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BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROKU, INC. Petitioner

v.

MEDIA CHAIN, LLC, Patent Owner

Case No. IPR2022-00392 U.S. Patent No. 10,515,191

DECLARATION OF JOHN TINSMAN IN SUPPORT OF PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 10,515,191

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		1.	[1P] "A computer implemented method for determining a target demographic for media marketing, comprising:"					
		2.	[1A] "receiving a first request from first user and a second request from a second user to reproduce the media content item;"					
		3.	[1B] "evaluating each of the first and second request to determine whether each of the first and second users has previously acquired a license to reproduce the media content item and offering the license to reproduce the media content item to each user when the each user does not have the license to reproduce the media content item;"					
		4.	[1C] "after the evaluation of the first request, extracting first user data specific to first user when the first user accepts the offer and acquires the license;"					
		5.	[1D] "after the evaluation of the second request, extracting second user data specific to the second user when the second user declines the offer to acquire the license;"					
		6.	[1E] "aggregating the extracted first and second user data into a statistics record,"					

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	7.	[1F] "wherein the statistics record summarizes the first user data and second user data;"101		
	8.	[1G] "storing in a license database the statistics record so that the summarized first and second user data is accessible to a third party;"		
	9.	[1H] "analyzing by the third party, the statistics record, to determine the target demographic based on a first demographic corresponding to the first user data and a second demographic corresponding to the second user data;"		
	10.	[1I] "and marketing, by the third party, the media content item to a plurality of other users corresponding to the determined target demographic."		
C.	Independent Claim 7110			
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	1.	A POSA would have been motivated to combine Brandstetter and Levy				
	2.	A POSA would have known how to combine Brandstetter and Levy and would have had a reasonable expectation of success				
B.	Indep	Independent Claim 1174				
	1.	[1P] "A computer implemented method for determining a target demographic for media marketing, comprising:"				
	2.	[1A] "receiving a first request from first user and a second request from a second user to reproduce the media content item;"				
	3.	[1B] "evaluating each of the first and second request to determine whether each of the first and second users has previously acquired a license to reproduce the media content item and offering the license to reproduce the media content item to each user when the each user does not have the license to reproduce the media content item;"				
	4.	[1C] "after the evaluation of the first request, extracting first user data specific to first user when the first user accepts the offer and acquires the license;"				
	5.	[1D] "after the evaluation of the second request, extracting second user data specific to the second user when the second user declines the offer to acquire the license;"				
	6.	[1E] "aggregating the extracted first and second user data into a statistics record,"				
	7.	[1F] "wherein the statistics record summarizes the first user data and second user data;"200				
	8.	[1G] "storing in a license database the statistics record so that the summarized first and second user data is accessible to a third party;"				
	9.	[1H] "analyzing by the third party, the statistics record, to determine the target demographic based on a first demographic corresponding to the first user data and a second demographic corresponding to the second user data;"				

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