

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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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.

CASE IPR2015-00335

Patent No. 6,108,686

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PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,108,686  
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. 6,108,686 (“the ‘686 Patent”)
Ex. 1002	File History for U.S. Patent No. 6,108,686
Ex. 1003	U.S. Patent No. 5,740,549 (“the Reilly patent” or “Reilly”)
Ex. 1004	Weiss, “ <i>New Places to Go Online</i> ,” 14(8) <i>Technology &amp; Learning</i> 109-115 (1994) (“the Technology & Learning Article”)
Ex. 1005	Declaration of Kevin C. Almeroth, Ph.D. (“Almeroth Dec.”)
Ex. 1006	<i>Curriculum vitae</i> of Kevin C. Almeroth, Ph.D.

LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG Electronics MobileComm U.S.A., Inc. (collectively “LG” or “petitioner”) submit this petition concurrently with a motion for joinder in previously-instituted *inter partes* review (“IPR”) of U.S. Patent No. 6,108,686 (“the ‘686 patent”), IPR2014-00717.

**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 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” or “Patent Owner”) is the owner of the ’686 Patent. Black Hills asserted the ’686 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 ’686 patent was challenged by Samsung in IPR2014-00717, as noted above. The ’686 Patent has been asserted in the following litigations:

<i>Black Hills Media LLC v. Yamaha Corp. Am.</i>	8-14-cv-00101	CACD	Jan. 21, 2014
<i>Black Hills Media LLC v. Sonos, Inc.</i>	2-14-cv-00486	CACD	Jan. 21, 2014
<i>Black Hills Media LLC v. Yamaha Corp. Am.</i>	2-14-cv-00482	CACD	Jan. 21, 2014

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