#### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

| United States Patent No.: 8,532,641  | S | Attorney Docket No.:                |
|--------------------------------------|---|-------------------------------------|
| Inventors: Russell W. White,         | S | 110797-0004-656                     |
| Kevin R. Imes                        | S | Customer No. 28120                  |
| Formerly Application No.: 13/673,391 | S | Petitioners:                        |
| Issue Date: Sept. 10, 2013           | S | Samsung Electronics Co., Ltd.;      |
| Filing Date: Nov. 9, 2012            | S | Samsung Electronics America, Inc.;  |
| Priority Date: March 28, 2000        | S | Samsung Telecommunications America, |
|                                      | S | LLC                                 |
| Former Group Art Unit: 2646          | S |                                     |
| Former Examiner: Erika Washington    | S |                                     |
|                                      | S |                                     |
|                                      | 8 |                                     |

For: SYSTEM AND METHOD FOR MANAGING MEDIA

MAIL STOP PATENT BOARD
Patent Trial and Appeal Board
United States Patent and Trademark Office
Post Office Box 1450
Alexandria, Virginia 22313-1450

DECLARATION OF DR. SCHUYLER QUACKENBUSH IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT NO. 8,532,641



## TABLE OF CONTENTS

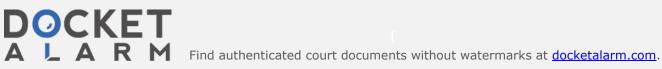
| I.   | Introduction   |  |        |   |           |
|------|--|--|--------|---|-----------|
| II.  | Opinions Regarding A Person Of Ordinary Skill In The Art |  |        | 8   |           |
| III. | The '  | 641 Pate   | ent    |   | 9         |
|      | Α.   | Overv  | iew of | the '641 Patent   | 9         |
|      | В.   | Claim  | Const  | ruction of '641 Patent Claims   | .11       |
| IV.  | Anal   | ysis of T  | he '64 | 1 Patent  | .12       |
|      | A.   | A. Ground 1: Obvious over Abecassis in view of Chennak 5, 8-11, 13, 14) Ground 2: Obvious over Abecassis in view of Chennak (Claims 1-3, 5, 6, 9, 10, 14) Ground 3: Obvious over Abecassis in view of Chennak (Claims 1-3, 5, 8-11, 13, 14) Ground 4: Obvious over Abecassis in view of Chennak and Lau (Claims 1-3, 5, 6, 9, 10, 14) Ground 5: Obvious over Abecassis in view of Chennak Galensky (Claims 7, 12) Ground 6: Obvious over Abecassis in view of Chennak and Galensky (Claims 6, 7) Ground 7: Obvious over Abecassis in view of Chennak Galensky (Claims 7, 12) Ground 8: Obvious over Abecassis in view of Chennak |        | Obvious over Abecassis in view of Chennakeshu (Claims 1.4) Obvious over Abecassis in view of Chennakeshu and Herro (5, 6, 9, 10, 14) Obvious over Abecassis in view of Chennakeshu and Lau (5, 8-11, 13, 14) Obvious over Abecassis in view of Chennakeshu, Herrod, (ims 1-3, 5, 6, 9, 10, 14) Obvious over Abecassis in view of Chennakeshu and (laims 7, 12) Obvious over Abecassis in view of Chennakeshu, Herrod, (y) (Claims 6, 7) Obvious over Abecassis in view of Chennakeshu, Lau, and | -3,<br>od |
|      |  | 1.   | Claim  | 1   | .22       |
|      |  |  | (a)    | Preamble  | .22       |
|      |  |  | (b)    | Element [1.A]   | .22       |
|      |  |  | (c)    | Element [1.B]   | .23       |
|      |  |  | (d)    | Element [1.C]   | .24       |
|      |  |  | (e)    | Element [1.D]   | .25       |
|      |  |  | (f)    | Element [1.E]   | .26       |
|      |  |  | (g)    | Element [1.F]   | .32       |
|      |  |  | (h)    | Element [1.G]   | .33       |
|      |  |  | (i)    | Element [1.H]   | .43       |
|      |  |  | (j)    | Element [1.I]   | .49       |



