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BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROKU, INC., Petitioner

v.

MEDIA CHAIN, LLC, Patent Owner

Case IPR2022-00394 U.S. Patent No. 10,885,154

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

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Case IPR2022-00394 U.S. Patent No. 10,885,154

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Case IPR2022-00394 U.S. Patent No. 10,885,154

PETITIONER'S UPDATED EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 10,860,154 to Estes ("'154 patent")
1002	Declaration of John Tinsman
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	Intentionally Left Blank
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. 10,860,154 ("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) (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")

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Exhibit No.	Description
1019	U.S. Patent No. 8,051,130 to Logan ("Logan")
	"Digital Rights Management," FTC.org (March 25, 2009)
1020	(https://www.ftc.gov/news-events/events-calendar/2009/03/digital-
1021	rights-management) U.S. Patent No. 8,776,216 to Boccon-Gibod et al. ("Boccon-Gibod")
1021	
	Urs Gasser et al., "Case Study: DRM-protected Music
1022	Interoperability and e-Innovation," Harvard.edu (November 2007)
1022	(https://dash.harvard.edu/bitstream/handle/1/2794938/DRM- protected+Music+In eroperability+and+eInnovation.pdf; jsessionid
	=FEC1E2A0F87ABB7EB30E41EA93AC1CA C?sequence=2)
1023	Intentionally Left Blank
	Intentionally Left Blank
1024	
1025	Intentionally Left Blank
1026	Intentionally Left Blank
1027	U.S. Patent Publication No. 2011/0314378 A1 to Nijim et al.
1027	("Nijim")
	"Apple TV Coming to Your Living Room," Apple.com (January 9,
1028	2007) (https://www.apple.com/newsroom/2007/01/09Apple-TV-
	Coming-to-Your-Living-Room/)
1020	Jaap Haitsma, et al., "A Highly Robust Audio Fingerprinting
1029	System," 3rd International Conference on Music Information Retrieval, Paris, France, October 13-17, 2002 ("Haitsma")
1020	U.S. Patent No. 9,554,176 to Gharaat et al. ("Gharaat")
1030	
	Alex Pappademas, "Mood music for the cyber set," CNN.com,
1031	archived December 7, 2004 (https://web.archive.org/web/20041207101754/http:/
1051	(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")
	U.S. Patent Publication No. 2006/0206478 to Glaser et al. ("Glaser")
1033	U.S. Fatent Fublication NO. 2000/0200478 to Glasef et al. (Glasef)

Exhibit No.	Description
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 et al. ("Ramaswamy")
1039	U.S. Patent No. 5,223,924 to Strubbe et al. ("Strubbe924")
1040	U.S. Patent Publication No. 2001/0056405 to Muyres et al. ("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)
1045	U.S. Patent No. 8,375,131 To Rogers et al. ("Rogers")
1046	U.S. Patent Publication No. 2012/0233701 to Kidron ("Kidron")
1047	U.S. Patent No. 6,317,722 to Jacobi et al. ("Jacobi")
1048	U.S. Patent No. 8,352,331 to Dunning et al. ("Dunning")
1049	U.S. Patent Publication No. 2003/0086341 to Wells et al. ("Wells")
1050	U.S. Patent No. 7,178,720 to Strubbe et al. ("Strubbe")
1051	"Technological Protection Systems for Digitized Copyrighted Works: A Report to Congress," United States Patent and Trademark

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