

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROKU, INC.

Petitioner,

v.

CANON KABUSHIKI KAISHA

Patent Owner.

Case IPR2020-00343

U.S. Patent No. 8,713,206

**Declaration of Kyle K. Tsui in Support
of Petition for *Inter Partes* Review of
U.S. Patent No. 8,713,206**

Roku Exhibit 1023

I, Kyle K. Tsui, make the following declaration pursuant to 28 U.S.C. §1746:

1. I am a senior attorney at the law firm of Ropes & Gray LLP.
2. I provide this declaration in connection with the above-identified *Inter Partes* review proceeding that is being requested at the U.S. Patent and Trademark Office (“USPTO”) by Roku, Inc. against Canon Kabushiki Kaisha. Unless otherwise stated, the facts set forth in this Declaration are based on my personal knowledge.
3. **Ex. 1001** hereto is a true and correct copy of U.S. Patent No. 8,713,206 to Junji Kotani, which is available from the USPTO. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alternations, other than these noted markings, have been made to this document.
4. **Ex. 1002** hereto is a certified file history of U.S. Patent No. 8,713,206 to Junji Kotani, which is available from the USPTO. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alternations, other than these noted markings, have been made to this document.
5. **Ex. 1004** hereto is a true and correct copy of U.S. Patent No. 7,877,696 to Michael J. Telek *et al.*, which is available from the USPTO. This document has been marked with an exhibit label and page numbers on each page at the bottom

right corner. However, no alternations, other than these noted markings, have been made to this document.

6. **Ex. 1005** hereto is a true and correct copy of European Patent Publication EP0989729 to Hideo Takiguchi *et al.*, which is available from the European Patent Office. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alternations, other than these noted markings, have been made to this document.

7. **Ex. 1006** hereto is a true and correct copy of Chinese Patent CN2935383Y to Zhou Lu *et al.*, which is available from the Chinese Patent Office. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alternations, other than these noted markings, have been made to this document.

8. **Ex. 1008** hereto is a true and correct copy of Japanese Patent Application Publication JP2004-350160 to Hiroshi Suda, which is available from the Japanese Patent Office. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alternations, other than these noted markings, have been made to this document.

9. **Ex. 1010** hereto is a true and correct copy of Japanese Patent Laid-Open No. 7-123379 to Yoshio Iizuka, which is available from the Japanese Patent Office. This document has been marked with an exhibit label and page numbers on each

page at the bottom right corner. However, no alternations, other than these noted markings, have been made to this document.

10. **Ex. 1012** hereto is a true and correct copy of Japanese Patent Laid-Open No. 2006-235993 to Haruhito Watanabe, which is available from the Japanese Patent Office. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alternations, other than these noted markings, have been made to this document.

11. **Ex. 1014** hereto is a true and correct copy of a document titled Universal Serial Bus Specification, Revision 2.0, which was obtained from the USB Implementers Forum, Inc. at the following URL: <https://www.usb.org/documents>. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alternations, other than these noted markings, have been made to this document.

12. **Ex. 1015** hereto is a true and correct copy of a document titled Universal Serial Bus Common Class Specification, Revision 1.0, which was obtained from the USB Implementers Forum, Inc. at the following URL: <https://usb.org/sites/default/files/usbccs10.pdf>. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alternations, other than these noted markings, have been made to this document.

13. **Ex. 1016** hereto is a true and correct copy of a PDF document titled “USB Complete Third Edition,” by Janet L. Axelson, published by Lakeview Research LLC with a copyright date of 2005, which is available at https://www.academia.edu/30851880/USB_Complete_3rdEdition. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alternations, other than these noted markings, have been made to this document.

14. **Ex. 1017** hereto is a true and correct copy of Plaintiff’s Preliminary Constructions and Extrinsic Evidence served in *Canon, Inc. v. TCL Electronics Holdings Ltd.*, No. 2:18-cv-00546 (E.D. Tex.) on December 4, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alternations, other than these noted markings, have been made to this document.

15. **Ex 1018** hereto is a true and correct copy of Defendants’ Preliminary Constructions and Extrinsic Evidence served in *Canon, Inc. v. TCL Electronics Holdings Ltd.*, No. 2:18-cv-00546 (E.D. Tex.) on December 4, 2019. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alternations, other than these noted markings, have been made to this document.

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