UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NETFLIX, INC.,
Petitioner,

v.

GOTV STREAMING, LLC
Patent Owner.

Case No. IPR2023-00758

U.S. Patent No. 8,478,245

**DECLARATION OF BENJAMIN B. BEDERSON
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,478,245**

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IX. PRIORITY DATE OF THE '245 PATENT 60

X. APPLICATION OF THE PRIOR ART TO CLAIMS 1–33.....61

A. Ground 1: *Hariki* in view of *Harris* renders obvious Claims 1-33 61

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. 61

2. Claim 2 "A method as described in claim 1 wherein said using a graphical user interface comprising said plurality of rendering blocks to generate renderable content comprises: processing said compiled content using a reader of said wireless device; and issuing commands from said reader to individual rendering blocks of said graphical user interface based on said rendering commands of said compiled content." 92

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3. Claim 3 "A method as described in claim 1 wherein said render able content comprises audio content and display content." 95

4. Claim 4 "A method as described in claim 1 wherein said compiled content is partially resultant from said application operating on a remote server." 95

5. Claim 5 "A method as described in claim 1 wherein said compiled content is specific to the rendering capabilities of said wireless device." 96

6. Claim 6 "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." 98

7. Claim 7 "A method as described in claim 6 wherein said custom configuration comprises a syntax that is generic regarding said wireless device type." 102

8. Claim 8 "A method as described in claim 1 wherein said custom configuration comprises configuration information and content specific to said application." 102

9. Claim 9 "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 further said identifying said custom configuration comprises receiving an identifier that identifies said custom configuration." 104

10. Claim 10 "A method as described in claim 1 further comprising receiving and storing said custom configuration." 105

11. Claim 11 "A method as described in claim 1 wherein said plurality of rendering blocks of said graphical user interface comprises: a first block that controls the rendering of ticker information across a display screen of said wireless device; a second block that controls the rendering of button images on said display screen; and a third block that controls the rendering of audio on a speaker of said wireless device." 106

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12. Claim 12 "A non-transitory computer usable medium comprising instructions therein that when executed by a processor implement a method of rendering content on a wireless device, said method comprising: receiving 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; receiving compiled content 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; using a graphical user interface comprising said plurality of rendering blocks to generate renderable content based on said compiled content and said custom configuration; and rendering said renderable content on said wireless device, wherein said receiving compiled content comprises: receiving first compiled content specific to a first page of said application; and receiving second compiled content specific to a second page of said application, wherein said custom configuration is applicable to both said first and second com piled content." 107

13. Claim 13 "A non-transitory computer usable medium as described in claim 12 wherein said using a graphical user interface comprising said plurality of rendering blocks to generate renderable content comprises: processing said compiled content using a reader of said wireless device; and issuing commands from said reader to individual rendering blocks of said graphical user interface based on said rendering commands of said compiled content." 110

14. Claim 14 "A non-transitory computer usable medium as described in claim 12 wherein said renderable content comprises audio content and display content." 110

15. Claim 15 "A non-transitory computer usable medium as described in claim 12 wherein said compiled content is partially result ant from said application operating on a remote server." 110

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