

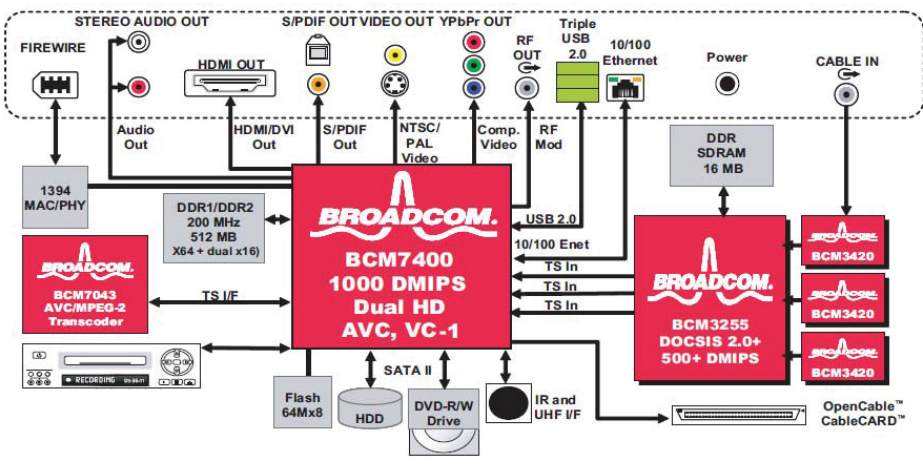
**EXHIBIT A**  
Preliminary Infringement Claim Chart for U.S. Pat. No. 6,233,389  
Samsung DVRs

the Claim	Samsung DVRs <sup>1</sup>
<b>Claim 1</b>	
1[a]. A process for the simultaneous storage and play back of multimedia data, comprising the steps of:	<p>A Samsung DVR can simultaneously store and play back multimedia data. <i>See, e.g.,</i> <a href="http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf">http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf</a> (Samsung SMT-H3090 2008 User Guide), p. 2 ("Viewing one program while recording another program." "Simultaneous Time Shifted Buffering for two Programs."); p. 9 ("Record two live TV programs simultaneously while watching two recorded programs on HDD.")</p> <p><b>"TIME WARNER CABLE AND SAMSUNG FORGE AGREEMENT FOR TRU2WAY SET-TOP DEVELOPMENT, PURCHASE &amp; DEPLOYMENT</b>  <b>Release Date: 07/06/2009</b></p> <p>Time Warner Cable and Samsung today announced that they have signed a letter of commitment for the continued development, purchase and deployment of Samsung True2Way enabled set-top boxes, including the first second-source DVR. "We look to offer our customers advanced set-top boxes with features that are simple and easy to use," said Mike Hayashi, Executive Vice President of Advanced Engineering for Time Warner Cable. "We have been a leader in the roll-out of Tru2Way devices and we are continuing to grow our relationship with Samsung, a CE company dedicated to the development of new equipment meeting the necessary standards and offering attractive feature sets."</p> <p>Thomas Rhee, SVP, New Business Development for Samsung, added, "We are thrilled to have worked closely with Time Warner Cable to launch Tru2way on our family of cable set-tops including the SMT-H3090 and SMT-H3270 High Definition DVRs. As in Korea, we look forward to the expansion of Tru2way in North America."</p> <p>This agreement further solidifies Time Warner Cable's commitment to its deployment of Tru2Way enabled set-top boxes. To date Time Warner Cable has deployed over 2 million Tru2Way set-top boxes, of which approximately 400,000 are Samsung boxes.</p> <p>Time Warner Cable and Samsung also recently signed an MOU that focuses on collaborating in development of better home</p>

<sup>1</sup> In this chart, reference is made to a Samsung DVR identified as SMT-H3090. The same analysis applies to other Samsung DVRs with the same functionality, including but not limited to set top boxes with DVR functionality bearing the model designations, SMT-H3272, SMTH3270, and SMT-H4372 and other DVRs having the same functionality. Additionally, this chart also references the specific processor included in the SMT-H3090. The same analysis applies to DVRs that include other processors with the same functionality, for example the processors in each of the accused DVRs.

the Claim	Samsung DVRs <sup>1</sup>
	networking solutions for entertainment. This work is part of Time Warner Cable's continuing efforts to provide its customers with technology that brings new levels of ease and convenience." <a href="http://www.timewarnercable.com/corporate/about/inthenews.ashx?PRID=2626&amp;MarketID=0">http://www.timewarnercable.com/corporate/about/inthenews.ashx?PRID=2626&amp;MarketID=0</a>

