CLRB Hanson Industries, LLC et al v. Google Inc.

Doc. 260

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Pursuant to the Court's October 19, 2007 Order Re: Motions for Reconsideration of Claim Construction Order (the "Order"), Plaintiff Acacia Media Technologies Corporation ("Acacia") hereby submits this memorandum containing Acacia's "proposed list of which components are necessary to perform each step" of each asserted method claim. (Order, at 13:14-15). As required by the Court in its Order, Acacia's submitted enumeration is based upon the Court's construction set forth in the Order at 13:8-10 and 14:17-19¹ for "transmission system" and "receiving system." Acacia has concurrently filed the Chart required by the Court (as stated at 14:1-12 of the Order) under separate cover.

The currently asserted method claims are:

- '992 patent, claims 19-22 and 41-46;
- '275 patent, claims 2 and 5;
- '863 patent, claims 14-19; and
- '720 patent, claims 8 and 11.

In the Order, the Court states that parties' lists should "take into consideration cooperative relationships, optional components, and the steps of each claim." (Order, at 13:16-18). For each asserted method claim, Acacia has provided in this Memorandum the requested list of components corresponding to each step for the transmission system and the receiving system (if applicable) for each asserted method claim and the requested "cooperative relationships" and "optional components."

I. Claim 19 of the '992 Patent

Transmission System of Claim 19 of the '992 Patent Α.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 19, the following components are necessary to perform the following steps:

Claim 19	Claim Language	Component	"Cooperative Relationships"
of the '992		_	and "Optional Components"
patent			

Acacia reserves all rights on appeal with respect to the construction of the terms "transmission system" and "receiving system."

DORMAN LLP		
HENNIGAN, BENNETT &	LAWYERS	

Claim 19 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim 19, step 1	storing, ² in the transmission system, information from items in a compressed data form, the information including an identification code and being placed into ordered data blocks;	The component ³ described in the specification and illustrated by Block Diagram 2b, labeled compressed data library 118.	The compressed data library 118: (1) may be comprised of one or more compressed data libraries; (2) may be a network of mass storage devices connected together via a high speed network; (3) receives information from a compression means or a compressed data formatter; (4) outputs information to a transmission format conversion CPU or a transmitter means; (5) may be a mixed media system; (6) based upon popularity codes and usage, items may be dynamically moved to the most appropriate media; (7) may be connected to an optional remote order processing and item database 300 via the library access 121 and the library system control computer 1123; (8) may be accessed using a queue manager program, which optimizes such access;

The Court has construed this step to require only "storing," i.e., it does not require any other acts, such as assigning an identification code, ordering the data blocks, or compressing the data blocks: "... previously to storing, (a) an identification code has already been assigned to the information; (b) the information has been placed into ordered data blocks; and (c) the information has been compressed." (3rd CCO, at 18:22-26).

³ For each component of the transmission system (and in every claim in which "transmission system" appears), the component may or may not be located at the same location as the other components of the transmission system. (See, '992 patent, 5:59-65).

1	Claim 19	Claim Language	Component	"Cooperative Relationships"
2	of the '992 patent		Composition (and "Optional Components"
3				(9) storage encoding, which includes the assignment of a
5				unique identification code, may be performed before or after the item is stored in the compressed
6				data library;
7				(10) information may be stored as a file with the unique
8				identification code, and the file may include the compressed data,
9 10				time markers, and program notes; and
11				(11) the stored items may be
12				comprised of audio and/or video information.
13	'992	sending a request, by the user to the	The components described in the	This step of sending a request is not performed by the
14	patent, Claim 19,	transmission	specification and illustrated by Block	transmission system and is not required to be performed by a
15	step 2	system, for at least a part of the stored information to be	Diagram 1c, 2a, and 2b labeled:	receiving system (although a request could optionally be made
16		transmitted to the one of the receiving	(1) the library system	through the user/computer interface 207 of the receiving
17 18		systems at one of the remote location	control computer 1123; or	system).
19		selected by the	(2) the library system control computer 1123	The Court has, however, included this step as requiring a
20		user;	and the library access interface 121; or	"transmission system" component, because the request
21			(3) the library system	is sent to the transmission system. (See, 5 th CCO, at 12:17-
22			control computer 1123, the library access	19).
23			interface 121, and an operator; or	The library access interface 121:
24			(4) the source material	(1) receives user requests via standard telecommunications or
25			library 111; or	high speed communications channels;
26			(5) the remote order processing and item	,
27			database 300.	(2) may receive requests from the remote order processing and item
28				database 300 or may directly

Hennigan, Bennett & Dorman Lawyers

Claim 19 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
			receive requests;
			(3) receives requests which may include the address of the user, the address of the item and may optionally include specific frame numbers, item names, unique identification code, item title, program notes, and the desired viewing time of the item;
			(4) may receive requests from a user via a telephone tone decoder, voice response hardware, operator assisted service, or user terminal interfaces; and
			(5) passes transmission requests to the library system control computer 1123, which may place the requests into a transmission queue. User requests may also alternatively be made to the source material library using any available communication channel.
			The library system control computer 1123:
			(1) sends information to the transmission format conversion CPU(s) and/or to the compressed data library; and
			(2) users may directly access the item database master, which may reside in the library system control computer 1123 via application programs running on the library system control computer 1123 and running on the reception system of the user.
			A system operator is included as a necessary component of the

			- -
			transmission system, because the specification makes clear that requests may be received by operators. In its 3rd CCO, the Court held that a system operator is part of the transmission system. (3rd CCO, at 13:10-14:6).
patent, Claim 19, step 3 fr tr sy re th	ending at least a portion of the stored information from the ransmission system to the ecciving system at the selected remote ocation;	The components described in the specification and illustrated by Block Diagram 2b, labeled: (1) compressed data library 118, library system control computer 1123, transmission format conversion CPU 119, and transceiver 122, or (2) compressed data library 118, library system control computer 1123, and library access interface 121.	See, '992 patent, claim 19, step 1. The transmission format conversion CPU 119 transfers the desired segments of data from the compressed data library onto the communication channel and receives the user request and retireves the requested data blocks from the compressed data library. As an option, the information may be sent directly to the user via the library access interface 121. The transmitters/transceivers 122 of Figure 2b: (1) The Block Diagram shows alternative structures. One or all of them may be necessary depending upon the communication channel(s) which is employed [See, 5 th CCO, 14:4-8]; (2) each communication channel type is accessed through the use of a communication adaptor board or processor connecting the data processed in the transmission format converter 119 to the transmission channel;

DORMAN LLP	
Ø	
BENNETT	LAWYERS
HENNIGAN,	

1	Claim 19 of the '992	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
2	patent			
3 4				limited to, common telephone service, ISDN, B-ISDN, DBS, cable television systems,
5				microwave, MAN, LAN, high speed modems, communication couplers.
6				
7				(4) the transmitter 122 places the formatted data onto the communications channel; the
8				signal is sent to the reception
9 10				system in either a two-way or a one-way communication process;
11				(5) in a standard telephone connection, the transmitter is a
12				modem, in an ISDN channel, the transmitter is a data coupler;
13				(6) the data rate of the transmission is up to 10 Mb/sec;
14				-
15 16				(7) the transmitted data blocks can be multiplexed or non-multiplexed;
17				
18				(8) the transmitted data blocks can be addressed or non-addressed blocks of items, where
19				a block of an item may be an entire item or a portion of an
20				item;
21				(9) the transmitted data blocks
22				may be composed of either compressed, partially compressed, or fully
23				decompressed data, as required by the reception system;
24				
25				(10) the same data block may be simultaneously transmitted over
26				different distribution channels and the blocks may have receiver
27				addresses appended thereto or the reception system may have been
28				preconfigured to receive the

Claim 19 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
			blocks; and (11) audio and/or video information is transmitted.

