UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NETFLIX, INC., PETITIONER,

v.

GOTV STREAMING, LLC, PATENT OWNER.

CASE IPR2023-00757 PATENT 8,989,715

SECOND DECLARATION OF JOSHUA S. WYDE



I, Joshua S. Wyde, declare:

- ¶1. I am over the age of eighteen, I am of sound mind, and I am fully competent to testify. This declaration is based upon my personal knowledge, or, if so stated, upon information and belief.
- ¶2. I am an attorney at the law firm of Alavi Anaipakos, PLLC, and I am one of the attorneys representing the Patent Owner, GoTV Streaming, LLC, in the above captioned IPR.
- ¶3. The statements below are subject to the following caveat: any highlighting in the exhibits was added to help the Panel locate cited sections.
- ¶4. Exhibit 2023 is a true and correct copy of a printout of Generate, Free On-Line Dictionary of Computing, *available at* https://foldoc.org/generate (last updated June 15, 1995).
- ¶5. Exhibit 2024 is a true and correct copy of a printout of Output, TechTerms.com; The Computer Dictionary, available at https://techterms.com/definition/output (last updated December 12, 2006)



- ¶6. Exhibit 2025 is a true and correct copy of a printout of From, Merriam-Webster.com Dictionary, *available at* https://www.merriam-webster.com/dictionary/from (last visited December 12, 2023).
- ¶7. Exhibit 2026 is a true and correct copy a printout of the first page of Customized, Merriam-Webster.com Dictionary, available at https://www.merriam-webster.com/dictionary/customized (last visited Jan. 05, 2024).
- ¶8. Exhibit 2027 is a true and correct copy of a printout of Application-Specific, Wiktionary, available at https://en.wiktionary.org/wiki/application-specific (last visited Dec. 15, 2023).
- ¶9. Exhibit 2028 is a true and correct copy of an excerpt from a 10-K statement filed by Netflix with the Securities and Exchange Commission (Jan. 26, 2023).
- ¶10. Exhibit 2029 is a true and correct copy of an excerpt from Netflix Women In Tech Event UI Engineering August 2018, Jessica Berglund, Netflix UI engineer, 22:43–23:02, available at https://www.youtube.com/watch?v=YpIGejJiaBo



- ¶11. Exhibit 2030 is a true and correct copy of Ethan Kao Deposition Designations Video, GoTV Streaming, LLC v. Netflix, Inc., No. 2:22-cv-07556 (C.D. Cal. Oct. 19, 2023) (Dkt. 413-13).
- ¶12. Exhibit 2031 is a true and correct copy of the deposition of Dr. Benjamin Bederson (Jan. 10, 2024).
- ¶13. These statements are made with the knowledge that willful false statements are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.
- ¶14. Per 28 U.S.C § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed in Houston, Texas on January 26, 2024.

Joshul S. Wyde

