EXHIBIT A

Preliminary Infringement Claim Chart for U.S. Pat. No. 6,233,389

Samsung DVRs

the Claim	Samsung DVRs ¹
Claim 1	
1[a]. A process for the simultaneous storage and play back of multimedia data, comprising the steps of:	A Samsung DVR can simultaneously store and play back multimedia data. <i>See, e.g.</i> , <u>http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf</u> (Samsung SMT-H3090 2008 User Guide), p. 2 ("Viewing one program while recording another program." "Simultaneous Time Shifted Buffering for two Programs."); p. 9 ("Record two live TV programs simultaneously while watching two recorded programs on HDD.") "TIME WARNER CABLE AND SAMSUNG FORGE AGREEMENT FOR TRU2WAY SET-TOP DEVELOPMENT, PURCHASE & DEPLOYMENT Release Date: 07/06/2009
	Time Warner Cable and Samsung today announced that they have signed a letter of commitment for the continued development, purchase and deployment of Samsung True2Way enabled set-top boxes, including the first second-source DVR. "We look to offer our customers advanced set-top boxes with features that are simple and easy to use," said Mike Hayashi, Executive Vice President of Advanced Engineering for Time Warner Cable. "We have been a leader in the roll-out of Tru2Way devices and we are continuing to grow our relationship with Samsung, a CE company dedicated to the development of new equipment meeting the necessary standards and offering attractive feature sets." Thomas Rhee, SVP, New Business Development for Samsung, added, "We are thrilled to have worked closely with Time Warner Cable to launch Tru2way on our family of cable set-tops including the SMT-H3090 and SMT-H3270 High Definition DVRs. As in Korea, we look forward to the expansion of Tru2way in North America." This agreement further solidifies Time Warner Cable's commitment to its deployment of Tru2Way enabled set-top boxes. To date Time Warner Cable has deployed over 2 million Tru2Way set-top boxes, of which approximately 400,000 are Samsung boxes. Time Warner Cable and Samsung also recently signed an MOU that focuses on collaborating in development of better home

¹ In this chart, reference is made to a Samsung DVR identified as SMT-H3090. The same analysis applies to other Samsung DVRs with the same functionality, including but not limited to set top boxes with DVR functionality bearing the model designations, SMT-H3272, SMTH3270, and SMT-H4372 and other DVRs having the same functionality. Additionally, this chart also references the specific processor included in the SMT-H3090. The same analysis applies to DVRs that include other processors with the same functionality, for example the processors in each of the accused DVRs.

EXHIBIT A TO TIVO INFRINGEMENT CONTENTIONS '389 PATENT SAMSUNG DVRS

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the Claim	Samsung DVRs ¹			
	networking solutions for entertainment. This work is part of Time Warner Cable's continuing efforts to provide its customers			
	with technology that brings new levels of ease and convenience."			
	http://www.timewarnercable.com/corporate/about/inthenews.ashx?PRID=2626&MarketID=0			

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the Claim	Samsung DVRs ¹
[1b] accepting	A Samsung DVR accepts television broadcast signals. On information and belief, Samsung DVRs receive television
television (TV)	programming in the form of QAM-modulated MPEG2 transport stream packets.
broadcast signals,	
wherein said TV	See, e.g., (Samsung SMT-H3090 2008 Data Sheet), p.1 ("Samsung SMT-H3090 is Dual tuner Digital Video Recorder(DVR)
signals are based	which provides Standard Definition (SD), High-Definition(HD) and Analog video signals. Dual tuner DVR allows cable
on a multitude of	subscribers to watch and record two HD programs Simultaneously.""), p. 2 ("In-band Tuner : 54 to 864MHz, Receiving 64 or
standards,	256 QAM."));
including, but not	
limited to,	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf
National	(Samsung SMT-H3090 2008 User Guide), p. 2 ("RF Input Tuning Range: 88 to 860 MHz."); (BCM7400 Product Brief)
Television	(showing BCM3420 and BCM3255 chips)
Standards	
Committee	On information and belief, Samsung DVRs accept ATSC broadcast signals.
(NTSC)	
broadcast, PAL	
broadcast,	
satellite	
transmission,	
DSS, DBS, or	
ATSC;	
[1c] tuning said TV signals to a specific program;	A Samsung DVR has tuners which can tune TV signals to a specific program. <i>See, e.g.,</i> (Samsung SMT-H3090 2008 Data Sheet), p.1 ("Samsung SMT-H3090 is Dual tuner Digital Video Recorder(DVR) which provides Standard Definition (SD), High-Definition(HD) and Analog video signals. Dual tuner DVR allows cable subscribers to watch and record two HD programs Simultaneously.""), p. 2 ("In-band Tuner : 54 to 864MHz, Receiving 64 or 256 QAM.")). For example, based on information and belief the Samsung DVRs tune to a specific frequency or a band of frequencies.
[1d] providing at least one Input	A Samsung DVR has at least one Input Section, wherein said Input Section converts said specific program to a Moving Pictures Experts Group (MPEG) formatted stream for internal transfer and manipulation. The Input Section converts said specific
Section, wherein	program to an MPEG formatted stream, for example in the course of performing QAM demodulation and Analog-to-Digital
said Input Section	conversion (A/D). A Samsung DVR will perform QAM demodulation and Analog-to-Digital conversion in the course of
converts said	watching live television and recording a television program. See, e.g.,
specific program	watching rive television and recolume a television program. Dec, e.g.,
to an Moving	
to all woving	EXHIBIT A TO TIVO INFRINGEMENT CONTENTIONS

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EXHIBIT A TO TIVO INFRINGEMENT CONTENTIONS '389 PATENT SAMSUNG DVRS

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the Claim	Samsung DVRs ¹	Ĭ
	including any additional information needed for its further processing.	Ī
	On information and belief, the MPEG stream is separated into its video and audio components, for example, the course of PID filtering, start code detection, and temporary storage in memory. Additionally, the streams are separated when presented to the video and audio decoders. In the course of PID filtering and start code detection, on information and belief, MPEG2 transport stream packets are discretely analyzed. Each MPEG2 transport stream packet contains audio or video data. The MPEG2 transport stream packets are temporarily stored in memory (e.g., on-chip buffers, flash, and/or system DRAM), where each MPEG2 transport stream packet is held in a distinct memory location. As another example, the video and audio data packets of the MPEG data are separated when they are sent to separate decoders. For example, audio packets go to audio decoders while	
	video packets go to video decoders	
	Samsung DVRs may contain MPEG encoders, including the BCM7041:	

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the Claim	Samsung DVRs ¹	
	Still further, on information and belief, the hardware and software in the Samsung DVRs perform substantially the same	
	function as the Media Switch, that of parsing an MPEG stream and separating an MPEG stream into its video and audio	
	components so that the video and audio components can be provided to the video and audio MPEG decoders, in substantially the	
	same way, by sending the video and audio data to separate decoders, regardless of any order of processing in the DVR, to yield	
	the same result, an analyzed MPEG stream that is separated into audio and video components for playback on a user's display,	
	and therefore would infringe under the doctrine of equivalents.	

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the Claim		Samsung DV			
	Digital HD DVR STB (S	Digital HD DVR STB (SMT-H3090) provides the following functions.			
	- An MPEG decoder capable of processing HD/SD stream				
	- SCTE55-1, 55-2 and D	OCSIS Cable Modem for OOB Signaling			
	- Digital AV transmission, such as IEEE1394 and HDMI				
	- Content Protection				
	- CableCARD Interface				
	- OCAP™ 1.0 applicatio	n platform			
		- DVR Features			
	- Recording :				
	HDD	Capacity			
	160GB	Up to 65 hours for SD (Standard Definition) stream			
		Up to 15 hours for HD (High Definition) stream.			
	320GB	Up to 130 hours for SD (Standard Definition) stream			
		Up to 30 hours for HD (High Definition) stream.			

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the Claim		Samsung DVRs ¹		
[1g] providing at	A Samsung DVR has at least one Output Section, wherein said Output Section extracts said video and audio components from			
east one Output	said storage device. F	or example, Samsung DVRs allow users to play back recorded television	on programs to watch at a later	
Section, wherein	time. See, e.g.,			
said Output				
Section extracts				
aid video and		ercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsu	ng_SMT_3090HD_UserGuide.pdf	
udio components	(Samsung SMT-H309	0 2008 User Guide), at 10:		
from said storage				
device;	DVR Feature	S		
	SMT-H3090 supports DVR fi	eature through the Hard Disk Drive as follows.		
		-		
	Feature	Description		
	File Playback	Play, Stop, Rewind, Pause for recorded contents.		
	File Trick Mode	1, 4, 8, 32 times FFP (Fast Forward Play)		
		1, 4, 8, 32 times FRP (Fast Rewind Play)		
		1/2, frame by frame skipping SFP (Slow Forward Play)		
		1/2, Frame by frame SRP (Slow Rewind Play)		
	Time-Shift Recording	User can pause live TV program for a certain amount of		
		time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.		
	Instant Recording	Record live TV program instantly		
	Watching and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.		
	Audio/Radio Recording	Audio or Radio program recording		
	Simultaneous Recording and Time Shift Recording	Up to two Simultaneous Recording and Time-Shift Recording on live TV programs		
	-			

(Samsung SMT-H3090 2008 Data Sheet), at 1:

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the Claim		Samsung DVRs ¹			
	provides Standard E	MT-H3090 is Dual tuner Digital Video Recorder(DVR) which efinition (SD), High-Definition(HD) and Analog video signals. rs cable subscribers to watch and record two HD programs			
	On information and back. <i>See, e.g.,</i>	belief, Samsung DVRs extract MPEG2 transport stream packets from a hard disk drive (HDD) during play			
	· .	hercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf 90 2008 User Guide), at 6:			
	Digital HD DVR STB (SMT-H3090) provides the following functions. - An MPEG decoder capable of processing HD/SD stream - SCTE55-1, 55-2 and DOCSIS Cable Modem for OOB Signaling - Digital AV transmission, such as IEEE1394 and HDMI - Content Protection - CableCARD Interface for CAS - OCAP™ 1.0 application platform - DVR Features - Recording :				
	HDD	Capacity			
	160GB	Up to 65 hours for SD (Standard Definition) stream Up to 15 hours for HD (High Definition) stream.			
	Up to 130 hours for SD (Standard Definition) stream Up to 30 hours for HD (High Definition) stream.				
	differences are insub	ferences are alleged to exist between this claim element and the above referenced functionality, such stantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the Output Section, for example that of extracting said video and audio components from said storage			

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the Claim	Samsung DVRs ¹				
	device, in substantially the same way, for example by reading the data from the storage device, to yield the same result, a				
	retrieved data stream for further processing and display to a viewer.				
h] wherein said utput Section sembles said deo and audio	A Samsung DVR has at least one Output Section that assembles said video and audio components into an MPEG stream. C information and belief, MPEG2 transport stream packets are assembled into an MPEG2 transport stream, de-multiplexed, an packetized elementary streams are constructed when read from the disk and/or before being sent to a decoder.				
mponents into MPEG stream;	For example, Video and	nd Audio data are read from the disk for playback.			
		ercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuid 0 2008 User Guide), at 10:	<u>ə.pdf</u>		
	DVR Feature	S eature through the Hard Disk Drive as follows.			
	Feature	Description			
	File Playback	Play, Stop, Rewind, Pause for recorded contents.			
	File Trick Mode	1, 4, 8, 32 times FFP (Fast Forward Play)			
		1, 4, 8, 32 times FRP (Fast Rewind Play)			
		1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play)			
	Time Chiff December				
	Time-Shift Recording	User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.			
	Instant Recording	Record live TV program instantly			
	Watching and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.			
	Audio/Radio Recording	Audio or Radio program recording			
	Simultaneous Recording	Up to two Simultaneous Recording and Time-Shift			
	and Time Shift Recording	Recording on live TV programs			

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the Claim	Samsung DVRs ¹					
	(Samsung SMT-H309	0 2008 Data Sheet), at 1:				
	provides Standard De	T-H3090 is Dual tuner Digital Video Recorder(DVR) which finition (SD), High-Definition(HD) and Analog video signals. cable subscribers to watch and record two HD programs				
	On information and be back. <i>See, e.g.,</i>	clief, Samsung DVRs extract MPEG2 transport stream packets from a hard disk drive (HDD) during play				
	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide (Samsung SMT-H3090 2008 User Guide), at 6:					
	Digital HD DVR STB (SM	IT-H3090) provides the following functions.				
		ble of processing HD/SD stream				
		ICSIS Cable Modem for OOB Signaling such as IEEE1394 and HDMI				
	- Digital AV transmission, - Content Protection	SUCH AS IEEE 1394 AND ID/MI				
	- CableCARD Interface fo	r CAS				
	- OCAP™ 1.0 application	platform				
	- DVR Features					
	- Recording :					
	HDD	Capacity				
	160GB	Up to 65 hours for SD (Standard Definition) stream Up to 15 hours for HD (High Definition) stream.				
	320GB	Up to 130 hours for SD (Standard Definition) stream Up to 30 hours for HD (High Definition) stream.				
	These video and audio	data are assembled into an MPEG stream so that they can be processed and displayed by an MPEG				

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the Claim	Samsung DVRs ¹				
	VIDEO AND GRAPHICS DISPLAY				
	Overview				
	The video and graphics module accepts decoded AVC/MPEG/VC-1 or analog video and performs professional quality compositing of text and graphics with video. The video subsystem takes in uncompressed video from either the AVC/MPEG/ VC-1 decoder or the digital ITU-T-656 input. The subsystem processes the input videos based on the input and output format, and system requirements. It can be scaled and converted to the output display format directly, or go through single and multiple capture and playback loops. Each capture and playback loop could involve data processing like DNR, MAD-IT, or scaling.				
	Two independent video streams (one stream must be limited to SD stream) can be processed at the same time and converted to different size and format. Finally, they can be blended together as PIP (picture in picture) windows or drive up to two separate displays. Both displays may have separate graphics inputs to blended with. The architecture allows users to create a series of frame-buffers that allow an unlimited number of graphics layers to be composited and blended together before being displayed.				
	Once the graphical frame-buffers are available, they can be combined with the video using a new compositor. This new compositor allows up to two video surfaces to be combined with a graphical surface (frame-buffers). The blending order of any surface is controlled by software to allow the utmost flexibility for the end-user.				
	The graphic surface generation is now divorced from the real-time display requirements of the video output. Once the new graphics surface is available, it can be switched in for display. Therefore, all of the graphics development interacts only with the memory—not with any of the display hardware.				
	The architecture goal of this new, modular approach is to allow various chip-sets to share the same basic component building blocks to achieve the customers design requirements. The BCM7405 employs enough of these building blocks to realize a dual video output with independent graphics on each output. Supported video decode and display format combinations can be seen in Table 1-4 on page 1-36.				
	BRCM 7405 Preliminary Hardware Data Module at 1-35				
	To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function as the Output Section, for example that of assembling said video and audio components into an MPEG stream, in substantially the same way, for example by demultiplexing or packetizing the data, to yield the same result, a properly formatted data stream for presentation to the decoder.				
[1i] wherein said Output Section sends said MPEG	A Samsung DVR has an Output Section that sends said MPEG stream to a decoder. See, e.g., (BCM7400 Product Brief):				

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the Claim	Samsung DVRs ¹					
	Digital HD	DVR STB				
	OpenCable Application	P STB (Digital High-Definition Digital Video Recorder n Platform Set-Top Box) provides high quality video and audio ractive services including Video-On-Demanβ.				
	Digital HD DVR STB (SMT-H3090) provides the following functions. - An MPEG decoder capable of processing HD/SD stream - SCTE55-1, 55-2 and DOCSIS Cable Modem for OOB Signaling - Digital AV transmission, such as IEEE1394 and HDMI - Content Protection - CableCARD Interface for CAS - OCAP™ 1.0 application platform - DVR Features					
	HDD	Capacity				
	160GB Up to 65 hours for SD (Standard Definition) stream Up to 15 hours for HD (High Definition) stream.					
	320GB Up to 130 hours for SD (Standard Definition) stream Up to 30 hours for HD (High Definition) stream.					

