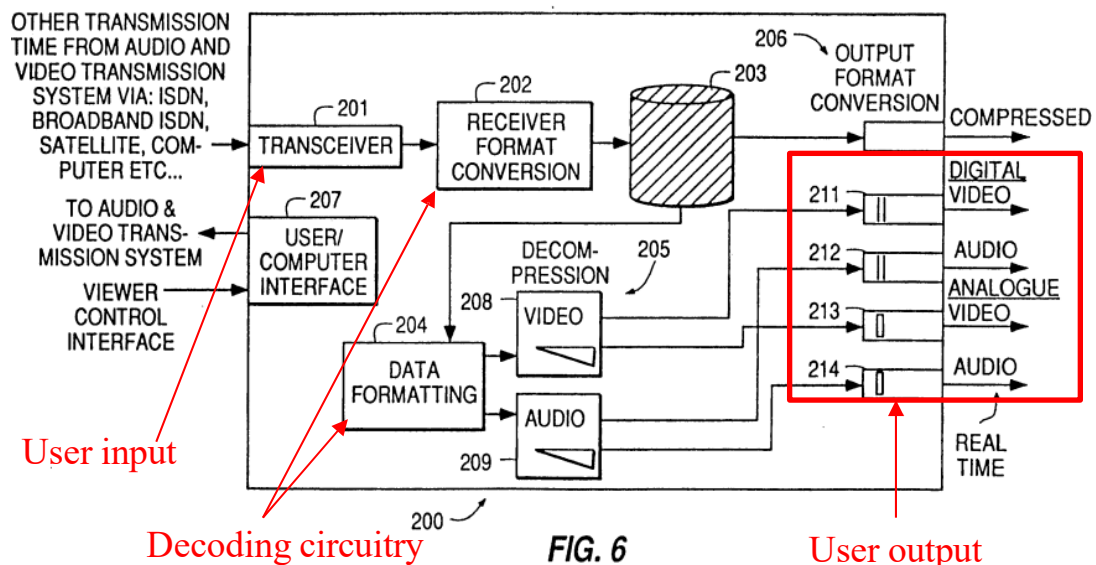
Thus, Yurt teaches [6.3], and Yurt's teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶210.

[6.4] decoding circuitry connected to said user input and output for receiving said requested data file via said user input and providing said requested data file to the output device via said user output.

Yurt teaches receiving requested data files via the transceiver 201. *See* [6.2].

Yurt further teaches providing the requested data files to output devices via converters 211-214. *See* [6.3]; Ex.1003, ¶¶211-212.

Yurt additionally teaches “*decoding circuitry*.” Yurt uses “cable television decoders” with “standard television receivers” for receiving data from transmission system 100. Ex.1005, 4:44-51. The cable television decoders decompress the requested material. Ex.1005, 4:44-46. Thus, decompression is an act of decoding in Yurt. Yurt’s reception systems further include “receiver format converter 202,” which “converts the compressed formatted data blocks into a format suitable for playback by the user in real time.” Ex.1005, 18:9-13; *see also* Figure 6:



Ex.1005, Fig. 6 (annotated); Ex.1003, ¶213.

The data formatter 204 “processes the compressed formatted data blocks and distinguishes audio information from video information.” Ex.1005, 18:22-26. The data formatter 204 is, therefore, also “*decoding circuitry*” alone or with format converter 202. When playback is desired, the decoded data goes through the converter 202 and data formatter 204 to the converters 211-214. Ex.1005, 18:9-35. By this process, and as seen in Figure 6, Yurt’s decoding circuitry is therefore connected to both the transceiver 201 (“*user input*”) and the converters 211-214 (“*user output*”). Thus, Yurt teaches [6.3], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶213-215.