Receiving System of Claim 19 of the '992 Patent B.

The receiving system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a receiving system. With respect to Claim 19, the following components are necessary to perform the following steps:

Claim 19 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim19, step 4	receiving the sent information by the receiving system at the selected remote location;	The component described in the specification and illustrated by Block Diagram 6, labeled 201.	The transceiver 201: (1) receives audio and/or video information transmitted by the transmission system; and (2) outputs information to the receiver format converter 201.
'992 patent, Claim 19, step 5	storing a complete copy of the received information in the receiving system at the selected remote location; and	The components described in the specification and illustrated by Block Diagram 6, labeled 203 or the components described in the specification and illustrated by Block Diagram 1f, labeled 200c.	See, '992 patent, claim 19, step 3. The storage devices 203 and 200c: (1) receive information from the receiver format converter; (2) may output compressed information to an output format converter 206 or may output information to a data formatter 204 or to a video decompressor 208 or audio decompressor 209; (3) may be part of the head end of a cable television system; (4) stores the received information in the event that the

Claim 19 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
			user wants to play back the information at a later time than when initially requested; and (5) may perform a combination of buffering and non-buffering b buffering some of the requested
			material and decompressing the remainder of the material for immediate viewing as it is distributed by transmission system.
'992 patent, Claim 19, step 6	playing back the stored copy of the information using the receiving system at the selected remote location at a time requested by the user.	The components described in the specification and illustrated by Block Diagram 6, labeled output data formatter labeled "compressed", output data formatters labeled 211, 212, 213, and/or 214. Components labeled data formatter 204 and decompressors 208 and/or 209 are optional.	The data formatter 204: (1) is optional, because it is unnecessary in a system that receives only audio information or only video information; (2) receives information from the storage 203 or from the receiver format converter 202; (3) outputs information to the video and/or audio decompressors 208 and 209; and (4) processes the compressed formatted data blocks and distinguishes audio information from video information. The video decompressor 208 and audio decompressor 209: (1) may receive information from the data formatter (if both audio and video information is received) or from the receiver format converter or storage (if only audio or video information is received); and
			(2) outputs information to output format converters 211, 212, 213, and 214 depending upon whether

1	Claim 19	Claim Language	Component	"Cooperative Relationships"
2	of the '992 patent			and "Optional Components"
3 4				audio and/or video information is included and whether analog or digital output is desired.
5				The output format converters:
6				(1) output format converters 211
7				and 213 are only required if any video information is received;
8				(2) output format converters 212
9				and 214 are only required if any audio information is received;
11				(3) output format converters 211
12				and 212 are only required if digital output is desired;
13				(4) output format converters 213
14				and 214 are only required if audio output is desired;
15				(5) output format converters 211 and 213 receive information from
16				the video decompressor;
17				(6) output format converters 212 and 214 receive information from
18				the audio decompressor;
19				(7) output format converters 211,
20				212, 213, and 214 each output information at a real time rate
21				and output information to a playback system such as a TV or
22				audio amplifier or to an audio video/recorder; and
23				·
24				(8) output from the output format converters 211-214 may be
25				controlled by playback controls, such as play, fast forward,
26				rewind, stop, pause, and play slow.
27				

Claim 20 of the '992 Patent II.

Transmission System of Claim 20 of the '992 Patent A.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 20, the following components are necessary, in addition to the components of claim 19, to perform the following steps:

Claim 20 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim 20, step 1	converting the analog signals of the information to digital components;	The component described in the specification and illustrated by Block Diagram 2a, labeled as components 123a and/or 123b.	See, '992 patent, claim 41, step 4.
'992 patent, Claim 20, step 2	formatting the digital signals of the information;	The components described in the specification and illustrated by Block Diagram 2a, labeled as components 125a and/or 125b.	See, '992 patent, claim 41, step 4.
'992 patent, Claim 20, step 3	ordering the converted analog signals and the formatted digital signals into a sequence of addressable data blocks and;	The component described in the specification and illustrated by Block diagram 2a, labeled 114.	See, '992 patent, claim 41, step 5.
'992 patent, Claim 20, step 4	compressing the ordered information.	The component described in the specification and illustrated by Block diagram 2a, labeled 116, including audio compressor 128 and/or video compressor 129. The precompression processor 115 is optional.	See, '992 patent, claim 41, step 6.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

В. Receiving System of Claim 20 of the '992 Patent

There is no step in claim 20 of the '992 patent which involves the receiving system.

III. Claim 21 of the '992 Patent

Transmission System of Claim 21 of the '992 Patent A.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 21, the following components are necessary, in addition to the components of claim 19, to perform the following steps:

Claim 21 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim 21, step 1	storing the items in a plurality of compressed audio and video libraries in the transmission system.	The component described in the specification and illustrated by Block Diagram 2b, labeled compressed data library 118. More than one compressed data library 118 is required.	See, '992 patent, claim 19, step 1.

В. Receiving System of Claim 21 of the '992 Patent

There is no step in claim 21 of the '992 patent which involves the receiving system.

IV. Claim 22 of the '992 Patent

Transmission System of Claim 22 of the '992 Patent A.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 22, the following components are necessary, in addition to the components of claim 19, to perform the following steps:

Claim 22 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim 22,	storing a list of items available to the user from at	The components described in the specification and	The library access interface 121, remote order processing and item database 300, and library system

Claim 22 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
step 1	least one compressed data library; and	illustrated by Block diagram 2a, labeled library system control computer 1123, the component described in the specification and illustrated in Figure 1c, labeled as the remote order processing and item database 300, the dispatching control software, multiple database servers, and/or other computer systems.	control computer 1123: (1) the remote order processing and item database 300 may connect to the compressed data library of choice via the library access interface 121 and communicates with the library system control computer 1123; (2) the item database master may reside in the library system control computer 1123; (3) users may access the data stored in the item database master via application programs running on the system control computer 1123 and on the reception system 200 of the user (4) users may connect to the item database via any available telecommunication channel; (5) the library access interface 121 sends information to the library system control computer 1123; (6) the library system control computer 1123; (7) the names and other facts in the item data base may be updated at any time via the storage encoding process; (8) a catalog listing some or all of the available titles may be published; (9) Facts about the items may be

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Claim 22 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
		other computer systems. Alternatively, the component is a system operator.	

В. Receiving System of Claim 22 of the '992 Patent

The receiving system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a receiving system. With respect to Claim 22, the following components are necessary, in addition to the components of claim 19, to perform the following steps:

Claim 22 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim 22, step 3	providing the user with the list so that the user may remotely select a particular item for transmission.	The component described in the specification and illustrated by Block diagram 6 labeled user/computer interface 207 and/or the user's telephone.	See, '992 patent, claim 22, step 1.