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the Claim	Samsung DVRs ¹
	The BCM7400 is a dual-channel high definition satellite, cable, and IP set-top box DVR solution offering integrated AVC (H.264/MPEG-4 Part 10), MPEG-2, MPEG-4 Part 2, DivX, and VC-1 video decoding technology. It combines a data transport processor, two high-definition AVC/MPEG-2/VC- 1 video decoders, two advanced-audio decoders, 2D and 3D graphics processing, high-quality video scaling and motion adaptive deinterlacing, seven video DACs, dual stereo high-fidelity audio DACs, adual-threaded 330-MHz MIPS32 with FPU class CPU, and a peripheral control unit providing a variety of set-top box control functions. The BCM7400 supports either DDR1 or DDR2 memory architectures.
	The MPEG-2 DVB-compliant transport stream/PES parser and demultiplexer is capable of simultaneously processing 256 PIDs via 128 PID channels in up to six independent external transport stream inputs and four internal playback channels. All 128 PID channels can be used by the record, addio, and video interface engine, PCR processing, message filter, and for output via the high- speed transport or remux module. The data transport module can be configured to support eight record channels for PVR functionality and six AV channels to interface to audio and video decoders. The transport provides 1DES/3DES/DVB/Mult2/AES descrambling support. A memory-to- memory DMA security module may be programmed for supporting AES/ 1DES/3DES/CSS/CPRM/CPPM/DTCP copy protection algorithms/ standards. The B CM/1400 features the Broadcom secure processor, providing secure key generation, management, and protection.
	The advanced video decoders featured in the BCM7400 are capable of supporting high definition A VC, VC-1, and MPEG-2 streams. A VC support is for Main and High Profile to level 4.1 for 720p and 1080i high definition support or to Level 3.1 for stand and definition streams. A VC High Profile was added to the fidelity range extensions specifically to address the needs of consumer broadcast and playback applications. Tools include addition al transform sizes and spatial prediction modes and support for ad aptive quantization matrix. The video decoders also support high definition VC-1
	(Advanced Profile Level 3, Main, and Simple Profiles) and MPEG-2, Main Profile at Main and High Level. The BCM7400 has two advanced audio processors capable of decoding Dolby Digital, Dolby Digital Plus, AAC 5.1, AAC+level 2, and MPEG 1 layers 1, 2, and 3 with simultaneous pass-through support. 3D SRS audio is also supported. Available audio outputs are 1 ² S, S/ PDIF, and two pairs of analog outputs.

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the Claim		Samsung DVRs ¹	
[1k] wherein said	A Samsung DVR delivers decoded TV output sig	nals to a TV receiver. A Samsung DVR can be connected to a TV using	
decoder delivers	HDMI, DVI, component, Y Output, Video Outpu	t, S-Video Out, Cable Out, or 1394 connectors. See, e.g.,	
said TV output	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf		
signals to a TV	(Samsung SMT-H3090 2008 User Guide), at 13-14:		
receiver; and			
	<u>Connection to a TV Having a Composite or S-</u> VIDEO Jack	Connection to a TV Having Component Jacks (Y. Pb. Pr)	
	Below is the method for connecting to a TV having a composite or S-VIDEO jack.	See below to connect to a TV having a Component port (Y, Pb, Pr).	
		When connecting the Component Video and Audio cables, be sure to match the jacks to the plugs of the same color.	
	Video Connection Connection to the VIDEO OUT jack Using a video connector of Video & Audio cable, connect the VIDEO OUT jack to the Video Input jack on the TV.	Audio Cable	
	Connection to the S-VIDEO OUT jack Using an S-Video cable, connect the S-VIDEO OUT jack to the S-Video Input jack on the TV.	Video Connection Using the offered Video (Component) cable, connect the Y, Pb, Pr (HDTV) jack to the Y, Pb, Pr (DTV Video Input) jack on the TV.	
	Audio Connection Using the offered Audio cable or audio connectors of Video & Audio cable, connect the AUDIO OUT (LR) jacks on the rear panel to the Audio Input (L/R) jacks on the TV. Be sure to match the audio jacks with the plugs of the same color.	Audio Connection Using the offered Audio cable, connect the AUDIO OUT (L/R) jacks on the rear panel to the Audio Input (L/R) jacks on the TV. Be sure to match the audio jacks with the plugs of the same color.	
	SMT-H30R0 User Guide_13	14_ © SAMSUNG Electronics Co., Ltd.	
[11] accepting	A Samsung DVR accepts control commands from a user, wherein said control commands are sent through the system and affect		
control commands			
from a user,	information and belief, the remote control sends IR signals that are received by the Samsung DVR. The hardware and software		
wherein said	receives commands from a user, which affect the	flow of data through the system, e.g., begin recording, channel change,	
control commands	trickplay, etc. See, e.g.,		
are sent through	(BCM7400 Product Brief) (showing front panel c	ontrols input to the BCM7400 chip):	
		EXHIBIT A TO TIVO INFRINCEMENT CONTENTIONS	

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the Claim	Samsung DVRs ¹		
the system and affect the flow of said MPEG stream.	Stereo A000 00T Stepte 00T VIDeo 00T YPEP 00T Triple Image: contract of the step of the ste		

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the Claim		Samsu	ng DVRs ¹
	DVR Feature	S aature through the Hard Disk Drive as follows.	
	Feature	Description	
	File Playback	Play, Stop, Rewind, Pause for recorded contents.	
	File Trick Mode	1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play)	
	Time-Shift Recording	User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.	
	Instant Recording	Record live TV program instantly	
	Watching and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.	
	Audio/Radio Recording	Audio or Radio program recording	
	Simultaneous Recording and Time Shift Recording	Up to two Simultaneous Recording and Time-Shift Recording on live TV programs	
	EPG Recording	Scheduled recording using EPG	
	To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function, for example that of accepting control commands from a user, in substantially the same way, for example by including hardware and/or software interfaces that can accept user commands, to yield the same result, wherein said control commands are sent through the system and affect the flow of said MPEG stream.		
Claim 2		1 1 1 1 1 1 1 1 4 7	
The process of claim 1, wherein said Input Section directs said	stream to a destination	indicated by said control commands.	amsung DVRs include an input section that directs an MPEG
MPEG stream to the destination			data to any of memory, hard disks, and/or optical storage EXHIBIT A TO TIVO INFRINGEMENT CONTENTIONS

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the Claim	Samsung DVRs ¹		
indicated by said control commands.	devices.		
Claim 3			
The process of claim 1, wherein said Output Section extracts said video and audio components from the storage device indicated by said control commands.	In addition to the features described above regarding claim 1, Samsung DVRs include an output section that extracts video and audio components from the storage device indicated by said control commands. For example, when a Samsung DVR receives a command to play back a television program, an output section, including for example decoders, demodulators, and other processing devices may extract video and audio data from any of memory, hard disks, and/or optical storage devices for display to a viewer.		

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the Claim	Samsung DVRs ¹
	STEREO AUDO OUT FIREWIRE

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the Claim	Samsung DVRs ¹		
Claim 5			
The process of claim 1, wherein the storing and extracting of said video and audio components from said storage device are performed simultaneously.	A Samsung DVR can simultaneously store and extract video and audio components from a storage device, for example, in the course of simultaneously recording and playing back television programming. <i>See, e.g.,</i> <u>http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf</u> (Samsung SMT-H3090 2008 User Guide), p. 2 ("Viewing one program while recording another program." "Simultaneous Time Shifted Buffering for two Programs."); p. 9 ("Record two live TV programs simultaneously while watching two recorded programs on HDD.") To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function, for example storing and extracting of said video and audio components from said storage device, in substantially the same way, for example by performing these actions substantially simultaneously, to yield the same result, wherein said storing and extracting appear to occur at the same time.		
Claim 6			
The process of claim 1, wherein said Media Switch calculates and logically associates a time stamp to said video and audio components.	In addition to the features described above regarding claim 1, Samsung DVRs include a Media Switch that calculates and logically associates a time stamp to said video and audio components. For example, when a Samsung DVR records a program a local timestamp may be generated by a processor and internal clock, and stored with the video and audio date. See, e.g., BRCM 7405 functional description at page 1-22: A local timestamp is generated at the input buffer via an internal counter using a 27-MHz clock selectable from any of the three available locked timebases, or the free-running system clock. The local timestamp can be prepended as a 32-bit field to each recorded transport packet. The format of the 32-bit timestamp filed is programmable. In one mode, this field contains a 28-bit local timestamp plus a 4-bit parity which can be used/during playback to transmit the packets at a rate equivalent to when they were recorded and can be used for PCR correction in the Remux modules. In another mode, the upper two bits of the 32-bit timestamp field are user programmable with the remaining bits being the timestamp.		

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the Claim	Samsung DVRs ¹		
Claim 7			
The process of claim 1, wherein said Media	In addition to the features described above regarding claim 1, Samsung DVRs include a Media Switch that extracts time stamp values from a digital TV stream and logically associates said time stamp values to said video and audio components.		
Switch extracts time stamp values from a digital TV	For example, when a Samsung DVR receives and records digital input stream, it may include a time stamp, such as a presentation time stamp (PTS) that is included in that stream. The PTS will be extracted and stored with the input data stream. See, e.g., BRCM 7405 functional description at page 1-22:		
stream and logically	Record Channel's Index Table Generation		
associates said time stamp values	Index table generation is a function that is supported in the record channel. Although this function handles more than just start code table entries, it will be referred to as the SCD (start code detector) in this document.		
to said video and audio components.	The SCD records the positions of PES packet header stream_id's and elementary stream start codes within a recorded transport stream for a given PID. There are two transport modes of operation: MPEG and DIRECTV. The data structure for data stored in the memory buffer is a start code index table that is detailed in the Record Index Table Definition section.		
	Within each transport mode (MPEG and DIRECTV), there are four index table modes supported. All modes utilize a 6-word index entry. Four index entry types are supported: Start Code (SC), Presentation Time Stamp (PTS), Transport Field (TF), and Seamless Pause (SP). The following describes the four entry types:		
	1 The SC index entry provides offsets to start-code locations within the associated record buffer.		
	2 The PTS index entry provides PTS values extracted from the recorded stream.		
	3 The TPIT transport field parser stores transport field index entries. For the on-change conditions, an initial entry is made for detection of the first PID. For example, if the first packet for a PID with the transport_scrambling_control_change_en bit set has a scrambling control of 10, an index table entry is stored for the transport_scrambling_control_change condition with the transport_scrambling_control_change bit set and the actual value of the scrambling_control of 10 is stored in the scram_control field.		
	4 The seamless pause feature is intended for use with playback. It allows live viewing of a program with the capability of pausing the program. The program is initially viewed without going through the record/playback path. This eliminates channel change latency incurred when going through this path. When the user wishes to pause the program, a record channel must be enabled with the appropriate PID channels selected for record. Then REC_PAUSE_EN is asserted. This assertion prevents the selected PID channel data from being sent to the audio/video decoders. The user sees this as a pause. Once REC_PAUSE_EN is set, the next packet that is recorded has a seamless pause entry made in the record index table (if the index table is enabled). When the user wishes to resume the program, the stream now comes from a playback channel instead of the live channel. The index table entry made for seamless pause is used to determine where to start the playback.		
	EXHIBIT A TO TIVO INFRINGEMENT CONTENTIONS		

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the Claim	Samsung DVRs ¹		
Claim 12			
The process of claim 1, further	In addition to the feature	rres described above regarding claim 1, Sa	amsung DVRs include fast playback and fast reverse playback.
comprising the step of:	DVR Feature	S	
increasing the	SMT-H3090 supports DVR fe	eature through the Hard Disk Drive as follows.	
decoder system clock rate for fast	Feature	Description	
playback or fast	File Playback	Play, Stop, Rewind, Pause for recorded contents.	
reverse playback	File Trick Mode	1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play)	
		1/2, Frame by frame SRP (Slow Rewind Play)	
	Time-Shift Recording	User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.	
	Instant Recording	Record live TV program instantly	
	Watching and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.	
	Audio/Radio Recording	Audio or Radio program recording	
	Simultaneous Recording and Time Shift Recording	Up to two Simultaneous Recording and Time-Shift Recording on live TV programs	
	EPG Recording	Scheduled recording using EPG	
		decoder system clock rate. For example, t	d fast reverse playback modes are implemented by, among other he PCR block may be used by rate managers to control the

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m	Samsung DVRs ¹				
PCR Recovery Block					
The data transport design	The data transport design supports two equivalent PCR recovery circuits, each programmed independently.				
Each data transport PCR module is capable of extracting the PCR information from a selected packet stream and generating Timebase pulses (Timebase is a 27-MHz pulse train in 108-MHz clock domain) output that can be used by rate managers. Each PCR module is also used to send the extracted PCRs directly to the audio and video decoders to ensure that both decoders are using the same PCR.					
			I 110 (d 0		1 1
				ures described above regarding claim 1, Samsung DVRs include slow playback and slow reve	se playbac
er ^{ne} DVR Feature					
DVR Feature	2S				
SMT-H3090 supports DVR	feature through the Hard Disk Drive as follows.				
Feature	Description				
Feature File Playback	Description Play, Stop, Rewind, Pause for recorded contents.				
E ile Dissilie els	Play, Stop, Rewind, Pause for recorded contents.				
File Playback					
Dr File Playback	Play, Stop, Rewind, Pause for recorded contents. 1, 4, 8, 32 times FFP (Fast Forward Play)				
or File Playback	Play, Stop, Rewind, Pause for recorded contents. 1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play)				
or File Playback	Play, Stop, Rewind, Pause for recorded contents. 1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play) User can pause live TV program for a certain amount of				
File Playback File Trick Mode	Play, Stop, Rewind, Pause for recorded contents. 1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play)				
r File Playback File Trick Mode	Play, Stop, Rewind, Pause for recorded contents. 1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play) User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90				
File Playback File Trick Mode Time-Shift Recording	Play, Stop, Rewind, Pause for recorded contents. 1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play) 1/2, Frame by frame SRP (Slow Rewind Play) User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.				
OT File Playback File Trick Mode Time-Shift Recording Instant Recording	Play, Stop, Rewind, Pause for recorded contents. 1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame skipping SFP (Slow Rewind Play) 1/2, Frame by frame SRP (Slow Rewind Play) User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording. Record live TV program instantly Record two live TV programs simultaneously while				
File Playback File Trick Mode Time-Shift Recording Instant Recording Watching and Recording	Play, Stop, Rewind, Pause for recorded contents. 1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play) 1/2, Frame by frame SRP (Slow Rewind Play) User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording. Record live TV program instantly Record live TV programs simultaneously while watching two recorded programs on HDD.				

