UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD ROKU, INC., Petitioner, v. UNIVERSAL ELECTRONICS, INC., Patent Owner. Case No. IPR2020-00953

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

U.S. Patent 9,911,325

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	В	The Examiner Provided No Rationale for Allowance During Prosecution of the '325 Patent		
IV.		Level of ordinary skill in the art		
V.		Claim Construction		
	A	"Key code" and "Keystroke indicator"		
	В	. "Key code signal"		
VI.		Claims 9 and 11-15 are not entitled to a Priority Claim to December 16, 2003.		
VII		GROUND E: Claims 9 and 11-15 of the '325 Patent are Unpatentable under 35 U.S.C. § 103 Over Chardon		
	A	Overview of Chardon		
	В	Independent Claim 9		
	1.	[9.P]: "A first device for transmitting a command to control a functional operation of a second device, the first device comprising:"		
	2.	[9.1]: "a receiver;"		
	3.	[9.2A] / [9.2B] "a first transmitter;" / "a second transmitter;"21		
	4.	[9.3] "a processing device coupled to the receiver, the first transmitter, and the second transmitter; and"		
	5.	[9.4] "a memory storing instructions executable by the processing device, the instructions causing the processing device to:"		
	6.	[9.4.1] "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.	[9.4.2] "format the key code for transmission to the second device; and" 28		



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8	c	9.4.3] "transmit the formatted key code to the second device in a key ode signal via use of the first transmitter and a first communication rotocol;"	.30
9	s: p tl	9.4.4] "transmit the formatted key code to the second device in a keyco- ignal via use of the second transmitter and a second communication rotocol when it is determined that the second device is not responsive he key code signal transmitted via use of the first transmitter and the fir- ommunication protocol."	to rst
	C.	Claim 11: "The first device as recited in claim 9, wherein one of the first and second communication protocols comprises a wired communication protocol and the other of the first and second communication protocols comprises a wireless communication protocol."	33
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PETITIONER'S EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 9,911,325 to Mui ("'325 Patent")
1002	Prosecution History of U.S. Patent No. 9,911,325 ("Prosecution History")
1003	Declaration of Dr. Samuel Russ in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. 9,911,325
1004	Curriculum Vitae of Dr. Samuel Russ
1005	U.S. Patent Publication No. 2004/0080428 to Rye et al. ("Rye")
1006	U.S. Patent No. 4,426,662 to Skerlos et al. ("Skerlos")
1007	U.S. Patent No. 7,562,128 to Caris <i>et al.</i> ("Caris")
1008	U.S. Patent No. 8,132,105 to Dubil <i>et al.</i> ("Dubil")
1009	Markman Order SACV 18-01580 JVS (Dated August 8, 2019)
1010	"Device Specification for Infrared Detecting unit for Remote Control GP1UV70QS series," Sharp Corporation Electronic Components Group, Opto-Electronic Devices Division (Dated December 27, 2002) ("GP1UV70")
1011	"Data Formats for IR Remote Control," Vishay Semiconductors (Dated August 27, 2003) ("Vishay")
1012	"User Interface – Infrared Learner (Remote Control) AN2092" Project Guide, Cypress Semiconductor Corporation (Dated November 11, 2002) ("Cypress")
1013	"VCR Commander Service User's Guide," Scientific-Atlanta, Inc., (Dated September 2000) ("VCR Commander")
1014	U.S. Patent No. 5,469,152 to Yamamoto et al. ("Yamamoto").
1015	"Infrared Remote Control Transmitter RC5 Product Specification," Philips Semiconductors (Dated June 15, 1999)
1016	"AT2400 AllTouch Remote Control User's Guide," Scientific- Atlanta, Inc. (Dated February 2002)
1017	"EXPLORER 2100 or 3100 Digital Home Communications Terminals User's Installation Guide," Scientific Atlanta, Inc. (Dated July 2000)
1018	U.S. Patent No. 6,909,471 to Bayley ("Bayley").



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