\mathbf{V} . Claim 41 of the '992 Patent

Transmission System of Claim 41 of the '992 Patent Α.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 41, the following components are necessary to perform the following steps:

Claim 41	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim 41, step 1	storing items having information in a source material library;	The component described in the specification and illustrated by Block Diagram 2a, labeled source material library 111.	The Court has already held that the source material library is the structure for storing items having information. In its 1st CCO, the Court held that the corresponding structure in the specification for

DORMAN LLP	
HENNIGAN, BENNETT &	LAWYERS

1 2	Claim 41	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
3				performing the claimed function of "storing items having
4 5				information" is source material library 111. (1st CCO, at 12:12-15).
6				The source material library 111:
7				(1) provides temporary storage of
8				items prior to conversion and storage in a compressed data library means;
9 10				(2) may be a single source
11				material library or a plurality of source material libraries which may be geographically located
12				close together or far apart;
13 14				(3) may communicate with one another using methods and channels similar to the
15				communication with a receiving system 200 or they may
16				communicate via any available method;
17				(4) may output information to an
18				identification encoder or to one or both types of input receivers,
19				depending on which is present in the converter and depending on
20				whether the information comprises audio and/or video
21				information;
22				(5) may be coordinated using
23				dispatching software to coordinate network traffic, source
24				material library 111 utilization, source material library 111
25				contents, and connection costs; and
2627				(6) may receive user requests for the transmission of an item.
28	'992	retrieving the	The component described	The telecine device and the audio

Claim 41	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
patent, Claim 41, step 2	information in the items from the source material library;	in the specification and understood by persons of ordinary skill in the art at the time of the '992 patent as a playback device for playing back physical items, such as video tapes, film, or computer disks, which contain audio information, video information, or both. In the context of the item being a film, the specification provides the example of a digital telecine device for the video portion of the film and an optical or magnetic digital playback device for the audio information of the film. Such playback devices utilize system operator interaction.	digital playback devices are optional devices, used in instances when the item having information is a film having digital audio. Although no other device is explicitly recited in the specification for retrieving the information in the items, persons skilled in the art in 1991 would have known which devices would be used to play back items having information and the patentees did not need to describe each and every possible device used to playback physical items having information, such as video tapes, film, or computer disks, which contain audio information, video information, or both. The playback device is optional, because one would be unnecessary if the item is received via interlibrary transfer and the item is already in a compressed format.
'992 patent, Claim 41, step 3	assigning a unique identification code to the retrieved information;	The components described in the specification and illustrated by Block Diagram 2a, labeled 112 and identified in the specification as the identification encoder and a system operator.	In its 2nd CCO, the Court delineated the possible functions (optional and mandatory) disclosed in the specification for the identification encoder: (1) the identification encoder 112 gives a unique identification code to items stored in a compressed data library (6:34-35 [referring in each instance to the column:line numbers in the '702 patent]); (2) performs storage encoding (giving the item a unique identification code, optionally logging details about the item, called program notes, and assigning the item a popularity code) just prior to conversion of

DORMAN LLP		
Ø		
BENNETT	LAWYERS	
HENNIGAN,		

Claim 41	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
			the item for transmission to reception system, at any item after starting the conversion
			process, or after storing the item in the compressed data library (6:34-42);
			(3) preferably assigns: a unique identification code, a file address, a popularity code and input program notes (6:43-48);
			(4) inputs digital signal to digital input receiver (6:62-64);
			(5) inputs analog signal to analog-to-digital converter (7:6-8);
			(6) passes previously compressed items directly to the compressed data library (7:36-41);
			(7) allows entry of item notes and production credits (10:45-51);
			(8) maps item addresses to item names as an alternative method of accessing items (10:52-53);
			(9) operates a program which updates a master item database
			(on the library access control computer 1123) containing facts regarding items in the
			compressed data library system (10:56-59); and
			(10) generates a unique address
			code which makes access to the requested data possible (10:43-44).
			The specification also states that
			storage encoding is performed by a system operator and, in its 3rd CCO, the Court held that the

transmission system (3 rd CCO, at 13:10-14:6). The converter 113: (1) is optional, because one is unnecessary if the item is received via interlibrary transfer and the item is already in a compressed format;
(1) is optional, because one is unnecessary if the item is received via interlibrary transfer and the item is already in a compressed format;
(2) includes a digital input receiver 124 if information is input in a digital format; (3) includes an analog input receiver 127 if information is input in an analog format; (4) includes both a digital input receiver 124 and an analog input receiver 127 if both types of information are contemplated as being input (not necessarily at the same time); (5) receives input information from the identification encoder; (6) has digital input receiver 124 which outputs information to a formatter 125, which includes digital audio formatter 125a and/or digital video formatter 125b and which outputs information to video and/or audio time encoders 114 associated with the formatter 125; (7) has analog input receiver 127 which outputs information to an analog-to-digital converter 123, which includes analog audio converter 123a and/or analog video converter 123b, which outputs information to video
rii (rriibs (ff (wffdaliitw (wawc

ett & Dorman llp	YERS
igan, Benni	LAW
TENZ	

	Claim 41	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
				digital converter.
	992 atent,	placing the formatted data into	The component described in the specification and	Time encoder 114:
\mathbf{C}	laim 41, ep 5	a sequence of addressable data blocks;	illustrated by Block diagram 2a, labeled 114.	(1) is optional, because one is unnecessary if the item is received via interlibrary transfer and the item is already in a compressed format;
				(2) receives information from
				audio and/or video converters 123a, 123b and/or audio and/or video formatters 125a, 125b;
				(3) outputs information to the pre-compression processors or to
				the compression means;
				(4) places the blocks of converted formatted information from
				converter 113 into a group of addressable data blocks;
				(5) places formatted data into a sequence of addressable data
				blocks; and
				(6) employs time encoding as the addressing scheme and time
				encoding allows realignment of the audio and video information
				in the compressed data formatting section 117 after
				separate audio and video compression processing by
				precompression processor 115 and compressor 116 and time
				encoding is achieved by assigning relative time markers to
				the audio and video data as it passes from the converter 113
				through the time encoder 114 to
				the precompression processor 115.
	992 atent,	compressing the formatted and	The component described in the specification and	The compressor 116:

Claim 41	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
Claim 41, step 6	sequenced data blocks;	illustrated by Block diagram 2a, labeled 116, including audio compressor 128 and/or video compressor 129. The precompression processor 115 is optional.	(1) is optional, because one is unnecessary if the item is received via interlibrary transfer and the item is already in a compressed format;
		processor TTE is optional.	(2) includes an audio compressor 128 and/or a video compressor 129;
			(3) may compress audio information by adaptive differential pulse code modulation (ADPCM) which may be implemented by the apt-x 100 digital audio compression system by APT;
			(4) may compress video on a group of 24 video frames passed in sequence and may involve applying direct cosine transform and motion compensation.
			The precompression processor 115:
			(1) is optional, because one is unnecessary if the item is received via interlibrary transfer and the item is already in a compressed format and because it is only necessary if the frame rate and aspect ratio of the video data must be converted and if the audio information requires transcoding;
			(2) has a video precompression processor 115b and/or an audio precompression processor 115a, where video precompression processor processes the video so that it fits in the aspect ratio of the transmission and receiving system and audio precompression processor processes audio

	Claim 41	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
				information for sample rate and word length optimization;
				(3) output from video precompression processor 115b is stored in frame buffer 131, which is dual ported and is directly addressable by video compressor 129;
				(4) audio precompression processor 115a may transcode incoming audio information, as required, to create the optimum sample rate and word lengths for compression processing; and
				(5) output of audio precompressor 115a is a constant sample rate signal of a fixed word length which is buffered in frame buffer 130, which is dual ported and is directly addressable by audio compressor 128.
1	'992 patent,	storing, as a file, the compressed,	The components described in the	The compressed data formatter 117:
111	Claim 41, step 7	formatted, and sequenced data blocks with the assigned unique identification code; and	specification and illustrated by Block Diagram 2a, labeled as 117 (including, but only optionally, 117') and 118.	(1) places audio and/or video data received from the compressor into a file, where the file may contain the compressed audio and/or video data, the time markers, and the program notes;
				(2) in inter-library transfers, passes the compressed information directly from the identification encoder to the compressed data formatter;
				(3) may include a short term storage 117' for storing interlibrary transfer materials; and
				(4) outputs files to the compressed data library 118.

