

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

TVNGO LTD.,
Patent Owner

IPR2026-00213
U.S. Patent No. RE50,328

**PETITIONERS' OPPOSITION TO PATENT OWNER'S
REQUEST FOR DISCRETIONARY DENIAL**

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I. INTRODUCTION

The Director should deny TVnGO's request for discretionary denial ("DD Brief"). The Director should reject TVnGO's primary "settled expectations" argument because TVnGO violated its duty of disclosure during the prosecution of the original patent and again during prosecution of U.S. Pat. No. RE50,328 ("the '328 patent"). TVnGO's second violation of its duty of disclosure happened despite facing an inequitable conduct defense for the original patent in the *LG* litigation and despite the district court's denial of TVnGO's motion to strike that inequitable conduct defense. The highly material information that TVnGO withheld from the U.S. Patent Office during the reissue prosecution included the prior art relied on for Ground 1 of this Petition (Marler, EX1007) as well as the European Patent Office examination report that rejected a claim similar to claim 1 of the '328 patent. Under these circumstances, TVnGO has no basis for any settled expectations other than a finding of unpatentability, and discretionarily denying this IPR would unjustly reward TVnGO's repeated violations of its duty of disclosure and be contrary to the interests of justice. Moreover, the '328 patent has been in force for only about 14 months, far less than the six years typically required for settled expectations. Even when combined with the time that the original patent was in force before being held invalid, the total is still about a year short. TVnGO's other arguments are also flawed. The Director should therefore reject TVnGO's discretionary denial request.

II. ARGUMENT

A. There Is No Basis for Any Settled Expectations by TVnGO

The only “settled expectations” that TVnGO can reasonably have is that the ’328 patent will be challenged in an IPR like this one, and will be found, like the original patent from which the ’328 patent was reissued, unpatentable for the reasons discussed below.

1. TVnGO Has No Basis for Any Settled Expectations for the ’328 Patent

The ’328 patent was reissued a little over a year ago on March 4, 2025, after a district court found the original U.S. Patent No. 9,407,969 invalid in the *LG* litigation. EX002, 1; EX1010, 8. A patent issued a little more than a year ago is not entitled to any settled expectations. To the contrary, the Director encourages and routinely grants early challenges such as this one.

TVnGO asserts that it is “entitled to strong settled expectations” because the ’328 patent issued with substantially the same claims as the original patent. DD Brief, 6. However, TVnGO cites no decision with such a holding while ignoring a decision with the opposite holding: *Carbyne, Inc. v. Tritech Software Sys.*, IPR2025-00959, Paper 11 (Director Oct. 3, 2025). In *Carbyne*, the Deputy Director denied the request for discretionary denial, holding that the challenged reissue patent, RE50,016E, “has not been in force for a significant period of time (reissued in 2024)” and that “[e]arly challenges favor robust, predictable rights and weigh against

discretionary denial.” *Carbyne*, Paper 11 at 3. RE50,016E issued on June 18, 2024, which was—like here—a little more than a year before the *Carbyne* decision. EX1036, 1. And, like here, the original patent issued in 2016, which at the time of the *Carbyne* decision would have been sufficient for settled expectations if the original patent issue date were the relevant date, as TVnGO incorrectly asserts. *Id.*

The challenged claims in *Carbyne* were claims 1, 5-9, 13-17 and 25-27, all of which were original except for dependent claims 17 and 25-27. EX1037, 5; EX1036, 18. The reissue claims in *Carbyne* were even less different from the original claims than the claims here as can be seen by comparing challenged reissue claim 1 in *Carbyne* (no words added, single word deleted) with challenged reissue claim 1 of the '328 patent (5 words added, 2 words deleted):

