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24 UNITED STATES DISTRICT COURT
25 CENTRAL DISTRICT OF CALIFORNIA

26 UNILOC 2017 LLC,

27 Plaintiff,

28 v.

HULU, LLC.

Defendant.

CASE NO. 8:18-cv-02058-GW-DFM


**PLAINTIFF'S PATENT LOCAL
RULE 3-1 AND 3-2 DISCLOSURES
OF ASSERTED CLAIMS,
INFRINGEMENT CONTENTIONS
AND DOCUMENT PRODUCTION
ACCOMPANYING DISCLOSURE**

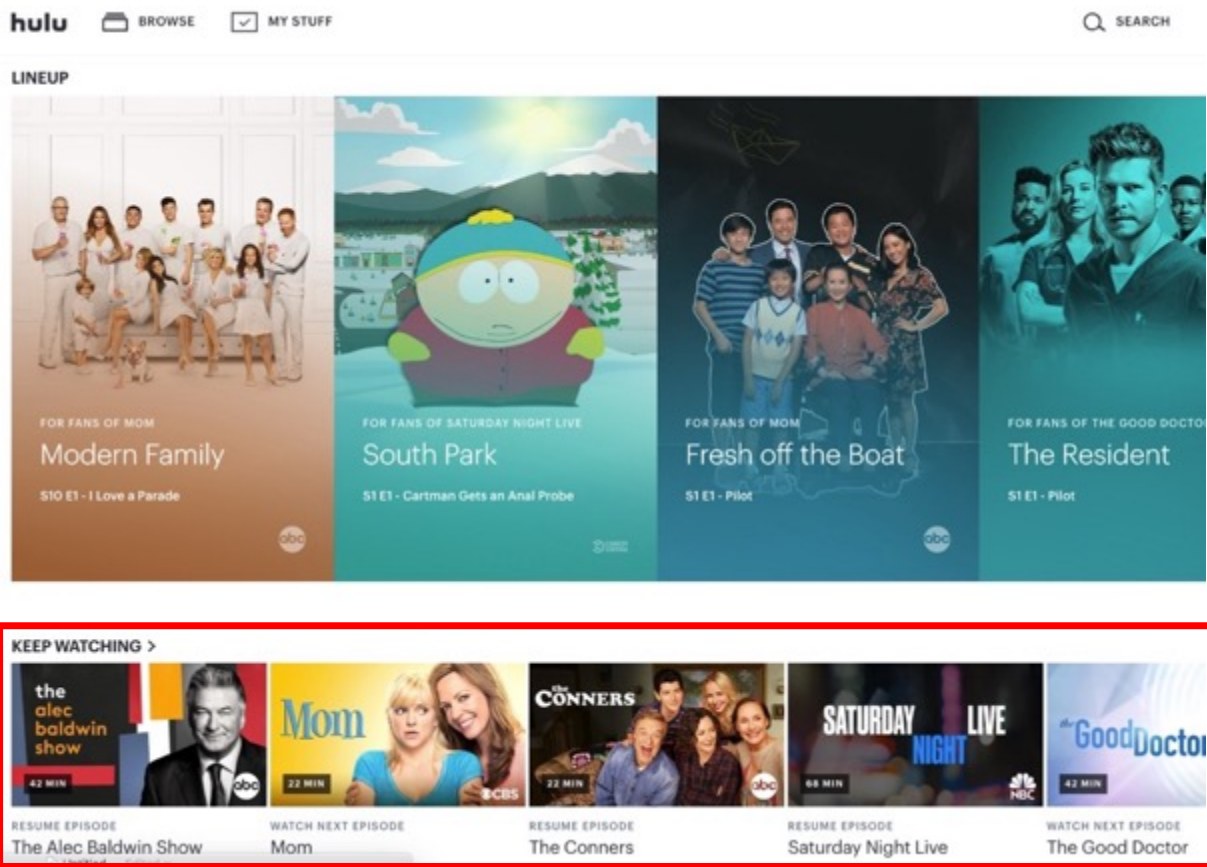
Exhibit B



Hulu's Infringement of U.S. Patent No. 9,721,273


Plaintiff accuses Hulu, LLC ("Hulu") of making, using, selling, licensing, offering for sale/license and/or importing products and services, including Hulu.com and its subscription-based streaming OTT service and related software, applications, servers and clients (collectively the "Accused Products") of directly infringing claim 1 of U.S. Patent No. 9,721,273 (the "'273 Patent").

