UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC., AMAZON.COM SERVICES LLC, AMAZON WEB SERVICES, INC., and AUDIBLE, INC.,

Petitioners,

v.

AUDIO POD IP, LLC,

Patent Owner.

Case No. IPR2025-01003 U.S. Patent No. 9,729,907

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 9,729,907



TABLE OF CONTENTS

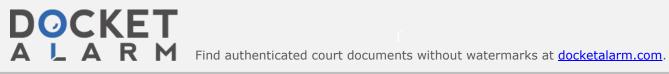
I.	INT	RODUCTION			
II.	THE '907 PATENT			2	
	A.	Ove	rview	2	
	B.	Pros	ecution	3	
	C.	Priority			
III.	LEV	EL OF ORDINARY SKILL IN THE ART			
IV.	CLA	AIM CONSTRUCTION			
V.	STATEMENT OF PRECISE RELIEF REQUESTED				
	A.	Grou	ınds	4	
	B.	Statı	us of References as Prior Art	5	
VI.	GROUND 1A: CLAIMS 1-14, 17-19, AND 21 WOULD HAVE BEEN OBVIOUS IN VIEW OF DTB			6	
	A.	Claim 1		6	
		1.	Preamble	6	
		2.	1[a][i]: Descriptor File	6	
		3.	1[a][ii]-1[a][iii]: Digital Media Streams	7	
		4.	1[a][iv]: External Descriptor File	8	
		5.	1[b]: Location Information	9	
		6.	1[c][i]: Time Offsets	11	
		7.	1[c][ii]: Content Points in Audio Narration	13	
		8.	1[d]: Correlating Time Offsets and Content Points	14	



	9.	1[e]: Synchronization Points	14			
	10.	1[f]: Synchronization Time Offsets	16			
	11.	1[g][i]: Correlating Synchronization Time Offsets and Synchronization Points	17			
	12.	1[g][ii]: Synchronized Rendering	18			
B.	Clai	aim 2				
C.	Clai	Claim 3				
D.	Claim 4					
Е.	Clai	Claim 5				
F.	Clai	Claim 6				
G.	Claim 7					
	1.	7[a]: Visually Rendered Content	23			
	2.	7[b]: Automated Page Turns	23			
Н.	Clai	Claim 8				
I.	Claim 9					
J.	Clai	m 10	25			
K.	Claim 11					
	1.	11[a]: Selecting Streams	26			
	2.	11[b]: Determining a First Position	26			
	3.	11[c]: Rendering from the First Position	27			
L.	Claim 12					
M	Clair	m 13	28			



	N.	Claim 14	29	
	O.	Claim 17		
	P.	Claim 18	30	
		1. 18[a][i]: Navigating	30	
		2. 18[a][ii]: Some Content Not Resident on Client Device		
	Q.	Claim 19	31	
	R.	Claim 21	32	
VII.		OUND 1B: CLAIMS 2 AND 18-19 WOULD HAVE EN OBVIOUS IN VIEW OF DTB AND YOSHIMURA	33	
	A.	Claim 2	33	
	В.	Claim 18	34	
		1. 18[a][i]: Navigating	34	
		2. 18[a][ii]: Some Content Not Resident on Client Device		
	C.	Claim 19	37	
VIII.		OUND 1C: CLAIM 7 WOULD HAVE BEEN OBVIOUS VIEW OF DTB AND DUNCAN		
IX.		OUND 1D: CLAIM 8 WOULD HAVE BEEN OBVIOUS VIEW OF DTB AND HECKERMAN		
X.		OUND 1E: CLAIMS 14 AND 20 WOULD HAVE BEED VIOUS IN VIEW OF DTB AND BULTERMAN		
	A.	Claim 14	42	
	B	Claim 20	44	



XI.			1F: CLAIM 15 WOULD HAVE BEEN OBVIOUS OF DTB AND YANG	45			
XII.			1G: CLAIM 16 WOULD HAVE BEEN OBVIOUS OF DTB, YANG, AND COPLEY	47			
XIII.	GROUND 2A: CLAIMS 1-3, 8-12, 14, 17-19, AND 21 WOULD HAVE BEEN OBVIOUS IN VIEW OF MCCARTNEY						
	A.	Clair	m 1	49			
		1.	Preamble	49			
		2.	1[a][i]: Descriptor File	49			
		3.	1[a][ii]: Same Originating Work	51			
		4.	1[a][iii]: Digital Media Streams	51			
		5.	1[a][iv]: External Descriptor File	51			
		6.	1[b]: Location Information	52			
			a. TSD File	52			
			b. BPM File	53			
		7.	1[c][i]: Time Offsets	53			
		8.	1[c][ii] and 1[d]: Content Points Correlated to Time Offsets	54			
		9.	1[e]: Synchronization Points	55			
		10.	1[f]: Synchronization Time Offsets	56			
		11.	1[g][i]: Correlating Synchronization Time Offsets and Synchronization Points	58			
		12.	1[g][ii]: Synchronized Rendering	59			



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

