

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC., LG ELECTRONICS U.S.A., INC., and LG
ELECTRONICS MOBILECOMM U.S.A., INC.
Petitioner,

v.

BLACK HILLS MEDIA, LLC
Patent Owner.

IPR2015-00334
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 <i>et al.</i> (“White”).
Ex. 1004	U.S. Patent No. 6,199,076 to Logan <i>et al.</i> (“Logan”)
Ex. 1005	U.S. Patent No. 7,020,704 to Lipscomb <i>et al.</i> (“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.”)
Ex. 1010	U.S. Provisional Patent Application No. 60/177,063 (“the ‘063 application” or the “063 app.”)
Ex. 1011	U.S. Provisional Patent Application No. 60/177,783 (“the ‘783 application” or “the ‘783 app.”)
Ex. 1012	U.S. Provisional Patent Application No. 60/177,867 (“the ‘867 application” or “the ‘867 app.”)
Ex. 1013	U.S. Provisional Patent Application No. 60/177,884 (“the ‘884 application” or “the ‘884 app.”)
Ex. 1014	Decision on Institution of <i>Inter Partes</i> Review Pursuant to 37 C.F.R. § 42.108 in <i>Yamaha Corp. of America v. Black Hills Media, LLC</i> , Case IPR2013-00594 (March 20, 2014)
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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”)

LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG Electronics MobileComm U.S.A., Inc. (collectively “LG” or “petitioner”) respectfully submit this petition for *inter partes* review (IPR) of U.S. Patent No. 8,050,652 (“the ’652 Patent”) concurrently with a Motion for Joinder under 35 U.S.C. § 315(c) and 37 C.F.R. § 42.122(b). Petitioner requests institution of IPR and party joinder with the pending instituted IPR titled *Samsung Electronics Co., Ltd. v. Black Hills Media, LLC*, IPR2014-00737 (“the Samsung IPR”).

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 LG Electronics, Inc., LG Electronics U.S.A., Inc. and LG Electronics MobileComm U.S.A. Inc.

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

Black Hills Media, LLC (“Black Hills”) asserted the ’652 Patent against LG and others in *Certain Media Devices, including Televisions, Blu-Ray Disc Players, Home Theater Systems, Tablets and Mobile Phones, Components Thereof and Associated Software*, Inv. No. 337-TA-882 (U.S.I.T.C., filed May 13, 2013) (“the ITC Investigation”) and *Black Hills Media, LLC v. LG Electronics, Inc.*, 1:13-cv-00803 (filed May 6, 2013) (“the district court litigation”). The ’652 patent was challenged by Samsung in IPR2014-00737, as noted above. It was also challenged in *Yamaha Corp. of Am. V. Black Hills Media LLC*, IPR2013-00594 (Sept. 18, 2013).

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