On information and belief, at least one of these slow playback and slow reverse playback modes are implemented by, among other things, decreasing the decoder system clock rate. For example, the PCR block may be used by rate managers to control the EXHIBIT A TO TIVO INFRINGEMENT CONTENTIONS '389 PATENT SAMSUNG DVRS

the Claim	Samsung DVRs ¹		
	playback rate of the decoders.		
	PCR Recovery Block		
	The data transport design supports two equivalent PCR recovery circuits, each programmed independently.		
	Each data transport PCR module is capable of extracting the PCR information from a selected packet stream and generating Timebase pulses (Timebase is a 27-MHz pulse train in 108-MHz clock domain) output that can be used by rate managers. Each PCR module is also used to send the extracted PCRs directly to the audio and video decoders to ensure that both decoders are using the same PCR.		

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the Claim	Samsung DVRs ¹		
Claim 18			
The process of claim 1, wherein said Media	In addition to the features described above regarding claim 1, Samsung DVRs include a Media Switch that has a data bus connecting it to a CPU and DRAM.		
Switch has a data bus connecting it to a CPU and DRAM.	For example, Samsung DVRs may include a processor that includes, for example, an EBI with a data bus that connects to ei of CPU, e.g. a MIPs processor or the like, and DRAM, including memory used for DMA or other storage or buffering funct See, e.g. BRCM7405 Functional Description at 1-83		
	The BCM7405 EBI provides a 27-bit address bus and a 16-bit bidirectional data bus. In addition, separate read and write strobes are provided along with up to six firmware-configurable chip select signals. Each chip select is fully programmable and:		
	 Supports block sizes between 8 KB and 64 MB Has extended clock cycle access control Has 8-bit or 16-bit selection of peripheral data bus width 		
	The BCM7405 EBI automatically breaks up accesses where the transfer data is larger than the target size, such as a 32-bit read or write initiated by the CPU or internal DMA targeting an 8-bit wide peripheral results in four separate byte-wire read or write accesses to the target.		
	The BCM7405 EBI supports glueless connection to an external Nand Flash device for booting the Host MIPS or for general nonvolatile storage. Many standard Nand Flash devices are supported, from 128 Mbit to 2 Gbit densities, and in x8 and x16 data widths. Hardware ECC, write protect, and local buffering assists with booting.		
	Synchronous burst read operations for an external FLASH ROM on the EBI bus is supported, which allows more code to remain resident in the external EPROM chips instead of mirroring it to DRAM storage.		
	Internal bus protocols need to be extended to allow burst reads. The EBI interface converts these burst accesses into a cache-line read of 16 bytes. Non-cacheable access would be handled as single word reads (as currently happens). This allows the use of synchronous FLASH ROM chips, such as the Intel 28F256Kxx family.		
Claim 19			
The process of claim 1, wherein said Media	In addition to the features described above regarding claim 1, Samsung DVRs include a Media Switch that shares an address bus with a CPU and DRAM.		

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the Claim	Samsung DVRs ¹
Switch shares an address bus with a CPU and DRAM	For example, Samsung DVRs may include a processor that includes, for example, an EBI with a shared address bus that connects to both a CPU, e.g. a MIPs processor or the like, and DRAM, including memory used for DMA or other storage or buffering functions. See, e.g. BRCM7405 Functional Description at 1-83
	The BCM7405 EBI provides a 27-bit address bus and a 16-bit bidirectional data bus. In addition, separate read and write strobes are provided along with up to six firmware-configurable chip select signals. Each chip select is fully programmable and: Supports block sizes between 8 KB and 64 MB Has extended clock cycle access control
	Has 8-bit or 16-bit selection of peripheral data bus width
	The BCM7405 EBI automatically breaks up accesses where the transfer data is larger than the target size, such as a 32-bit read or write initiated by the CPU or internal DMA targeting an 8-bit wide peripheral results in four separate byte-wire read or write accesses to the target.
	The BCM7405 EBI supports glueless connection to an external Nand Flash device for booting the Host MIPS or for general nonvolatile storage. Many standard Nand Flash devices are supported, from 128 Mbit to 2 Gbit densities, and in x8 and x16 data widths. Hardware ECC, write protect, and local buffering assists with booting.
	Synchronous burst read operations for an external FLASH ROM on the EBI bus is supported, which allows more code to remain resident in the external EPROM chips instead of mirroring it to DRAM storage.
	Internal bus protocols need to be extended to allow burst reads. The EBI interface converts these burst accesses into a cache-line read of 16 bytes. Non-cacheable access would be handled as single word reads (as currently happens). This allows the use of synchronous FLASH ROM chips, such as the Intel 28F256Kxx family.
Claim 20	
The process of claim 1, wherein said Media	In addition to the features described above regarding claim 1, Samsung DVRs include a Media Switch that operates asychronously and autonomously with a CPU.
Switch operates asychronously	For example, Samsung DVRs may include a processor that includes, for example, a PCI bus that allows the media switch to

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the Claim	Samsung DVRs ¹
and autonomously with a CPU.	operate asynchronously and autonomously from the CPU. See, e.g. BRCM7405 Functional Description at 1-83
	PCI AND EXTERNAL BUS INTERFACE
	The BCM7405 includes a shared interface that supports 33 MHz PCI 2.3 and external buses to allow the internal processor control of external peripherals that may be attached to the PCI bus and to allow an external controller to access the peripherals and memory associated with the BCM7405.
	The PCI and EBI interfaces share many of the same pins to reduce the overall pin counts. Both PCI and EBI operate at the same PCI clock input frequency. Critical control signals such as FRAMEb and CSb are not shared. The arbitration and multiplexing of this PCI/EBI interface happens completely in hardware. When the interface is operated as an EBI function, PCI devices will not respond because the FRAMEb is not asserted. When the interface is operated as a PCI function, EBI devices will not respond because the CSb is not asserted. Both EBI and PCI interfaces operate at a max clock frequency of 33 MHz.
	Software running on the internal MIPS processor can allow the BCM7405 to act as a PCI South bridge. This allows an easier migration path for external processors to access the peripheral devices (such as the USB controller).
	When in PCI Client mode, the EBI function is disabled and the PCI interface supports both internal and external PCI masters. When in PCI Host Bridge mode, the EBI interface functions as an EBI bus master only. It supports asynchronous, synchronous and 68K modes. The PCI interface supports both external and internal PCI masters. The internal PCI arbiter is designed to support the EBI request as a modified PCI master with special request and grant handshaking. If an external PCI arbiter is selected, the special EBI request/grant pair maps to the PCI GNT2b/REQ2b pins.
Claim 21	
The process of	In addition to the features described above regarding claim 1, Samsung DVRs include a storage device that is connected to said
claim 1, wherein	Media Switch.
said storage	Ear around the Computer DVDs include among other things a hard drive apprentively connected to the media switch for staring
device is	For example, the Samsung DVRs include, among other things, a hard drive operatively connected to the media switch for storing multimedia data.
connected to said Media Switch.	

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the Claim	Samsung DVRs ¹
	STEREO AUDIO OUT SIPDIF OUT VIDEO OUT YPEP OUT FIREWIRE HDMI OUT OUT OUT OUT OUT OUT OUT OUT

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the Claim	Samsung DVRs ¹					
claim 1, wherein	hardware.					
said Media	$\mathbf{D}_{\mathbf{r}} = \mathbf{D}_{\mathbf{r}} \mathbf{D}_{\mathbf{r}} + \mathbf{D}_{\mathbf{r}} \mathbf{D}_{\mathbf{r}} + \mathbf{D}_{\mathbf{r}} \mathbf{D}_{\mathbf{r}} \mathbf{D}_{\mathbf{r}} + \mathbf{D}_{\mathbf{r}} \mathbf{D}_{$					
Switch is	For example, a Samsung DVR includes a processor, such as a BRCM7405 that may be implemented as a "system on chip" or					
implemented in	physical hardware instantiation. See, e.g., Function description at 1-4:					
hardware.						
	TOP-LEVEL OVERVIEW					
	The BCM7405 is a next-generation high-definition satellite, cable, and IP set-top box solution offering integrated AVC (H.264/MPEG-4 Part 10), MPEG-4 Part 2, MPEG-2, and VC-1 video decoding technology. It also supports China AVS standard, DivX, H.263, and XviD formats. The BCM7405 combines a data transport processor, high-definition video decoder, advanced-audio decoder, 2D graphics processing, high-quality video scaling and motion adaptive de-interlacing, six video DACs, stereo high-fidelity audio DACs, a MIPS 4380 class processor with FPU, and a peripheral control unit providing a variety of set-top box control functions.					
	The Data Transport Processor is an MPEG-2 DVB-compliant transport stream message/PES parser and demultiplexer. It is capable of simultaneously processing 255 PIDs via 255 PID channels in up to six channels which can be selected from six independent external transport stream inputs and five internal playback channels. The data transport supports decryption for up to 128 PID channels in all streams. All 128 PID channels can be used by the Record, Audio, and Video interface engine (RAVE), PCR processors, message filter as well as for output via the high-speed transport or remux module. The data transport module RAVE supports 24 channels. Each RAVE channel can be configured as either a record channel for PVR functionality or as an AV channel to interface to audio and video decoders. The transport provides 1DES/3DES/DVB/Multi2/ AES descrambling support. A memory-to-memory DMA security module may be programmed for supporting AES/1DES/ 3DES/CSS/CPRM/CPPM/DTCP copy protection algorithms/standards.					
Claim 31						
31[a]. A process	A Samsung DVR can simultaneously store and play back multimedia data. See, e.g.,					
for the	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf					
simultaneous	(Samsung SMT-H3090 2008 User Guide), p. 2 ("Viewing one program while recording another program." "Simultaneous Time					
storage and play	Shifted Buffering for two Programs."); p. 9 ("Record two live TV programs simultaneously while watching two recorded					
back of	programs on HDD.")					
multimedia data, comprising the	"TIME WARNER CABLE AND SAMSUNG FORGE AGREEMENT FOR TRU2WAY SET-TOP DEVELOPMENT,					
steps of:	PURCHASE & DEPLOYMENT					
sups 01.	Release Date: 07/06/2009					
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the Claim	Samsung DVRs ¹				
	Time Warner Cable and Samsung today announced that they have signed a letter of commitment for the continued development,				
	purchase and deployment of Samsung True2Way enabled set-top boxes, including the first second-source DVR. "We look to offer our customers advanced set-top boxes with features that are simple and easy to use," said Mike Hayashi,				
	Executive Vice President of Advanced Engineering for Time Warner Cable. "We have been a leader in the roll-out of Tru2Way				
	devices and we are continuing to grow our relationship with Samsung, a CE company dedicated to the development of new				
	equipment meeting the necessary standards and offering attractive feature sets."				
	Thomas Rhee, SVP, New Business Development for Samsung, added, "We are thrilled to have worked closely with Time				
	Warner Cable to launch Tru2way on our family of cable set-tops including the SMT-H3090 and SMT-H3270 High Definition				
	DVRs. As in Korea, we look forward to the expansion of Tru2way in North America." This agreement further solidifies Time Warner Cable's commitment to its deployment of Tru2Way enabled set-top boxes. To				
	date Time Warner Cable has deployed over 2 million Tru2Way set-top boxes, of which approximately 400,000 are Samsung				
	boxes.				
	Time Warner Cable and Samsung also recently signed an MOU that focuses on collaborating in development of better home				
	networking solutions for entertainment. This work is part of Time Warner Cable's continuing efforts to provide its customers				
	with technology that brings new levels of ease and convenience."				
[21]	http://www.timewarnercable.com/corporate/about/inthenews.ashx?PRID=2626&MarketID=0				
[31b] providing a physical data	A Samsung DVR has an input device that may include cable input, tuners, an analog to digital converter, and/or, on information and belief, other components such as the Broadcom BCM3255 or other similar chip that may perform QAM demodulation,				
source, wherein	including chips made by other third parties. See, e.g., (Samsung SMT-H3090 2008 Data Sheet), p.1 ("Samsung SMT-H3090 is				
said physical data	Dual tuner Digital Video Recorder(DVR) which provides Standard Definition (SD), High-Definition(HD) and Analog video				
source accepts	signals. Dual tuner DVR allows cable subscribers to watch and record two HD programs Simultaneously.""), p. 2 ("In-band				
broadcast data from an input	Tuner : 54 to 864MHz, Receiving 64 or 256 QAM."));				
device, parses	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf				
video and audio	(Samsung SMT-H3090 2008 User Guide), p. 2 ("RF Input Tuning Range: 88 to 860 MHz."); (BCM7400 Product Brief)				
data from said broadcast data,	(showing BCM3420 and BCM3255 chips):				
and temporarily					
stores said video					
and audio data;					

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the Claim	Samsung DVRs ¹				
	STEREO AUDIO OUT SPDIF OUT VIDEO OUT YPEP OUT FIREWIRE IDMI OUT IDMI OUT				
	A Samsung DVR has a physical data source, which accepts broadcast data from the input device, analyzes the video and audio data, and temporarily stores the data in, for example, internal memory and/or DRAM buffers. For example, the Samsung SMT-H3090 DVR uses Broadcom BCM7400 and/or other chips such as the BCM3255 QAM Receiver, in conjunction with SDRAM and/or other temporary storage. (The Samsung SMT-H3090 use Broadcom BCM3418 tuners instead of the BCM3420 tuners)				

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the Claim	Samsung DVRs ¹				
the Claim	 The BCM7400 is a dual-channel high definition satellite, cable, and IP set-top box DVR solution offering integrated AVC (H.264/MPEG-4 Part 10), MPEG-2, MPEG-4 Part 2, DivX, and VC-1 video decoding technology. It combines a data transport processor, two high-definition AVC/MPEG-2/VC-1 video decoders, two advanced-audio decoders, 2D and 3D graphics processing, high-quality video scaling and motion adaptive deinterlacing, seven video DACs, dual stereo high-fidelity audio DACs, a dual-threaded 350-MHz MIPS32 with FPU class CPU, and a peripheral control unit providing a variety of set-top box control functions. The BCM7400 supports either DDR1 or DDR2 memory architectures. The MPEG-2 DVB-compliant transport stream/PES parser and demultiplexer is capable of simultaneously processing 256 PIDs via 128 PID channels in up to six independent external transport stream inputs and four internal playback channels. All 128 PID channels can be used by the record, audio, and video interface engine, PCR processing, message filter, and for output via the high-speed transport or remux module. The data transport provides 1DES/3DES/DVB/Multi2/AES descrambling support. A memory-to-memory DMA security module may be programmed for supporting AES/ 1DES/3DES/CSK/CPRM/CPPM/DTCP copy protection algorithms/ standards. The BCM7400 features the Broadcom scure processor, providing secure key generation, management, and protection. On information and belief, the Broadcom chips, such as thand other chips used inside Samsung DVRs, PID filter mu Schematics and specifications on Broadcom chips such as this time. 	 Profile at Main and High Level. The BCM7400 has two advanced audio processors capable of decoding Dolby Digital, Dolby Digital Plus, AAC 5.1, AAC+ level 2, and MPEG 1 layers 1, 2, and 3 with simultaneous pass-through support. 3D SRS audio is also supported. Available audio outputs are I²S, S/ PDIF, and two pairs of analog outputs. High-quality video and graphics processing is integrated, featuring advanced studio-quality 2D and 3D graphics processing. Also included are motionadaptive deinterlacing with 3:2 pull-down, and letterbox detection. Digital noise reduction minimizes mosquito noise and MPEG artifacts, including block noise. Picture-in-picture, split picture, and independent picture in graphics are supported. The BCM7400 has a dual-stream analog video encoder with Macrovision that supports the following output standards: NTSC-M, NTSC-J, PAL-BDGHIN, PAL-M, and PAL-Nc. The following output formats are supported: composite, S-Video, SCART, RGB, and YPrPb component. The following output resolutions are supported: 480i, 480p, 576i, 576p, 720p, 1080i, and 1080p 24/30. Seven output video DACs are available to be shared among the output functions. The BCM7400 also supports output over an HDMI interface and a channel 3/4 RF modulator. An ITU-R-656 output port is also available with teletext sideband. BeCM3255 chip, BCM7400 chip, etc., used inside Samsung DVRs and the BCM7400 may be proprietary and thus inaccessible to TiVo at 			
	In addition, a Samsung DVR includes DDR SDRAM and/or other RAM and/or flash memory and/or other internet memory that can be used to temporarily store video and audio data. <i>See, e.g.</i> , (BCM7400 Product Brief) (showing 16MB SRAM and 512MB 64-bit DDR bi-directionally coupled to the BCM BCM7400 chips, respectively):				