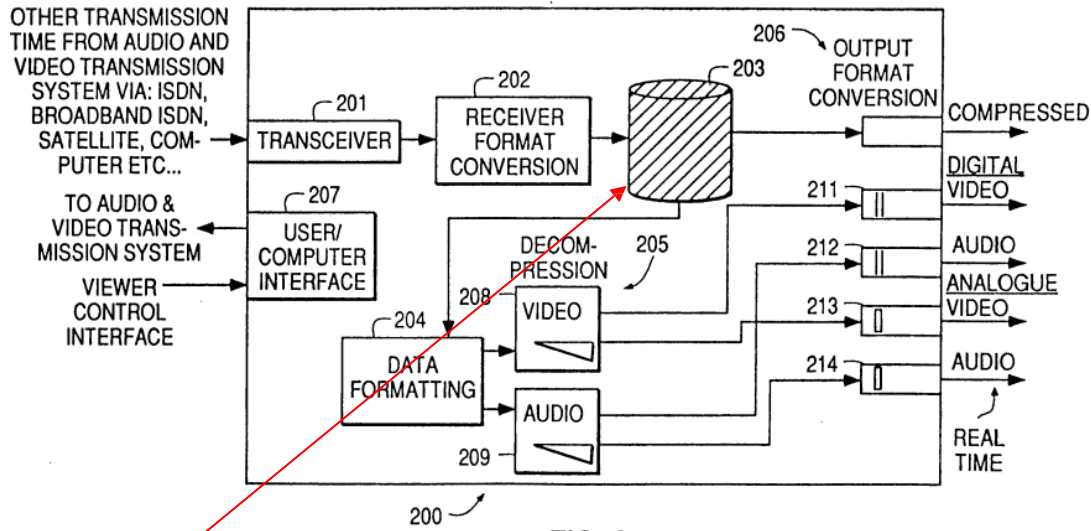
9. Claim 9

[9.0] A system as claimed in claim 6

See [2.0]-[2.2.3] and [6.0]-[6.4]. Ex.1003, ¶216.

[9.1] further comprising a storage device for recording the requested data file.

Yurt teaches that the reception system includes a storage 203 to store received data files, used e.g. when “the user may want to play back the requested item” at a later time. Ex.1005, 18:14-21. This demonstrates “*storage device for recording the requested data file.*” Further, requested audio may also “be sent to an audio/video recorder of the user” (another example of storage). Ex.1005, 18:36-38; *see also* Figure 6:



Storage device

Ex.1005, Fig. 6 (annotated); Ex.1003, ¶¶217-218.

Thus, Yurt discloses [9.1], and Yurt's teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶219.

10. Claim 10

[10.0] A system as claimed in claim 6

See [2.0]-[2.2.3] and [6.0]-[6.4]. Ex.1003, ¶220.

[10.1] further comprising a telephone for sending a request from the user.

Yurt teaches that users are able to access the distribution system several ways, including “via **telephone** tone decoders and voice response hardware.” Ex.1005, 13:53-64. Yurt thus “allows the user to remotely select audio/video material **from any location that has either telephone service** or a computer.” Ex.1005, 1:62-66; *see also* 15:44-46. As a result, Yurt teaches the user sending the request via

telephone. Thus, Yurt teaches [10.1], and Yurt's teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶221-223.

11. Claim 11

[11.0] A system as claimed in claim 2,

See [2.0]-[2.2.3]. Ex.1003, ¶224.

[11.1] further comprising a modulator connected to said library and said processor for modulating said requested data file.

When Yurt's transmission system 100 is processing a file request, it "retrieves the composite formatted data block of the requested item stored in compressed data library 118 and converts the compressed data block **into a format suitable for transmission.**" Ex.1005, 13:40-45. It would have been obvious that a "format suitable for transmission," including via cable/satellite, included modulation. Therefore, Yurt renders obvious [11.1]. Thus, Yurt teaches [11.1], and Yurt's teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶225-227.

12. Claim 12

[12.1] providing the system of claim 2

See [2.0]-[2.2.3]. Ex.1003, ¶232.

[12.2] generating at a user system a user request including information on a requested data file and a user address;

Once the user has searched the library, “the user **selects the item for transmission** at a certain time and **location**.” Ex.1005, 15:20-22; [1.1.4.2]. The selection includes an “identification code of the item” (e.g., an audio file). Ex.1005, 14:24-26. When accessing via a user terminal, Yurt’s request for an item includes “identification of the item for transmission and the chosen destination for the item.” Ex.1005, 15:6-29. These are multiple examples of requests for digital audio files and the location (“*address*”) of the user, generated at the user’s terminal. Thus, Yurt discloses [12.2], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶233-235.

[12.3] receiving said user request at said network interface;

See [2.1.4.1] and [1.1.4.2]. Ex.1003, ¶236.