The asserted claim includes elements that are implemented, at least in part, by proprietary and specialized electronics, firmware and/or software in the Accused Products. The precise designs, processes, and algorithms used in them are held secret, at least in part, and are not publicly available in their entirety. An analysis of Hulu's documentation and/or source code may be necessary to fully and accurately describe all infringing features and functionality of the Accused Products and, accordingly, Plaintiff reserves the right to supplement these contentions once such information is made available to Plaintiff. Furthermore, Plaintiff reserves the right to revise these contentions, including as discovery in the case progresses, in view of any non-infringement arguments Hulu may make (*e.g.*, to allege infringement under the doctrine of equivalents), in view of the Court's final claim construction in this action, and in connection with the provision of its expert reports.


Claim	Accused Products
<p>1. A method for providing content via a computer network and computing system, the method comprising:</p>	<p>The Accused Products perform a method for providing content via a computer network and computer system. In particular, Hulu operates a streaming service that delivers TV shows and movies to subscribers over the Internet.</p>  <p>http://www.hulu.com</p>
<p>storing presentation data that represents content of a first collection of one or more presentations using the computer system;</p>	<p>The Accused Products store presentation data that represents content of a first collection of one or more presentations using the computer system. For example, Hulu maintains a collection of presentations that a user has started, but not finished, watching. Hulu stores presentation data that represents the first collection of presentations, such as titles and cover art. Such a collection can be displayed in several contexts, including on the Hulu homepage:</p>

Claim	Accused Products
	 <p>The screenshot displays the Hulu homepage. At the top, there is a navigation bar with the Hulu logo, 'BROWSE' and 'MY STUFF' links, and a search icon. Below this is a 'LINEUP' section featuring four promotional cards for the following shows and episodes:</p> <ul style="list-style-type: none"> Modern Family: S10 E1 - I Love a Parade (ABC) South Park: S1 E1 - Cartman Gets an Anal Probe (Comedy Central) Fresh off the Boat: S1 E1 - Pilot (ABC) The Resident: S1 E1 - Pilot (ABC) <p>Below the lineup is a 'KEEP WATCHING >' section, which is highlighted with a red border in the image. It contains five cards for shows that the user has watched recently:</p> <ul style="list-style-type: none"> The Alec Baldwin Show: 42 MIN (ABC) - Button: RESUME EPISODE Mom: 22 MIN (CBS) - Button: WATCH NEXT EPISODE The Conners: 22 MIN (ABC) - Button: RESUME EPISODE Saturday Night Live: 68 MIN (NBC) - Button: RESUME EPISODE The Good Doctor: 42 MIN (ABC) - Button: WATCH NEXT EPISODE <p>And while browsing categories, such as "Kids":</p>

Claim	Accused Products
	<p>Kids</p> <p>FOR YOU ></p>  <p>Teen Titans Go! Big City Greens Jumanji Muppet Babies Alvin and the Chipmunks: Th...</p> <p>KEEP WATCHING ></p>  <p>DuckTales (2017)</p> <p>An analysis of Hulu's source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff.</p>
<p>storing data indicative of the first collection of presentations so as to be associated with the presentation data;</p>	<p>The Accused Products store data indicative of the first collection of presentations so as to be associated with the presentation data. For example, Hulu stores identifiers for each presentation, such as "2b4f6451..." (corresponding to "Chicago Med"). The identifiers are indicative of the first collection of presentations and are associated with the presentation data.</p> <pre>target_id: "2b4f6451-b084-450a-a6d7-f116ecc85af6" target_name: "Chicago Med" target_type: "series"</pre> <p>In another example, Hulu stores viewing data indicating the amount of time the user has watched each presentation in the "Keep Watching" row. Upon information and belief, viewing data for partially-watched presentations is used to identify the presentations in the first collection. As such, this stored</p>