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the Claim	Samsung DVRs ¹				
	STEREO AUDIO OUT SIPDIF OUT VIDEO OUT YPbPr OUT FIREWIRE HDMI OUT Out Out Out Out Out Out Out Out				
	To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function as the physical data source, for example that accepting, parsing, and temporarily storing, in substantially the same way, for example by receiving data that has been transmitted to the DVR, PID filtering, startcode detecting and otherwise analyzing that data, and writing that data to memory locations and disks, to yield the same result, a properly formatted data stream for further processing by the rest of the system.				
[31c] providing a source object, wherein said source object extracts video and audio data from said physical data source;	A Samsung DVR provides a source object, a collection of data and operations that, among other things, extracts video and audio data from the physical data source. For example, in a Samsung DVR, video and audio data move from the Broadcom BCM3255 chip, or similar chip, to memory, including DRAM and/or the Data Transport processor of the Broadcom 7400 chip, or similar chip, and from the BCM7400 chip, or similar chip, to memory, including DRAM. <i>See, e.g.</i> , (BCM7400 Product Brief) (showing Transport Input data going into MPEG-2/DVB Transport of the Broadcom BCM7400 chip:				

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the Claim	Samsung DVRs ¹				
	STEREO AUDIO OUT FIREWIRE				
	To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function as the Source Object, for example that of extracting video and audio data from said physical data source, in substantially the same way, for example by using one or more instantiations of software codes and/or hardware/firmware combinations, to yield the same result, data and operations executing in the DVR that operate on the video and audio data from the physical data source.				
[31d] providing a transform object, wherein said transform object stores and	A Samsung DVR provides a transform object, a collection of data and operations that, among other things, transforms the form of data upon which it operates. For example, Samsung DVRs transform the form of the data. Upon information and belief, the Samsung DVRs store television program data during recording, and play back certain portions, such as certain frames, during certain trickplay operations.				
retrieves data streams onto a storage device;	As another example, Samsung DVRs also perform a temporal transform. For example, Samsung DVRs allow users to store television programs to watch at a later time or can pause live television. <i>See, e.g.</i> , http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung_SMT_3090HD_UserGuide.pdf				
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the Claim	Samsung DVRs ¹			
	 (Samsung SMT-H3090 2008 User Guide), p. 10 ("User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording."); p. 10 ("Record two live TV programs simultaneously while watching two recorded programs on HDD.") Samsung DVRs store data streams on and retrieve data streams from a hard disk drive (HDD) during recording and playback, respectively. <i>See, e.g.</i>, (BCM7400 Product Brief) (showing SATA II interface to HDD): 			
	STEREO AUDIO OUT SPDIF OUT VIDEO OUT YPEPF OUT FIREWIRE Audio HDMIDU Audio HDMIDU SPDIF OUT VIDEO OUT YPEPF OUT FIREWIRE Audio HDMIDU SPDIF OUT VIDEO OUT YPEPF OUT FIREWIRE Audio Out HDMIDU SPDIF DIF OUT FIRE Audio Out SPDIF OUT VIDEO OUT YPEPF OUT FIRE FIRE FIRE TSC/ Comp. FIRE Mod HDMIDU SPDIF DIF OUT SPDIF OUT SPDIF OUT SPDI			
	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf (Samsung SMT-H3090 2008 User Guide), at 6:			

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the Claim	Samsung DVRs ¹		
	Digital HD DVR STB (SMT-H3090) provides the following functions. - An MPEG decoder capable of processing HD/SD stream - SCTE55-1, 55-2 and DOCSIS Cable Modem for OOB Signaling - Digital AV transmission, such as IEEE1394 and HDMI - Content Protection - CableCARD Interface for CAS - OCAP™ 1.0 application platform - DVR Features - Recording :		
	HDD	Capacity	
	160GB	Up to 65 hours for SD (Standard Definition) stream Up to 15 hours for HD (High Definition) stream.	
	320GB	Up to 130 hours for SD (Standard Definition) stream Up to 30 hours for HD (High Definition) stream.	
	For example, in the Sa stored in blocks on the the locations of the Mi To the extent any diffe differences are insubst the same function as the substantially the same combinations, to yield storage locations.	ling a television program, Samsung DVRs may generate index information using start code information. umsung DVRs, on information and belief, data streams in the form of MPEG2 transport stream packets are e hard disk drive. Index information is stored on the hard disk drive as *.clt files, which have pointers to PEG2 transport stream packets of the various recorded programs. erences are alleged to exist between this claim element and the above referenced functionality, such tantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially he Transform Object, for example that of storing and retrieving data streams onto a storage device, in way, for example by using one or more instantiations of software codes and/or hardware/firmware the same result, data and operations executing in the DVR that move video and audio data to and from	
[31e] wherein said source objects obtains a buffer from said transform object, said source object	A Samsung DVR provides a source object, a collection of data and operations that, among other things, obtains a buffer from the transform object, converts video data into data streams, and fills the buffer with the streams. Samsung DVR software obtains a buffer, converts video data into data streams and fills the buffer with the streams. <i>See, e.g.</i> , (BCM7400 Product Brief) ("The BCM7400 incorporates a complete MIPS32-Verified TM microprocessor subsystem, including caches with bridging to memory and a local bus.")		
	1	EXHIBIT A TO TWO INFRINGEMENT CONTENTIONS	

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the Claim	Samsung DVRs ¹ and audio data in conjunction with memory locations and other software processes.			
[31f] wherein said source object is automatically flow controlled by said transform object;	A Samsung DVR has a source object that, among other things, is automatically flow controlled by a transform object. On information and belief, the Samsung DVR software has self-regulating data flow in relation to, for example, the single-port DRAM. <i>See, e.g.,</i> (BCM7400 Product Brief) ("The BCM7400 incorporates a complete MIPS32-Verified TM microprocessor subsystem, including caches with bridging to memory and a local bus.").			

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the Claim	Samsung DVRs ¹
	Samsung K4T511630G 512MB RAM and Samsung K4H561638 RAM).
	In regular operation, there is no significant corruption of data due to overwriting or lack of self-regulation.
	To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function as the Transform Object's automatic flow control of the Source Object, for example that of self-regulating the processing, in substantially the same way, for example by using one or more instantiations of software codes and/or hardware/firmware combinations, to yield the same result, data and operations executing in the DVR that are self regulated.
[31g] providing a sink object,	A Samsung DVR provides a sink object, a collection of data and operations that, among other things, obtains data stream buffers from a transform object and outputs the streams to a video and audio decoder. The Samsung DVR software obtains data streams
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the Claim	Samsung DVRs ¹			
	Digital HD DVR STB			
	Digital HD DVR OCAP STB (Digital High-Definition Digital Video Recorder			
	OpenCable Application Platform Set-Top Box) provides high quality video and audio			
	broadcasting, and interactive services including Video-On-Demand.			
	Digital HD DVR STB (SMT-H3090) provides the following functions. - An MPEG decoder capable of processing HD/SD stream			
		CSIS Cable Modern for OOB Signaling		
		such as IEEE1394 and HDMI		
	- Content Protection			
	- CableCARD Interface for			
	- OCAP™ 1.0 application - DVR Features	platform		
	- DVR Features - Recording :			
	HDD	Capacity		
	160GB	Up to 65 hours for SD (Standard Definition) stream		
		Up to 15 hours for HD (High Definition) stream.		
	320GB	Up to 130 hours for SD (Standard Definition) stream		
		Up to 30 hours for HD (High Definition) stream.		
	(Samsung SMT-H)	3090 2008 Data Sheet), at 1:		
		, ·		
	-			
		SMT-H3090 is Dual tuner Digital Video Rec		
	provides Standard Definition (SD), High-Definition(HD) and Analog video signals. Dual tuner DVR allows cable subscribers to watch and record two HD programs			
	simultaneously.	wa cable subscribers to waterrand record	navonio programs	
	(Samsung SMT-H3090 2008 Data Sheet), at 2:			

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the Claim	Samsung DVRs ¹			
	advanced Homen _ DTCP-IP for Home _ MoCA(Multimedia	with networked media devices by using network standards (DLNA, UPnP) e network content protection over Coaxial Alliance) upgradable (Optional)		
	Back Panel Feat			
	Feature RF Input	Description F-type Female		
	AV Out	2 NTSC-M RCA(CVBS), S-Video, Component(Y/Pb/P) Video, HDMI, 2 RCA, 2 S/FDF (Optical, Bectrical)		
	AV h	1 Component (Y/Pb/Pr) Video, 1 RCA(L/R)		
	Connections-Interactive	USB 2.0 Host, IEEE1394, E-SATA, RJ-45 Ethemet(10/100M)		
	CableCARD	Multi-Stream CableCARD™		
	Power	AC 120V, 60Hz, AC Outlet		
	substantially the		hat of obtaining buffers or pointers thereto and outputting data streams, in the or more instantiations of software codes and/or hardware/firmware being output to a decoder.	
[31h] wherein said decoder converts said streams into display signals and sends said signals to a display;	(Broadcom BCM • Dual advanced A • H264/AVC M • VC-1 Advance • VC-1 Simple a • HD MPE62	R has a decoder that converts data s 1 7400 Product Brief), at 1: FEATURES VC/MPEG-2/VC-1 decoders ain and High Profile to Level 4.1 d Profile © Level 3 and Main Profile and SD MPEG-2 sture decode PEG4 part 2 ASP decode	treams into display signals and sends those signals to a display. See, e.g.,	
	(Broadcom BCM	1 7400 Product Brief), at 2 (showin	g video decoders): EXHIBIT A TO TIVO INFRINGEMENT CONTENTIONS	

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the Claim	Samsung DVRs ¹
	The BCM7400 is a dual-channel high definition satellite, cable, and IP set-top box DVR solution offering integrated AVC (H.264/MPEG-4 Part 10), MPEG-2, MPEG-4 Part 2, DivX, and VC-1 video decoding technology. It combines a data transport processor, two high-definition AVC/MPEG-2/VC- l video decoders, two advanced-audio decoders, 2D and 3D graphics processing, high-quality video scaling and motion adaptive deinterlacing, seven video DACs, dual stereo high-fidelity audio DACs, a dual-threaded 350-MHz MIPS32 with FPU class CPU, and a peripheral control unit providing a variety of set-top box control functions. The BCM7400 supports either DDR 1 or DDR2 memory architectures.
	The MPEG-2 DVB-compliant transport stream/PES parser and demultiplexer is capable of simultaneously processing 256 PIDs via 128 PID channels in up to six independent external transport stream inputs and four internal playback channels. All 128 PID channels can be used by the record, andio, and video interface engine, PCR processing, message filter, and for output via the high- speed transport or remux module. The data transport module can be configured to support eight record channels for PVR functionality and six AV channels to interface to audio and video decoders. The transport provides 1DES/3DES/DVB/Mult2/AES descrambling support. A memory-to- memory DMA security module may be programmed for supporting AES/ 1DES/3DES/CSS/CPRM/CPPM/DTCP copy protection algorithms/ standards. The B CM7400 features the Broadcom secure processor, providing secure key generation, m an agement, and protection.
	The advanced video decoders featured in the BCM7400 are capable of supporting high definition A VC, VC-1, and MPEG-2 streams. A VC support is for Main and High Profile to level 4.1 for 720p and 1080i high definition support or to Level 3.1 for stand and definition streams. A VC High Profile was added to the fidelity range extensions specifically to address the needs of consumer broadcast and playback applications. Tools include addition al transform sizes and spatial prediction modes and support for ad aptive quantization matrix. The video decoders also support high definition VC-1
	(Advanced Profile Level 3, Main, and Simple Profiles) and MPEG-2, Main Profile at Main and High Level. The BCM7400 has two advanced audio processors capable of decoding Dolby Digital, Dolby Digital Plus, AAC 5.1, AAC+level 2, and MPEG 1 layers 1, 2, and 3 with simultaneous pass-through support. 3D SRS audio is also supported. Avail able audio outputs are 1 ² S, S/ PDIF, and two pairs of analog outputs.
	On information and belief, Samsung DVRs have an MPEG-2 decoder that decodes standard definition and/or high definition television programs.

