UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DISH NETWORK L.L.C.,

Petitioner

vs.

MULTIMEDIA CONTENT MANAGEMENT LLC

Patent Owner

Case IPR2019-01015

U.S. Patent No. 8,799,468

DECLARATION OF DR. EDWIN A. HERNANDEZ-MONDRAGON

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TABLE OF CONTENTS

I. INTRODUCTION 4

II. QUALIFICATIONS 8

III. LEGAL UNDERSTANDING 11

Level of Ordinary Skill in the Art 12

Anticipation 13

Inherency 13

Obviousness 14

IV. SUMMARY OF OPINION 19

V. PERSON OF ORDINARY SKILL IN THE ART 21

VI. OVERVIEW OF THE '468 PATENT 21

VII. CLAIM CONSTRUCTION 22

A. "to generate[ing …] controller instructions" 23

B. "selectively transmit[ting, by the plurality of gateway units,] the content requests to the service provider network in accordance with the controller instructions" 24

C. "controller node" 25

D. "service provider network" 25

E. "gateway units" 26

F. "network elements" 26

VIII. PATENTABILITY ANALYSIS—CHALLENGED CLAIMS 26

1. Hoang '980 Does not Disclose or Fairly Suggest Generating Controller Instructions 28

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2. Hoang '980 Does not Disclose or Fairly Suggest the "selectively transmit[ting]" element and Petitioner's Combination of Unidirectional and Bi-directional Disclosures is Flawed 32

IX. CONCLUSION.....49

X. CERTIFICATION 50

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I. INTRODUCTION

[01] My name is Dr. Edwin A. Hernandez-Mondragon. I understand that I am submitting a declaration for Multimedia Content Management LLC ("MCM"). I am offering technical opinions in connection with the *Inter Partes* Review ("IPR") proceeding in the United States Patent and Trademark Office for U.S. Patent No. 8,799,468 ("the '468 Patent"). I have reviewed the references listed in Petitioner's Exhibit List. I make this declaration based on my personal knowledge, experience, and any noted research. I am over the age of 21 and am competent to make this declaration.

[02] The statements herein include my opinions and the bases for those opinions. These relate to at least the following documents and references of the pending IPR Petition, which I have reviewed and considered:

- U.S. Patent No. 8,799,468 (Ex. 1001)
- U.S. Patent No. 9,465,925 (Ex. 1002)
- Prosecution History of Application No. 13/369,174, resulting in U.S. Patent No. 8,799,468 (Ex. 1003)
- Prosecution History of Application No. 14/338,240, resulting in U.S. Patent No. 9,465,925 (Ex. 1005)

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- Prosecution History of Application No. 10/989,023, resulting in U.S. Patent No. 8,122,128 (Ex. 1004)

- Declaration of Anthony Wechselberger (Ex. 1006)

- *Curriculum Vitae* of Anthony Wechselberger (Ex. 1007)

- U.S. Published Application No. 2002/0049980 by Hoang ("Hoang '980") (Ex. 1008)

- U.S. Patent No. 7,725,267 by Hoang ("Hoang '267") (Ex. 1009)

- U.S. Published Application No. 2003/0208561 to Hoang ("Hoang '561") (Ex. 1010)

- Michael Adams, OpenCable™ Architecture (2000) ("OpenCable") (Ex. 1011)

- Canadian Patent 2,321,462 to Cameron ("Cameron") (Ex. 1013)

- U.S. Published Application No. 2002/0162109 to Shteyn ("Shteyn") (Ex. 1014)

- U.S. Patent No. 5,945,503 by Venkatesh ("Venkatesh") (Ex. 1015)

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