IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.
Petitioner,

v.

BLACK HILLS MEDIA, LLC
Patent Owner.

Case No. To Be Assigned
Patent No. 8,050,652

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,050,652 UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 *et seq.*

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LIST OF EXHIBITS

Exhibit	Description
Ex. 1001	U.S. Patent No. 8,050,652
Ex. 1002	File History for U.S. Patent No. 8,050,652
Ex. 1003	U.S. Patent No. 7,187,947 to White *et al*. ("White").
Ex. 1004	U.S. Patent No. 6,199,076 to Logan *et al*. ("Logan")
Ex. 1005	U.S. Patent No. 7,020,704 to Lipscomb *et al.* ("Lipscomb")
Ex. 1006	U.S. Provisional Patent Application No. 60/157,736 ("the '736 application" or "the '736 app.")
Ex. 1007	U.S. Provisional Patent Application No. 60/176,829 ("the '829 application" or "the '829 app.")
Ex. 1008	U.S. Provisional Patent Application No. 60/176,830 ("the '830 application" or "the '830 app.")
Ex. 1009	U.S. Provisional Patent Application No. 60/176,833 ("the '833 application" or "the '833 app.")
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Ex. 1011	U.S. Provisional Patent Application No. 60/177,783 ("the '783 application" or "the '783 app.")
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Ex. 1014	Decision on Institution of *Inter Partes* Review Pursuant to 37 C.F.R. § 42.108 in *Yamaha Corp. of America v. Black Hills Media, LLC*, Case IPR2013-00594 (March 20, 2014)
Ex. 1015	Declaration of Kevin Jeffay, Ph.D.
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Ex. 1017	U.S. Patent No. 5,168,481 to Culbertson *et al*. ("Culbertson")
Ex. 1018	U.S. Patent No. 5,616,876 to Cluts ("Cluts")
Ex. 1019	Nielsen, J., Desurvire, H., Kerr, R., Rosenberg, D., Salomon, G., Molich, R., and Stewart, T., "Comparative Design Review: An Exercise in Parallel Design," Proc. ACM INTERCHI'93 Conf. (Apr. 24-29, 1993) ("Nielsen")
Ex. 1020	Hacker, S. "MP3: The Definitive Guide by Scot Hacker" March, 2000 (Springer) ("Hacker")

I. MANDATORY NOTICES (37 C.F.R. § 42.8(A)(1))

A. Real Party-In-Interest (37 C.F.R. § 42.8(b)(1))

The real parties in interest for this Petition for *Inter Partes* Review ("IPR") are Samsung Electronics Co., Ltd.; Samsung Electronics America, Inc.; and Samsung Telecommunications America, LLC.

B. Related Matters (37 C.F.R. § 42.8(b)(2))

U.S. Patent No. 8,050,652 ("the '652 Patent") is currently the subject of *inter partes* review proceeding IPR2013-00594 that was filed on September 18, 2013, by Yamaha Corporation of America ("the '594 IPR Petitioner"). *Yamaha Corp. of America v. Black Hills Media, LLC*, Case IPR2013-00594 (*instituted* March 20, 2014). After a preliminary response filed on December 26, 2013, by Black Hills Media, LLC, the owner of the '652 Patent, the Board on March 20, 2014, instituted *inter partes* review of claims of the '652 Patent. Decision on Institution of *Inter Partes* Review Pursuant to 37 C.F.R. § 42.108 in *Yamaha Corp. of America v. Black Hills Media, LLC*, Case IPR2013-00594 (March 20, 2014).

The '652 Patent is currently the subject of litigation against multiple defendants in the Eastern District of Texas, the District of Delaware and the Central District of California, including the action captioned *Black Hills Media, LLC v. Samsung Elecs. Co., Ltd. et al.* (Civil Action No. 2-13-cv-00379 (E.D. Tex.); the "Samsung Litigation"). Other defendants in the litigations include LG Electronics, Inc.; LG Electronics U.S.A, Inc.; LG Electronics Mobilecomm U.S.A.,

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