1. A system configured to provide, to emergency operators, communication through textual messages, the system comprising:

one or more processors configured to execute computer program modules, the computer program modules comprising:

a call reception module configured to receive incoming emergency voice calls being placed to an emergency call center through an emergency communications network from wireless mobile devices, the incoming emergency voice calls including a first voice call placed from a first wireless mobile device;

an outgoing message module configured to generate outgoing textual messages for transmission to wireless mobile devices from which incoming emergency voice calls are received such that a first outgoing textual message is generated for transmission to the first wireless mobile device based on the first voice call;

a transmission module configured to transmit the outgoing textual messages to the [appropriate] wireless mobile devices through a second communications network that is different than the emergency communications network such that the first outgoing textual message is transmitted to the first wireless mobile device through the second communications network;

a presentation module configured to present incoming emergency voice calls to emergency operators through a user interface, wherein the user interface includes a set of user-selectable options, and wherein the presentation module is further configured to receive user input from emergency operators to select one or more of the set of user-selectable options; and

a web-hosting module configured to host web resources configured to:

(i) query wireless mobile devices for location information; and

(ii) share, responsive to receipt of location information, received location information with the presentation module;

wherein the first outgoing textual message includes a uniform resource locator (URL) link to the web resources; and

wherein the presentation module is further configured to present shared queried location information to emergency operators through the user interface.

1. A method for generating at a user's premises an overlay using video signals constituting a first data and overlay-enabling digital data constituting a second data, the method comprising:

(a) providing a combiner circuit at the user's premises, wherein:

the combiner circuit is coupled to a TV set and connected to a separate TV [timer] tuner box or TV tuner in the TV set, at the user's premises, and

the combiner circuit is also connected through distinct networks to each of a video signal input providing video signals through the *separate* TV tuner box or *the* TV tuner in the TV set, and an Internet data input providing overlay-enabling digital data over the Internet,

wherein said video signals and said overlay-enabling digital data are received at the user's premises by different resources as mutually distinct and independent inputs, and

wherein said overlay-enabling digital data includes at least:

a Web link indicating a website where content that is associated with said overlay-enabling digital data is stored,

an image indicative of the content associated with said overlay-enabling digital data, and

an overlay activation criterion; and

(b) processing at the user's premises said overlay-enabling digital data and generating at the user's premises a corresponding overlay only if said *overlay* activation criterion is met, wherein generating [an] *the* overlay includes:

generating at the user's premises a first display screen including at least a first portion corresponding to said video signals and a second portion overlaid over said first portion and corresponding at least to said image, and

associating the Web link with said second portion of the first display screen thereby allowing a user to cause the combiner circuit to retrieve said content, generate a second video display screen including at least a portion which corresponds to said content, and input the second display screen to said TV set.

EX1036, 17

EX1002, 14

The only case cited by TVnGO, *Nvidia Corp. v. Neural AI*, does not state that settled expectations for a reissue patent with the same claims should be measured from the issue date of the original patent, and *Carbyne* holds to the contrary. In any event,

Nvidia did not find settled expectations and is inapposite because it concerned a broadening reissue where all original claims were replaced with new claims. DD Brief, 6.

TVnGO is also not entitled to any settled expectations for the '328 patent and its predecessor patent because they have been in force for less than six years even when combining their terms. The original '969 patent was found invalid in the *LG* litigation on April 16, 2020, less than three years and ten months after it issued on August 2, 2016, which was affirmed by the Federal Circuit on June 28, 2021. EX1010, 1. Even when considering the 14-month period since reissuance of the '328 patent, the total term of the '328 patent and its predecessor is only about five years, which is less than the six years routinely required for a finding of settled expectations. This is yet another independent reason why TVnGO is not entitled to any settled expectations.

2. There Were No Settled Expectations for the *LG* Case to “Remove”

TVnGO's argument that the *LG* case did not “remove” TVnGO's settled expectations (DD Brief, 9) fails because there were no settled expectations to remove, as demonstrated above. TVnGO's argument that the original patent corresponding to the '328 reissue patent was found indefinite is unpersuasive when one considers that the original patent was found invalid early in the case at the

Markman stage before LG’s prior art challenges were addressed in the district court.

