

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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DISH NETWORK L.L.C.,  
Petitioner,

v.

MULTIMEDIA CONTENT MANAGEMENT LLC,  
Patent Owner

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IPR2019-01015  
PATENT 8,799,468

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**PATENT OWNER PRELIMINARY RESPONSE TO PETITION  
PURSUANT TO 37 C.F.R. § 42.107(a)**

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File History for U.S. Patent No. 8,799,468	Ex. 1003
File History for U.S. Patent No. 8,122,128	Ex. 1004
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Declaration of Anthony Wechselberger	Ex. 1006
<i>Curriculum Vitae</i> of Anthony Wechselberger	Ex. 1007
U.S. Publication No. 2002/0049980 to Hoang (“Hoang ’980”)	Ex. 1008
U.S. Patent No. 7,725,267 to Hoang (“Hoang ’267”)	Ex. 1009
U.S. Publication No. 2003/0208561 to Hoang (“Hoang ’561”)	Ex. 1010
Michael Adams, OpenCable™ Architecture (2000) (“OpenCable”)	Ex. 1011
Complaint, <i>Multimedia Content Management LLC v. DISH Network Corporation</i> , Civil Action No.: 6:18-cv-00207-ADA	Ex. 1012
Canadian Patent 2,321,462 to Cameron et al. (“Cameron”)	Ex. 1013
U.S. Publication No. 2002/0162109 to Shteyn (“Shteyn”)	Ex. 1014
U.S. Patent No. 5,974,503 to Venkatesh, et al. (“Venkatesh”)	Ex. 1015
Unified Patents, Inc. v. Multimedia Content Management LLC, IPR2017-01934, Paper 9, Patent Owner Preliminary Response (PTAB Dec. 14, 2017)	Ex. 1016
Newton’s Telecom Dictionary (15th Edition 1999) (excerpts)	Ex. 1017
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Microsoft Press Computer Dictionary (3rd Edition 1997)	Ex. 1019
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Declaration of Curt Williams Concerning the “OpenCable Architecture” Reference by Michael Adams, executed March 15, 2019	Ex. 1021
U.S. Publication No. 2003/0172376 to Coffin III (“Coffin”)	Ex. 1022
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Petition for <i>Inter Partes</i> Review of Claims 1-5, 9, 11-13, 19, 23-27, and 32-34 of U.S. Patent No. 8,799,468, <i>Unified Patents Inc. v. Catonian IP Management LLC</i> , Case IPR2017-01934	Ex. 2002
Markman Construction Order for <i>Multimedia Content Management LLC v. Dish Network Corporation</i> , Case No. 6:18-cv-00207-ADA (W.D.Tex. June 17, 2019)	Ex. 2003
“Information technology – Generic coding of moving pictures and associated audio information: Systems,” International Standard, ISO/EIC 13818-1, Second edition, 2000-12-01	Ex. 2004
“Digital Video Broadcasting (DVB); DVB interaction channel for Cable TV distribution systems (CATV),” ETSI Standard, ETSI ES 200 800, V1.3.1 (2001-10)	Ex. 2005
Defendant’s Responsive Claim Construction Brief for <i>Multimedia Content Management LLC v. Dish</i>	Ex. 2006

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