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the Claim	Samsung DVRs ¹			
	SMT-H3090 supports DVR feature through the Hard Disk Drive as follows.			
	Feature	Description		
	File Playback	Play, Stop, Rewind, Pause for recorded contents.		
	File Trick Mode	1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play)		
	Time-Shift Recording	User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.		
	Instant Recording	Record live TV program instantly		
	Watching and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.		
	Audio/Radio Recording	Audio or Radio program recording		
	Simultaneous Recording and Time Shift Recording	Up to two Simultaneous Recording and Time-Shift Recording on live TV programs		
	EPG Recording	Scheduled recording using EPG		
	differences are insubs the same function as t instantiations of softw broadcast data through	tantial. On information and belief, the has he Control Object, for example that of re- vare codes and/or hardware/firmware com- h the system.	laim element and the above referenced functionality, such rdware and software in the Samsung DVRs perform substantially eeving commands same way, for example by using one or more binations, to yield the same result, controlling the flow of the	
[31k] wherein said control object sends flow command events to said source, transform, and	events to source, trans the Samsung DVR. The software receives user the unit, e.g., channel	form, and sink objects. On information a he Samsung DVR software is responsive commands and sends command events t	and operations that, among other things, sends flow command nd belief, the remote control sends IR signals that are received by to front panel buttons and a remote control. The hardware and o other portions of the software to control the various functions of re-in-picture, etc. <i>See, e.g.</i> , (BCM7400 Product Brief) (showing	

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the Claim	Samsung DVRs ¹
sink objects.	STEREO AUDDO OUT SPPDIF OUT VIDEO OUT YPEPP OUT FIREWRIE WIT WIT BE DOTON FIREWRIE WIT WIT WIT WIT BE DOTON FIREWRIE WIT

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		Samsu	g DVRs ¹
	R Feature:	s	
		eature through the Hard Disk Drive as follows.	
3011-03	JOO SUPPONS DIVR 18	ature through the Hard Disk Drive as follows.	
	Feature	Description	
File Pla	yback	Play, Stop, Rewind, Pause for recorded contents.	
F ile Tric	k Mode	1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play)	
		1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play)	
Time-SI	nift Recording	User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.	
Instant	Recording	Record live TV program instantly	
Watchir	ng and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.	
Audio/F	tadio Recording	Audio or Radio program recording	
	neous Recording ne Shift Recording	Up to two Simultaneous Recording and Time-Shift Recording on live TV programs	
EPG Re	cording	Scheduled recording using EPG	

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the Claim	Samsung DVRs ¹		
Claim 32			
32[a]. An apparatus for the simultaneous storage and play back of multimedia data, comprising:	A Samsung DVR can simultaneously store and play back multimedia data. <i>See, e.g.</i> , <u>http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf</u> (Samsung SMT-H3090 2008 User Guide), p. 2 ("Viewing one program while recording another program." "Simultaneous Time Shifted Buffering for two Programs."); p. 9 ("Record two live TV programs simultaneously while watching two recorded programs on HDD.") "TIME WARNER CABLE AND SAMSUNG FORGE AGREEMENT FOR TRU2WAY SET-TOP DEVELOPMENT, PURCHASE & DEPLOYMENT Release Date: 07/06/2009		
	Time Warner Cable and Samsung today announced that they have signed a letter of commitment for the continued development, purchase and deployment of Samsung True2Way enabled set-top boxes, including the first second-source DVR. "We look to offer our customers advanced set-top boxes with features that are simple and easy to use," said Mike Hayashi, Executive Vice President of Advanced Engineering for Time Warner Cable. "We have been a leader in the roll-out of Tru2Way devices and we are continuing to grow our relationship with Samsung, a CE company dedicated to the development of new equipment meeting the necessary standards and offering attractive feature sets." Thomas Rhee, SVP, New Business Development for Samsung, added, "We are thrilled to have worked closely with Time Warner Cable to launch Tru2way on our family of cable set-tops including the SMT-H3090 and SMT-H3270 High Definition DVRs. As in Korea, we look forward to the expansion of Tru2way in North America." This agreement further solidifies Time Warner Cable's commitment to its deployment of Tru2Way enabled set-top boxes. To date Time Warner Cable has deployed over 2 million Tru2Way set-top boxes, of which approximately 400,000 are Samsung boxes. Time Warner Cable and Samsung also recently signed an MOU that focuses on collaborating in development of better home networking solutions for entertainment. This work is part of Time Warner Cable's continuing efforts to provide its customers with technology that brings new levels of ease and convenience." <u>http://www.timewarnercable.com/corporate/about/inthenews.ashx?PRID=2626&MarketID=0</u>		
[32b] a module for accepting television (TV)	A Samsung DVR accepts television broadcast signals. On information and belief, Samsung DVRs receive television programming in the form of QAM-modulated MPEG2 transport stream packets.		
broadcast signals, wherein said TV	See, e.g., (Samsung SMT-H3090 2008 Data Sheet), p.1 ("Samsung SMT-H3090 is Dual tuner Digital Video Recorder(DVR) which provides Standard Definition (SD), High-Definition(HD) and Analog video signals. Dual tuner DVR allows cable EXHIBIT A TO TIVO INFRINGEMENT CONTENTIONS		
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the Claim	Samsung DVRs ¹
signals are based	subscribers to watch and record two HD programs Simultaneously.""), p. 2 ("In-band Tuner : 54 to 864MHz, Receiving 64 or
on a multitude of	256 QAM."));
standards,	
including, but not	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf
limited to,	(Samsung SMT-H3090 2008 User Guide), p. 2 ("RF Input Tuning Range: 88 to 860 MHz."); (BCM7400 Product Brief)
National	(showing BCM3420 and BCM3255 chips)
Television	
Standards	On information and belief, Samsung DVRs accept ATSC broadcast signals.
Committee	
(NTSC)	
broadcast, PAL	
broadcast,	
satellite	
transmission,	
DSS, DBS, or	
ATSC;	
[32c] a module	A Samsung DVR has tuners which can tune TV signals to a specific program. See, e.g., (Samsung SMT-H3090 2008 Data
for tuning said TV	Sheet), p.1 ("Samsung SMT-H3090 is Dual tuner Digital Video Recorder(DVR) which provides Standard Definition (SD),
signals to a	High-Definition(HD) and Analog video signals. Dual tuner DVR allows cable subscribers to watch and record two HD
specific program;	programs Simultaneously.""), p. 2 ("In-band Tuner : 54 to 864MHz, Receiving 64 or 256 QAM.")). For example, based on
	information and belief the Samsung DVRs tune to a specific frequency or a band of frequencies.
[32d] at least one	A Samsung DVR has at least one Input Section, wherein said Input Section converts said specific program to a Moving Pictures
Input Section,	Experts Group (MPEG) formatted stream for internal transfer and manipulation. The Input Section converts said specific
wherein said	program to an MPEG formatted stream, for example in the course of performing QAM demodulation and Analog-to-Digital
Input Section	conversion (A/D). A Samsung DVR will perform QAM demodulation and Analog-to-Digital conversion in the course of
converts said	watching live television and recording a television program. See, e.g.,
specific program	
to an Moving	
Pictures Experts	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf
Group (MPEG)	(Samsung SMT-H3090 2008 User Guide), p. 2 ("RF Input Tuning Range: 88 to 860 MHz."); (BCM7400 Product Brief)
formatted stream	(showing BCM3420 and BCM3255 chips):
for internal	
	EXHIBIT A TO TIVO INFRINGEMENT CONTENTIONS

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the Claim	Samsung DVRs ¹
transfer and	
manipulation;	STEREO AUDIO OUT FIREWIRE
	To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function as the Input Section, for example that of converting a specific program into an MPEG stream, in substantially the same way, for example by turning the input data, whatever its format, into a digital representation such as MPEG, to yield the same result, a properly formatted data stream for internal transfer and manipulation.
[32e] a Media Switch, wherein said Media Switch parses said MPEG stream, said MPEG stream is separated into its video and audio components;	A Samsung DVR has a Media Switch, wherein said Media Switch parses MPEG streams, said MPEG stream is separated into its video and audio components. The Media Switch parses MPEG streams, for example, on information and belief, in the course of PID filtering and start code detection. Broadcom chips used inside Samsung DVRs have PID filters or parsers that PID filter or parse multi-program transport streams to a single-program transport stream and start code detectors that perform start code detection. <i>See, e.g.</i> ,

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the Claim	Samsung DVRs ¹	
	including any additional information needed for its further processing.	
	On information and belief, the MPEG stream is separated into its video and audio components, for example, the course of PID filtering, start code detection, and temporary storage in memory. Additionally, the streams are separated when presented to the video and audio decoders. In the course of PID filtering and start code detection, on information and belief, MPEG2 transport stream packets are discretely analyzed. Each MPEG2 transport stream packet contains audio or video data. The MPEG2 transport stream packets are temporarily stored in memory (e.g., on-chip buffers, flash, and/or system DRAM), where each MPEG2 transport stream packet is held in a distinct memory location. As another example, the video and audio data packets of the MPEG data are separated when they are sent to separate decoders. For example, audio packets go to audio decoders while video packets go to video decoders	
	Samsung DVRs may contain MPEG encoders, including the BCM7041:	

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the Claim	Samsung DVRs ¹	
	Still further, on information and belief, the hardware and software in the Samsung DVRs perform substantially the same	
	function as the Media Switch, that of parsing an MPEG stream and separating an MPEG stream into its video and audio	
	components so that the video and audio components can be provided to the video and audio MPEG decoders, in substantially the	
	same way, by sending the video and audio data to separate decoders, regadless of any order of processing in the DVR, to yield	
	the same result, an analyzed MPEG stream that is separated into audio and video components for playback on a user's display,	
	and therefore would infringe under the doctrine of equivalents.	
		1

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the Claim		Samsung DVRs ¹		
	Digital HD DVR STB (SMT-H3090) provides the following functions.			
	- An MPEG decoder capable of processing HD/SD stream			
	 SCTE55-1, 55-2 and DOCSIS Cable Modem for OOB Signaling Digital AV transmission, such as IEEE1394 and HDMI Content Protection CableCARD Interface for CAS 			
	- OCAP™ 1.0 applicatio	n platform		
	- DVR Features			
	- Recording : HDD Capacity			
	160GB	Up to 65 hours for SD (Standard Definition) stream		
		Up to 15 hours for HD (High Definition) stream.		
	320GB	Up to 130 hours for SD (Standard Definition) stream		
	Up to 30 hours for HD (High Definition) stream.			

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he Claim	Samsung DVRs ¹				
at least one					
ut Section,	said storage device. F	or example, Samsung DVRs allow users	to play back recorded television programs to watch at a later		
ein said	time. See, e.g.,				
Output Section					
ets said	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf				
onents from					
storage	(Buillbuilg Bivil 1150)	0 2000 Oser Guide), at 10.			
e;	DVR Feature	c			
-,					
	SMIT-HOUGO SUPPORS DIVR 1	eature through the Hard Disk Drive as follows.			
	Feature	Description			
	File Playback	Play, Stop, Rewind, Pause for recorded contents.			
	File Trick Mode	1, 4, 8, 32 times FFP (Fast Forward Play)			
		1, 4, 8, 32 times FRP (Fast Rewind Play)			
		1/2, frame by frame skipping SFP (Slow Forward Play)			
		1/2, Frame by frame SRP (Slow Rewind Play)			
	Time-Shift Recording	User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90			
		minutes of recording for Time-shift recording.			
	Instant Recording	Record live TV program instantly			
	Watching and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.			
	Audio/Radio Recording	Audio or Radio program recording			
	Audio/Radio Recording Simultaneous Recording and Time Shift Recording				

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the Claim	Samsung DVRs ¹			
	provides Standard E	VIT-H3 090 is Dual tuner Digital Video Recorder(DVR) which lefinition (SD), High-Definition(HD) and Analog video signals. /s cable subscribers to watch and record two HD programs		
	On information and belief, Samsung DVRs extract MPEG2 transport stream packets from a hard disk drive (HDD) durin back. See, e.g.,			
	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pd (Samsung SMT-H3090 2008 User Guide), at 6:			
	MT-H3090) provides the following functions. bable of processing HD/SD stream DOCSIS Cable Modem for OOB Signaling h, such as IEEE1394 and HDMI for CAS in platform			
	HDD	Capacity		
	160GB Up to 65 hours for SD (Standard Definition) stream Up to 15 hours for HD (High Definition) stream.			
	320GB Up to 130 hours for SD (Standard Definition) stream Up to 30 hours for HD (High Definition) stream.			
To the extent any differences are alleged to exist between this claim element and the above referenced function differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs per the same function as the Output Section, for example that of extracting said video and audio components from				

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the Claim		Samsung DVRs ¹			
	device, in substantially the same way, for example by reading the data from the storage device, to yield the same result, a				
	retrieved data stream for further processing and display to a viewer.				
[32h] wherein	A Samsung DVR has at least one Output Section that assembles said video and audio components into an MPEG stream. On				
said Output	information and belief, MPEG2 transport stream packets are assembled into an MPEG2 transport stream, de-multiplexed, and				
Section assembles	packetized elementary streams are constructed when read from the disk and/or before being sent to a decoder				
said video and	Demonstrale Widee en	I An Jie date and not des Jiels for all advert			
audio components into an MPEG stream;					
stream,					
	http://www.timewarne	rcable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf			
	(Samsung SMT-H3090) 2008 User Guide), at 10:			
	DVR Features	S			
		-			
		SMT-H3090 supports DVR feature through the Hard Disk Drive as follows.			
	Feature	Feature Description			
	File Playback	Play, Stop, Rewind, Pause for recorded contents.			
	File Trick Mode	1, 4, 8, 32 times FFP (Fast Forward Play)			
		1, 4, 8, 32 times F RP (Fast Rewind Play)			
		1/2, frame by frame skipping SFP (Slow Forward Play)			
		1/2, Frame by frame SRP (Slow Rewind Play)			
	Time-Shift Recording	User can pause live TV program for a certain amount of			
		time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.			
	Instant Recording	Record live TV program instantly			
	Watching and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.			
	Audio/Radio Recording Audio or Radio program recording				
	Simultaneous Recording Up to two Simultaneous Recording and Time-Shift and Time Shift Recording Recording on live TV programs				
	EPG Recording	Scheduled recording using EPG			

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the Claim		Samsung DVRs ¹		
	(Samsung SMT-H3090	2008 Data Sheet), at 1:		
	-H3 090 is Dual tuner Digital Video Recorder(DVR) which nition (SD), High-Definition(HD) and Analog video signals. cable subscribers to watch and record two HD programs			
	On information and belief, Samsung DVRs extract MPEG2 transport stream packets from a hard disk drive (HDD) during play back. <i>See, e.g.,</i>			
	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf (Samsung SMT-H3090 2008 User Guide), at 6:			
	Digital HD DVR STB (SMT-H3090) provides the following functions. - An MPEG decoder capable of processing HD/SD stream - SCTE55-1, 55-2 and DOCSIS Cable Modem for OOB Signaling - Digital AV transmission, such as IEEE1394 and HDMI - Content Protection - CableCARD Interface for CAS - OCAP™ 1.0 application platform - DVR Features - Recording :			
	HDD	Capacity		
	160GB	Up to 65 hours for SD (Standard Definition) stream Up to 15 hours for HD (High Definition) stream.		
	320GB	Up to 130 hours for SD (Standard Definition) stream Up to 30 hours for HD (High Definition) stream.		
	These video and audio	data are assembled into an MPEG stream so that they can be processed and displayed by an MPEG		

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the Claim	Samsung DVRs ¹
	VIDEO AND GRAPHICS DISPLAY
	Overview
	The video and graphics module accepts decoded AVC/MPEG/VC-1 or analog video and performs professional quality compositing of text and graphics with video. The video subsystem takes in uncompressed video from either the AVC/MPEG/ VC-1 decoder or the digital ITU-T-656 input. The subsystem processes the input videos based on the input and output format, and system requirements. It can be scaled and converted to the output display format directly, or go through single and multiple capture and playback loops. Each capture and playback loop could involve data processing like DNR, MAD-IT, or scaling.
	Two independent video streams (one stream must be limited to SD stream) can be processed at the same time and converted to different size and format. Finally, they can be blended together as PIP (picture in picture) windows or drive up to two separate displays. Both displays may have separate graphics inputs to blended with. The architecture allows users to create a series of frame-buffers that allow an unlimited number of graphics layers to be composited and blended together before being displayed.
	Once the graphical frame-buffers are available, they can be combined with the video using a new compositor. This new compositor allows up to two video surfaces to be combined with a graphical surface (frame-buffers). The blending order of any surface is controlled by software to allow the utmost flexibility for the end-user.
	The graphic surface generation is now divorced from the real-time display requirements of the video output. Once the new graphics surface is available, it can be switched in for display. Therefore, all of the graphics development interacts only with the memory—not with any of the display hardware.
	The architecture goal of this new, modular approach is to allow various chip-sets to share the same basic component building blocks to achieve the customers design requirements. The BCM7405 employs enough of these building blocks to realize a dual video output with independent graphics on each output. Supported video decode and display format combinations can be seen in Table 1-4 on page 1-36.
	BRCM 7405 Preliminary Hardware Data Module at 1-35
	To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function as the Output Section, for example that of assembling said video and audio components into an MPEG stream, in substantially the same way, for example by demultiplexing or packetizing the data, to yield the same result, a properly formatted data stream for presentation to the decoder.
[32i] wherein said Output Section sends said MPEG	A Samsung DVR has an Output Section that sends said MPEG stream to a decoder. See, e.g., (BCM7400 Product Brief):

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the Claim		Samsung DVRs ¹	
	Digital HD	DVR STB	
	OpenCable Application	P STB (Digital High-Definition Digital Video Recorder n Platform Set-Top Box) provides high quality video and audio ractive services including Video-On-Demanβ.	
	- An MPEG decoder ca - SCTE55-1 , 55-2 and I		
	HDD	Capacity	
	160GB Up to 65 hours for SD (Standard Definition) stream Up to 15 hours for HD (High Definition) stream.		
	320GB	Up to 130 hours for SD (Standard Definition) stream Up to 30 hours for HD (High Definition) stream.	

