Lenovo Holding Company, Inc., et al. (Petitioners) V. DoDot Licensing Solutions LLC (Patent Owner)

Case IPR2019-01278, IPR2019-01279 U.S. Patent Nos. 8,020,083, 8,510,407

# Petitioner's Demonstratives

Wednesday, October 28, 2020

1:00 pm Eastern

Alexandria, VA (virtual)

Petitioner Demonstrative Exhibit – Not Evidence – 1

# All Challenged Claims are Invalid

- The challenged claims are obvious
- The term "template" should be construed broadly enough to include text and executable code as recited in the claims and specification
- Dependent claims 8 and 20 of the '407 Patent are obvious over Razavi, Anderson, and Fortin
- Patent Owner's secondary considerations evidence is insufficient to overcome the prima face case of obviousness



## Challenged Claims of the '083 & '407 Patents

- U.S. 8,020,083: Claims 1-16
- U.S. 8,510,407: Claims 1, 8-13, and 20-24

Petition, Paper 1, at 22-63. Patent Owner Response, Paper 15, at 8-17.

Petitioner Demonstrative Exhibit – Not Evidence – 3



# **Instituted Grounds**

- U.S. 8,020,083
  - Claims 1-16 under § 103 in view of Hoff & Berg
  - Claims 1-16 under § 103 in view of Razavi & Anderson

## U.S. 8,510,407

- Claims 1, 9-13, and 21-24 under § 103 in view of Hoff, Berg, & Nazem or AAPA
- Claims 8 and 20 under § 103 in view of Hoff, Berg, Nazem or AAPA, and Fortin
- Claims 1, 9-13, and 21-24 under § 103 in view of Razavi & Anderson
- Claims 8 and 20 under § 103 in view of Razavi, Anderson, and Fortin

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# '083 and '407 Patents

- "Directed to accessing and displaying Internet content which includes a definition for rendering a graphical user interface and a URL pointing to [the time-varying] Internet content to be downloaded and presented within said user interface."
- Present content in a configurable frame (i.e., graphical user interface "GUI").
- Seek to avoid situation where content was "typically trapped within the frame of a browser."
- Teach that content providers can develop Networked
  Information Monitors ("NIM").

.07 Patent, Abstract, 1:67-2:9, 2:59-61, 5:18-31.
 .07 Petition, Paper 1, at 2-8;
 .83 Petition, Paper 1 at 2-4.
 Petitioner Demonstrative Exhibit – Not Evidence – 5

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