

LG ELECTRONICS, INC.,
Petitioner

v.

CONSTELLATION DESIGNS, LLC,
Patent Owner

IPR2023-00319 (U.S. Patent No. 10,693,700)

Patent Owner's Demonstrative Exhibit

Petition Hinges On Petitioner's Challenge To Pr

The '700 patent states that it is a continuation of the '777 pa (Barsoum). Ex. 1001 code (63). Petitioner challenges this claim to arguing that features of the challenged claims do not have written description support in Barsoum. Pet. 2–19. Patent Owner disagree Resp. 35–58. All three references (Barsoum, ATSC322, ATSC327) by Petitioner are only prior art to the '700 patent if the '700 patent claim priority to Barsoum.

Paper No. 10 (Instit

Only Claims 5, 15, and 25 Are At Issue

Ground	Claims	Prior Art Basis
1A	2-3, 12-13, 22-23	§103 – '777 patent in view of ATSC322
1B	5, 15, 25	§103 – '777 patent in view of ATSC327

A Single Limitation Remains At Issue

Claim 5

5. The communication system of claim 1, wherein the plurality of different non-uniform multidimensional symbol constellations is capable of providing a greater parallel decoding capacity at a specific SNR than the other symbol constellations in the plurality of [redacted] multidimensional symbol constellations at the same

Ex. 1001 ('70)

PTAB Has Already Rejected Petitioner's Argument

Decision Denying Institution of IPR

Claim 6 recites:

The communication system of claim 1, wherein:

the non uniform symbol constellation is selected from a plurality of unequal symbol constellations; and

each of the plurality of unequally spaced symbol constellations is characterized by an assignment of labels and spacing of the constellation points such that each of the plurality of unequally spaced symbol constellations is capable of providing parallel decoding capacity when operated at a symbol constellation operating at the same SNR as the other plurality of unequally spaced symbol constellations when operated at the same SNR.

Ex. 1001, 15:51–62. Claims 16 and 27 are substantially similar. *Id.* at 18:49–50.

LG Electronics, Inc., v. Constellation Designs, LLC, IPR2023-00320, Paper No. 11 (Decision Denying Institution of IPR)

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