TVnGO is not “entitled” to settled expectations that the newly reissued ’328 patent would not be challenged in an IPR for all of the reasons discussed above.

3. TVnGO’s Knowledge of Undisclosed Material Prior Art Precludes Any Settled Expectations

In addition to TVnGO not being entitled to any settled expectations based on the recent reissue date of the ’328 patent, TVnGO also is not entitled to any settled expectations because TVnGO has known for several years that the claims of the ’328 patent are invalid over highly material prior art cited in a corresponding European application that TVnGO withheld from the U.S. Patent Office during the reissue prosecution in violation of TVnGO’s duty of candor under 37 C.F.R. § 1.56. That prior art was the same Marler reference (EX1007) relied on in Ground 1 of this petition. Under these circumstances, TVnGO is not entitled to any “settled expectations” regarding the ’328 patent’s patentability. This IPR should not be discretionarily denied because such a denial would unjustly reward TVnGO for violating its duty of disclosure and would be contrary to the public interest by undermining the integrity of the patent system. *See Magnolia Medical Tech., Inc. v. Kurin, Inc.*, IPR2026-00097, Paper 17 at 6 (Director May 14, 2026) (precedential) (Section I.E discussing integrity of the patent system as factor to be considered for discretionary denial).

European patent application no. 05703078.5 (the “Corresponding EP Application”) corresponds to the ’328 patent. EX1039, 4; EX1002, 1 (both corresponding to PCT/IL2005/000035). On November 15, 2011, the European Patent Office (EPO) issued an examination report indicating that both independent claims 1 and 11 of Corresponding EP Application were not novel in view of Marler, and that all dependent claims were either not novel or lacked inventive step (*i.e.*, were obvious) over Marler. EX1038, 3-5 (referring to Marler as D2). That same examination report indicated that the claims also lacked inventive step over another reference, Blackketter. *Id.* at 5 (referring to Blackketter as D3).

In response to this rejection, TVnGO amended claim 1 of the Corresponding EP Application to make it substantially similar to claim 1 of the ’328 patent, including a requirement for an “overlay activation criterion,” and argued that the amended claim was patentable. EX1039, 40-44 and 8-10. The claims were again rejected. EX1040, 4. As a result, TVnGO again amended claim 1 of the Corresponding EP Application, including substantially narrowing the “overlay activation criterion” limitation to require “overlay activation criteria including at least a channel information and a time information defining on which channel or channels of said TV broadcast signal the associated internet connect [*sic*, content] is to be streamed and at what times.” EX1041, 7. These limitations are not found in the ’328 patent, which recites the broader “an overlay activation criterion” limitation.

The narrower limitation in the EP patent is necessary to distinguish over Marler because Marler discloses a real-time trigger which is an overlay activation criterion but which does not specify a start time, and Marler does not explicitly disclose that the trigger includes a channel or channels of a TV broadcast signal as recited in the amended version of claim 1 of the Corresponding EP Application. Petition, 24-27 (citing Marler at ¶¶[0016], [0026], [0035]). Because claim 1 of the '328 patent does not include these additional requirements added to the “overlay activation criterion” limitations in the European patent, claim 1 of the '328 patent is anticipated by Marler as demonstrated in Ground 1 of the Petition.

TVnGO was under a duty to disclose both Marler and Blackketter to the U.S. Patent Office. The EPO examiner rejected claim 1 (and all other claims) in the Corresponding EP Application over both references when claim 1 was in substantially the same form as claim 1 of the '328 patent. TVnGO was also obligated to disclose the EP examination report that disclosed the examiner's reasoning in rejecting the EP claims. *Dayco Prods., Inc. v. Total Containment, Inc.*, 329 F.3d 1358, 1368 (Fed. Cir. 2003); *Larson Manuf. Co. v. Aluminart Prods. Ltd.*, 559 F.3d 1317, 1338 (Fed. Cir. 2009). TVnGO should have made these disclosures during the prosecution of the original '969 patent given that the EPO examiner's rejection was made in 2011, several years before the '969 patent issued.