[12.4] processing said information of said user request;

With respect to the user terminal example of Yurt discussed at [12.2], the transmission system receives the user request and places it “into a transmission queue managed by the library system control computer 1123,” with a queue manager that “keeps track of the user ID, the chosen program and price, the user channel type, the number of requests for a given program, the latest delivery time, and the compressed data library media type (for example, high speed or low speed).” Ex.1005, 15:33-46. Placing the request on the queue and tracking the information

demonstrates “*processing*” the request’s information. Thus, Yurt discloses [12.4], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶237-239.

[12.5] retrieving said requested data file from said library; and

See [2.1.4.3] and [1.1.4.3]. Ex.1003, ¶240.

[12.6] transmitting said requested data to file to said user system.

See [2.1.4.5] and [1.1.4.4]. Ex.1003, ¶241.

13. Claim 13

[13.0] A method as claimed in claim 12 further comprising the steps of:

See [12.0]-[12.6] and [2.0]-[2.2.3]. Ex.1003, ¶242.

[13.1] recording request information indicative of said requested data file and said user address.

See [2.1.4.6] and [1.1.4.5]. Ex.1003, ¶243.

14. Claim 14

[14.0] A method as claimed in claim 13 further comprising a step of

See [12.0]-[12.6], [2.0]-[2.2.3], and [13.0]-[13.1]. Ex.1003, ¶244.

[14.1] using the recorded request information for marketing statistics and billing information

Yurt combined with Logan renders obvious [14.1].

First, Yurt teaches maintaining databases with information about items

maintained. *See, e.g.,* Ex.1005, 7:50-55 (“item database records”), 8:45-47 (“information records for” items that include songs), 10:66-11:4 (details regarding the item “are kept in an **item database**”), 11:9-21 (database recording facts about the items); [1.1.4.5]. Yurt also teaches the desirability of tracking the popularity of requested files. Ex.1005, 12:28-57; 15:38-41 (tracking items); Ex.1003, ¶¶245-246.

Second, Logan further teaches storing user-specific information in “a **user data and usage log database indicated at 143**” which includes user usage data, user preferences, demographics, and unique program selections. Ex.1006, 5:35-45; [1.1.4.5]. Logan uses this stored information to generate records “of actual player use by individual subscribers,” produced “on a periodic basis in connection with financial and accounting functions including **subscriber and advertiser billing**, content provider royalty payment accounting, and **marketing analysis processing**.” Ex.1006, 6:27-35; Ex.1003, ¶247.

The combined teachings thus renders obvious using recorded information for billing and marketing. It would have been obvious to use Logan’s use of user records for billing and marketing analysis in combination with the information tracked by Yurt and Logan. Doing so would have beneficially aided Yurt’s system in making items more accessible (e.g., popularity), and better positioned popular files for easier access and/or better marketing opportunities. Ex.1003, ¶¶247-248.

15. Claim 17

[17.0] A system as claimed in claim 2

See [2.0]-[2.2.3]. Ex.1003, ¶249.

[17.1] wherein said data files include digitized video files.

Yurt discloses “[a] **system of distributing video** and/or audio information” using “digital signal processing.” Ex.1005, Abstract; [1.0]. Yurt particularly teaches storing and managing the “audio information” as “**digital** audio and **video** information” in a “file.” Ex.1005, 5:66-6:7; 2:41-47. Thus, Yurt’s digital video files include “*digitized video files*.” Thus, Yurt discloses [17.1], and Yurt’s teachings would not be materially altered in the combination with Logan either. Ex.1003, ¶¶250-251.

XII. CONCLUSION

Petitioner has established a reasonable likelihood that the Challenged Claims are unpatentable.

Respectfully submitted,

Dated: October 10, 2025

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**CERTIFICATE OF COMPLIANCE WITH
TYPE-VOLUME LIMITATION PURSUANT TO 37 C.F.R. § 42.24**

This brief complies with the type-volume limitation of 37 C.F.R. § 42.24(a)(1)(i).

The brief contains 11,570 words, excluding the parts of the brief exempted by 37 C.F.R. § 42.24(a).

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CERTIFICATE OF SERVICE
IN COMPLIANCE WITH 37 C.F.R. § 42.6(e)(4)

The undersigned certifies that the **PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,182,128 and Exhibits 1001 - 1009 and 1013 - 1015** were served on October 10, 2025, via **Express Mail** on the Patent Owner at the following address of record as listed on the USPTO Patent Center:

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