Claim 41	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
			See also, '992 patent, Claim 19, step 1.
'992 patent, Claim 41, step 8	sending at least a portion of the file to one of the remote locations.	The components described in the specification and illustrated by Block Diagram 2b, labeled: (1) compressed data library 118, library system control computer 1123, transmission format conversion CPU 119, and transceiver 122, or (2) compressed data library 118, library system control computer 1123, and library access interface 121.	See, '992 patent, Claim 19, step 3.

B. Receiving System of Claim 41 of the '992 Patent

There is no step in claim 41 of the '992 patent which involves the receiving system.

VI. Claim 42 of the '992 Patent

Transmission System of Claim 42 of the '992 Patent A.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 42, the following components are necessary, in addition to the components of claim 41, to perform the following steps:

Claim 42 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim 42, step 1	A/D converting analog signals of the retrieved information into a series of digital data bytes; and	The components described in the specification and illustrated by Block Diagram 2a, labeled as 127, including 123a	See, '992 patent, claim 41, step 4.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Claim 42 of the '992 patent	Claim Language	Component and/or 123b.	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim 42, step 2	converting the series of digital data bytes into formatted data with a predetermined format.	The components described in the specification and illustrated by Block Diagram 2a, labeled as 127, including 123a and/or 123b.	See, '992 patent, claim 41, step 4.

В. Receiving System of Claim 42 of the '992 Patent

There is no step in claim 42 of the '992 patent which involves the receiving system.

Claim 43 of the '992 Patent VII.

Transmission System of Claim 43 of the '992 Patent Α.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 43, the following components are necessary, in addition to the components of claim 41, to perform the following steps:

Claim 43 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim 43, step 1	converting digital signals of the retrieved information into predetermined voltage levels; and	The components described in the specification and illustrated by Block Diagram 2a, labeled as 124.	See, '992 patent, claim 41, step 4.
'992 patent, Claim 43, step 2	converting the predetermined voltage levels into formatted data with a predetermined format.	The components described in the specification and illustrated by Block Diagram 2a, labeled as 125a and/or 125b.	See, '992 patent, claim 41, step 4.

В. Receiving System of Claim 43 of the '992 Patent

There is no step in claim 43 of the '992 patent which involves the receiving system.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Claim 44 of the '992 Patent VIII.

Α. Transmission System of Claim 44 of the '992 Patent

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 44, the following components are necessary, in addition to the components of claim 41, to perform the following steps:

Claim 44 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim 44, step 1	converting digital signals of the retrieved information into formatted data with a predetermined format	The components described in the specification and illustrated by Block Diagram 2a, labeled as 124, including 125a and/or 125b.	See, '992 patent, claim 41, step 4.

В. Receiving System of Claim 44 of the '992 Patent

There is no step in claim 44 of the '992 patent which involves the receiving system.

IX. Claim 45 of the '992 Patent

Transmission System of Claim 45 of the '992 Patent Α.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 45, the following components are necessary, in addition to the components of claim 41, to perform the following steps:

Claim 45 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim 45, step 1	separately storing a plurality of files, each including compressed, sequenced data blocks.	The component described in the specification and illustrated by Block Diagram 2b, labeled compressed data library 118.	See, '992 patent, claim 41, step 7.

B. Receiving System of Claim 45 of the '992 Patent

There is no step in claim 45 of the '992 patent which involves the receiving system.

X. Claim 46 of the '992 Patent

A. Transmission System of Claim 46 of the '992 Patent

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 46, the following components are necessary, in addition to the components of claim 45, to perform the following steps:

Claim 46 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'992 patent, Claim 46, step 1	generating a listing of available items;	The component described in the specification and illustrated by Block diagram 2a, labeled library access interface 121 and library system control computer 1123, an application interface program running on the system control computer 1123, the component described in the specification and illustrated in Figure 1c, labeled as the remote order processing and item database 300, the dispatching control software, multiple database servers, and/or other computer systems. Alternatively, the component is a system operator.	See, '992 patent, claim 22, step 1.
'992 patent, Claim 46, step 2	receiving transmission requests to transmit available items; and	The components described in the specification and illustrated by Block Diagram 1c, 2a, and 2b labeled:	See, '992 patent, claim 19, step 2.

Claim 46 of the '992 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
		(1) the library system control computer 1123; or	
		(2) the library system control computer 1123 and the library access interface 121; or	
		(3) the library system control computer 1123, the library access interface 121, and an operator; or	
		(4) the source material library 111; or	
		(5) the remote order processing and item database 300.	
'992 patent, Claim 46, step 3	retrieving stored formatted data blocks corresponding to requests from users.	The components described in the specification and illustrated by Block Diagram 2b, labeled Transmission Conversion CPU 119.	See, '992 patent, claim 19, step 3.

Receiving System of Claim 46 of the '992 Patent B.

There is no step in claim 46 of the '992 patent which involves the receiving system.

XI. Claim 2 of the '275 Patent

Transmission System of Claim 2 of the '275 Patent A.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 2, the following components are necessary to perform the following steps:

Claim 2 of the '275 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'275 patent, Claim 2, step 1	storing, in the transmission system, information from items in a compressed data form, the information including an identification code and being placed into ordered data blocks;	The component described in the specification and illustrated by Block Diagram 2b, labeled compressed data library 118.	See, '992 patent, claim 19, step 1.
'275 patent, Claim 2, step 2	sending a request, by the user to the transmission system, for at least a part of the stored information to be transmitted to a reception system associated with a receiving system at one of the remote locations selected by the user;	The components described in the specification and illustrated by Block Diagram 1c, 2a, and 2b labeled: (1) the library system control computer 1123; or (2) the library system control computer 1123 and the library access interface 121; or (3) the library system control computer 1123, the library access interface 121, and an operator; or (4) the source material library 111; or (5) the remote order processing and item database 300.	See, '992 patent, claim 19, step 2.
'275 patent, Claim 2, step 3	sending at least a portion of the stored information from the transmission	The components described in the specification and illustrated by Block Diagram 2b, labeled:	See, '992 patent, claim 19, step 3

Claim 2 of the '275 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
	system to the reception system;	(1) compressed data library 118, library system control computer 1123, transmission format conversion CPU 119, and transceiver 122, or (2) compressed data library 118, library system control computer 1123, and library access interface 121.	

В. Receiving System of Claim 2 of the '275 Patent

The receiving system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a receiving system. With respect to Claim 2, the following components are necessary to perform the following steps:

Claim 2 of the '275 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'275 patent, Claim 2, step 4	receiving the sent information by the reception system;	The component described in the specification and illustrated by Block Diagram 6, labeled 201.	See, '992 patent, claim 19, step 4.
'275 patent, Claim 2, step 5	storing a complete copy of the received information in the reception system; and	The components described in the specification and illustrated by Block Diagram 6, labeled 203 or the components described in the specification and illustrated by Block Diagram 1f, labeled 200c.	See, '992 patent, claim 19, step 5.
'275 patent, Claim 2, step 6	playing back the stored copy of the information from the reception system to the	The components described in the specification and illustrated by Block Diagram 6, labeled output	See, '992 patent, claim 19, step 6.

