UNITED STATES PATENT AND TRADEMARK OFFICE				
_				
BEFORE THE PA	TENT TRIAL AND APPEAL BOARD			
_				
D	SH NETWORK L.L.C., Petitioner,			
	V.			
MULTIMEDIA CONTENT MANAGEMENT LLC, Patent Owner				
_				
	IPR2019-01015			
	PATENT 8,799,468			

PATENT OWNER SUR-REPLY TO PETITIONER'S REPLY TO PATENT OWNER PRELIMINARY RESPONSE TO PETITION



IPR2019-01015 U.S. Patent 8,799,468

Table of Contents

I.	Introduction	1
II.	Institution Would Be An Inefficient Use of the Board's Resources	2
III.	The Board Should Not Relitigate Claim Construction	5
IV.	Conclusion	6



Table of Exhibits

Exhibits to Petition	
U.S. Patent No. 8,799,468 ("'468 Patent")	EX1001
U.S. Patent No. 9,465,925	EX1002
File History for U.S. Patent No. 8,799,468	EX1003
File History for U.S. Patent No. 8,122,128	EX1004
File History for U.S. Patent No. 9,465,925	EX1005
Declaration of Anthony Wechselberger	EX1006
Curriculum Vitae of Anthony Wechselberger	EX1007
U.S. Publication No. 2002/0049980 to Hoang	EX1008
("Hoang '980")	
U.S. Patent No. 7,725,267 to Hoang ("Hoang '267")	EX1009
U.S. Publication No. 2003/0208561 to Hoang	EX1010
("Hoang '561")	
Michael Adams, OpenCabletm Architecture (2000)	EX1011
("OpenCable")	
Complaint, Multimedia Content Management LLC v.	EX1012
DISH Network Corporation, Civil Action No.: 6:18-	
cv-00207-ADA	
Canadian Patent 2,321,462 to Cameron et al.	EX1013
("Cameron")	
U.S. Publication No. 2002/0162109 to Shteyn	EX1014
("Shteyn")	
U.S. Patent No. 5,974,503 to Venkatesh, et al.	EX1015
("Venkatesh")	
Unified Patents, Inc. v. Multimedia Content	EX1016
Management LLC, IPR2017-01934, Paper 9, Patent	
Owner Preliminary Response (PTAB Dec. 14, 2017)	
Newton's Telecom Dictionary (15th Edition 1999)	EX1017
(excerpts)	
Unified Patents, Inc. v. Multimedia Content	EX1018
Management LLC, IPR2017-01934, Paper 10	
(Institution Decision) (PTAB Mar. 5, 2018)	
Microsoft Press Computer Dictionary (3rd Edition	EX1019
1997)	
Certification of the Library of Congress for Open	EX1020
Cable Architecture by Michael Adams, executed	
February 27, 2019	



	U.S. Patent 8,799,408
Declaration of Curt Williams Concerning the	EX1021
"OpenCable Architecture" Reference by Michael	
Adams, executed March 15, 2019	
U.S. Publication No. 2003/0172376 to Coffin III	EX1022
("Coffin")	
Deposition of Joel Williams dated April 12, 2019	EX1023
Plaintiff's Opening Claim Construction Brief (DI 51)	EX1024
Defendant's Opening Claim Construction Brief (DI	EX1025
48)	
Plaintiff's Responsive Claim Construction Brief (DI	EX1026
53)	
Defendant's Responsive Claim Construction Brief	EX1027
(DI 52)	
Plaintiff's Reply Claim Construction Brief (DI 59)	EX1028
Defendant's Reply Claim Construction Brief (DI 58)	EX1029
Declaration of Anthony J. Wechselberger In Support	EX1030
of Defendant's Opening Claim Construction Brief	
Exhibits to POPR	
Declaration of Dr. Edwin A. Hernandez-Mondragon	EX2001
Petition for <i>Inter Partes</i> Review of Claims 1-5, 9,	EX2002
11-13, 19, 23-27, and 32-34 of U.S. Patent No.	
8,799,468, Unified Patents Inc. v. Catonian IP	
Management LLC, Case IPR2017-01934	
Markman Construction Order for Multimedia	EX2003
Content Management LLC v. Dish Network	
Corporation, Case No. 6:18-cv-00207-ADA (W.D.	
Tex. June 17, 2019)	
"Information technology – Generic coding of	EX2004
moving pictures and associated audio information:	
Systems," International Standard, ISO/EIC 13818-1,	
Second edition, 2000-12-01	
"Digital Video Broadcasting (DVB); DVB	EX2005
interaction channel for Cable TV distribution	
systems (CATV)," ETSI Standard, ETSI ES 200	
800, V1.3.1 (2001-10)	
Defendant's Responsive Claim Construction Brief	EX2006
1	



	0.5. I dient 0,777,100
Network Corporation, Case No. 6:18-cv-00207-	
ADA (W.D. Tex. April 5, 2019)	
Order Denying Motion to Stay Pending Inter Partes	EX2007
Review of U.S. Patent Numbers 8,799,468 and	
9,465,925 for Multimedia Content Management LLC	
v. Dish Network Corporation, Case No. 6:18-cv-	
00207-ADA (W.D. Tex. May 30, 2019)	
Decision Denying Institution of <i>Inter Partes</i> Review,	EX2008
NHK Spring Co., Ltd. v. Intri-Plex Technologies,	
<i>Inc.</i> , Case IPR2018-00752, U.S. Patent No.	
6,183,841, September 12, 2018	
Plaintiff Multimedia Content Management LLC and	EX2009
Defendant Dish Network L.L.C.'s Scheduling Order	
for Multimedia Content Management LLC v. Dish	
Network Corporation, Case No. 6:18-cv-00207-	
ADA (W.D. Tex. June 5, 2019)	
Transcript of Markman Hearing Before the	EX2010
Honorable Alan D. Albright for Multimedia Content	
Management LLC v. Dish Network Corporation,	
Case No. 6:18-cv-00207-ADA (W.D. Tex. May 7,	
2019)	
Transcript of Hearing on Motion to Dismiss Before	EX2011
the Honorable Alan D. Albright for Multimedia	
Content Management LLC v. Dish Network	
Corporation, Case No. 6:18-cv-00207-ADA (W.D.	
Tex. May 7, 2019)	
Exhibit E to Defendant's Opening Claim	EX2012
Construction Brief, Declaration of Anthony J.	
Wechselberger, for Multimedia Content	
Management LLC v. Dish Network Corporation,	
Case No. 6:18-cv-00207-ADA (W.D. Tex. March	
15, 2019)	



DOCKET A L A R M

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 interface) 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.

