EXHIBIT 14

to Declaration of Katherine Harihar
in Support of Plaintiff's Supplemental
Claim Construction Brief

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

TVnGO LTD. (BVI),

               Plaintiff,

      v.

LG ELECTRONICS INC. and
LG ELECTRONICS U.S.A., INC.,

             Defendants.

Civil Action No. 1:18-cv-10238-RMB-KMW

SUPPLEMENTAL DECLARATION OF MICHAEL SPRENGER, Ph.D.
IN SUPPORT OF PLAINTIFF'S SUPPLEMENTAL CLAIM CONSTRUCTION BRIEF

1.   I, Michael Sprenger, Ph.D. hereby declare as follows:

2.   I have been retained on behalf of Plaintiff TVnGO. I am being compensated at the rate of $325 per hour. My compensation is in no way dependent on the outcome of this litigation. I understand that this declaration is being submitted with Plaintiff's Supplemental Claim Construction Brief.

3.   I have been asked to provide my opinion regarding how a person of ordinary skill in the art (POSA) would have understood certain terms and phrases of U.S. Patent Nos. 8,132,220 ("the '220 patent"); 9,124,945 ("the '945 patent"); 9,392,339 ("the '339 patent"); 9,407,969 ("the '969 patent"); 9,794,621 ("the '621 patent") (collectively, "the Asserted Patents").

I.   MATERIALS CONSIDERED

4.   In reaching the conclusions set forth below, I have considered the materials mentioned in my opening and responsive declarations, as well as both parties' opening and responsive claim construction briefs, the declarations of W. Leo Hoarty, and the transcript of the *Markman* hearing held on January 8, 2020.
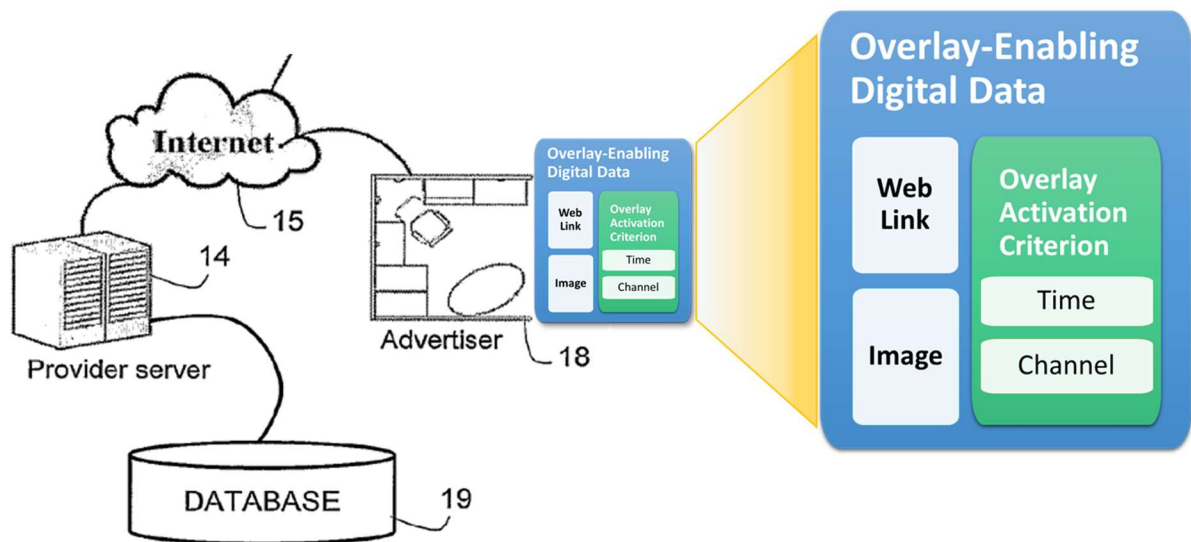
II.   ANALYSIS

A.   "overlay activation criterion" (Term 1)

5.   As I set forth in my previous declarations, the Asserted Patents are clear regarding what an overlay activation criterion is and a POSA would understand this term in view of the specification, figures, and claims of the patent.