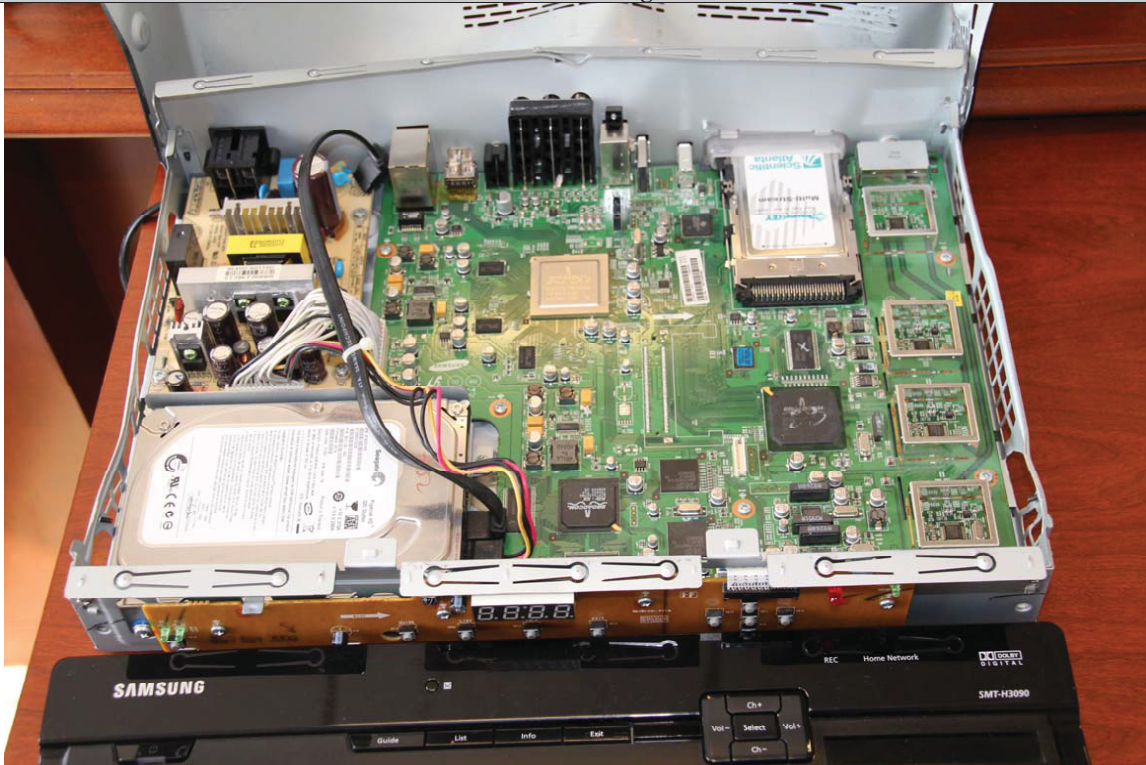
the Claim	Samsung DVRs <sup>1</sup>
<p>[1b] accepting television (TV) broadcast signals, wherein said TV signals are based on a multitude of standards, including, but not limited to, National Television Standards Committee (NTSC) broadcast, PAL broadcast, satellite transmission, DSS, DBS, or ATSC;</p>	<p>A Samsung DVR accepts television broadcast signals. On information and belief, Samsung DVRs receive television programming in the form of QAM-modulated MPEG2 transport stream packets.</p> <p><i>See, e.g.</i>, (Samsung SMT-H3090 2008 Data Sheet), p.1 (“Samsung SMT-H3090 is Dual tuner Digital Video Recorder(DVR) which provides Standard Definition (SD), High-Definition(HD) and Analog video signals. Dual tuner DVR allows cable subscribers to watch and record two HD programs Simultaneously.”), p. 2 (“In-band Tuner : 54 to 864MHz, Receiving 64 or 256 QAM.”));</p> <p><a href="http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf">http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf</a> (Samsung SMT-H3090 2008 User Guide), p. 2 (“RF Input Tuning Range: 88 to 860 MHz.”); (BCM7400 Product Brief) (showing BCM3420 and BCM3255 chips)</p> <p>On information and belief, Samsung DVRs accept ATSC broadcast signals.</p>
<p>[1c] tuning said TV signals to a specific program;</p>	<p>A Samsung DVR has tuners which can tune TV signals to a specific program. <i>See, e.g.</i>, (Samsung SMT-H3090 2008 Data Sheet), p.1 (“Samsung SMT-H3090 is Dual tuner Digital Video Recorder(DVR) which provides Standard Definition (SD), High-Definition(HD) and Analog video signals. Dual tuner DVR allows cable subscribers to watch and record two HD programs Simultaneously.”), p. 2 (“In-band Tuner : 54 to 864MHz, Receiving 64 or 256 QAM.”)). For example, based on information and belief the Samsung DVRs tune to a specific frequency or a band of frequencies.</p>
<p>[1d] providing at least one Input Section, wherein said Input Section converts said specific program to an Moving</p>	<p>A Samsung DVR has at least one Input Section, wherein said Input Section converts said specific program to a Moving Pictures Experts Group (MPEG) formatted stream for internal transfer and manipulation. The Input Section converts said specific program to an MPEG formatted stream, for example in the course of performing QAM demodulation and Analog-to-Digital conversion (A/D). A Samsung DVR will perform QAM demodulation and Analog-to-Digital conversion in the course of watching live television and recording a television program. <i>See, e.g.</i>,</p>

