EX. E

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

MULTIMEDIA CONTENT MANAGEMENT LLC, Plaintiff v. DISH NETWORK L.L.C., Defendant.	§ § § § § § § § § §	Civil Action No.: 6:18-cv-00207-ADA JURY TRIAL DEMANDED PATENT CASE

DECLARATION OF ANTHONY J. WECHSELBERGER IN SUPPORT OF DEFENDANT'S OPENING CLAIM CONSTRUCTION BRIEF

DECLARATION IN SUPPORT OF CLAIM CONSTRUCTION BRIEF

1.   I have been asked to provide technical background and context to claim construction issues related to U.S. Patent No. 8,799,468 ('468 Patent) and U.S. Patent No. 9,465,925 ('925 Patent) and the claimed "service provider network" (SPN), and associated communications over the SPN. In particular, I have been asked to discuss this in relation to what role, if any, a person of ordinary skill in the art (POSA) would understand the Internet is required to play in the asserted claims.

1.   BACKGROUND AND QUALIFICATIONS

2.   In formulating my opinions, I have relied on my knowledge, training, and experience in the relevant field, which I will summarize briefly. Further detail can be found in my Curriculum Vitae, which is attached as **Attachment A** to this declaration.

3.   My areas of expertise include broadband content distribution networks and communication infrastructures (Internet, broadcast, cable, satellite, and wireless mediums) including one-way and two-way interactive architectures, computer networks, communications-systems technologies and equipment, various content and information distribution and merchandising channels, digital television, digital cinema, interactive media/multimedia systems, Internet technologies (including but not limited to delivering content via the Internet,

communications standards and protocols), digital-rights management, physical media and file-based and streaming content delivery, and other areas of expertise relevant to the technologies of this matter.

4.   I have a bachelor's degree and a master's degree in electrical engineering from the University of Arizona in 1974 and San Diego State University in 1979, respectively. I also completed the Executive Program for Scientists and Engineers at the University of California at San Diego in 1984. I am a named inventor on two patents: U.S. Patent No. 4,531,020 entitled "Multi-layer Encryption System for the Broadcast of Encrypted Information" and U.S. Patent No. 5,113,440 entitled "Universal Decoder."

5.   I am currently the President of Entropy Management Solutions, a position I have held since I founded the company in 1999. In this capacity, I perform consulting services related to technology and business development, content management, distribution and merchandizing, systems engineering, and product design in the areas of industrial and consumer broadband and multimedia technologies and associated commercial systems.

6.   I have over forty years of experience working with high-technology systems related to military, commercial, and consumer communication systems and networks. I have held various design, leadership, and executive positions in, for example, engineering, operations, sales and marketing, and product

management at leading companies in those fields, such as TV/COM International, Inc. and Oak Communications, Inc. Over a period of many years, I have published and presented articles and papers related to content/information creation, transmission/distribution, and reception/consumption in various media sectors including cable, satellite, broadcast/wireless, Internet, and digital cinema.

7.   I specialize in the areas of analog and digital communications and signal processing as applied in content delivery systems including the associated network command and control. In this context, "command and control" (C&C) refers to the technical oversight and management of communication systems and equipment within a distribution network to direct the equipment as to its set-up and operation in order to perform required functions. In the types of networks discussed in the asserted patents, command and control typically operates in the background (i.e., invisible to consumers) to enable the system or network operator to manage access to the network and provide delivery of content to a consumer appliance (referred to as a gateway unit or network element in the '468 and '925 Patent claims respectively) if authorized, according to C&C instructions generated by a controller node. With respect to being authorized, "rights management" refers to control over the delivery and consumption of content (programming, movies, data files, etc.) according to defined rules on behalf of the network operator and/or content-rights owner. As today's electronic delivery processes have become more

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming inter-face) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.