TVnGO also should have disclosed Marler, Blackketter and the EPO

examination report during the prosecution of the reissue application, during which TVnGO was subject to the same duty of disclosure under 37 C.F.R. § 1.56. MPEP §1418. As discussed above, LG asserted an inequitable conduct defense based in part on the failure to disclose these references to the examiner during the '969 patent prosecution. EX1041, ¶¶34-39. TVnGO was aware of these allegations because it filed a motion to strike/dismiss LG's inequitable conduct defense and counterclaim, which the district court denied on May 23, 2019. EX1044, [DNJ Opinion 5/23/19] 2-3. That happened just three years before TVnGO filed the reissue application for the '328 patent on July 18, 2022.

However, rather than complying with its duty of disclosure to the U.S. Patent Office, TVnGO again withheld Marler, Blackketter and the EPO examination report. TVnGO also withheld LG's district court pleading containing the LG's inequitable conduct defense and counterclaim, the briefing on TVnGO's motion to strike those allegations, and the district court opinion denying TVnGO's motion. The only document from the *LG* litigation that TVnGO discloses to the examiner was its own self-serving response to the district court's order for additional briefing on the invalidity of the '328 patent claims—a response that says nothing about Marler, Blackketter, the EPO examination report, or the allegations of TVnGO's inequitable conduct. EX1002, 2 (listing "Plaintiff's Brief in Response to the Court's March 5, 2020 Letter Order"); EX1043 [TVnGO response to Court's 3/5/20 letter order), *passim*.

The examiner never found or considered the documents that TVnGO withheld during the prosecution of the '328 patent, and as a result allowed the patent to reissue with the claims in their present form. But TVnGO knew, having seen the EPO examiner's rejection of similar claims in the Corresponding EP Application, that the '328 patent should not have reissued in its present form.

TVnGO's inequitable conduct is yet another reason why it is not entitled to settled expectations that the claims of the '328 patent will not be found unpatentable or that the '328 patent will not be subject to *inter partes* review. The Director has recognized that a Patent Owner's failure to disclose material prior art to the Patent Office cuts against its settled expectations:

The Office has a commitment to issuing reliable and durable patent rights resulting from high-quality examination. A patent applicant's failure to provide prior art that it owns cuts against its settled expectations and weighs against discretionary denial.

Microsoft Corp. v. Sandpiper CDN, LLC, IPR2026-00180, Paper 15, at 3 (Director, May 6, 2026). In that case, the patent owner withheld a patent that it owned from the examiner, which resulted in the reference not being considered during prosecution. *Id.* at 2-3. Here, TVnGO's failure to disclose Marler and the other materials from the Corresponding EP Application is even more egregious because TVnGO had an objective indication – the EP examiner's novelty rejection over Marler – that clearly indicated that the information it failed to disclose was highly

material. The only just result of TVnGO's repeated violations of its duty of disclosure is to institute this IPR so that the U.S. Patent Office can address the unpatentability of the '328 patent claims in view of Marler as it would have if TVnGO had complied with its duty of disclosure. *Magnolia Medical Tech., Inc. v. Kurin, Inc.*, IPR2026-00097, Paper 17 at 7 (Director May 14, 2026) (precedential) ("the central purpose of IPRs is to determine whether the patent at issue may have been improvidently granted and whether and to what extent that right should continue to be recognized at all.").

B. TVnGO's Commercialization Efforts Do Not Support Discretionary Denial

TVnGO argues that its commercialization efforts support discretionary denial. DD Brief, 11-12. These arguments are entitled to no weight. First, there is no evidence that any patents were licensed. TVnGO submitted no license agreements or contracts with its DD Brief. The only evidence of licenses and contracts that TVnGO did submit (EX2005-EX2007)—all of which are hearsay—mention only technology, not patents. EX2005, 3 (discussing rights to "market in Israel middleware TVnGO technology"); EX2006, 1 (discussing contract for integrating TVnGO system into converted set top boxes); EX2007, 1 (discussing only demonstration at Consumer Electronics Show in 2007).