Claim 2 of the '275 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
	receiving system at the selected remote location at a time requested by the user.	data formatter labeled "compressed", output data formatters labeled 211, 212, 213, and/or 214 and illustrated by Block Diagram 1f, and/or by Block Diagram 1g, labeled 200d. Components labeled data formatter 204 and decompressors 208 and/or 209 are optional.	

XII. Claim 5 of the '275 Patent

Transmission System of Claim 5 of the '275 Patent A.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 5, the following components are necessary to perform the following steps:

Claim 5 of the '275 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'275 patent, Claim 5, step 1	storing, in the transmission system, information from items in a compressed data form, the information including an identification code and being placed into ordered data blocks;	The component described in the specification and illustrated by Block Diagram 2b, labeled compressed data library 118.	See, '992 patent, claim 19, step 1.
'275 patent, Claim 5, step 2	sending a request, by the user to the transmission system, for at least a part of the stored	The components described in the specification and illustrated by Block Diagram 1c, 2a, and 2b	See, '992 patent, claim 19, step 2.

2	Claim 5 of the '275 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
3		information to be transmitted to a	labeled:	
4		reception system associated with a	(1) the library system control computer 1123; or	
5		receiving system at	•	
6		one of the remote locations selected	(2) the library system control computer 1123	
7		by the user;	and the library access interface 121; or	
8			·	
9			(3) the library system control computer 1123,	
10			the library access interface 121, and an	
11			operator; or	
12			(4) the source material library 111; or	
13			•	
14			(5) the remote order processing and item	
15			database 300.	
16	'275	sending at least a	The components	See, '992 patent, claim 19, step 3.
17	patent, Claim 5,	portion of the stored information	described in the specification and	
	step 3	from the transmission	illustrated by Block Diagram 2b, labeled:	
18		system to the		
19		reception system;	(1) compressed data library 118, library	
20			system control computer 1123, transmission format	
21			conversion CPU 119, and	
22			transceiver 122, or	
23			(2) compressed data library 118, library	
24			system control computer	
25			1123, and library access interface 121.	

B. Receiving System of Claim 5 of the '275 Patent

The receiving system of the present invention as described in the specification, comprising all necessary components to perform each step

26

27

required to be performed by, on, or with a receiving system. With respect to Claim 5, the following components are necessary to perform the following steps:

Claim 5 of the '275 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'275 patent, Claim 5, step 4	receiving the sent information by the reception system;	The component described in the specification and illustrated by Block Diagram 6, labeled 201.	See, '992 patent, claim 19, step 4.
'275 patent, Claim 5, step 5	storing a complete copy of the received information in the reception system; and	The components described in the specification and illustrated by Block Diagram 6, labeled 203 or the components described in the specification and illustrated by Block Diagram 1f, labeled 200c.	See, '992 patent, claim 19, step 5.
'275 patent, Claim 5, step 6	playing back the stored copy of the information sent over a cable communication path from the reception system to the receiving system at the selected remote location at a time requested by the user.	The components described in the specification and illustrated by Block Diagram 6, labeled output data formatter labeled "compressed", output data formatters labeled 211, 212, 213, and/or 214 and illustrated by Block Diagram 1f, and/or by Block Diagram 1g, labeled 200d. Components labeled data formatter 204 and decompressors 208 and/or 209 are optional.	See, '992 patent, claim 19, step 6.

XIII. Claim 14 of the '863 Patent

A. Transmission System of Claim 14 of the '863 Patent

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 14, the following components are necessary to perform the following steps:

Claim 14 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'863 patent, Claim 14, step 1	transmitting compressed, digitized data representing a complete copy of at least one item of audio/video information at a non-real time rate from a central processing location;	The components described in the specification and illustrated by Block Diagram 2b, labeled: (1) compressed data library 118, library system control computer 1123, transmission format conversion CPU 119, and transceiver 122, or (2) compressed data library 118, library system control computer 1123, and library access interface 121.	See, '992 patent, claim 19, step 3.
'863 patent, Claim 14, step 6	inputting an item having information into the transmission system;	The component described in the specification and illustrated by Block Diagram 2a, labeled source material library 111 and/or components described in the specification and illustrated by Block Diagram 2a labeled as 124 and/or 127.	See, '992 patent, claim 41, steps 1 and 4.
'863 patent, Claim 14, step 7	assigning a unique identification code to the item having information;	The components described in the specification and illustrated by Block Diagram 2a, labeled 112 and identified in the specification as the identification encoder and a system operator.	See, '992 patent, claim 41, step 3.
'863 patent, Claim 14, step 8	formatting the item having information as a sequence of addressable data	The components described in the specification and illustrated by Block Diagram 2a, components	See, '992 patent, claim 41, steps 4 and 5.

Claim 14 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
	blocks;	123a and/or 123b and /or components 125a and/or 125b.	
		The component described in the specification and illustrated by Block diagram 2a, labeled 114.	
'863 patent, Claim 14, step 9	compressing the formatted and sequenced data blocks;	The component described in the specification and illustrated by Block diagram 2a, labeled 116, including audio compressor 128 and/or video compressor 129. The precompression processor 115 is optional.	See, '992 patent, claim 41, step of
'863 patent, Claim 14, step 10	storing, as a file, the compressed, formatted, and sequenced data blocks with the assigned unique identification code; and	The components described in the specification and illustrated by Block Diagram 2a, labeled as 117 (including, but only optionally, 117') and 118.	See, '992 patent, claim 41, step
'863 patent, Claim 14, step 11	sending at least a portion of the file at the non-real time rate to the local distribution system.	The components described in the specification and illustrated by Block Diagram 2b, labeled:	See, '992 patent, claim 41, step 8
		(1) compressed data library 118, library system control computer 1123, transmission format conversion CPU 119, and transceiver 122, or	
		(2) compressed data library 118, library system control computer 1123, and library access interface 121.	

B. Receiving System of Claim 14 of the '863 Patent

The receiving system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a receiving system. With respect to Claim 14, the following components are necessary to perform the following steps:

Claim 14 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'863 patent, Claim 14, step 2	receiving the transmitted compressed, digitized data representing a complete copy of the at least one item of audio/video information, at a local distribution system remote from the central processing location;	The component described in the specification and illustrated by Block Diagram 6, labeled 201.	See, '992 patent, claim 19, step 4.
'863 patent, Claim 14, step 3	storing the received compressed digitized data representing the complete copy of the at least one item at the local distribution system;	The components described in the specification and illustrated by Block Diagram 6, labeled 203 or the components described in the specification and illustrated by Block Diagram 1f, labeled 200c.	See, '992 patent, claim 19, step 5.
'863 patent, Claim 14, step 4	in response to the stored compressed, digitized data, transmitting a representation of the at least one item at a real-time rate to at least one of a plurality of subscriber receiving stations coupled to the local distribution system;	The components described in the specification and illustrated by Block Diagram 6, labeled output data formatters 211, 212, 213, and/or 214 and illustrated by Block Diagram 1f, and/or by Block Diagram 1g, labeled 200d.	See, '992 patent, claim 41, step 8. According to the specification, compressed or decompressed information can be transmitted from a receiving system using transmitter 200d or a cable television transmitter. Claim 14 of the '992 patent specifies, however, that only decompressed information is transmitted.

