UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, Petitioner,

v.

TOUCHSTREAM TECHNOLOGIES, INC., Patent Owner.

> Case No. IPR2022-00795 U.S. Patent No. 8,356,251

PATENT OWNER'S RESPONSE PURSUANT TO 37 C.F.R § 42.120

TABLE OF CONTENTS

I. The '251 Patent
A. Claims4
B. Specification
C. Prosecution History11
II. Level of Ordinary Skill in the Art
III. Claim Construction
A. "Media Player"13
B. "Programming Code"16
IV. Petitioner's Grounds and Cited References
A. Muthukumarasamy20
1. Muthukumarasamy's presentation and selection of content
2. Muthukumarasamy describes two distinct processes that may be initiated by the IED
B. Hayward28
V. Legal Standards
VI. The Challenged Claims Would Not Have Been Obvious over Muthukumarasamy Alone (Ground I) or in View of Hayward (Ground II)
A. Muthukumarasamy Describes Two Distinct Processes, Neither Disclosing the Claimed Method, and Petitioner Fails to Show Any Obvious Modification Satisfying the Claims
1. Petitioner Relies on Muthukumarasamy's Descriptions of Two Separate Processes
2. Neither the RCIBS Process nor the zHub/zNode Process Discloses All the Limitations of the Challenged Independent Claims
B. Muthukumarasamy Does Not Disclose or Suggest Converting the Universal Playback Control Command Includes Selecting from among a Plurality of Specific Commands That Correspond to a Respective Media Player
C. Petitioner Fails to Prove That an Ordinary Artisan Would Have Considered the zHub and zNode Part of a <i>Server System</i> with Muthukumarasamy's Server 55

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D.	Claims 2, 5, 6–8, 9 Would Not Have Been Obvious	58
VII.	Conclusion	58

PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
2001	<i>Touchstream Technologies, Inc. v. Google LLC</i> , Case No. 6:21- cv-00569-ADA (E.D. Tex.) - Docket
2002	DocketNavigator Time to Milestones – Waco Division, from September 18, 2018 to present
2003	Email from Google's Counsel, dated July 7, 2022
2004	Declaration of Jordan T. Bergsten
2005	Touchstream's Preliminary Infringement Contentions, dated August 27, 2021
2006	Google's Preliminary Invalidity Contentions, dated October 22, 2021
2007	Google's Supplemental Preliminary Invalidity Contentions, dated January 3, 2022
2008	Touchstream's Amended Preliminary Disclosure of Asserted Claims, Infringement Contentions, and Priority Dates, dated November 8, 2021
2009	Google's Final Invalidity Contentions, dated April 14, 2022
2010	Google's Notice of Subpoenas to Boxee, dated April 14, 2022
2011	Google's Notice of Subpoenas to Lynx Tech, dated April 14, 2022
2012	Google's Notice of Subpoenas to Peel Tech, dated April 14, 2022
2013	Google's Notice of Subpoenas to Samsung, dated April 14, 2022
2014	Touchstream's First Set of Requests for Production, dated April 15, 2022
2015	Touchstream's First Set of Interrogatories, dated April 19, 2022
2016	Touchstream's Second Set of Interrogatories, dated April 25, 2022
2017	Google's First Set of Requests for Production to Touchstream, dated April 25, 2022
2018	Google's First Set of Interrogatories to Touchstream, dated April 25, 2022

2019	Exhibit J to Google's Final Invalidity Contentions, dated April 14, 2022
2020	Order Granting Joint Motion to Amend Scheduling Order (Dkt. 81), <i>Touchstream Technologies, Inc. v. Google LLC</i> , Case No. 6:21-cv-00569-ADA (E.D. Tex.)
2021	Transcript of the Deposition of Benjamin B. Bederson, Ph.D. on December 21, 2022
2022	Declaration of Kevin C. Almeroth, Ph.D.
2023	Curriculum Vitae of Kevin C. Almeroth, Ph.D.

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