# UNITED STATES PATENT AND TRADEMARK OFFICE

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#### BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC., Petitioner

v.

STRATOSAUDIO, INC., Patent Owner

IPR2021-00716 U.S. Patent No. 8,688,028

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PATENT OWNER RESPONSE



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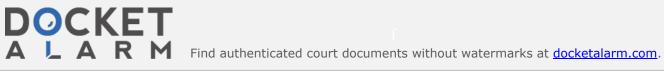
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VI.	CLAIMS 11, 14-16 AND 18 ARE NOT ANTICIPATED BY TAKAHISA (GROUND 1)						
	A. Takahisa does not anticipate Claim 11						
		1.	Takahisa does not disclose "[a] method for correlating media content identifying data with at least one broadcast	•			



			Element 11[Pre]34
		2.	Takahisa does not disclose "each identifying data aggregate associated with the at least one broadcast segment" - Element 11[d]
	B.	Taka	hisa does not anticipate claims 14, 15, and 1841
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		1.	Mackintosh does not disclose "[a] method for correlating media content identifying data with at least one broadcast segment received by the communication device" – Element 11[Pre]
		2.	Mackintosh does not teach or suggest "each identifying data aggregate associated with the at least one broadcast segment" - Element 11[d]
			a. No disclosure of this element in Mackintosh47
			b. No motivation to modify Mackintosh to meet this element
	B.	Macl	kintosh does not render obvious claims 14, 15, and 1856
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		1.	Mackintosh does not disclose "wherein the data stream further comprises data that enables a unique identification of the at least one broadcast segment"



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