

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TWITTER, INC.

Petitioner

v.

VIDSTREAM, LLC

Patent Owner

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Case IPR2017-01131  
U.S. Patent No. 8,464,304  
(Claims 1, 4-5, 8-9, 11-17, 19-26, and 28-30)

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**VIDSTREAM LLC's PATENT OWNER'S RESPONSE**

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<b>No.</b>	<b>Description</b>
2001	Official Notice of Bankruptcy Case Filing, U.S. Bankruptcy Court for the Western District of Oklahoma, Case No., 17-14849 (filed November 30, 2017)
2002	Declaration of James Olivier, Ph.D.
2003	Webpage entitled “Review GSM phone Nokia 6270” that was archived by the Wayback Machine at web.archive.org on February 5, 2006
2004	Webpage entitled “Nokia E50 Hands-on Preview” that was archived by the Wayback Machine at web.archive.org on May 30, 2006
2005	Nokia webpage listing specifications of the Nokia 6630 that was archived by the Wayback Machine at web.archive.org on December 29, 2004
2006	Webpage entitled “Nokia 6630 (Nokia Charlie) Detailed Tech Specs”
2007	CNET webpage entitled “Nokia 6630 – smartphone – GSM / UMTS Series Specs”
2008	Transcript of June 20, 2018 Deposition of Henry Houh, Ph.D.

## I. INTRODUCTION

All grounds asserted in the Petition rely on Lahti (Ex. 1006) to supply certain features of each of independent claims 1, 17, 22, 26, including a server providing instructions to a client computing device to cause video data to be captured in accordance with predetermined constraint(s) defined by the instructions.

However, Petitioner has not shown that Ex. 1006 teaches capturing video data in accordance with predetermined constraints. All challenged dependent claims depend from independent claims 1, 17, 22, and 26, and therefore, all asserted grounds fail to show unpatentability of any challenged claim.

Patent Owner therefore respectfully asks the Board to uphold the patentability of claims 1, 4-5, 8-9, 11-17, 19-26, and 28-30.

## II. THE '304 PATENT

The '304 Patent discloses “receiving and distributing user-generated video content.” *See* Ex. 1001 at Abstract. Specifically, the '304 Patent provides ways to facilitate “receiving video data from a client computing device, where the video data is captured using a camera connected to the client computing device in accordance with instructions executed on the client computing device to provide the video data in accordance with predetermined constraints.” *Id.* Figure 1 depicts such a “content creation and distribution system (CCDS) 100.” *Id.* at 9:44-45.

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