6.   A basic overview of the general path of overlay-enabling digital data is described below, using timing and channel information as a simple example of overlay activation criteria for clarity.
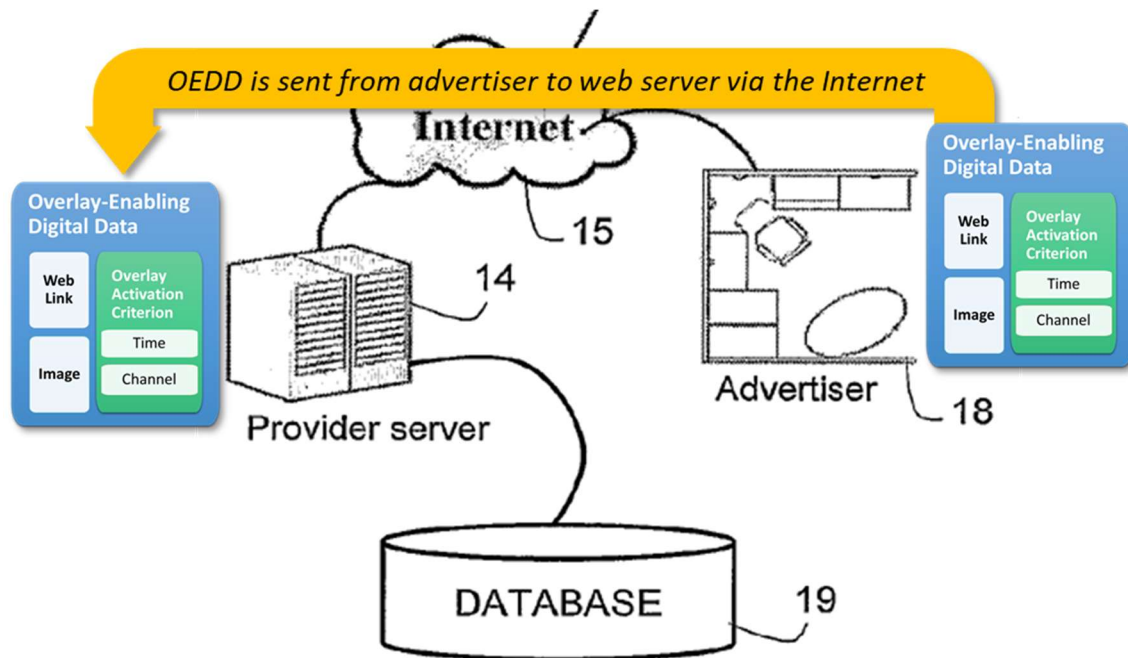
7.   An IP content provider creates the overlay-enabling digital data. *See, e.g.*, '220

Patent at 3:57-4:5; FIG. 2. According to the claim language of, e.g., the '220 Patent, the overlay-enabling digital data includes at least: **a Web link** indicating a website where content that is associated with said overlay-enabling digital data is stored; **an image** indicative of the content associated with said overlay-enabling digital data; and **an overlay activation criterion**. *See* '220 Patent at Claim 1, 13. A basic representation of the overlay-enabling digital data is shown below with the overlay activation criterion including at least timing and channel information. In this example, timing information relates to specific time slots during which the overlay (or IP content) should be displayed on the user's TV screen (e.g., between the hours of 19:30-21:30), and channel information relates to the specific channels the overlay is to be displayed on. This is described in the patents at column 7:51-8:5 of the '220 patent, by way of example. Below, the exemplary overlay-enabling digital data (OEDD) is placed next to the advertiser (as shown on FIG. 1 of the patents). The advertiser is an IP content provider as described in the patents.

8.   The IP content provider, in FIG. 1, an advertiser, "interfaces with the web server [14] for creating IP content and associating therewith calendar and program data indicating dates, times and channels in respect of which IP content is to be streamed to the customer premises."

See '220 Patent at 4:6-18. Below, I depict how the overlay-enabling digital data is provided to the web server 14 (also referred to as the "provider server") via the Internet.

9.   The web server 14 also communicates with the database 19, and database 19 can receive and store overlay-enabling digital data. The database 19 includes an event timetable (shown below on the next figure), as well as associated TV channels that can be updated from time to time. *See* '220 Patent at 4:6-18; FIGS. 1, 2.

10.   As depicted below, I show an example where the database 19 has received overlay-enabling digital data from three different IP content providers with different overlay activation criteria comprising timing and channel information for each particular overlay from the three IP content providers. The event timetable stored in the database 19 indicates on what channels and at what times the overlay-enabling digital data are to be streamed to a user based on each respective overlay activation criterion. For instance, OEDD 1 is to be streamed on all channels at all times, OEDD 2 is only to be streamed on Channel 3 beginning at 7:00 and 8:00 PM, and OEDD 3 is only to be streamed on Channel 4 beginning at 7:00 and 9:00 PM.

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