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the Claim	Samsung DVRs ¹
	The BCM7400 is a dual-channel high definition satellite, cable, and IP set-top box DVR solution offering integrated AVC (H.264/MPEG-4 Part 10), MPEG-2, MPEG-4 Part 2, DivX, and VC-1 video decoding technology. It combines a data transport processor, two high-definition AVC/MPEG-2/VC- 1 video decoders, two advanced-audio decoders, 2D and 3D graphics processing, high-quality video scaling and motion adaptive deinterlacing, seven video DACs, dual stereo high-fidelity audio DACs, adual-threaded 330-MHz MIPS32 with FPU class CPU, and a peripheral control unit providing a variety of set-top box control functions. The BCM7400 supports either DDR1 or DDR2 memory architectures.
	The MPEG-2 DVB-compliant transport stream/PES parser and demultiplexer is capable of simultaneously processing 256 PIDs via 128 PID channels in up to six independent external transport stream inputs and four internal playback channels. All 128 PID channels can be used by the record, addio, and video interface engine, PCR processing, message filter, and for output via the high- speed transport or remux module. The data transport module can be configured to support eight record channels for PVR functionality and six AV channels to interface to audio and video decoders. The transport provides 1DES/3DES/DVB/Mult2/AES descrambling support. A memory-to- memory DMA security module may be programmed for supporting AES/ 1DES/3DES/CSS/CPRM/CPPM/DTCP copy protection algorithms/ standards. The B CM/1400 features the Broadcom secure processor, providing secure key generation, management, and protection.
	The advanced video decoders featured in the BCM7400 are capable of supporting high definition A VC, VC-1, and MPEG-2 streams. A VC support is for Main and High Profile to level 4.1 for 720p and 1080i high definition support or to Level 3.1 for stand and definition streams. A VC High Profile was added to the fidelity range extensions specifically to address the needs of consumer broadcast and playback applications. Tools include addition al transform sizes and spatial prediction modes and support for ad aptive quantization matrix. The video decoders also support high definition VC-1
	(Advanced Profile Level 3, Main, and Simple Profiles) and MPEG-2, Main Profile at Main and High Level. The BCM7400 has two advanced audio processors capable of decoding Dolby Digital, Dolby Digital Plus, AAC 5.1, AAC+level 2, and MPEG 1 layers 1, 2, and 3 with simultaneous pass-through support. 3D SRS audio is also supported. Available audio outputs are 1 ² S, S/ PDIF, and two pairs of analog outputs.

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the Claim		Samsung DVRs ¹	
[32k] wherein	A Samsung DVR delivers decoded TV output signals to a TV receiver. A Samsung DVR can be connected to a TV using		
said decoder	HDMI, DVI, component, Y Output, Video Output, S-Video Out, Cable Out, or 1394 connectors. See, e.g.,		
delivers said TV		1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf	
output signals to a	(Samsung SMT-H3090 2008 User Guide), at 13-	14:	
TV receiver; and			
	<u>Connection to a TV Having a Composite or S-</u> VIDEO Jack	Connection to a TV Having Component Jacks (Y. Pb. Pr)	
	Below is the method for connecting to a TV having a composite or S-VIDEO jack.	See below to connect to a TV having a Component port (Y, Pb, Pr).	
		When connecting the Component Video and Audio cables, be sure to match the jacks to the plugs of the same color.	
	Video Connection Connection to the VIDEO OUT jack Using a video connector of Video & Audio cable, connect the VIDEO OUT jack to the Video Input jack on the TV.	Audio Cable	
	Connection to the S-VIDEO OUT jack Using an S-Video cable, connect the S-VIDEO OUT jack to the S-Video Input jack on the TV.	Video Connection Using the offered Video (Component) cable, connect the Y, Pb, Pr (HDTV) jack to the Y, Pb, Pr (DTV Video Input) jack on the TV.	
	Audio Connection Using the offered Audio cable or audio connectors of Video & Audio cable, connect the AUDIO OUT (LR) jacks on the rear panel to the Audio Imput (LR) jacks on the TV. Be sure to match the audio jacks with the plugs of the same color.	Audio Connection Using the offered Audio cable, connect the AUDIO OUT (L/R) jacks on the rear panel to the Audio Input (L/R) jacks on the TV. Be sure to match the audio jacks with the plugs of the same color.	
	SMT+10080 User Guide _13	14_ © SAMSUNG Electronics Co., Ltd.	
[321] accepting	A Samsung DVR accepts control commands from	n a user, wherein said control commands are sent through the system and affect	
control commands		R software is responsive to front panel buttons and a remote control. On	
from a user,		R signals that are received by the Samsung DVR. The hardware and software	
wherein said		flow of data through the system, e.g., begin recording, channel change,	
control commands	trickplay, etc. See, e.g.,		
are sent through	(BCM7400 Product Brief) (showing front panel c	ontrols input to the BCM7400 chip):	
		EXHIBIT A TO TIVO INFRINCEMENT CONTENTIONS	

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the Claim	Samsung DVRs ¹	
the system and affect the flow of said MPEG stream.	Stere Aubo out Stere Aubo out	

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SMT-H30 File Play File Trick Time-Shi Instant F Watching Audio/Ra Simultan and Time EPG Rec To the e differen the sam. includin comman	Samsung DVRs ¹		ng DVRs'
File Trick File Trick Time-Shi Instant F Watching Audio/Ra Simultan and Time EPG Rec To the e differen the sam- includin comman Claim 33	R Feature 3090 supports DVR fr	S eature through the Hard Disk Drive as follows.	
File Trick File Trick Time-Shi Instant F Watching Audio/Ra Simultan and Time EPG Rec To the e differen the sam- includin comman Claim 33	Feature	Description	
Time-Shi Instant F Watching Audio/Ra Simultan and Time EPG Rec To the e differen the samu includin comman	ayback	Play, Stop, Rewind, Pause for recorded contents.	
Instant F Watching AudioRa Simultan and Time EPG Rec To the e differen the sam- includin comman	ick Mode	1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play)	
Watching Audio/Ra Simultan and Time EPG Rec To the e differen the samu includin comman	hift Recording	User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.	
AudioRa Simultan and Time EPG Rec To the e differen the samincludin comman	Recording	Record live TV program instantly	
Simultan and Time EPG Rec To the e differen the sam- includin comman	ing and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.	
To the edifferen the same includin comman	Radio Recording	Audio or Radio program recording	
To the e differen the sami includin commar Claim 33	aneous Recording ne Shift Recording	Up to two Simultaneous Recording and Time-Shift Recording on live TV programs	
differen the sami includin commar Claim 33	ecording	Scheduled recording using EPG	
	To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function, for example that of accepting control commands from a user, in substantially the same way, for example by including hardware and/or software interfaces that can accept user commands, to yield the same result, wherein said control commands are sent through the system and affect the flow of said MPEG stream.		
The apparatus of In addit			
claim 32, wherein stream t said Input Section	to a destination	indicated by said control commands.	Samsung DVRs include an input section that directs an MPEG
	d For example, when a Samsung DVR receives a command to record a television program, an input section, including for e tuners, parsers, and other processing devices may direct MPEG data to any of memory, hard disks, and/or optical storage		

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the Claim	Samsung DVRs ¹
indicated by said control commands.	devices. STEREO AUDIO OUT SIPDIF OUT VIDEO OUT VIDEO OUT SIPDIF OUT VIDEO OUT FIREWIRE HOM OUT Audio HOM/IOVI SIPDIF MTSC/ Out HOM/IOVI SIPDIF Audio DIF Mod HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF SIPDIF SIPOADCOM HOM/IOVI SIPDIF Mod HOM/IOVI SIPDIF SIPOADCOM HOM/IOVI SIPDIF SIPOADCOM HOM/IOVI SIPDIF SIPOADCOM HOM/IOVI SIPDIF SIPOADCOM HOM/IOVI SIPDIF SIPOADCOM HOM/IOVI SIPDIF SIPOADCOM HOM/IOVI SIPDIF SIPOADCOM HOM/IOVI SIPOADCOM HOM/IOVI SIPOADCOM HOM/IOVI SIPOACOM HOM/IOVI SIP
Claim 34	
The apparatus of claim 32, wherein said Output Section extracts said video and audio components from the storage device indicated by said control commands.	In addition to the features described above regarding claim 32, Samsung DVRs include an output section that extracts video and audio components from the storage device indicated by said control commands. For example, when a Samsung DVR receives a command to play back a television program, an output section, including for example decoders, demodulators, and other processing devices may extract video and audio data from any of memory, hard disks, and/or optical storage devices for display to a viewer.

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the Claim	Samsung DVRs ¹
	STEREO AUDIO OUT FIREWIRE

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the Claim	Samsung DVRs ¹
Claim 36	
The apparatus of claim 32, wherein the storing and extracting of said video and audio components from said storage device are performed simultaneously.	In addition to the features described above regarding claim 32, Samsung DVR can simultaneously store and extract video and audio components from a storage device, for example, in the course of simultaneously recording and playing back television programming. <u>http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf</u> (Samsung SMT-H3090 2008 User Guide), p. 2 ("Viewing one program while recording another program." "Simultaneous Time Shifted Buffering for two Programs."); p. 9 ("Record two live TV programs simultaneously while watching two recorded programs on HDD.") To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function, for example storing and extracting of said video and audio components from said storage device, in substantially the same way, for example by performing these actions substantially simultaneously, to yield the same result, wherein said storing and extracting appear to occur at the same time.
Claim 37	
The apparatus of claim 32, wherein said Media Switch calculates and logically associates a time stamp to said video and audio components.	In addition to the features described above regarding claim 32, Samsung DVRs include a Media Switch that calculates and logically associates a time stamp to said video and audio components. For example, when a Samsung DVR records a program a local timestamp may be generated by a processor and internal clock, and stored with the video and audio date. See, e.g., BRCM 7405 functional description at page 1-22: A local timestamp is generated at the input buffer via an internal counter using a 27-MHz clock selectable from any of the three available locked timebases, or the free-running system clock. The local timestamp can be prepended as a 32-bit field to each recorded transport packet. The format of the 32-bit timestamp field is programmable. In one mode, this field contains a 28-bit local timestamp plus a 4-bit parity which can be used[during playback to transmit the packets at a rate equivalent to when they were recorded and can be used for PCR correction in the Remux modules. In another mode, the upper two bits of the 32-bit timestamp field are user programmable with the remaining bits being the timestamp.
Claim 38	
The apparatus of claim 32, wherein said Media Switch extracts time stamp values	In addition to the features described above regarding claim 32, Samsung DVRs include a Media Switch that extracts time stamp values from a digital TV stream and logically associates said time stamp values to said video and audio components. For example, when a Samsung DVR receives and records digital input stream, it may include a time stamp, such as a presentation time stamp (PTS) that is included in that stream. The PTS will be extracted and stored with the input data stream.
5463861	exhibit a to tivo infringement contentions '389 patent Samsung dvrs

the Claim	Samsung DVRs ¹		
from a digital TV	See, e.g., BRCM 7405 functional description at page 1-22:		
stream and logically	Record Channel's Index Table Generation		
associates said time stamp values to said video and audio components.	Index table generation is a function that is supported in the record channel. Although this function handles more than just start code table entries, it will be referred to as the SCD (start code detector) in this document. The SCD records the positions of PES packet header stream_id's and elementary stream start codes within a recorded transport stream for a given PID. There are two transport modes of operation: MPEG and DIRECTV. The data structure for data stored in the memory buffer is a start code index table that is detailed in the Record Index Table Definition section.		
	Within each transport mode (MPEG and DIRECTV), there are four index table modes supported. All modes utilize a 6-word index entry. Four index entry types are supported: Start Code (SC), Presentation Time Stamp (PTS), Transport Field (TF), and Seamless Pause (SP). The following describes the four entry types:		
	1 The SC index entry provides offsets to start-code locations within the associated record buffer.		
	2 The PTS index entry provides PTS values extracted from the recorded stream.		
	3 The TPIT transport field parser stores transport field index entries. For the on-change conditions, an initial entry is made for detection of the first PID. For example, if the first packet for a PID with the transport_scrambling_control_change_en bit set has a scrambling control of 10, an index table entry is stored for the transport_scrambling_control_change condition with the transport_scrambling_control_change bit set and the actual value of the scrambling_control of 10 is stored in the scram_control field.		
	4 The seamless pause feature is intended for use with playback. It allows live viewing of a program with the capability of pausing the program. The program is initially viewed without going through the record/playback path. This eliminates channel change latency incurred when going through this path. When the user wishes to pause the program, a record channel must be enabled with the appropriate PID channels selected for record. Then REC_PAUSE_EN is asserted. This assertion prevents the selected PID channel data from being sent to the audio/video decoders. The user sees this as a pause. Once REC_PAUSE_EN is set, the next packet that is recorded has a seamless pause entry made in the record index table (if the index table is enabled). When the user wishes to resume the program, the stream now comes from a playback channel instead of the live channel. The index table entry made for seamless pause is used to determine where to start the playback.		
Claim 43			
The apparatus of claim 32 , further comprising: a module for increasing the decoder system	In addition to the features described above regarding claim 32, Samsung DVRs include fast playback and fast reverse playback.		

