IPR2018-01187, -01630

Netflix, Inc.

v.

Realtime Adaptive Streaming LLC

Patent 9,769,477

Served October 7, 2019

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Argument Roadmap

❖ The Petitions do not identify the claimed "first" or "seco[nd]" encoders

❖ Limitation 1[B] requires the first encoder being "config[ured] to" compress video or image data faster than the seco[nd] encoder

❖ The Petitions fail to show Imai, Pauls, or any combinatio[n] disclose limitation 1[B]

❖ The Petitions fail to explain why a POSITA would combin[e] Imai and Pauls

❖ The Petitions fail to explain how a POSITA would combin[e] references

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- ❖ The Petitions fail to explain how a POSITA would combin[e] references

The Petitions Do Not Identify The Claimed "firs[t]" "second" Encoders

The Petitions must explain "how any specific combination would operate or read on" the claims. *ActiveVideo Networks, Inc. v. Verizon Commc'ns, Inc.*, 694 F.3d 1312, 1327-28 (Fe[d.] Cir. 2012).

The Petitions Do Not Identify The Claimed "first" "second" Encoders

Limitation 1[B] requires specifying which of at least two encoders is the "first asymmetric data compression encoder" that is "configured to compress . . . video or image data" and which the "second asymmetric data compression encoder" that is configured to compress video image data.

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