

ROKU, INC., Petitioner,

v.

UNIVERSAL ELECTRONICS, INC., Patent Owner.

Case Nos. IPR2020-00951 and IPR2020-00953 U.S. Patent 9,911,325

DECLARATION OF DR. SAMUEL H. RUSS

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A	Overview of Rye			
В	. Rye in view of Skerlos discloses Embodiment 2 54			
C	. Independent Claim 1			
1.	[1.P]: "A first device for transmitting a command to control a functional operation of a second device, the first device comprising:"58			
2.	[1.1]: "a receiver;"60			
3.	[1.2] "a transmitter;" 6			
4.	[1.3] "a processing device coupled to the receiver and the transmitter; and" 62			
5.	[1.4] "a memory storing instructions executable by the processing device, the instructions causing the processing device to:"			
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;"			
7.	[1.4.2] "format the key code for transmission to the second device; and" .72			
8.	[1.4.3] "transmit the formatted key code to the second device in a key code signal via use of the transmitter;"			
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"			
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 on the plurality of key code data is to be represented in the key code signate transmitted to the second device."				
D	Claim 2: "The first device as recited in claim 1, wherein the receiver comprises an RF receiver."			
Е	Claim 3: "The first device as recited in claim 1, wherein the transmitter comprises an IR transmitter."			
F	Claim 5: "The first device as recited in claim 1, wherein the formatted key code is transmitted from the first device to the			



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	device and the second device."
C	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."
VIII.	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 DubiL89
A	A. Overview of Caris
В	Caris in view of Dubil discloses Embodiment 2
C	C. Independent Claim 1
1.	[1.P] "A first device for transmitting a command to control a functional operation of a second device, the first device comprising:"94
2.	[1.1] "a receiver;"
3.	[1.2] "a transmitter;"95
4.	[1.3] "a processing device coupled to the receiver and the transmitter; and"96
5.	[1.4] "a memory storing instructions executable by the processing device, the instructions causing the processing device to:"98
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;"
7.	[1.4.2] "format the key code for transmission to the second device; and" 103
8.	[1.4.3] "transmit the formatted key code to the second device in a key code signal via use of the transmitter;"
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"
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



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		transmitted to the second device."	
	D.	Claim 2: "The first device as recited in claim 1, wherein the receiver comprises an RF receiver."	14
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	В.	Claims 8 and 16: "The first device as recited in claim 1, wherein the first device comprises a further receiver for receiving the codeset from a fourth device in communication with the first device." / "The first device as recited in claim 1, wherein the first device comprises a further receiver for receiving at least one codeset from a fourth device in communication with the first device and wherein the at least one codeset is used to generate the key code."	21
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