

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DIRECTV, LLC

Petitioner

v.

QURIO HOLDINGS, INC.

Patent Owner

CASE: IPR2015-02005

Patent No. 7,787,904 B2

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 7,787,904 B2**

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EXHIBIT LIST

- Ex. 1001 U.S. Patent No. 7,787,904 B2 to Qurio Holdings, Inc. (“the 904 Patent”)
- Ex. 1002 File History of U.S. Patent No. 7,787,904 B2
- Ex. 1003 De Vet et al, “A personal digital assistant as an advanced remote control for audio/video equipment” from the Second Workshop on Human Computer Interaction with Mobile Devices, 1999 (“De Vet”)
- Ex. 1004 U.S. Patent Application Publication No. 2003/0193426 (“Vidal”)
- Ex. 1005 U.S. Patent Application Publication No. 2005/0057538 (“Morse”)
- Ex. 1006 U.S. Patent Application Publication No. 2006/0041655 (“Holloway”)
- Ex. 1007 (Reserved)
- Ex. 1008 NetRemote LE Installation Guide (“Installation Guide”)
- Ex. 1009 NetRemote LE Network Configuration Guide (“Configuration Guide”)
- Ex. 1010 NetRemote LE Setup Guide (“Setup Guide”)
- Ex. 1011 October 13, 2004 Internet Archive Capture of <http://www.promixis.com/products.php?section=netremote> (“NetRemote Webpage”)
- Ex. 1012 User’s Guide for HP iPAQ rx3000 series Mobile Media Companion, Document Part Number 364351-002, August 2004 (“RX3000”)
- Ex. 1013 Declaration of Tal Lavian, Ph.D. (“Lavian Decl.”)
- Ex. 1014 Declaration of John de Vet
- Ex. 1015 Declaration of Ron Bessems
- Ex. 1016 Declaration of Lisa Gade

EXHIBIT LIST
(continued)

- Ex. 1017 Declaration of Christopher Butler
- Ex. 1018 Declaration of Mark Dunlop, Ph.D.
- Ex. 1019 Declaration of Sara Hare
- Ex. 1020 U.S. Pub. No. 2001/0033244 A1 to Harris *et al.*
- Ex. 1021 U.S. Patent No. 4,746,919 to Reitmeier
- Ex. 1022 U.S. Pub. No. 2003/0115351 to Giobbi
- Ex. 1023 U.S. Patent No. 7,571,014 to Lambourne *et al.*
- Ex. 1024 Peter Tarasewich, *Wireless Devices for Mobile Commerce: User Interface Design and Usability*, in *Mobile Commerce: Technology, Theory, and Applications* 26-50 (2002).
- Ex. 1025 Brad A. Myers, *Using handhelds for wireless remote control of PCs and appliances* 17 *Interacting with Computers* 251-264 (2005)
- Ex. 1026 Labeled Claim Language of Claims 1-20 of U.S. Pat. No. 7,787,904 B2

I. INTRODUCTION

Pursuant to 35 U.S.C. § 311 and 37 C.F.R. § 42.100, DIRECTV, LLC (“Petitioner”) petitions for *inter partes* review (“IPR”) of claims 1-3, 10, 12, and 15-18 (“Challenged Claims”) of U.S. Pat. No. 7,787,904 B2 (“the 904 Patent,” Ex. 5 1001), assigned to Qurio Holdings, Inc. The 904 Patent describes a mobile device that wirelessly communicates with media devices to select content to be played by the media devices (*i.e.* a “smart remote”). Pursuant to 35 U.S.C. § 314(a), this Petition shows the reasonable likelihood that Petitioner will prevail with respect to at least one of the Challenged Claims, which are unpatentable under pre-AIA 35 10 U.S.C. § 102 and/or § 103 based on specific grounds listed below. In addition, this Petition demonstrates invalidity of each challenged claim by a preponderance of the evidence in compliance with 35 U.S.C. § 316(e). The Office is respectfully requested to institute an IPR trial and to cancel the Challenged Claims.

II. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(B)

15 Real Party in Interest: Petitioner DIRECTV, LLC identifies AT&T Services, Inc. as a real party in interest. Out of an abundance of caution, DIRECTV, LLC also identifies AT&T Inc. as a real party in interest only for the purpose of this proceeding based on recent decisions of the Patent Trial and Appeal Board, and only to the extent that Patent Owner contends that this separate legal entity should 20 be named a real party in interest in this IPR. AT&T Inc. is and always has been a

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