UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CHARTER COMMUNICATIONS, INC.,
Petitioner

v.

TOUCHSTREAM TECHNOLOGIES, INC.
Patent Owner

Patent No. 8,356,251
Filing Date: September 26, 2011
Issue Date: January 15, 2013
Title: PLAY CONTROL OF CONTENT ON A DISPLAY DEVICE

Inter Partes Review No.: IPR2024-01231

DECLARATION OF DAVID B. LETT

IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 et seq.



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	11.	Danciu-Mahajan or Danciu-Mahajan-Calvert Render Claims 1-26		



	Obvious
11.1	Independent Claim 1
11.2	Dependent Claim 2
11.3	Dependent Claim 3: "The method of claim 1 wherein converting the command into corresponding programming code to control the media player includes using information in a look-up table."
11.4	Dependent Claim 4: "The method of claim 3 wherein the look-up table stores a plurality of specific commands, each of which represents, respectively, a corresponding command for a different media player."98
11.5	Dependent Claim 5: "The method of claim 1 wherein the universal command represents an instruction to play the video content, to stop playing the video content or to pause playing the video content."
11.6	Dependent Claim 6: "The method of claim 1 wherein the video content is an interactive video game."
11.7	Dependent Claim 7: "The method of claim 1 wherein the video content is streaming media."
11.8	Dependent Claim 8: "The method of claim 1 wherein the synchronization code is uniquely associated with the display device on which the video content is to be played."
11.9	Dependent Claim 9: "The method of claim 8 wherein the synchronization code is different from an IP address associated with the display device and is different from a MAC address associated with the display device." 103
	Dependent Claim 10: "The method of claim 8 wherein assigning a synchronization code includes assigning a randomly generated code to the display device each time the display device connects to the server system."
11.11	Independent Claim 11
11.12	Dependent Claim 12: [12A]-[12C]: "The system of claim 11 including: a library storing protocols or application programming interfaces, wherein the server system is configured to check the identity of the media player identified in the one or more signals from the personal computing device, load an appropriate set of protocols or application programming interfaces from the library based on the identity of the media player, and convert the command from the personal computing device into a corresponding programming code to control the media player."



11.13	Dependent Claim 13: "[13A]-[13C]: "The system of claim 11 including: a look-up table storing a plurality of commands each of which is for a particular type of media player, wherein the server system is configured to convert the command into corresponding programming code to control the media player based on information in the look-up table."
11.14	Dependent Claim 14: "The system of claim 11 wherein the look-up table stores a correspondence between the universal command and a plurality of specific commands, each of which is for a different media player." 109
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11.16	Dependent Claim 16: "The system of claim 11 wherein the universal command represents an instruction to play the video content, to stop playing the video content or to pause playing the video content."
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11.18	Dependent Claim 18: "The system of claim 11 wherein the video content is streaming media."
11.19	Dependent Claim 19: "The system of claim 11 wherein the synchronization code is uniquely associated with the display device on which the video content is to be played."
11.20	Dependent Claim 20: "The system of claim 19 wherein the synchronization code is different from an IP address associated with the display device and is different from a MAC address associated with the display device."
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