UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD ROKU, INC., Petitioner, v. UNIVERSAL ELECTRONICS, INC., Patent Owner.

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 9,716,853

Case IPR2019-01615 U.S. Patent 9,716,853

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	A.	Ground 1: Claims 1, 3, 5, and 7 are Rendered Obvious Over Chardon, and in view of HDMI Specification and Stecyk	
	1. Inc	dependent Claim 1	38
	(a) '	"[1.P] A universal control engine, comprising:"	38
		'[1.1] a processing device; and a memory device having stored the instructions executable by the processing device, the instructions, executed by the processing device, causing the universal control engine"	when



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(c)	"[1.2] to respond to a detected presence of an intended target appliance within a logical topography of controllable appliances which includes the universal control engine"
(d)	"[1.3] by using an identity associated with the intended target appliance to create a listing comprised of at least a first communication method and a second communication method different than the first communication method"
(i) Chardon creates a database of IR and CEC command codes47
`	i) Chardon links the database of command codes to detected target opliances using obtained EDID information
(e)	"[1.4] for use in controlling each of at least a first functional operation and a second functional operation of the intended target appliance and"56
(f)	"[1.5] to respond to a received request from a controlling device intended to cause the intended target appliance to perform a one of the first and second functional operations"
(g)	"[1.6] by causing a one of the first and second communication methods in the listing of communication methods that has been associated with the requested one of the first and second functional operations to be used to transmit to the intended target appliance a command for controlling the requested one of the first and second functional operations of the intended target appliance."
2. D	Dependent Claim 363
(a)	"[3.P] The universal control engine as recited in claim 1, wherein the instructions cause the universal control engine to"
(b)	"[3.1] initiate a detection of the presence of the intended target appliance within the logical topography of controllable appliances." 64
3. D	Pependent Claim 565
(a)	"[5.P] The universal control engine as recited in claim 1, wherein the instruction [sic] cause the universal control engine to cause"65
(b)	"[5.1] a prompt to be displayed in a display associated with the universal control engine in response to a detected presence of the intended target appliance within a logical topography of controllable appliances, the prompt requesting a user to provide data indicative of the identity associated with the intended target appliance."
4. D	Dependent Claim 769



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	(a)	"[7.P] The universal control engine as recited in claim 1, wherein the instructions cause the universal control engine to"	69
	(b)	"[7.1] initiate an interrogation of the intended target appliance to determine which of a plurality of communication methods are supported by the appliance for use in receiving a command for controlling at least one of the first and second functional operations using results obtained from the interrogation to create the listing."	69
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	D	Service Information (37 C F R & 42 8(b)(4))	73



PETITIONER'S EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 9,716,853 to Arling et al. ("'853 patent")
1002	File History of U.S. Patent No. 9,716,853 ("Prosecution History")
1003	Declaration of Dr. Samuel Russ in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. 9,716,853
1004	Curriculum Vitae of Dr. Samuel Russ
1005	U.S. Patent Publication No. 2012/0249890 to Chardon <i>et al.</i> ("Chardon")
1006	U.S. Patent Publication No. 2009/0254500 to Stecyk ("Stecyk")
1007	U.S. Patent Publication No. 2004/0148632 to Park et al. ("Park")
1008	Tracy V. Wilson, "How HDMI Works," archived March 26, 2010 (https://web.archive.org/web/20100326090548/https://electronics.howstuffworks.com/hdmi2.htm)
1009	U.S. Patent Publication No. 2011/0289113 to Arling et al. ("Arling")
1010	High-Definition Multimedia Interface – Specification Version 1.3a (November 10, 2006)
1011	User Manual Harmony 900 – Remote Control User Guide, Version 1.0, Logitech
1012	Intentionally Left Blank
1013	U.S. Patent No. 7,944,370 to Harris et al. ("Harris")
1014	Intentionally Left Blank
1015	Intentionally Left Blank
1016	U.S. Patent No. 7,136,709 to Arling et al. ("Arling II").
1017	Universal Electronics Inc. v. Roku, Claim Construction Order – 8:18-cv-01580 (August 8, 2019)
1018	Intentionally Left Blank



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