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the Claim		Samsun	g DVRs ¹
clock rate for fast playback or fast reverse playback	DVR Feature	S eature through the Hard Disk Drive as follows.	
	Feature	Description	
	File Playback	Play, Stop, Rewind, Pause for recorded contents.	
	File Trick Mode	1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play)	
	Time-Shift Recording	User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.	
	Instant Recording	Record live TV program instantly	
	Watching and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.	
	Audio/Radio Recording	Audio or Radio program recording	
	Simultaneous Recording and Time Shift Recording	Up to two Simultaneous Recording and Time-Shift Recording on live TV programs	
	EPG Recording	Scheduled recording using EPG	
	On information and belief, at least one of these fast playback and fast reverse playback modes are implemented by, among other things, increasing the decoder system clock rate. For example, the PCR block may be used by rate managers to control the playback rate of the decoders. PCR Recovery Block The data transport design supports two equivalent PCR recovery circuits, each programmed independently. Each data transport PCR module is capable of extracting the PCR information from a selected packet stream and generating Timebase pulses (Timebase is a 27-MHz pulse train in 108-MHz clock domain) output that can be used by rate managers. Each PCR module is also used to send the extracted PCRs directly to the audio and video decoders to ensure that both decoders are using the same PCR.		
Claim 44			
he apparatus of	In addition to the feature	ares described above regarding claim 32, S	Samsung DVRs include slow playback and slow reverse
			EXHIBIT A TO TIVO INFRINGEMENT CONTENTIO '389 PATEN

the Claim		Samsu	ng DVRs ¹
claim 32 , further comprising: a module for decreasing the decoder system clock rate for	playback. DVR Feature SMT-H3090 supports DVR fe	S ature through the Hard Disk Drive as follows.	
	Feature	Description	
slow playback or slow reverse	File Playback	Play, Stop, Rewind, Pause for recorded contents.	
playback.	File Trick Mode	1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play)	-
	Time-Shift Recording	User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.	-
	Instant Recording	Record live TV program instantly	
	Watching and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.	
	Audio/Radio Recording	Audio or Radio program recording	-
	Simultaneous Recording and Time Shift Recording	Up to two Simultaneous Recording and Time-Shift Recording on live TV programs	
	EPG Recording	Scheduled recording using EPG	
	On information and belief, at least one of these slow playback and slow reverse playback modes are implemented by, among other things, decreasing the decoder system clock rate. For example, the PCR block may be used by rate managers to control the playback rate of the decoders. PCR Recovery Block The data transport design supports two equivalent PCR recovery circuits, each programmed independently. Each data transport PCR module is capable of extracting the PCR information from a selected packet stream and generating Timebase pulses (Timebase is a 27-MHz pulse train in 108-MHz clock domain) output that can be used by rate managers. Each PCR module is also used to send the extracted PCRs direțity to the audio and video decoders to ensure that both decoders are using the same PCR.		

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the Claim	Samsung DVRs ¹		
Claim 49			
The apparatus of claim 32, wherein said Media	In addition to the features described above regarding claim 32, Samsung DVRs include a Media Switch that has a data bus connecting it to a CPU and DRAM.		
Switch has a data bus connecting it to a CPU and DRAM.	For example, Samsung DVRs may include a processor that includes, for example, an EBI with a data bus that connects to both a CPU, e.g. a MIPs processor or the like, and DRAM, including memory used for DMA or other storage or buffering functions. See, e.g. BRCM7405 Functional Description at 1-83		
	The BCM7405 EBI provides a 27-bit address bus and a 16-bit bidirectional data bus. In addition, separate read and write strobes are provided along with up to six firmware-configurable chip select signals. Each chip select is fully programmable and:		
	 Supports block sizes between 8 KB and 64 MB Has extended clock cycle access control Has 8-bit or 16-bit selection of peripheral data bus width 		
	The BCM7405 EBI automatically breaks up accesses where the transfer data is larger than the target size, such as a 32-bit read or write initiated by the CPU or internal DMA targeting an 8-bit wide peripheral results in four separate byte-wire read or write accesses to the target.		
	The BCM7405 EBI supports glueless connection to an external Nand Flash device for booting the Host MIPS or for general nonvolatile storage. Many standard Nand Flash devices are supported, from 128 Mbit to 2 Gbit densities, and in x8 and x16 data widths. Hardware ECC, write protect, and local buffering assists with booting.		
	Synchronous burst read operations for an external FLASH ROM on the EBI bus is supported, which allows more code to remain resident in the external EPROM chips instead of mirroring it to DRAM storage.		
	Internal bus protocols need to be extended to allow burst reads. The EBI interface converts these burst accesses into a cache-line read of 16 bytes. Non-cacheable access would be handled as single word reads (as currently happens). This allows the use of synchronous FLASH ROM chips, such as the Intel 28F256Kxx family.		
Claim 50			
The apparatus of claim 32, wherein said Media	In addition to the features described above regarding claim 32, Samsung DVRs include a Media Switch that shares an address bus with a CPU and DRAM.		

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the Claim	Samsung DVRs ¹
Switch shares an address bus with a CPU and DRAM.	For example, Samsung DVRs may include a processor that includes, for example, an EBI with a shared address bus that connects to both a CPU, e.g. a MIPs processor or the like, and DRAM, including memory used for DMA or other storage or buffering functions. See, e.g. BRCM7405 Functional Description at 1-83
	The BCM7405 EBI provides a 27-bit address bus and a 16-bit bidirectional data bus. In addition, separate read and write strobes are provided along with up to six firmware-configurable chip select signals. Each chip select is fully programmable and: Supports block sizes between 8 KB and 64 MB Has extended clock cycle access control
	Has 8-bit or 16-bit selection of peripheral data bus width
	The BCM7405 EBI automatically breaks up accesses where the transfer data is larger than the target size, such as a 32-bit read or write initiated by the CPU or internal DMA targeting an 8-bit wide peripheral results in four separate byte-wire read or write accesses to the target.
	The BCM7405 EBI supports glueless connection to an external Nand Flash device for booting the Host MIPS or for general nonvolatile storage. Many standard Nand Flash devices are supported, from 128 Mbit to 2 Gbit densities, and in x8 and x16 data widths. Hardware ECC, write protect, and local buffering assists with booting.
	Synchronous burst read operations for an external FLASH ROM on the EBI bus is supported, which allows more code to remain resident in the external EPROM chips instead of mirroring it to DRAM storage.
	Internal bus protocols need to be extended to allow burst reads. The EBI interface converts these burst accesses into a cache-line read of 16 bytes. Non-cacheable access would be handled as single word reads (as currently happens). This allows the use of synchronous FLASH ROM chips, such as the Intel 28F256Kxx family.
Claim 51	
The apparatus of claim 32, wherein said Media	In addition to the features described above regarding claim 32, Samsung DVRs include a Media Switch that operates asychronously and autonomously with a CPU.
Switch operates asychronously	For example, Samsung DVRs may include a processor that includes, for example, PCI bus that allows the media switch to

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the Claim	Samsung DVRs ¹
and autonomously with a CPU.	operate asynchronously and autonomously from the CPU. See, e.g. BRCM7405 Functional Description at 1-83
	PCI AND EXTERNAL BUS INTERFACE
	The BCM7405 includes a shared interface that supports 33 MHz PCI 2.3 and external buses to allow the internal processor control of external peripherals that may be attached to the PCI bus and to allow an external controller to access the peripherals and memory associated with the BCM7405.
	The PCI and EBI interfaces share many of the same pins to reduce the overall pin counts. Both PCI and EBI operate at the same PCI clock input frequency. Critical control signals such as FRAMEb and CSb are not shared. The arbitration and multiplexing of this PCI/EBI interface happens completely in hardware. When the interface is operated as an EBI function, PCI devices will not respond because the FRAMEb is not asserted. When the interface is operated as a PCI function, EBI devices will not respond because the CSb is not asserted. Both EBI and PCI interfaces operate at a max clock frequency of 33 MHz.
	Software running on the internal MIPS processor can allow the BCM7405 to act as a PCI South bridge. This allows an easier migration path for external processors to access the peripheral devices (such as the USB controller).
	When in PCI Client mode, the EBI function is disabled and the PCI interface supports both internal and external PCI masters. When in PCI Host Bridge mode, the EBI interface functions as an EBI bus master only. It supports asynchronous, synchronous and 68K modes. The PCI interface supports both external and internal PCI masters. The internal PCI arbiter is designed to support the EBI request as a modified PCI master with special request and grant handshaking. If an external PCI arbiter is selected, the special EBI request/grant pair maps to the PCI GNT2b/REQ2b pins.
Claim 52	
The apparatus of	In addition to the features described above regarding claim 32, Samsung DVRs include a storage device is connected to said
claim 32, wherein	Media Switch.
said storage	
device is	For example, the Samsung DVRs include, among other things, a hard drive operatively connected to the media switch for storing
connected to said	multimedia data.
Media Switch.	

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the Claim	Samsung DVRs ¹
	STEREO AUDIO OUT SPDIF OUT VIDEO OUT YPEP OUT FIREWIRE OUT OUT FIREWIRE OUT OUT OUT OUT OUT OUT OUT OUT

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the Claim	Samsung DVRs ¹
apparatus for the	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf
simultaneous	(Samsung SMT-H3090 2008 User Guide), p. 2 ("Viewing one program while recording another program." "Simultaneous Time
storage and play	Shifted Buffering for two Programs."); p. 9 ("Record two live TV programs simultaneously while watching two recorded
back of	programs on HDD.")
multimedia data,	"TIME WARNER CABLE AND SAMSUNG FORGE AGREEMENT FOR TRU2WAY SET-TOP DEVELOPMENT,
comprising:	PURCHASE & DEPLOYMENT
	Release Date: 07/06/2009
	K(Kast Datt. 07/00/200)
	Time Warner Cable and Samsung today announced that they have signed a letter of commitment for the continued development,
	purchase and deployment of Samsung True2Way enabled set-top boxes, including the first second-source DVR.
	"We look to offer our customers advanced set-top boxes with features that are simple and easy to use," said Mike Hayashi,
	Executive Vice President of Advanced Engineering for Time Warner Cable. "We have been a leader in the roll-out of Tru2Way
	devices and we are continuing to grow our relationship with Samsung, a CE company dedicated to the development of new
	equipment meeting the necessary standards and offering attractive feature sets."
	Thomas Rhee, SVP, New Business Development for Samsung, added, "We are thrilled to have worked closely with Time
	Warner Cable to launch Tru2way on our family of cable set-tops including the SMT-H3090 and SMT-H3270 High Definition
	DVRs. As in Korea, we look forward to the expansion of Tru2way in North America."
	This agreement further solidifies Time Warner Cable's commitment to its deployment of Tru2Way enabled set-top boxes. To
	date Time Warner Cable has deployed over 2 million Tru2Way set-top boxes, of which approximately 400,000 are Samsung
	boxes.
	Time Warner Cable and Samsung also recently signed an MOU that focuses on collaborating in development of better home
	networking solutions for entertainment. This work is part of Time Warner Cable's continuing efforts to provide its customers
	with technology that brings new levels of ease and convenience."
	http://www.timewarnercable.com/corporate/about/inthenews.ashx?PRID=2626&MarketID=0
[61b] a physical	A Samsung DVR has an input device that may include cable input, tuners, an analog to digital converter, and/or, on information
data source,	and belief, other components such as the Broadcom BCM3255 or other similar chip that may perform QAM demodulation,
wherein said	including chips made by other third parties. See, e.g., (Samsung SMT-H3090 2008 Data Sheet), p.1 ("Samsung SMT-H3090 is
physical data	Dual tuner Digital Video Recorder(DVR) which provides Standard Definition (SD), High-Definition(HD) and Analog video
source accepts	signals. Dual tuner DVR allows cable subscribers to watch and record two HD programs Simultaneously.""), p. 2 ("In-band
broadcast data from an input	Tuner : 54 to 864MHz, Receiving 64 or 256 QAM."));
nom an mput	

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| the Claim | Samsung DVRs ¹ | | | |
|-----------|--|--|--|--|
| the Claim | Se
The BCM7400 is a dual-channel high definition satellite, cable, and IP set-top
box DVR solution offering integrated AVC (H.264/MPEG-4 Part 10),
MPEG-2, MPEG-4 Part 2, DivX, and VC-1 video decoding technology. It
combines a data transport processor, two high-definition AVC/MPEG-2/VC-
1 video decoders, two advanced-audio decoders, 2D and 3D graphics
processing, high-quality video scaling and motion adaptive deinterlacing,
seven video DACs, dual stereo high-fidelity audio DACs, a dual-threaded
350-MHz MIPS32 with FPU class CPU, and a peripheral control unit
providing a variety of set-top box control functions. The BCM7400 supports
either DDR1 or DDR2 memory architectures.
The MPEG-2 DVB-compliant transport stream/PES parser and demultiplexer
is capable of simultaneously processing 256 PIDs via 128 PID channels in up
to six independent external transport stream inputs and four internal playback
channels. All 128 PID channels can be used by the record, audio, and video
interface engine, PCR processing, message filter, and for output via the high-
speed transport or remux module. The data transport module can be
configured to support eight record channels for PVR functionality and six AV
channels to interface to audio and video decoders. The transport provides
1DES/3DES/DVB/Multi2/AES descrambling support. A memory-to-
memory DMA security module may be programmed for supporting AES/
1DES/3DES/CVEM/CPPM/DTCP copy protection algorithms/ | Profile at Main and High Level. The BCM7400 has two advanced audio
processors capable of decoding Dolby Digital, Dolby Digital Plus, AAC 5.1,
AAC+ level 2, and MPEG 1 layers 1, 2, and 3 with simultaneous pass-through
support. 3D SRS audio is also supported. Available audio outputs are I ² S, S/
PDIF, and two pairs of analog outputs.
High-quality video and graphics processing is integrated, featuring advanced
studio-quality 2D and 3D graphics processing. Also included are motion-
adaptive deinterlacing with 3:2 pull-down, and letterbox detection. Digital
noise reduction minimizes mosquito noise and MPEG artifacts, including
block noise. Picture-in-picture, split picture, and independent picture in
graphics are supported.
The BCM7400 has a dual-stream analog video encoder with Macrovision that
supports the following output standards: NTSC-M, NTSC-J, PAL-BDGHIN,
PAL-M, and PAL-Nc. The following output formats are supported:
composite, S-Video, SCART, RGB, and YPrPb component. The following
output resolutions are supported: 480i, 480p, 576i, 576p, 720p, 1080i, and
1080p 24/30. Seven output video DACs are available to be shared among the
output functions. The BCM7400 also supports output over an HDMI interface | | |
| | secure key generation, management, and protection. With teletext sideband. On information and belief, the Broadcom chips, such as the BCM3255 chip, BCM7400 chip, etc., used inside Samsung DVRs and other chips used inside Samsung DVRs, PID filter multi-program transport streams and perform start code detection. Schematics and specifications on Broadcom chips such as the BCM7400 may be proprietary and thus inaccessible to TiVo at this time. In addition, a Samsung DVR includes DDR SDRAM and/or other RAM and/or flash memory and/or other internal on-chip memory that can be used to temporarily store video and audio data. <i>See, e.g.</i>, (BCM7400 Product Brief) (showing 16MB SRAM and 512MB 64-bit DDR bi-directionally coupled to the BCM3255 and BCM7400 chips, respectively): | | | |

