

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ROKU, INC.,  
Petitioner,

v.

MEDIA CHAIN, LLC,  
Patent Owner.

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Case No. IPR2021-00390  
U.S. Patent No. 9,898,590

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**DECLARATION OF JOHN TINSMAN IN SUPPORT OF PETITION FOR  
*INTER PARTES* REVIEW OF U.S. PATENT NO. 9,898,590**

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| 2.    | [1A] “receiving a license request from a user requesting to<br>engage in a license transaction to reproduce a media content<br>item;” .....   | 91 |
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| 4.    | [1C] “after the evaluation of the license transaction, extracting<br>from the license transaction user data that is specific to the user<br>that is attempting to reproduce the media content item when the<br>user acquires the license and when the user declines the license,<br>wherein the user data includes demographic data associated<br>with the user that enables a copyright owner of the media<br>content item to gauge a demographic that acquired the license<br>for the media content item of the copyright owner and a |    |

|  |     |
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| demographic that declined the license for the media content item of the copyright owner;”  | 100 |
| (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” | 100 |
| (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”   | 109 |
| 5. [1D] “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;”  | 111 |
| 6. [1E] “storing in a license database the statistics record so that the user data is accessible to the copyright owner of the media content item; and”  | 113 |
| 7. [1F] “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.”   | 117 |
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