UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROKU, INC.,
Petitioner,

v.

MEDIA CHAIN, LLC,
Patent Owner.

Case No. IPR2022-00389
U.S. Patent No. 9,715,581

DECLARATION OF JOHN TINSMAN IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 9,715,581

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TABLE OF CONTENTS

I. INTRODUCTION 1
II. QUALIFICATIONS 2
III. MATERIALS CONSIDERED 9
IV. RELEVANT LEGAL STANDARDS 14
A. Obviousness 14
B. Level of Skill in the Art 16
C. Motivation to Combine and Hindsight Bias 17
D. Claim Construction 18
V. BACKGROUND OF THE TECHNOLOGY 19
A. Licensing and Distribution of Digital Media 19
1. E-Commerce and the Digital Revolution 19
2. The Rise of Digital Rights Management Technology 20
3. Cloud-Based Streaming and Licensing Models 23
B. Digital Fingerprinting 25
C. Targeted Marketing Based on User Demographics and Preferences 29
1. Targeted Marketing Over the Internet 29
2. Targeted Marketing Based on Users' Negative Preferences 33
VI. OVERVIEW OF THE '581 patent 35
A. Summary of the Disclosure 35
1. Licensing and Distributing Digital Media Content 37
2. Targeted Marketing 41
B. Summary of the Claims 42
1. Overview of the '581 Patent Claims 42
2. The '581 patent Claims Relative to Other Claims in the Family 46
C. Summary of the Prosecution History 48
VII. OVERVIEW OF THE PRIOR ART 49
A. Peled 49

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B. Brandstetter.....57
C. Pou 64
D. Levy.....69
E. Vijay.....75
VIII. CLAIM CONSTRUCTION 77
IX. GROUND 1: CLAIMS 1-21, 23, 25, 27, 29-30, AND 32 OF THE '581 PATENT ARE UNPATENTABLE UNDER 35 U.S.C. § 103 OVER PELED IN VIEW OF POU 77
A. Overview of the Combination of Peled and Pou.....78
1. A POSA would have been motivated to combine Peled and Pou. 78
2. A POSA would have known how to combine Peled and Pou and would have had a reasonable expectation of success.....83
B. Independent Claim 1 84
1. [1P] "A computer implemented method for providing a multimedia hardware device to generate an authorized reproduction of a media content item included in a digital media file, comprising:" 84
2. [1A] "loading a digital media file for reproduction, wherein the digital media file includes the media content item;" 91
3. [1B] "analyzing the digital media file to identify digital media information associated with the media content item;".....97
4. [1C] "receiving a license request from a user requesting to engage in a license transaction to reproduce the media content item;".....104
5. [1D] "evaluating the license transaction to determine whether the user has acquired a license to reproduce the media content item;" 107
6. [1E] "accessing a license database to determine whether the user is licensed to reproduce the media content item based on the digital media information;" 110
7. [1F] "reproducing the media content item when the user is licensed to reproduce the media content item based on the digital media information;" 114
8. [1G] "providing a licensing query to the user when the user is not licensed to reproduce the media content item to prompt the user to select to acquire a license to reproduce the media content item or to decline the license to reproduce the media content item;".....116

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9. [1H] "after the evaluation of the license transaction, extracting from the license transaction user data that is specific to the user that is attempting to reproduce the media content item when the user acquires the license and when the user declines the license, wherein the user data includes demographic data associated with the user that enables a copyright owner of the media content item to gauge a demographic that acquired the license for the media content item of the copyright owner and a demographic that declined the license for [] the media content item of the copyright owner;" 120

a) Peled discloses "after the evaluation of the license transaction, extracting from the license transaction user data that is specific to the user that is attempting to reproduce the media content item when the user acquires the license and when the user declines the license, wherein the user data includes demographic data associated with the user".....121

b) Peled discloses "wherein the user data … enables a copyright owner of the media content item to gauge a demographic that acquired the license for the media content item of the copyright owner and a demographic that declined the license for the media content item of the copyright owner".....124

10. [1I] "aggregating the user data into a statistics record for the license request when the user acquires the license and when the user declines the license, wherein the statistics record summarizes the user data associated with the license request;".....127

11. [1J] "storing in the license database the statistics record so that the user data is accessible to the copyright owner of the media content item; and".....129

12. [1K] "analyzing a plurality of statistics records aggregated from each license request for the media content item owned by the copyright owner to provide the copyright owner with the aggregated user data from each license request of the media content item when the license is acquired by the user and when the license is declined by the user." 132

C. Independent Claim 6 133

D. Independent Claim 11 138

E. Independent Claim 16 142

F. Claims 2 and 12 148

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G. Claims 3 and 13 149
H. Claims 4 and 14 151
I. Claims 5 and 15 154
J. Claims 7-8 and 17-18 157
K. Claims 9 and 19 159
L. Claims 10 and 20 162
M. Claims 21, 23, 25, and 27 163
N. Claims 29 and 32 168
O. Claim 30 169

X. GROUND 2: CLAIM 31 OF THE '581 PATENT IS UNPATENTABLE UNDER 35 U.S.C. § 103 OVER PELED IN VIEW OF POU AND BRANDSTETTER 170

XI. GROUND 3: CLAIMS 22, 24, 26, AND 28 OF THE '581 PATENT ARE UNPATENTABLE UNDER 35 U.S.C. § 103 OVER PELED IN VIEW OF POU AND VIJAY 172

XII. GROUND 4: CLAIMS 1-21, 23, 25, 27, AND 29-32 OF THE '581 PATENT ARE UNPATENTABLE UNDER 35 U.S.C. § 103 OVER BRANDSTETTER IN VIEW OF LEVY 177

A. Overview of the Combination of Brandstetter and Levy 177

1. A POSA would have been motivated to combine Brandstetter and Levy. 177
2. A POSA would have known how to combine Brandstetter and Levy and would have had a reasonable expectation of success. 185

B. Independent Claim 1 187

1. [1P]: "A computer implemented method for providing a multimedia hardware device to generate an authorized reproduction of a media content item included in a digital media file, comprising:" 187
2. [1A]: "loading a digital media file for reproduction, wherein the digital media file includes the media content item;" 196
3. [1B] "analyzing the digital media file to identify digital media information associated with the media content item;" 204
4. [1C] "receiving a license request from a user requesting to engage in a license transaction to reproduce the media content item;" 211

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