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the Claim	Samsung DVRs ¹	
	STEREO AUDIO OUT SPDIF OUT VIDEO OUT YPEPF OUT FIREWIRE Audio Out HDMIDUT Out SIPDIF Audio Out SIPDIF Audio Out SIPDIF Audio Out SIPDIF Audio Out SIPDIF NTSC/ PAL SIPDIF BECADCOM. USB 20 10/100 PAL SIZ NB SIZ N	
	To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function as the physical data source, for example that accepting, parsing, and temporarily storing, in substantially the same way, for example by receiving data that has been transmitted to the DVR, PID filtering, startcode detecting and otherwise analyzing that data, and writing that data to memory locations and disks, to yield the same result, a properly formatted data stream for further processing by the rest of the system.	
[61c] a source object, wherein said source object extracts video and audio data from said physical data source;	A Samsung DVR provides a source object, a collection of data and operations that, among other things, extracts video and audio data from the physical data source. For example, in a Samsung DVR, video and audio data move from the Broadcom BCM3255 chip, or similar chip, to memory, including DRAM and/or the Data Transport processor of the Broadcom 7400 chip, or similar chip, and from the BCM7400 chip, or similar chip, to memory, including DRAM. <i>See, e.g.</i> , (BCM7400 Product Brief) (showing Transport Input data going into MPEG-2/DVB Transport of the Broadcom BCM7400 chip:	

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object, wherein of data upon which it operates. For example, Samsung DVRs transform the form of the data. Upon information and b	Samsung DVRs ¹	
differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform su the same function as the Source Object, for example that of extracting video and audio data from said physical data so substantially the same way, for example by using one or more instantiations of software codes and/or hardware/firmw combinations, to yield the same result, data and operations executing in the DVR that operate on the video and audio of the physical data source.[61d] a transform object, whereinA Samsung DVR provides a transform object, a collection of data and operations that, among other things, transforms of data upon which it operates. For example, Samsung DVRs transform the form of the data. Upon information and be		
object, wherein of data upon which it operates. For example, Samsung DVRs transform the form of the data. Upon information and b	m substantially ta source, in rmware	
object stores and retrieves data streams onto acertain trickplay operations.As another example, Samsung DVRs also perform a temporal transform. For example, Samsung DVRs allow users to	As another example, Samsung DVRs also perform a temporal transform. For example, Samsung DVRs allow users to store	
storage device; television programs to watch at a later time or can pause live television. See, e.g., http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_Usert storage device; * 112 - storage device;		

the Claim	Samsung DVRs ¹
	 (Samsung SMT-H3090 2008 User Guide), p. 10 ("User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording."); p. 10 ("Record two live TV programs simultaneously while watching two recorded programs on HDD.") Samsung DVRs store data streams on and retrieve data streams from a hard disk drive (HDD) during recording and playback, respectively. <i>See, e.g.</i>, (BCM7400 Product Brief) (showing SATA II interface to HDD):
	STEREO AUDIO OUT SPDIF OUT VIDEO OUT YPEPF OUT FIREWIRE Audio HDMIDU Audio HDMIDU SPDIF OUT VIDEO OUT YPEPF OUT FIREWIRE Audio HDMIDU SPDIF OUT VIDEO OUT YPEPF OUT FIREWIRE Audio Out HDMIDU SPDIF DIF OUT FIRE Audio Out SPDIF OUT VIDEO OUT YPEPF OUT FIRE FIRE FIRE TSC/ Comp. FIRE Mod HDMIDU SPDIF DIF OUT SPDIF OUT SPDIF OUT SPDI
	http://www.timewarnercable.com/MediaLibrary/1/1/FAQ/Digital%20Cable/Samsung/Samsung_SMT_3090HD_UserGuide.pdf (Samsung SMT-H3090 2008 User Guide), at 6:

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	An MPEG decoder capa SCTE55-1, 55-2 and DC Digital AV transmission, Content Protection CableCARD Interface fo OCAP™ 1.0 application	able of processing HD/SD stream OCSIS Cable Modem for OOB Signaling such as IEEE1394 and HDMI
	Digital HD DVR STB (SMT-H3090) provides the following functions. - An MPEG decoder capable of processing HD/SD stream - SCTE55-1, 55-2 and DOCSIS Cable Modem for OOB Signaling - Digital AV transmission, such as IEEE1394 and HDMI - Content Protection - CableCARD Interface for CAS - OCAP™ 1.0 application platform - DVR Features - Recording :	
	HDD	Capacity
	160GB	Up to 65 hours for SD (Standard Definition) stream Up to 15 hours for HD (High Definition) stream.
	320GB	Up to 130 hours for SD (Standard Definition) stream Up to 30 hours for HD (High Definition) stream.
	For example, in the Sa stored in blocks on the the locations of the M To the extent any diffe differences are insubst the same function as the substantially the same combinations, to yield storage locations.	ding a television program, Samsung DVRs may generate index information using start code information. amsung DVRs, on information and belief, data streams in the form of MPEG2 transport stream packets are e hard disk drive. Index information is stored on the hard disk drive as *.clt files, which have pointers to IPEG2 transport stream packets of the various recorded programs. Ferences are alleged to exist between this claim element and the above referenced functionality, such stantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the Transform Object, for example that of storing and retrieving data streams onto a storage device, in e way, for example by using one or more instantiations of software codes and/or hardware/firmware d the same result, data and operations executing in the DVR that move video and audio data to and from
said source object to obtains a buffer from said	A Samsung DVR provides a source object, a collection of data and operations that, among other things, obtains a buffer from the transform object, converts video data into data streams, and fills the buffer with the streams. Samsung DVR software obtains a buffer, converts video data into data streams and fills the buffer with the streams. <i>See, e.g.</i> , (BCM7400 Product Brief) ("The BCM7400 incorporates a complete MIPS32-Verified TM microprocessor subsystem, including caches with bridging to memory and a local bus.")	

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the Claim Samsung DVRs ¹		
	and audio data in conjunction with memory locations and other software processes.	
[61f] wherein said source object is automatically flow controlled by said transform object;	A Samsung DVR has a source object that, among other things, is automatically flow controlled by a transform object. On information and belief, the Samsung DVR software has self-regulating data flow in relation to, for example, the single-port DRAM. <i>See, e.g.</i> , (BCM7400 Product Brief) ("The BCM7400 incorporates a complete MIPS32-Verified™ microprocessor subsystem, including caches with bridging to memory and a local bus.").	

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the Claim	Samsung DVRs ¹
	Samsung K4T511630G 512MB RAM and Samsung K4H561638 RAM).
	In regular operation, there is no significant corruption of data due to overwriting or lack of self-regulation.
	To the extent any differences are alleged to exist between this claim element and the above referenced functionality, such differences are insubstantial. On information and belief, the hardware and software in the Samsung DVRs perform substantially the same function as the Transform Object's automatic flow control of the Source Object, for example that of self-regulating the processing, in substantially the same way, for example by using one or more instantiations of software codes and/or hardware/firmware combinations, to yield the same result, data and operations executing in the DVR that are self regulated.
[61g] a sink object, wherein	A Samsung DVR provides a sink object, a collection of data and operations that, among other things, obtains data stream buffers from a transform object and outputs the streams to a video and audio decoder. The Samsung DVR software obtains data streams
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EXHIBIT A TO TIVO INFRINGEMENT CONTENTIONS

'389 PATENT SAMSUNG DVRS

the Claim		Sar	nsung DVRs ¹		
	Digital HD DVR STB				
 Digital HD DVR OCAP STB (Digital High-Definition Digital Video Recorder OpenCable Application Platform Set-Top Box) provides high quality video and audio broadcasting, and interactive services including Video-On-Deman¢l. Digital HD DVR STB (SMT-H3090) provides the following functions. An MPEG decoder capable of processing HD/SD stream SCTE55-1, 55-2 and DOCSIS Cable Modem for OOB Signaling Digital AV transmission, such as IEEE1394 and HDMI Content Protection CableCARD Interface for CAS OCAP™ 1.0 application platform DVR Features 					
	- Recording : HDD	Capacity			
	160GB	Up to 65 hours for SD (Standard Definition) stream Up to 15 hours for HD (High Definition) stream.			
	320GB	Up to 130 hours for SD (Standard Definition) stream Up to 30 hours for HD (High Definition) stream.			
	imagine Samsung provides Standard	3090 2008 Data Sheet), at 1: SMT-H3090 is Dual tuner Digital Video Rec Definition (SD), High-Definition(HD) and An ows cable subscribers to watch and record	alog video signals.		
(Samsung SMT-H		3090 2008 Data Sheet), at 2:			

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the Claim			Samsung DVRs ¹
	adva.noed Homē r _ DTCP-IP for Home _ MoCA(Multimedia	with networked media devices by using network standards (DLNA, UPnP) e network content protection over Coaxial Alliance) upgradable (Optional)	
	Back Panel Feat		
	Feature	Description	
	RF Input AV Out	F-type Female 2 NTSC-M RCA(CVBS), S-Video, Component(V/Pb/Pr) Video, HDMI, 2 RCA, 2 S/PDF (Optical, Bectrical)	
	AV h	1 Component(Y/Pb/Pr) Video, 1 RCA(L/R)	
	Connections-Interactive	USB 2.0 Host, IEEE1394, E-SATA, RJ-45 Ethemet(10/100M)	
	CableCARD	Multi-Stream CableCARD™	
	Power	AC 120V, 60Hz, AC Outlet	
	substantially the		hat of obtaining buffers or pointers thereto and outputting data streams, in the or more instantiations of software codes and/or hardware/firmware being output to a decoder.
[61h] wherein said decoder converts said streams into display signals and sends said	(Broadcom BCM	A has a decoder that converts data s 1 7400 Product Brief), at 1: FEATURES VC/MPEG-2/VC-1 decoders ain and High Profile to Level 4.1	treams into display signals and sends those signals to a display. See, e.g.,
signals to a display;	 VC-1 Advance VC-1 Simple a HD MPEG 2: MPEG still-pic DivX^Φ and Mi 	ed Profile @ Level 3 and Main Profile and SD MPEG-2 cture decode PEG4 part 2 ASP decode 1 7400 Product Brief), at 2 (showin	g video decoders):

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EXHIBIT A TO TIVO INFRINGEMENT CONTENTIONS '389 PATENT SAMSUNG DVRS

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the Claim	Samsung DVRs ¹
	The BCM7400 is a dual-channel high definition satellite, cable, and IP set-top box DVR solution offering integrated AVC (H.264/MPEG-4 Part 10), MPEG-2, MPEG-4 Part 2, DivX, and VC-1 video decoding technology. It combines a data transport processor, two high-definition AVC/MPEG-2/VC- 1 video decoders, two advanced-audio decoders, 2D and 3D graphics processing, high-quality video scaling and motion adaptive deinterlacing, seven video DACs, dual stereo high-fidelity audio DACs, a dual-threaded 350-MHz MIPS32 with FPU class CPU, and a peripheral control unit providing a variety of set-top box control functions. The BCM7400 supports either DDR 1 or DDR2 memory architectures.
	The MPEG-2 DVB-compliant transport stream/PES parser and demultiplexer is capable of simultaneously processing 256 PIDs via 128 PID channels in up to six independent external transport stream inputs and four internal playback channels. All 128 PID channels can be used by the record, andio, and video interface engine, PCR processing, message filter, and for output via the high- speed transport or remux module. The data transport module can be configured to support eight record channels for PVR functionality and six AV channels to interface to audio and video decoders. The transport provides 1DES/3DES/DVB/Mult2/AES descrambling support. A memory-to- memory DMA security module may be programmed for supporting AES/ 1DES/3DES/CSS/CPRM/CPPM/DTCP copy protection algorithms/ standards. The B CM7400 features the Broadcom secure processor, providing secure key generation, management, and protection.
	The advanced video decoders featured in the BCM7400 are capable of supporting high definition A VC, VC-1, and MPEG-2 streams. A VC support is for Main and High Profile to level 4.1 for 720p and 1080i high definition support or to Level 3.1 for stand and definition streams. A VC High Profile was added to the fidelity range extensions specifically to address the needs of consumer broadcast and playback applications. Tools include addition al transform sizes and spatial prediction modes and support for ad aptive quantization matrix. The video decoders also support high definition VC-1
	(Advanced Profile Level 3, Main, and Simple Profiles) and MPEG-2, Main Profile at Main and High Level. The BCM7400 has two advanced audio processors capable of decoding Dolby Digital, Dolby Digital Plus, AAC 5.1, AAC+level 2, and MPEG 1 layers 1, 2, and 3 with simultaneous pass-through support. 3D SRS audio is also supported. Avail able audio outputs are 1 ² S, S/ PDIF, and two pairs of analog outputs.
	On information and belief, Samsung DVRs have an MPEG-2 decoder that decodes standard definition and/or high definition television programs.

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the Claim		Samsu	ng DVRs ¹
	DVR Feature SMT-H3090 supports DVR f	'S eature through the Hard Disk Drive as follows.	
	Feature	Description	
	File Playback	Play, Stop, Rewind, Pause for recorded contents.	
	File Trick Mode	1, 4, 8, 32 times FFP (Fast Forward Play) 1, 4, 8, 32 times FRP (Fast Rewind Play) 1/2, frame by frame skipping SFP (Slow Forward Play) 1/2, Frame by frame SRP (Slow Rewind Play)	
	Time-Shift Recording	User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.	
	Instant Recording	Record live TV program instantly	
	Watching and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.	
	Audio/Radio Recording	Audio or Radio program recording	
	Simultaneous Recording and Time Shift Recording	Up to two Simultaneous Recording and Time-Shift Recording on live TV programs	
	EPG Recording	Scheduled recording using EPG	
	differences are insubs the same function as t instantiations of softw broadcast data through	tantial. On information and belief, the has he Control Object, for example that of re- vare codes and/or hardware/firmware com- h the system.	laim element and the above referenced functionality, such rdware and software in the Samsung DVRs perform substantially reiving commands same way, for example by using one or more binations, to yield the same result, controlling the flow of the
[61k] wherein said control object sends flow command events to said source, transform, and	A Samsung DVR provides a control object, a collection of data and operations that, among other things, sends flow command events to source, transform, and sink objects. On information and belief, the remote control sends IR signals that are received by the Samsung DVR. The Samsung DVR software is responsive to front panel buttons and a remote control. The hardware and software receives user commands and sends command events to other portions of the software to control the various functions of the unit, e.g., channel selection, start recording, trickplay, picture-in-picture, etc. <i>See, e.g.</i> , (BCM7400 Product Brief) (showing front panel controls input to the BCM7400 chip):		

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the Claim	Samsung DVRs ¹
sink objects.	STEREO AUDO OUT SIPDIF OUT VIDEO OUT YPE/F OUT INFREMUE INFREMUE INFREMUE INFREMUE

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	Samsung DVRs ¹			
	DVR Features			
SMI-H.	1090 supports DVR fe	eature through the Hard Disk Drive as follows.		
	Feature	Description		
File Pla	iyback	Play, Stop, Rewind, Pause for recorded contents.		
File Tri	ck Mode	1, 4, 8, 32 times FFP (Fast Forward Play)		
		1, 4, 8, 32 times FRP (Fast Rewind Play)		
		1/2, frame by frame skipping SFP (Slow Forward Play)		
		1/2, Frame by frame SRP (Slow Rewind Play)		
Time-S	hift Recording	User can pause live TV program for a certain amount of time, and resume it to watch. The STB allows 90 minutes of recording for Time-shift recording.		
Instant	Recording	Record live TV program instantly		
Watchi	ng and Recording	Record two live TV programs simultaneously while watching two recorded programs on HDD.		
Audio/	Radio Recording	Audio or Radio program recording		
	aneous Recording ne Shift Recording	Up to two Simultaneous Recording and Time-Shift Recording on live TV programs		
	ecording	Scheduled recording using EPG		

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