Second, the commercialization efforts identified by TVnGO pertained to

foreign countries; namely, Israel, Taiwan and China. EX2005, 3; EX2006, 1. No U.S. patents would have been implicated even if any of the alleged licenses or contracts did involve patents. And any foreign patents that may have been implicated in EX2005-EX2007 may differ from the '328 patent as evidenced by the difference between the '328 patent and corresponding EP patent. As a result, the decisions TVnGO cites in its DD Brief at 12 are inapposite because those decisions credited evidence of U.S. licensing of the challenged U.S. patents—evidence that does not exist here. *All. Laundry Sys., LLC v. PayRange LLC*, IPR2025-00950, Paper 11 at 3 (Director Sept. 19, 2025) (referring to license of “the challenged patent”); *Hisense Corp. v. VideoLabs, Inc.*, IPR2025-00883, Paper 15 at 2-3 (Director Oct. 10, 2025) (referring to “evidence that the challenged patents have been licensed to over twenty companies.”). The only U.S. activity TVnGO cites is a purported demonstration at the 2006 Consumer Electronics Show, which occurred years before the original '969 patent issued. EX2007, 1. A single demonstration at CES in one year is a *de minimis* commercialization effort that does not support discretionary denial of this IPR.

Third, the significance of the commercialization efforts identified in the DD Brief is dubious because the hearsay documents TVnGO provides are its own self-serving statements of anticipated income. TVnGO provided no evidence of any actual income or royalties. And this evidence of commercialization efforts occurred years before the above-mentioned European Patent Office prosecution that

demonstrates the unpatentability of the '328 patent.

C. There Is No “Overreliance” On Expert Testimony in the Petition

TVnGO next asserts “overreliance” in the Petition on the testimony of Samsung’s expert, Dr. Bove, but TVnGO provides only two instances of such overreliance. DD Brief, 12-15. This argument fails because both instances are only alternative theories of unpatentability, and because Dr. Bove’s declaration identifies prior art that supports his testimony in both instances identified by TVnGO.

For the first instance, TVnGO alleges that Dr. Bove’s testimony was used to “fill gaps” in Marler for limitations [1b] and [13a], which require a combiner circuit coupled to a “separate TV tuner box or TV tuner in the TV set.” DD Brief, 13; EX1002, 9:26-27, 10:59-60 (emphasis added). There are two flaws in this argument. The first is that this alleged “gap” in Marler pertains only to an alternative theory and has no impact on the primary theory.

The combiner circuit of limitations [1b] and [13a] can be coupled to either a separate TV tuner box or to a TV tuner in the TV set. In the first instance, Dr. Bove and the Petition rely on a combiner circuit being coupled to a TV tuner in the TV set. Petition, 17; EX1033, ¶84 (“Marler discloses that the combiner circuit is connected to ‘a separate TV tuner box or a TV tuner in the TV set’ because ‘the receiving circuit 114 (*e.g.*, a TV tuner card) is adapted to receive content over the transport medium 22,’ *Id.* The receiving circuit 114 is a TV tuner in a TV set to

which the combiner is connected in embodiments in which the receiver 16 is a TV.”). Dr. Bove’s declaration testimony and the Petition clearly identify where Marler discloses this primary theory, and TVnGO does not argue otherwise. This alone is sufficient to establish unpatentability.

Dr. Bove then discusses what he describes as an alternative theory:

Alternatively, it would have been obvious to a POSITA that Marler’s receiver 16 could connect to receive television content via a cable system or satellite system, in which case it would have been obvious to a POSITA that Marler’s RCVR 114 would be connected to a proprietary set-top box provided by the cable or satellite system operator because those systems were typically pay television systems with encrypted or scrambled broadcasts that required customers to have proprietary set-top boxes including a tuner and a decrypter/descrambler at the customer’s premises to decrypt and/or descramble the received broadcast transmissions.