Claim 14 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
	and		
'863 patent, Claim 14, step 5	decompressing the compressed, digitized data representing the at least one item of audio/video information after the transmission step wherein the decompressing step is performed in the local distribution system to produce the representation of the at least one item for transmission to the at least one subscriber station;	The components described in the specification and illustrated by Block Diagram 6, labeled 204, 208 and/or 209.	See, '992 patent, claim 19, step 6.

XIV. Claim 15 of the '863 Patent

Transmission System of Claim 15 of the '863 Patent A.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 15, the following components are necessary, in addition to the components of claim 14, to perform the following steps:

Claim 15 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'863 patent, Claim 15, step 1	inputting the item having information as blocks of digital data.	The component described in the specification and illustrated by Block Diagram 2a, labeled source material library 111 and/or components described in the specification and illustrated by Block	See, '992 patent, claim 41, steps 1 and 4.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Claim 15 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
		Diagram 2a labeled as 124 and/or 127.	

В. Receiving System of Claim 15 of the '863 Patent

There is no step in claim 15 of the '863 patent which involves the receiving system.

Claim 16 of the '863 Patent XV.

Transmission System of Claim 16 of the '863 Patent A.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 16, the following components are necessary, in addition to the components of claim 14, to perform the following steps:

Claim 16 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'863 patent, Claim 16, step 1	inputting the item having information as an analog signal;	The component described in the specification and illustrated by Block Diagram 2a, labeled source material library 111 and/or components described in the specification and illustrated by Block Diagram 2a labeled as 124 and/or 127.	See, '992 patent, claim 41, steps 1 and 4.
'863 patent, Claim 16, step 2	converting the analog signal to blocks of digital data.	The components described in the specification and illustrated by Block Diagram 2a, labeled as 127, including 123a and/or 123b.	See, '992 patent, claim 41, step 4.

В. **Receiving System of Claim 16 of the '863 Patent**

There is no step in claim 16 of the '863 patent which involves the receiving system.

Claim 17 of the '863 Patent XVI.

Transmission System of Claim 17 of the '863 Patent A.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 17, the following components are necessary to perform the following

Claim 17 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'863 patent, Claim 17, step 1	transmitting compressed, digitized data representing a complete copy of at least one item of audio/video information from the central processing location;	The components described in the specification and illustrated by Block Diagram 2b, labeled: (1) compressed data library 118, library system control computer 1123, transmission format conversion CPU 119, and transceiver 122, or (2) compressed data library 118, library system control computer 1123, and library access interface 121.	See, '992 patent, claim 19, step 3.
'863 patent, Claim 17, step 5	inputting an item having information into the transmission system;	The component described in the specification and illustrated by Block Diagram 2a, labeled source material library 111 or components described in the specification and illustrated by Block Diagram 2a labeled as 124 and/or 127.	See, '992 patent, claim 41, steps 1 and 4.
'863 patent, Claim 14, step 6	assigning a unique identification code to the item having information;	The components described in the specification and illustrated by Block Diagram 2a, labeled 112	See, '992 patent, claim 41, step 3.

Claim 17 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
		and identified in the specification as the identification encoder and a system operator.	
'863 patent, Claim 14, step 7	formatting the item having information as a sequence of addressable data blocks; and	The components described in the specification and illustrated by Block Diagram 2a, components 123a and/or 123b and/or components 125a and/or 125b. The component described in the specification and illustrated by Block diagram 2a, labeled 114.	See, '992 patent, claim 41, steps 4 and 5.
'863 patent, Claim 14, step 8	compressing the formatted and sequenced data blocks;	The component described in the specification and illustrated by Block diagram 2a, labeled 116, including audio compressor 128 and/or video compressor 129. The precompression processor 115 is optional.	See, '992 patent, claim 41, step 6.

B. Receiving System of Claim 17 of the '863 Patent

The receiving system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a receiving system. With respect to Claim 17, the following components are necessary to perform the following steps:

Claim 17 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'863 patent, Claim 17,	receiving the transmitted compressed, digitized data	The component described in the specification and illustrated by Block	See, '992 patent, claim 19, step 4.

Claim 17 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
step 2	representing a complete copy of the at least one item of audio/video information, at a local distribution system;	Diagram 6, labeled 201.	
'863 patent, Claim 17, step 3	storing the received compressed, digitized data representing the complete copy of the at least one item at a local distribution system; and	The components described in the specification and illustrated by Block Diagram 6, labeled 203 or the components described in the specification and illustrated by Block Diagram 1f, labeled 200c.	See, '992 patent, claim 19, step 5.
'863 patent, Claim 17, step 4	using the stored compressed, digitized data to transmit a representation of the at least one item to at a plurality of subscriber receiving stations coupled to the local distribution system;	The components described in the specification and illustrated by Block Diagram 6, labeled compressed output data formatter, output data formatters 211, 212, 213, and/or 214 and illustrated by Block Diagram 1f, and/or by Block Diagram 1g, labeled 200d. Components labeled data formatter 204 and decompressors 208 and/or 209 are optional.	See, '863 patent, claim 14, step 4.

XVII. Claim 18 of the '863 Patent

Transmission System of Claim 18 of the '863 Patent A.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 18, the following components are necessary, in addition to the components of claim 17, to perform the following steps:

Claim 18 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"	
'863 patent, Claim 18, step 1	inputting the item having information as blocks of digital data.	The component described in the specification and illustrated by Block Diagram 2a, labeled source material library 111 and/or components described in the specification and illustrated by Block Diagram 2a labeled as 124 and/or 127.	See, '992 patent, claim 41, steps 1 and 4.	

В. Receiving System of Claim 18 of the '863 Patent

There is no step in claim 18 of the '863 patent which involves the receiving system.

XVIII. Claim 19 of the '863 Patent

A. Transmission System of Claim 19 of the '863 Patent

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 19, the following components are necessary, in addition to the components of claim 14, to perform the following steps:

Claim 19 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'863 patent, Claim 19, step 1	inputting the item having information as an analog signal;	The component described in the specification and illustrated by Block Diagram 2a, labeled source material library 111 and/or components described in the specification and illustrated by Block Diagram 2a labeled as 124 and/or 127.	See, '992 patent, claim 41, steps 1 and 4.
'863 patent, Claim 19,	converting the analog signal to blocks of digital	The components described in the specification and	See, '992 patent, claim 41, step 4.

Claim 19 of the '863 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
step 2	data.	illustrated by Block Diagram 2a, labeled as 127, including 123a and/or 123b.	

Receiving System of Claim 19 of the '863 Patent B.

There is no step in claim 19 of the '863 patent which involves the receiving system.

Claim 8 of the '720 Patent XIX.

Transmission System of Claim 8 of the '720 Patent A.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 8, the following components are necessary to perform the following steps:

Claim 8 of the '720 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'720 patent, Claim 8, step 1	transmitting compressed, digitized data representing a complete copy of at least one item of audio/video information at a non-real time rate from a central processing location to a local distribution system remote from the central processing location;	The components described in the specification and illustrated by Block Diagram 2b, labeled: (1) compressed data library 118, library system control computer 1123, transmission format conversion CPU 119, and transceiver 122, or (2) compressed data library 118, library system control computer 1123, and library access interface 121.	See, '992 patent, claim 41, step 8.

