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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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VIZIO, Inc.  
Petitioner

v.

Personalized Media Communications, LLC  
Patent Owner

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*Inter Partes* Review No.: Unassigned

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 7,752,649**

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VIZIO, Inc. (“VIZIO”) requests *Inter Partes* Review (IPR) of Claims 1, 2, 3, 7, 8, 11, 13, 26, 27, 28, 29, 39, 41, 42, 45, 48, 49, 50, 51, 62, 63, 64, 67, 78, 82, 83, 84, 88, 90, 91, 92, 93, 94, and 97 (“the Challenged Claims”) of U.S. Patent No. 7,752,649 (“the ’649 Patent”) (Ex. 1002).

In 1981, the named inventors of the ’649 Patent filed U.S. Patent Appl. No. 06/317,510, which issued as U.S. Patent No. 4,694,490 (“the ’490 Patent”) to Personalized Media Communications, LLC (“PMC”). Ex. 1003. In 1987, PMC filed a continuation-in-part of that application, which discarded the original 22-column specification filed in 1981 and substituted a new specification that spanned over 300 columns. Ex. 1002. In the months leading up to June 8, 1995, PMC filed 328 continuations from that 1987 application, having tens of thousands of claims and deluging the Patent Office with thousands of prior art references. Ex. 1004 at 2; Ex. 1005; Ex. 1006 at 1-31; Ex. 1007 at 10. The ’649 Patent is one of the patents that issued from that flurry of activity.

**I. IDENTIFICATION OF CHALLENGE - 37 C.F.R. § 42.104(B)**

**A. 37 C.F.R. § 42.104(b)(1): Claims for Which IPR Is Requested**

VIZIO requests IPR of the Challenged Claims of the ’649 Patent.

**B. 37 C.F.R. § 42.104(b)(2): The Specific Art and Statutory Ground(s) on Which the Challenge Is Based**

IPR of the Challenged Claims is requested in view of the prior art below.

PMC asserts the Challenged Claims are entitled to the Sept. 11, 1987 priority date.

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