EX1033, ¶85 (emphasis added). As demonstrated above, this alternative theory is not necessary to establish unpatentability.

The second flaw in TVnGO’s argument is that Dr. Bove does identify prior art that discloses this alternative, *i.e.*, connecting a combiner box to a separate TV tuner box, at ¶173 of his Declaration when discussing the corresponding limitations in Ground 6 for the Zigmond patent. There, Dr. Bove explains that:

a POSITA would have found it obvious that the broadcast signal

8 of Figs. 2-3 would be received via a separate cable or satellite set top box including a tuner (each a claimed “separate TV tuner box”) because such signals were typically pay television signals which were broadcast in encrypted form and required decryption which was typically accomplished in a proprietary set top box at that time. *See, e.g.*, EX1013, 3:36-39; Figs. 1-2 (discussing “cable box 20 channel selector,” including a tuner.”).

EX1033, ¶173 (emphasis added). Redling (EX1013) shows exactly such a proprietary set top box with a tuner in the form of cable box 20. EX1013, 3:36-39; Figs. 1-2:

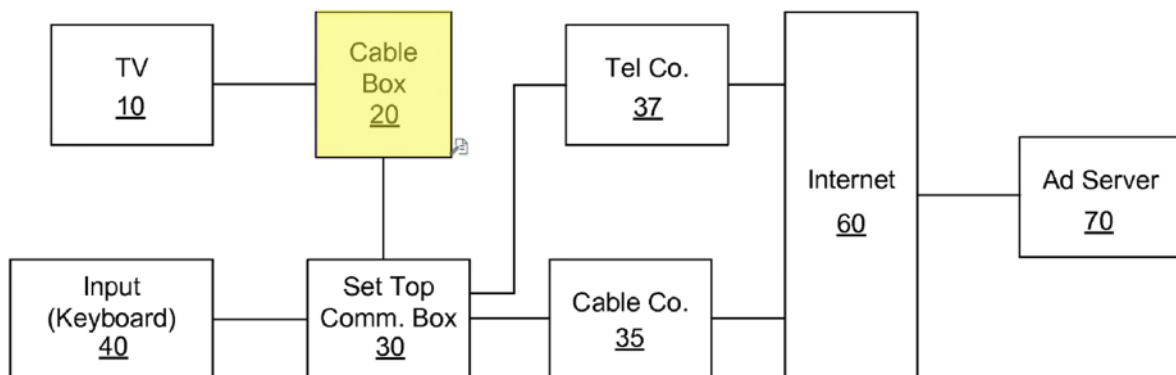


Figure 2

EX1013, Fig. 2 (highlight added); *see also* Fig. 1 and 3:36-39.

For the second instance, TVnGO alleges that Dr. Bove’s testimony was used to “fill gaps” in Zigmond for limitation [1g] and [13a], which requires “overlay-enabling digital data . . . received at the user’s premises” by an “independent input[.]”

that includes “an image indicative of the content associated with said overlay-enabling digital data.” DD Brief, 14. Limitation [1g] can be satisfied by an icon downloaded from the Internet. TVnGO asserts that Dr. Bove fails to show prior art support for the proposition that it would have been obvious to include one or two icons with Zigmond’s program code, which Zigmond discloses is downloaded via the Internet. DD Brief, 14 (citing Pet. at 62 and EX1033, ¶¶181-186). Again, TVnGO ignores the fact that this is only one theory in the Petition. In Ground 7, Dr. Bove demonstrates that it would have been obvious to modify Zigmond in view of Redling to download the icons via the Internet along with other overlay-enabling digital data. EX1033, ¶¶201-202. TVnGO identifies no “gap” for Ground 7 that is filled by Dr. Bove’s testimony. Yet again the Petition includes a basis for unpatentability that is independent of the alleged “gap” identified by TVnGO.

