

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CHARTER COMMUNICATIONS, INC.,

Petitioner

v.

SPRINT COMMUNICATIONS COMPANY L.P.,

Patent Owner

Case IPR2019-01139

Patent No. 6,757,907

PATENT OWNER'S PRELIMINARY RESPONSE

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 A. Legal Standard.....1717

 B. Humpleman Does Not Anticipate the Challenged Claims (Ground 1)1919

 1. Humpleman does not teach transferring a *control screen signal* as Element [B] requires.....2020

 a) Under Petitioner’s primary mapping, Element [B] is not satisfied.2020

 b) Petitioner’s mapping assumes an incorrect location of the *alleged processing system*, and Humpleman—read correctly—does not anticipate the '7907 claims.2222

 c) Element [B] is not satisfied under Petitioner’s alternative mapping either.2525

2.	Humpleman does not teach “a processing system configured to . . . receive a viewer control signal from the second communication interface,” as Element [C] requires.	<u>2727</u>
3.	Humpleman’s session manager cannot transfer <i>video signals</i> to a <i>first</i> or <i>second communication interface</i> based on indications in a <i>viewer control signal</i> and therefore does not satisfy Element [C].	<u>2828</u>
a)	Humpleman does not disclose that the alleged processing system transfers video signals as disclosed in Element [C].	<u>2929</u>
b)	Humpleman does not disclose that video signals are transferred to the alleged first or second communication interfaces.	<u>3030</u>
c)	Under Petitioner’s alternative mapping, Humpleman still fails to disclose Element [C] for the same reasons.	<u>3232</u>
4.	Petitioner fails to demonstrate a reasonable likelihood that it would prevail on Ground 1 for any claim.	<u>3333</u>
C.	The Challenged Claims Would Not Have Been Obvious over Humpleman and Yosuke (Ground 2).	<u>3333</u>
D.	The Challenged Claims Would Not Have Been Obvious over Humpleman and Ellis (Ground 3)	<u>3434</u>
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