<p><b>the Claim</b></p> <p>Pictures Experts Group (MPEG) formatted stream for internal transfer and manipulation;</p>	<p style="text-align: center;"><b>Samsung DVRs<sup>1</sup></b></p> <p><a href="http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf">http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf</a> (Samsung SMT-H3090 2008 User Guide), p. 2 ("RF Input Tuning Range: 88 to 860 MHz."); (BCM7400 Product Brief) (showing BCM3420 and BCM3255 chips):</p>  <p>The diagram illustrates the internal hardware of a Samsung DVR. At the center is the <b>BROADCOM BCM7400 1000 DMIPS Dual HD AVC, VC-1</b> chip. To its left is the <b>BROADCOM BCM7043 AVC/MPEG-2 Transcoder</b>, which is connected via <b>TS I/F</b> (Transport Stream Interface) to the main chip. Above the main chip is <b>DDR1/DDR2 200 MHz 512 MB X84+ dual x16</b> memory. To the right is the <b>BROADCOM BCM3255 DOCSIS 2.0+ 500+ DMIPS</b> chip, which is connected to the main chip via <b>TS In</b> and <b>TS In</b> lines. This chip is also connected to <b>DDR SDRAM 16 MB</b> and three <b>BCM3420</b> chips. The main chip is connected to various external components: <b>Flash 64Mx8</b>, <b>HDD</b>, <b>DVD-R/W Drive</b>, and <b>IR and UHF I/F</b>. It also interfaces with <b>1394 MAC/PHY</b>, <b>Audio Out</b>, <b>HDMI/DVI Out</b>, <b>S/PDIF Out</b>, <b>NTSC/PAL Video</b>, <b>Comp. Video</b>, <b>RF Mod</b>, <b>Triple USB 2.0</b>, <b>10/100 Ethernet</b>, and <b>Power</b>. Input ports include <b>FIREWIRE</b>, <b>STEREO AUDIO OUT</b>, <b>S/PDIF OUT VIDEO OUT YPbPr OUT</b>, <b>RF OUT</b>, and <b>CABLE IN</b>.</p> <p>To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function as the Input Section, for example that of converting a specific program into an MPEG stream, in substantially the same way, for example by turning the input data, whatever its format, into a digital representation such as MPEG, to yield the same result, a properly formatted data stream for internal transfer and manipulation.</p>
<p>[1e] providing a Media Switch, wherein said Media Switch parses MPEG stream, said</p>	<p>A Samsung DVR has a Media Switch, wherein said Media Switch parses MPEG streams, said MPEG stream is separated into its video and audio components. The Media Switch parses MPEG streams, for example, on information and belief, in the course of PID filtering and start code detection. Broadcom chips used inside Samsung DVRs have PID filters or parsers that PID filter or parse multi-program transport streams to a single-program transport stream and start code detectors that perform start code detection. See, e.g.,</p>

**the Claim**

MPEG stream is separated into its video and audio components;

**Samsung DVRs<sup>1</sup>**



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