Additionally, TVnGO ignores that Dr. Bove demonstrates earlier in his declaration that prior art discloses this alleged “gap.” At paragraphs 109-110 of his Declaration, Dr. Bove establishes that Marler discloses downloading icons such as icons 32 in Marler’s Figure 3 via a secondary link 20 which can be the Internet. Thus, there is no “gap” in the prior art that Dr. Bove fills with testimony.

Dr. Bove also establishes that Zigmond itself discloses downloading program code over the Internet. EX1033, ¶184. TVnGO does not contest Dr. Bove’s testimony that if only one or two icons were used in a system as taught for some

embodiments of Zigmond, it would have been obvious to include the icon with the program code. EX1033, ¶182-183; DD Brief, 14-16. TVnGO also offers no alternative to downloading the required icon with the program code as in Ground 6 or with the other overlay enabling digital data as in Ground 7. Grounds 6 and 7 cover both possibilities.

D. Samsung’s Diligence and TVnGO’s Lack of Diligence Favor Institution Under *Fintiv*

TVnGO filed its original complaint against Samsung Electronics Co., Ltd. (“SEC”) and Samsung Electronics America (“SEA”) on November 26, 2025. EX1042, 1. TVnGO did not serve SEA until nearly three months later on February 10, 2026. EX1043, 2. Rather than serving SEC, TVnGO agreed to extend the time to respond to the complaint until June 1, 2026 in exchange for waiver of service. EX1043, 2. In contrast, Samsung drafted and filed this Petition by February 13, 2026, less than three months after the original complaint was filed and just three days after SEA was served with the complaint. This was before the parties agreed to waiver of service on SEC, before any scheduling conference, before TVnGO served any infringement contentions, before any discovery, before any Markman briefing, and before the district court scheduling a trial date. Petitioner’s broad *Sotera*-plus stipulation (Paper 7) precludes any possible overlap between the district court

proceedings and this IPR. As a result, the *Fintiv* factors weigh strongly against discretionary denial.

E. TVnGO's Nitpicking Over Clerical Errors Is No Sound Basis for Discretionarily Denying this Petition

TVnGO argues that clerical errors warrant denial of the Petition. These arguments are without merit. TVnGO argues that the Petition should be denied because the wrong document was filed as EX1007 (Marler) and misleadingly argues that Petitioner's lack of diligence in correcting this error weighs against institution, without mentioning that TVnGO did not notify Petitioner of the error. DD Brief, 17-18. TVnGO does not claim to have been prejudiced by this error, nor could it have been prejudiced given that it was well aware of Marler because it was cited in the Corresponding EP Application. EX1038 (EPO examination report citing Marler as D2). In any event, EX1007 has now been corrected as authorized by the Board. EX3101. The other errors identified by TVnGO, DD Brief at 18, are inconsequential. The Petition presents ten independent grounds supported by extensive patents and printed publications and a detailed declaration, and was filed on a timeline the Office expressly encourages for early challenges. No discretionary weight should attach to initial clerical mistakes that have been corrected without prejudice to TVnGO.

III. CONCLUSION

The Director should reject TVnGO's request for discretionary denial for all of the reasons discussed above.

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Respectfully submitted,

/s/ James M. Heintz

Reg. No. 41828

DLA Piper LLP

One Fountain Square

11911 Freedom Drive, Suite 300

Reston, VA 20190-5602

Phone: + 1 703 773 4000

Fax: + 1 703 773 5000

Jim.heintz@us.dlapiper.com

Attorney for Petitioners, Samsung
Electronics Co., Ltd. and Samsung
Electronics America, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies pursuant to 37 C.F.R. § 42.6(e) that on May 22, 2026, a true and correct copy of this brief and any new exhibits were served by emailing a copy of the same (by agreement) to the following attorneys for the Patent Owner:

David L. Hecht - dhecht@hechtpartners.com
J. Tanner Murphy - tmurphy@hechtpartners.com

Respectfully submitted,

/s/ James M. Heintz

James M. Heintz