

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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NETFLIX, INC.,  
Petitioner,

v.

GOTV STREAMING, LLC  
Patent Owner.

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Case No. IPR2023-00757

U.S. Patent No. 8,989,715

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**DECLARATION OF BENJAMIN B. BEDERSON  
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 8,989,715**

Netflix v. GoTV  
IPR2023-00757

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IX. PRIORITY DATE OF THE '715 PATENT .....58

X. APPLICATION OF THE PRIOR ART TO CLAIMS 1–20.....59

A. Ground 1: *Hariki* in view of *Harris* renders obvious Claims 1-20 .....59

1. Claim 1 A method of generating content that is renderable by a wireless device, said method comprising: transmitting, to said wireless device, an identification of a custom configuration of a plurality of rendering blocks of said wireless device, wherein said custom configuration is associated with an application and configures said plurality of rendering blocks to render content in a manner customized to said application; and transmitting, to said wireless device, compiled content comprising (i) first compiled content specific to a first page of said application and (ii) second compiled content specific to a second page of said application, wherein said compiled content is generated in part from execution of said application, wherein said compiled content comprises render commands expressed in a syntax that is generic to said wireless device, and wherein said custom configuration is applicable to said first and second compiled content, wherein said compiled content and said custom configuration are usable by a graphical user interface comprising said plurality of rendering blocks to generate renderable content based on said compiled content and said custom configuration. ....59

2. Claim 2 “An apparatus according to claim 1, wherein the terminal comprises a memory, and wherein the processor is configured to send, to the terminal, a response to the content status that instructs the terminal to at least one of delete at least one piece of content from the memory of the terminal, or download at least one piece of content from the source.” .....87

3. Claim 3 “A method as described in claim 1 wherein said compiled content is partially resultant from said application operating on a remote server.” .....88

4. Claim 4 “A method as described in claim 1 wherein said compiled content is specific to the rendering capabilities of said wireless device.” .....89

5. Claim 5 “A method as described in claim 1 wherein each of said plurality of rendering blocks operates specific to a wireless device type of said wireless device and each is instructed using a syntax that is generic to said wireless device type.”.....90

6. Claim 6 “A method as described in claim 5 wherein said custom configuration comprises a syntax that is generic regarding said wireless device type.” .....94

7. Claim 7 “A method as described in claim 1 wherein said custom configuration comprises configuration information and content specific to said application.” .....94

8. Claim 8 “A method as described in claim 1 wherein said custom configuration is one of a plurality of memory-stored custom configurations stored by said wireless device, and wherein said method further comprises transmitting an identifier that identifies said custom configuration.” .....96

9. Claim 9 “A non-transitory computer readable medium comprising instructions therein that when executed by a processor implement a method of generating content that is renderable by a wireless device, said method comprising: transmitting, to said wireless device, an identification of a custom configuration of a plurality of rendering blocks of said wireless device, wherein said custom configuration is associated with an application and configures said plurality of rendering blocks to render content in a manner customized to said application; and transmitting, to said wireless device, compiled content comprising (i) first compiled content specific to a first page of said application and (ii) second compiled content specific to a second page of said application, wherein said compiled content is generated

in part from execution of said application, wherein said compiled content comprises render commands expressed in a syntax that is generic to said wireless device, and wherein said custom configuration is applicable to said first and second compiled content, wherein said custom configuration is applicable to said first and second compiled content, wherein said compiled content and said custom configuration are usable by a graphical user interface comprising said plurality of rendering blocks to generate renderable content based on said compiled content and said custom configuration.”.....97

10. Claim 10 “A non-transitory computer readable medium as described in claim 9 wherein said renderable content comprises audio content and display content.”.....100

11. Claim 11 “A non-transitory computer readable medium as described in claim 9 wherein said compiled content is partially resultant from said application operating on a remote server.” .....100

12. Claim 12 “A non-transitory computer readable medium as described in claim 9 wherein said compiled content is specific to the rendering capabilities of said wireless device.” .....100

13. Claim 13 “A non-transitory computer readable medium as described in claim 9 wherein each of said plurality of rendering blocks operates specific to a wireless device type of said wireless device and each is instructed using a syntax that is generic to said wireless device type.”.....100

14. Claim 14 “A non-transitory computer readable medium as described in claim 13 wherein said custom configuration comprises a syntax that is generic regarding said wireless device type.” .....101

15. Claim 15 “A non-transitory computer readable medium as described in claim 9 wherein said custom configuration comprises configuration information and content specific to said application.” .....101

16. Claim 16 “A non-transitory computer readable medium as described in claim 9 wherein said method further

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