В. Receiving System of Claim 8 of the '720 Patent

The receiving system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a receiving system. With respect to Claim 8, the following components are necessary to perform the following

Claim 8 of the '720 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'720 patent, Claim 8, step 2	receiving, into a receiving means, the transmitted compressed, digitized data representing a complete copy of the at least one item;	The component described in the specification and illustrated by Block Diagram 6, labeled 201.	See, '992 patent, claim 19, step 4.
'720 patent, Claim 8, step 3	storing, in a storing means, the received compressed, digitized data representing the complete copy of the at least one item at the local distribution system; and	The components described in the specification and illustrated by Block Diagram 6, labeled 203 or the components described in the specification and illustrated by Block Diagram 1f, labeled 200c.	See, '992 patent, claim 19, step 5.
'720 patent, Claim 8, step 4	in response to the stored compressed, digitized data, transmitting, using a transmitting means, a representation of the at least one item at a real-time rate to at least one of a plurality of subscriber selectable receiving stations coupled to the local distribution system, wherein the	The components described in the specification and illustrated by Block Diagram 6, output data formatter labeled "compressed", output data formatters labeled 211, 212, 213, and/or 214 and illustrated by Block Diagram 1f, and/or by Block Diagram 1g, labeled 200d. Components labeled data formatter 204 and decompressors 208 and/or	See, '863 patent, claim 14, step 4.

Claim 8 of the '720 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
	receiving means, the storing means, and the transmitting means are positioned at the same location, and wherein the at least one of the plurality of subscriber selectable stations is located at a premises geographically separated from the local distribution system.	209 are optional.	

XX. Claim 11 of the '720 Patent

Transmission System of Claim 11 of the '720 Patent A.

The transmission system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a transmission system. With respect to Claim 11, the following components are necessary to perform the following steps:

Claim 11 of the '720 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'720 patent, Claim 11, step 1	formatting items of audio/video information as compressed digitized data at a central processing location	The components described in the specification and illustrated by Block Diagram 2a, labeled as 113. Component 113 includes components 124 and/or 127. Component 113 also includes component 123 which includes components 123a and/or 123b and includes component 125, which includes components 125a and/or	See, '992 patent, claim 41, steps 4, 5, and 6.

Claim 11 Claim Language of the '720 patent		Component	"Cooperative Relationships" and "Optional Components"
		The component described in the specification and illustrated by Block diagram 2a, labeled 114 is optional. The component described in the specification and illustrated by Block diagram 2a, labeled 116, including audio compressor 128 and/or video compressor 129. The precompression processor 115 is optional.	
'720 patent, Claim 11, step 2	transmitting compressed, digitized data representing a complete copy of at least one item of audio/video information from the central processing location;	The components described in the specification and illustrated by Block Diagram 2b, labeled: (1) compressed data library 118, library system control computer 1123, transmission format conversion CPU 119, and transceiver 122, or (2) compressed data library 118, library system control computer 1123, and library access interface 121.	See, '992 patent, claim 19, step 3.

Receiving System of Claim 11 of the '720 Patent B.

The receiving system of the present invention as described in the specification, comprising all necessary components to perform each step required to be performed by, on, or with a receiving system. With respect to Claim 11, the following components are necessary to perform the following steps:

Claim 11 of the '720 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
'720 patent, Claim 11, step 3	receiving, into a receiving means, the transmitted compressed, digitized data representing a complete copy of the at least one item of audio/video information at a local distribution system;	The component described in the specification and illustrated by Block Diagram 6, labeled 201.	See, '992 patent, claim 19, step 4.
'720 patent, Claim 11, step 4	storing, in a storing means, the received compressed, digitized data representing the complete copy of the at least one item at the local distribution system; and	The components described in the specification and illustrated by Block Diagram 6, labeled 203 or the components described in the specification and illustrated by Block Diagram 1f, labeled 200c.	See, '992 patent, claim 19, step 5.
'720 patent, Claim 11, step 5	using the stored compressed, digitized data to transmit using a transmitting means a representation of the at least one item to at least one of a plurality of subscriber selectable receiving stations coupled to the local distribution system, wherein the receiving means, the storing means, and the transmitting means are positioned at the same location, and wherein the at least	The components described in the specification and illustrated by Block Diagram 6, output data formatter labeled "compressed", output data formatters labeled 211, 212, 213, and/or 214 and illustrated by Block Diagram 1f, and/or by Block Diagram 1g, labeled 200d. Components labeled data formatter 204 and decompressors 208 and/or 209 are optional.	See, '863 patent, claim 14, step 4.

DORMAN LLP	
Ø	
, BENNETT	LAWYERS
HENNIGAN	

LOS ANGELES. CALIFORNIA		

Claim 11 of the '720 patent	Claim Language	Component	"Cooperative Relationships" and "Optional Components"
	one of the plurality of subscriber selectable stations is located at a premises geographically separated from the location of the local distribution system.		

DATED: November 2, 2007 HENNIGAN BENNETT & DORMAN LLP

By /S/ Alan P. Block Alan P. Block

Attorneys for Plaintiff, ACACIA MEDIA TECHNOLOGIES CORPORATION

2

3

4

5

6

7

8

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action; my business address is 865 South Figueroa Street, Suite 2900, Los Angeles, California 90017.

On November 2, 2007, I served the within documents described as follows:

PLAINTIFF ACACIA MEDIA TECHNOLOGY CORPORATION'S MEMORANDUM PURSUANT TO COURT'S OCTOBER 19, 2007 ORDER RE: PROPOSED LIST OF COMPONENTS FOR THE TRANSMISSION SYSTEM AND THE RECEIVING SYSTEM WITH RESPECT TO THE ASSERTED METHOD CLAIMS on the interested parties in this action by transmitting via United States District Court for the Northern District of California Electronic Case Filing Program the document listed above by uploading the electronic files for each of the above listed documents on this date, addressed as set forth on the attached Service List.

The above-described document was also transmitted to the parties indicated below, by Federal Express only.

Chambers of the Honorable James Ware	
Attn: Regarding Acacia Litigation	
280 South First Street	
San Jose, CA 95113	
3 copies	
-	

I am readily familiar with Hennigan, Bennett & Dorman LLP's practice in its Los Angeles office for the collection and processing of federal express with Federal Express.

Executed on November 2, 2007, at Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/S/ Lisa McCorry	
Lisa McCorry	

05 CV 01114 JW PROOF OF SERVICE

SERVICE LIST

1	SERVICE DIST			
2	Juanita R. Brooks Todd G. Miller	Jonathan E. Singer William R. Woodford		
3	Fish & Richardson 12390 El Camino Real	Fish & Richardson 60 South Sixth Street, Suite 3300		
4	San Diego, California 92130-2081 Counsel for:	Minneapolis, Minnesota 55402 Counsel for:		
5	ACMP LLC;Ademia Multimedia LLC; Adult Entertainment Broadcast Network;	ACMP LLC; Ademia Multimedia LLC; Adult Entertainment Broadcast Network;		
6	Adult Revenue Services; Audio Communications; CJ Inc.; Club Jenna Inc.;	Adult Revenue Services; Audio Communications; CJ Inc.; Club Jenna Inc.;		
7	Cyber Trend Inc.; Cybernet Ventures Inc.; Game Link Inc.; Global AVS Inc.; Innovative	Cyber Trend Inc.; Cybernet Ventures Inc.; Game Link Inc.; Global AVS Inc.; Innovative		
8	Ideas International; Lightspeedcash; National A-1 Advertising Inc.; New Destiny Internet Group LLC; VS Media Inc.	Ideas International; Lightspeedcash; National A-1 Advertising Inc.; New Destiny Internet Group LLC; VS Media Inc.		
10	Victor De Gyarfas	Gary A. Hecker		
11	William J. Robinson Foley & Lardner	James Michael Slominski Hecker Law Group		
12	2029 Century Park E, 35th Floor Los Angeles, California 90067	1925 Century Park East, Suite 2300 Los Angeles, California 90067		
13	Counsel for: International Web Innovations, Inc.	Counsel for: Offendale Commercial Limited BV		
14	Mark D. Schneider	Alfredo A. Bismonte		
15	Gifford, Krass, Groh, Sprinkle, Anderson and Citkowski	Daniel H. Fingerman Bobby T. Shih		
16	280 N. Old Woodward Avenue, Suite 400 Birmingham, Michigan 48009-5394	Mount & Stoelker, P.C. River Park Tower, 17th Floor		
17	Counsel for: Askcs.com Inc.	333 W. San Carlos St. San Jose, CA 95110 Counsel for:		
18		Askes.com Inc.		
19	Adam Robert Alper David Allen York	Rachel Krevans Jason A. Crotty		
20	Latham & Watkins 135 Commonwealth Drive	Paul A. Friedman Morrison & Foerster LLP		
21	Menlo Park, California 94025 Counsel for:	425 Market Street San Francisco, California 94105-2482		
22	AP Net Marketing Inc.; ICS Inc.	Counsel for: Satellite LLC; Echostar Technologies		
23		Corporation; Echostar Communications Corporation		
24	David C. Doyle			
25	Morrison & Foerster LLP 3811 Valley Centre Dr., Suite 500			
26	San Diego, California 92130 Counsel for:			
27	Echostar Technologies Corporation			
28				

