## UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROKU, INC., Petitioner,

v.

UNIVERSAL ELECTRONICS INC., Patent Owner.

> Case IPR2019-01614 U.S. Patent 9,911,325

PATENT OWNER RESPONSE

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IV.	THE CITED GROUNDS DO NOT RENDER ANY CLAIMS UNPATENTABLE						
	A. Ground 1: Rye in View of Skerlos Does Not Render Obvi Claims 1-3, 5, or 7			Rye in View of Skerlos Does Not Render Obvious 5, or 715			
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		4.	Rye i	n view of Skerlos does not render obvious Claim 122			
			a.	Neither Rye nor Skerlos, alone or in combination, discloses, teaches, or suggests [1.3]: "a processing device coupled to the receiver and the transmitter; and"			

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	b.	Neither Rye nor Skerlos, alone or in combination, discloses, teaches, or suggests [1.4]: "a memory storing instructions executable by the processing device, the instructions causing the processing device to"
	с.	Neither Rye nor Skerlos, alone or in combination, discloses, teaches, or suggests [1.4.1]: "generate a key code using a keystroke indicator received from a third device in communication with first device via use of the receiver, the keystroke indicator having data that indicates an input element of the third device that has been activated"
	d.	Neither Rye nor Skerlos, alone or in combination, discloses, teaches, or suggests [1.4.2]: "format the key code for transmission to the second device"
	e.	Neither Rye nor Skerlos, alone or in combination, discloses, teaches, or suggests [1.4.3]: "transmit the formatted key code to the second device in a key code signal via the use of a transmitter"
	f.	Neither Rye nor Skerlos, alone or in combination, discloses, teaches, or suggests [1.4.4]: "wherein the generated key code comprises a one of a plurality of key code data stored in a codeset, wherein the one of the plurality of key code data is selected from the codeset as a function of the keystroke indicator received from the third device, wherein each of the plurality of key code data stored in the codeset comprises a series of digital ones and/or digital zeros, and"
	g.	Neither Rye nor Skerlos, alone or in combination, discloses, teaches, or suggests [1.4.5]: "wherein the codeset further comprises time information that describes how a digital one and/or a digital zero within the selected one of the plurality of key code data is to be represented in the key code signal to be transmitted to the second device"
5.	"The	n view of Skerlos does not render obvious Claim 2: first device as recited in claim 1, wherein the ver comprises an RF receiver"
6.	"The	n view of Skerlos does not render obvious Claim 3: first device as recited in claim 1, wherein the nitter comprises an IR transmitter"
7.	"The forma	n view of Skerlos does not render obvious Claim 5: first device as recited in claim 1, wherein the atted key code is transmitted from the first device to cond device via a wireless connection between the

		first o	device and the second device"	
	8.	"The gener	in view of Skerlos does not render obvious Claim 7: first device as recited in claim 1, wherein the rated key code controls at least one of a power on, er off, volume up, and volume down functional ation of the second device"	
B.		und 2: Caris in View of Dubil Does Not Render Obvious		
	1.	Overview of Caris		
	2.	Overview of Dubil		
	3.	A POSITA Would Not Have Combined Caris and Dubil		
	4.	Caris in view of Dubil does not render obvious Claim 1		
		a.	Neither Caris nor Dubil, alone or in combination, discloses, teaches, or suggests [1.3]: "a processing device coupled to the receiver and the transmitter; and"	
		b.	Neither Caris nor Dubil, alone or in combination, discloses, teaches, or suggests [1.4]: "a memory storing instructions executable by the processing device, the instructions causing the processing device to"	
		с.	Neither Caris nor Dubil, alone or in combination, discloses, teaches, or suggests [1.4.1]: "generate a key code using the keystroke indicator received from a third device in communication with first device via use of the receiver, the keystroke indicator having data that indicates an input element of the third device that has been activated"44	
		d.	Neither Caris nor Dubil, alone or in combination, discloses, teaches, or suggests [1.4.2]: "format the key code for transmission to the second device"47	
		e.	Neither Caris nor Dubil, alone or in combination, discloses, teaches, or suggests [1.4.3]: "transmit the formatted key code to the second device in a key code signal via the use of a transmitter"	
		f.	Neither Caris nor Dubil, alone or in combination, discloses, teaches, or suggests [1.4.4]: "wherein the generated key code comprises a one of a plurality of key code data stored in a codeset, wherein the one of the plurality of key code data is selected from the codeset as a function of the keystroke indicator received from the third device,	

	wherein each of the plurality of key code data stored in the codeset comprises a series of digital ones and/or digital zeros, and"	51
	g. Neither Caris nor Dubil, alone or in combination, discloses, teaches, or suggests [1.4.5]: "wherein the codeset further comprises time information that describes how a digital one and/or a digital zero within the selected one of the plurality of key code data is to be represented in the key code signal to be transmitted to the second device"	53
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