

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

OPENTV, INC.

Petitioner

v.

CISCO SYSTEMS, INC., CISCO TECHNOLOGY INC., SCIENTIFIC-
ATLANTA, LLC, SCIENTIFIC-ATLANTA, INC. AND NDS AMERICAS INC.

Patent Owner

CASE: Unassigned

Patent No. 7,505,592 B2

TRANSMITTAL LETTER FOR PETITION FOR *INTER PARTES* REVIEW

Patent Trial and Appeal Board,

Petitioner and Real Party in Interest OpenTV, Inc. hereby submits the following documents for filing a petition for *inter partes* review of U.S. Patent No. 7,505,592 B2 entitled “Apparatus For Entitling And Transmitting Service Instances To Remote Client Devices” which issued March 17, 2009.

Petitioner requests review and rejection of all claims, claims 1-20, of the U.S. Patent No. 7,505,592 B2 and cancellation of U.S. Patent No. 7,505,592 B2.

I. List of Documents Filed with This Petition

1. Transmittal Letter for Petition for *Inter Partes* Review (4 pages);
2. Petition for *Inter Partes* Review of U.S. Patent No. 7,505,592 B2
 - 2.1. Table of Contents (3 pages)
 - 2.1. Exhibit List (1 page)
 - 2.3. Main Body of Petition (60 pages)
 - 2.4. Certificate of Service (1 page)
 - 2.5. Ten (10) Exhibits in Support of the Petition:
 - Ex. 1001: U.S. Patent No. 7,505,592 (“the ‘592 Patent”) (28 pages)
 - Ex. 1002: U.S. Patent No. 5,790,935 (“Payton”) (17 pages)
 - Ex. 1003: U.S. Patent No. 7,698,723 (“Hicks”) (20 pages)
 - Ex. 1004: U.S. Patent Pub. No. 2002/0146237 (“Safadi”) (10 pages)
 - Ex. 1005: U.S. Patent Pub. No. 2003/0110234 (“Egli”) (32 pages)
 - Ex. 1006: U.S. Patent Pub. No. 2003/0135859 (“Putterman”) (19 pages)
 - Ex. 1007: Michael Perkins PhD Declaration (with Appendices) (744 pages)
 - Ex. 1008: The ‘592 Patent File History (965 pages)
 - Ex. 1009: Prior Art Matrix (1 page)
 - Ex. 1010: IEEE Dictionary Excerpt (4 pages)
3. Power of Attorney Executed by Petitioner OpenTV, Inc. (2 pages)

II. Counsel for Petitioner

Petitioner appoints the following counsel and information for service:

LEAD COUNSEL	BACK-UP COUNSEL
Amy E. Simpson USPTO Reg. No. 54,688 Perkins Coie LLP 11988 EL Camino Real, Suite 200 San Diego, CA 92130 Phone: 858-720-5702 Fax: 858-720-5799 opentv-cisco-ipr@perkinscoie.com	Bing Ai USPTO Reg. No. 43,312 Perkins Coie LLP 11988 EL Camino Real, Suite 200 San Diego, CA 92130 Phone: 858-720-5707 Fax: 858-720-5799 opentv-cisco-ipr@perkinscoie.com
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Pursuant to 37 C.F.R. § 42.10(b), a Power of Attorney for appointing the above designated counsel for this Petition by OpenTV, Inc. is concurrently filed.

III. Payment of Fees

The Office is authorized to charge \$25,000.00 for this Petition for *Inter Partes* Review of claims 1-20 of the '592 Patent to Deposit Account No. 50-5252 as required under 37 C.F.R. § 42.15(a) and pursuant to the current official fee schedule effective on March 19, 2013. The above total fee of \$25,000.00 includes \$9,000.00 in *inter partes* review request fee for up to 20 claims and \$14,000.00 in *inter partes* review post-institution fee for up to 15 claims and \$2,000 in post-

institution excess claims fee. The Office is further authorized to charge any other fees or apply any credit in connection with this Petition to the above referred Deposit Account.

IV. Compliance Statements

This submission meets statutory requirements under 35 U.S.C. §§ 311 and 312 and complies with requirements under relevant patent rules, inter alia, 35 C.F.R. §§ 42.6, 42.8, 42.22 and 42.100 through 42.106. In addition, this submission complies with requirements under *The Office Patent Trial Practice Guide* issued on August 12, 2012.

Dated: June 4, 2013

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Respectfully submitted,

/Amy E. Simpson/

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Nicholas T. Bauz , Reg. No. 41,604

Attorneys for Petitioner OpenTV, Inc.