05 CV 01114 JW

1	Annemarie A. Daley	Richard R. Patch
	Stephen P. Safranski	J. Timothy Nardell
2	Robins Kaplan Miller & Ciresi LLP	Coblentz, Patch, Duffy & Bass LLP
	2800 LaSalle Plaza	One Ferry Building, Suite 200
3	800 LaSalle Avenue	San Francisco, California 94111-4213
4	Minneapolis, Minnesota 55402	Counsel for:
4	Counsel for:	Coxcom, Inc.; Hospitality Network, Inc.
5	Coxcom, Inc.; Hospitality Network, Inc.	
3	Joffrey H. Doon	William R. Overend
6	Jeffrey H. Dean Kevin D. Hogg	Morgan D. Tovey
	Bradford P. Lyerla	Reed Smith Crosby Heafey
7	Carl E. Myers	Two Embarcadero Center, Suite 2000
	Marshall Gerstein & Borun LLP	San Francisco, California 94111
8	6300 Sears Tower	Counsel for:
	233 South Wacker Drive	Charter Communications, Inc.
9	Chicago, Illinois 60606	
10	Counsel for:	
10	Armstrong Group; Arvig Communication	
11	Systems; Charter Communications, Inc.; East Cleveland TV and Communications LLC;	
11	Massillon Cable TV, Inc.; Wide Open West LLC	
12	Mussilion Cable IV, Inc., Wide Open West LLC	
	Daralyn J. Durie	Victor G. Savikas
13	Joshua H. Lerner	Kevin G. McBride
	David J. Silbert	Maria K. Nelson
14	Keker & Van Nest LLP	Marsha E. Mullin
1.5	710 Sansome Street	Jones Day
15	San Francisco, California 94111	555 South Flower Street, 50th Floor
16	Counsel for:	Los Angeles, California 90071
10	Comcast Cable Communications, LLC; Insight Communications, Inc.	Counsel for: DirecTV Group, Inc.
17	Communications, Inc.	Bucciv Group, inc.
	Stephen E. Taylor	Mitchell D. Lukin
18	Jan J. Klohonatz	Baker Botts L.L.P.
1.0	Taylor & Co. Law Offices, Inc.	One Shell Plaza
19	One Ferry Building, Suite 355	910 Louisiana
20	San Francisco, California 94111	Houston, Texas 77022
20	Counsel for:	Counsel for:
21	Mediacom Communications Corporation	Mediacom Communications Corporation; Bresnan Communications
21		Bresnan Communications
22	Jeffrey D. Sullivan	Rebecca Anne Bortolotti
	Michael J. McNamara	John Christopher Reich
23	Baker Botts L.L.P.	Albert L. Underhill
	30 Rockefeller Plaza	Merchant & Gould
24	New York, New York 10112	80 S. 8th Street, Suite 3200
25	Counsel for:	Minneapolis, Minnesota 55402
25	Mediacom Communications Corporation;	Counsel for:
26	Bresnan Communications	Arvig Communications Systems; Cannon
۷		Valley Communications, Inc.; Loretel
27		Cablevision; Mid-Continent Media, Inc.;
- '		Savage Communications, Inc.; Sjoberg's Cablevision, Inc.; US Cable Holdings LP
28		Cuotevision, Inc., OS Cuote Houtings Li
ŀ		

05 CV 01114 JW PROOF OF SERVICE

27

28

1	Sean David Garrison	C. Mark Kittredge
2	Robert Francis Copple	Perkins Coie Brown & Bain PA
2	Lewis & Roca LLP 40 N. Central Avenue	P.O. Box 400 Phoenix, Arizona 85001-0400
3	Phoenix, Arizona 85004-4429	Counsel for:
	Counsel for:	Cable One Inc.
4	Cable America Corp.	
5	Troy Blinn Forderman	Gregory T. Spalj
	George Chun Chen	Fabyanske Westra & Hart PA
6	Bryan Cave LLP	800 LaSalle Avenue, Suite 1900
7	2 N. Central Avenue, Suite 2200 Phoenix, Arizona 85004-4406	Minneapolis, Minnesota 55402 Counsel for:
,	Counsel for:	Cable System Service, Inc.
8	Cable System Service Inc.	
9	Patrick J. Whalen	Fritz Byers
10	Spencer Fan Britt & Brown LLP	824 Spitzer Bulding
10	1000 Walnut Street, Suite 1400	520 Madison Avenue
11	Kansas City, Missouri 64106 Counsel for:	Toledo, Ohio 43604 Counsel for:
	NPG Cable Inc.	Block Communications, Inc.
12		M.I. C.F.
13	Clay K. Keller Buckingham, Doolittle & Burroughs	Melissa G. Ferrario Barry S. Goldsmith
	50 South Main Street	Gary H. Nunes
14	Akron, Ohio 44308	Womble Carlyle Sandridge & Rice
15	Counsel for: Nelsonville TV Cable, Inc.	8065 Leesburg Pike, Fourth Floor Tysons Corner, VA 22182
13	Neisonville IV Cable, Inc.	Counsel for:
16		Nelsonville TV Cable, Inc.
17	Chaistanhan D. Fasan	Stanban S. Vamiarlay
1,	Christopher B. Fagan Fay Sharpe Fagan Minnich & McKee	Stephen S. Korniczky James V. Fazio
18	1100 Superior Avenue, Seventh Floor	Paul Hastings Janofsky & Walker LLP
19	Cleveland, Ohio 44114-2518	3579 Valley Centre Drive
	Counsel for: Armstrong Group; East Cleveland TV and	San Diego, CA 92130 Counsel for:
20	Communications LLC; Massillon Cable TV,	Cebridge Connections
21	Inc.; Wide Open West, LLC	
22	Benjamin Hershkowitz	David S. Benyacar
22	Goodwin Proctor LLP	Daniel Reisner Keye Scholer II P
23	599 Lexington Avenue New York, NY 10022	Kaye Scholar LLP 425 Park Avenue
_	Counsel for:	New York, NY 10022
24	CSC Holdings, Inc.	Counsel for:
25		Time Warner Cable, Inc.

05 CV 01114 JW