| 2.  | Claim | 2              | 50 |
|-----|-------|----------------|----|
| 3.  | Claim | 3              | 53 |
|     | (a)   | Element [3.A]  | 53 |
|     | (b)   | Element [3.B]  | 54 |
|     | (c)   | Element [3.C]  | 54 |
| 4.  | Claim | 5              | 56 |
| 5.  | Claim | 6              | 59 |
|     | (a)   | Element [6.A]  | 59 |
|     | (b)   | Element [6.B]  | 61 |
| 6.  | Claim | 7              | 64 |
|     | (a)   | Element [7.A]  | 64 |
|     | (b)   | Element [7.B]  | 64 |
| 7.  | Claim | 8              | 68 |
|     | (a)   | Preamble       | 68 |
|     | (b)   | Element [8.A]  | 69 |
|     | (c)   | Element [8.B]  | 70 |
|     | (d)   | Element [8.C]  | 71 |
|     | (e)   | Element [8.D]  | 71 |
|     | (f)   | Element [8.E]  | 71 |
| 8.  | Claim | 9              |    |
|     | (a)   | Element [9.A]  | 72 |
|     | (b)   | Element [9.B]  | 72 |
|     | (c)   | Element [9.C]  |    |
|     | (d)   | Element [9.D]  | 72 |
| 9.  | Claim | 10             |    |
| 10. | Claim | 11             | 75 |
| 11. | Claim | 12             | 77 |
|     | (a)   | Element [12.A] | 77 |
|     | (b)   | Element [12.B] |    |
|     | (c)   | Element [12.C] |    |
| 12  | Claim | 13             | 78 |

|    |  | (a)  | Element [13.A]  | 78  |
|----|--|--|---|-----|
|    |  | (b)  | Element [13.B]  | 78  |
|    | 13.                                    | Clain  | n 14  | 81  |
| В. | Ryd<br>Gro<br>Che<br>Gro<br>Ryd<br>Gro | beck (Cound 10:<br>nnakeshound 11:<br>beck, ar<br>ound 12: | Obvious over Treyz in view of Gladwin, Chennakeshu, laims 1-3, 5, 8-11, 13, 14)  Obvious over Treyz in view of Herrod, Gladwin, nu, and Rydbeck (Claims 1-3, 5, 9, 10, 13, 14)  Obvious over Treyz in view of Gladwin, Chennakeshud Galensky (Claims 7, 12)  Obvious over Treyz in view of Herrod, Gladwin, nu, Rydbeck, and Galensky (Claims 6, 7, 12) | u,  |
|    | 1.                                     |  | n 1   |     |
|    |  | (a)  | Preamble  |     |
|    |  | (b)  | Element [1.A]   |     |
|    |  | (c)  | Element [1.B]   |     |
|    |  | (d)  | Element [1.C]   |     |
|    |  | (e)  | Element [1.D]   | 87  |
|    |  | (f)  | Element [1.E]   | 89  |
|    |  | (g)  | Element [1.F]   | 94  |
|    |  | (h)  | Element [1.G]   | 97  |
|    |  | (i)  | Element [1.H]   | 101 |
|    |  | (j)  | Element [1.I]   | 107 |
|    | 2.                                     | Clain  | n 2   | 108 |
|    | 3.                                     | Clain  | n 3   | 109 |
|    |  | (a)  | Element [3.A]   | 109 |
|    |  | (b)  | Element [3.B]   | 109 |
|    |  | (c)  | Element [3.C]   | 110 |
|    | 4.                                     | Clain  | n 5   | 110 |
|    | 5.                                     | Clain  | 16  | 112 |
|    |  | (a)  | Element [6.A]   | 112 |
|    |  | (b)  | Element [6.B]   | 115 |
|    | 6.                                     | Clain  | n 7   | 117 |
|    |  | (a)  | Element [7 A]   | 117 |

|     | (b)   | Element [7.B]  | 8 |
|-----|-------|----------------|---|
| 7.  | Claim | 8              | 2 |
|     | (a)   | Preamble       | 2 |
|     | (b)   | Element [8.A]  | 3 |
|     | (c)   | Element [8.B]  | 4 |
|     | (d)   | Element [8.C]  | 5 |
|     | (e)   | Element [8.D]  | 6 |
|     | (f)   | Element [8.E]  | 6 |
| 8.  | Claim | 9              | 6 |
|     | (a)   | Element [9.A]  | 6 |
|     | (b)   | Element [9.B]  | 6 |
|     | (c)   | Element [9.C]  | 7 |
|     | (d)   | Element [9.D]  | 7 |
| 9.  | Claim | 10             | 7 |
| 10. | Claim | 11             | 8 |
| 11. | Claim | 12             | 1 |
|     | (a)   | Element [12.A] | 1 |
|     | (b)   | Element [12.B] | 1 |
|     | (c)   | Element [12.C] | 1 |
| 12. | Claim | 13             | 2 |
|     | (a)   | Element [13.A] | 2 |
|     | (b)   | Element [13.B] | 2 |
| 13. | Claim | 14             | 5 |



# DOCKET

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

# **Real-Time Litigation Alerts**



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## **Advanced Docket Research**



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## **Analytics At Your Fingertips**



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

#### **LAW FIRMS**

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

#### **FINANCIAL INSTITUTIONS**

Litigation and bankruptcy checks for companies and debtors.

### **E-DISCOVERY AND LEGAL VENDORS**

Sync your system to PACER to automate legal marketing.

