UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD ROKU, INC., Petitioner v. MEDIA CHAIN, LLC, Patent Owner Case IPR2022-00389

PETITIONER'S UNOPPOSED MOTION TO DISMISS PETITION FOR INTER PARTES REVIEW

U.S. Patent No. 9,715,581

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450



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

TABLE OF CONTENTS

| I. | REASONS WHY TERMINATION IS APPROPRIATE | 1 |
|-----|--|---|
| II. | STATUS OF PROCEEDINGS INVOLVING THE CHALLENGED | |
| | PATENT | 2 |
| Ш. | CONCLUSION | 2 |



PETITIONER'S UPDATED EXHIBIT LIST

| Exhibit No. | Description |
|-------------|--|
| 1001 | U.S. Patent No. 9,715,581 ("'581 patent") |
| 1002 | Declaration of John Tinsman in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. 9,715,581 |
| 1003 | U.S. Patent Publication No. 2004/0010417 to Peled ("Peled") |
| 1004 | U.S. Patent Publication No. 2011/0191246 to Brandstetter <i>et al.</i> ("Brandstetter") |
| 1005 | U.S. Patent Publication No. 2005/0004873 to Pou et al. ("Pou") |
| 1006 | U.S. Patent Publication No. 2008/0140433 to Levy et al. ("Levy") |
| 1007 | U.S. Patent No. 7,818,261 to Weiskopf et al. ("Weiskopf") |
| 1008 | U.S. Patent Publication No. 2013/0166921 to Vijay et al. ("Vijay") |
| 1009 | Prosecution History of U.S. Patent No. 9,715,581 ("'581 Prosecution History") |
| 1010 | Prosecution History of U.S. Patent No. 9,898,590 ("'590 Prosecution History") |
| 1011 | Prosecution History of U.S. Patent No. 10,489,560 ("'560 Prosecution History") |
| 1012 | Prosecution History of U.S. Patent No. 10,515,191 ("'191 Prosecution History") |
| 1013 | Prosecution History of U.S. Patent No. 10,860,691 ("'691 Prosecution History") |
| 1014 | Prosecution History of U.S. Patent No. 10,885,154 ("'154 Prosecution History") |
| 1015 | Curriculum Vitae of John Tinsman |
| 1016 | U.S. Patent No. 7,043,473 to Rassool et al. ("Rassool") |
| 1017 | Mary Madden, The State of Music Online: Ten Years After Napster, Pew Research Center (June 15, 2009) |



| | 0.5. Tatent 100. 7,713,301 |
|-------------|--|
| Exhibit No. | Description |
| | (https://www.pewresearch.org/internet/2009/06/15/the-state-of-music-online-ten-years-after-napster/) |
| 1018 | U.S. Patent No. 8,185,475 to Hug ("Hug") |
| 1019 | U.S. Patent No. 8,051,130 to Logan ("Logan") |
| 1020 | "Digital Rights Management," FTC.org (March 25, 2009) (https://www.ftc.gov/news-events/events-calendar/2009/03/digital-rights-management) |
| 1021 | U.S. Patent No. 8,776,216 to Boccon-Gibod et al. ("Boccon-Gibod") |
| 1022 | Urs Gasser <i>et al.</i> , "Case Study: DRM-protected Music Interoperability and e-Innovation," Harvard.edu (November 2007) (https://dash.harvard.edu/bitstream/handle/1/2794938/DRM-protected+Music+Interoperability+and+eInnovation.pdf;jsessionid= FEC1E2A0F87ABB7EB30E41EA93AC1CAC?sequence=2) |
| 1023 | Intentionally Left Blank |
| 1024 | Intentionally Left Blank |
| 1025 | Intentionally Left Blank |
| 1026 | Intentionally Left Blank |
| 1027 | U.S. Patent Publication No. 2011/0314378 A1 to Nijim et al. ("Nijim") |
| 1028 | "Apple TV Coming to Your Living Room," Apple.com (January 9, 2007) (https://www.apple.com/newsroom/2007/01/09Apple-TV-Coming-to-Your-Living-Room/) |
| 1029 | Jaap Haitsma, <i>et al.</i> , "A Highly Robust Audio Fingerprinting System," 3rd International Conference on Music Information Retrieval, Paris, France, October 13-17, 2002 ("Haitsma") |
| 1030 | U.S. Patent No. 9,554,176 to Gharaat et al. ("Gharaat") |
| 1031 | Alex Pappademas, "Mood music for the cyber set," CNN.com, |



| E-lailaid Nia | D.S. I atent 140. 2,713,301 |
|---------------|---|
| Exhibit No. | Description |
| | archived December 7, 2004 (https://web.archive.org/web/20041207191754/http:/archives.cnn.com/2000/TECH/computing/09/08/mood.music.idg/index.html) |
| 1032 | U.S. Patent No. 8,306,976 to Handman et al. ("Handman") |
| 1033 | U.S. Patent Publication No. 2006/0206478 to Glaser et al. ("Glaser") |
| 1034 | U.S. Patent No. 7,081,579 to Alcade et al. ("Alcade") |
| 1035 | Avery Li-Chun Wang, "An Industrial-Strength Audio Search Algorithm," 4th International Conference on Music Information Retrieval, Baltimore, Maryland, USA, October 27-30, 2003. |
| 1036 | Bryan Jacobs, "How Shazam Works To Identify (Nearly) Every Song You Throw At It," Gizmodo.com (September 24, 2010) https://gizmodo.com/how-shazam-works-to-identify-nearly-every-song-you-th-5647458 |
| 1037 | European Patent Application Publication No. 1,558,032 to Widevine Technologies, Inc. |
| 1038 | U.S. Patent Publication No. 2013/0051772 to Ramaswamy <i>et al.</i> ("Ramaswamy") |
| 1039 | U.S. Patent No. 5,223,924 to Strubbe et al. ("Strubbe924") |
| 1040 | U.S. Patent Publication No. 2001/0056405 to Muyres <i>et al.</i> ("Muyres") |
| 1041 | U.S. Patent No. 7,603,382 to Halt, Jr. ("Halt") |
| 1042 | U.S. Patent No. 10,447,564 to Abraham et al. ("Abraham") |
| 1043 | U.S. Patent No. 8,583,089 to Ramer et al. ("Ramer") |
| 1044 | Laurie J. Flynn, "Like This? You'll Hate That. (Not All Web Recommendations Are Welcome.)," NYTIMES.com (January 23, 2006) (https://www.nytimes.com/2006/01/23/technology/like-this-youll-hate-that-not-all-web-recommendations-are.html) |



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

