WAG Slides
IPR2022-01412, -01413

SCOPE AND CONTENT OF THE PRIOR AR

As a **factual** matter, the scope and content of Carmel con

- The **object** of performing internet streaming from
  hardware using widely supported standards.

- Dividing the stream into **time-sequenced slices** in

- **Transmitting the slices** at the selected encoding to
  with the most recently available slice or an earlier
  the user.

- Seeking to sustain the transmission of the successi
  equal to the rate at which the slices are being gene
  ahead of or fall behind the program.

- **Commonly known as "push".**

DIFFERENCES BETWEEN CLAIMED SUBJECT MATTE

- Claimed Subject Matter:

  - Analysis must address each and every limitation, a

  - It is impossible for an internet streaming mechani
    '824 claim limitations unless –

    - Content is divided into a plurality of time-sequ

    - The client originates successive requests that i
      every element to be sent in response to each s

- Prior Art:

  - Carmel discloses only a single request to start a st
    starting point.

  OBVIOUSNESS ANALYSIS MUST BE CONSISTENT WIT

PETITION RELIES ON <u>BOTH</u> FIGS. 6A AND 6B OF CA
REQUEST" [MIS]CHARACTERIZA

- **Pet. at 26:** "the request for a particular slice of dat
  serial indicator (slice index) of the requested slice
  this process **is repeated for each slice**."

- **Pet. at 29:** "Carmel teaches that after the client 30
  the client 30 downloads that slice. (Polish, ¶138; (
  also id., 2:1-21, 3:63-66, 4:7-11, 10:24-54, **Figs. 6A**

- **Pet. at 38:** "**Figures 6A and 6B** show that Carmel r
  streaming system where the data recipient is resp
  to be transmitted."

- **Pet. at 40:** "data slices are sent by the server 36 or
  from clients 30 … this confirmed by **Figs. 6A and 6**
  each slice is selected and downloaded, **the proces**

**GOOGLE'S EXPERT, DR. POLISH, CONFIRMED HIS RELIANC[E ON]
CARMEL AS DISCLOSING SUCCESSIVE INDIVIDUAL SL[IDES]**

- **Dr. Polish:** As in the Petition, Dr. Polish maintained th[at]
  represented pulls. EX1002 ¶ 176: "Figs. 6A and 6B …
  selected and downloaded, the process repeats."

- **EX1002 ¶ 182:** Similarly characterizing both Figs. 6A [and]
  side-by-side illustration to highlight their similarity a[nd]

- Asked to describe the difference, Dr. Polish stated: "S[…]
  in there to choose the level and to determine link rat[…]
  104:5-18 (answer).

- Note – the Petition and its expert support were prese[…]
  Figs. 6A and 6B were directed to "**classic 'client pull'**[…]

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