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BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROKU, INC.,
Petitioner,

v.

UNIVERSAL ELECTRONICS, INC.,
Patent Owner.

Case IPR No. IPR2019-01614
U.S. Patent 9,911,325

PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 9,911,325

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7. [1.4.2] "format the key code for transmission to the second device; and" 22

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8. [1.4.3] "transmit the formatted key code to the second device in a key code signal via use of the transmitter;" 27

9. [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" 27

10. [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." 29

D. Claim 2: "The first device as recited in claim 1, wherein the receiver comprises an RF receiver." 33

E. Claim 3: "The first device as recited in claim 1, wherein the transmitter comprises an IR transmitter." 33

F. Claim 5: "The first device as recited in claim 1, wherein the formatted key code is transmitted from the first device to the second device via a wireless connection between the first device and the second device." 34

G. Claim 7: "The first device as recited in claim 1, wherein the generated key code controls at least one of a power on, power off, volume up, and volume down functional operation of the second device." 35

VII. GROUND 2: Claims 1, 2, 3, 4, and 5 of the '325 Patent are Unpatentable under 35 U.S.C. § 103 Over Caris In view of Dubil 35

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C. Independent Claim 1 39

1. [1.P] "A first device for transmitting a command to control a functional operation of a second device, the first device comprising:" 39

2. [1.1] "a receiver;" 40

3. [1.2] "a transmitter;" 41

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4. [1.3] "a processing device coupled to the receiver and the transmitter; and" 42
5. [1.4] "a memory storing instructions executable by the processing device, the instructions causing the processing device to:" 43
6. [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;" 44
7. [1.4.2] "format the key code for transmission to the second device; and" 45
8. [1.4.3] "transmit the formatted key code to the second device in a key code signal via use of the transmitter;" 48
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10. [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." 52

D. Claim 2: "The first device as recited in claim 1, wherein the receiver comprises an RF receiver." 54

E. Claim 3: "The first device as recited in claim 1, wherein the transmitter comprises an IR transmitter." 54

F. Claim 4: "The first device as recited in claim 1, wherein the formatted key code is transmitted from the first device to the second device via a wired connection between the first device and the second device." 54

G. Claim 5: "The first device as recited in claim 1, wherein the formatted key code is transmitted from the first device to the second device via a wireless connection between the first device and the second device." 55

VIII. Patent Owner is unaware of any secondary considerations of non-obviousness 55

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