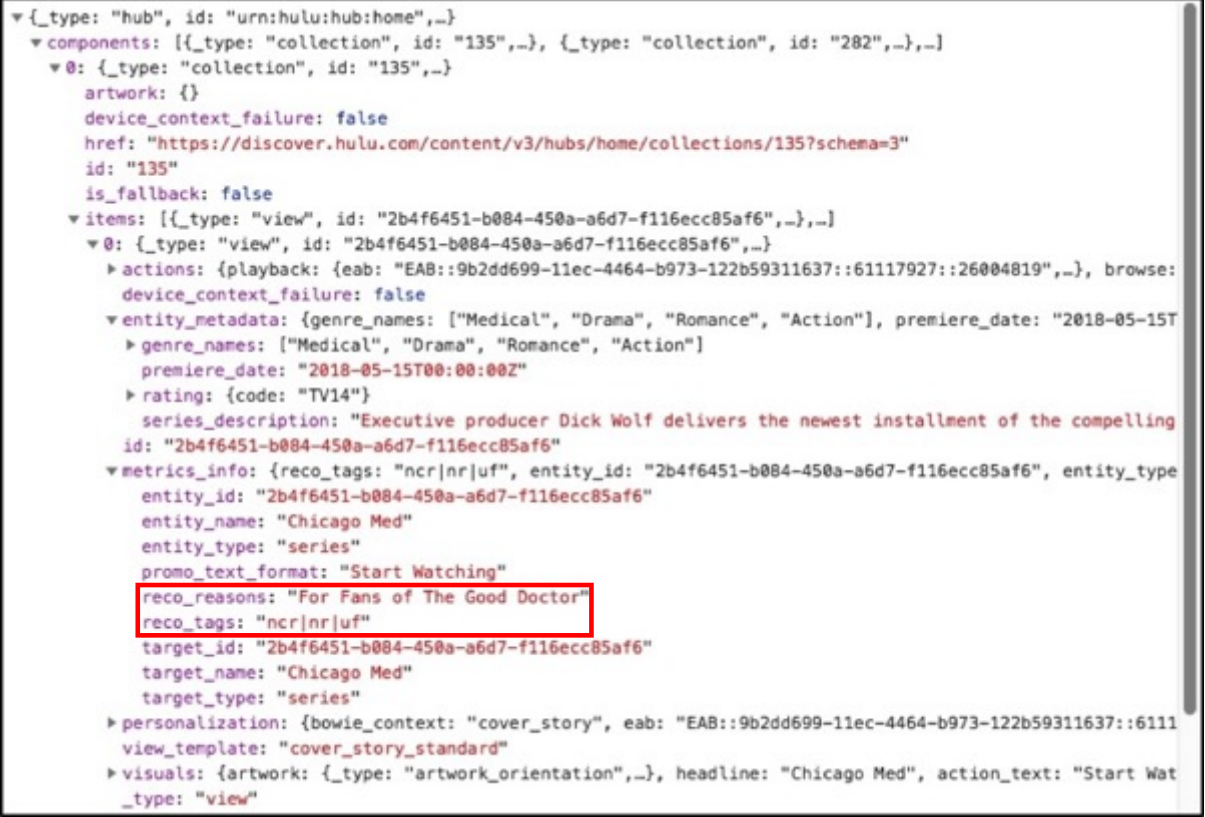
Claim	Accused Products
	<p>viewing data is indicative of the first collection of presentations and is associated with the presentation data.</p>  <p>An analysis of Hulu's source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff.</p>
<p>storing feed data that represents a collection of one or more feeds using the computer system, wherein each of the feeds identifies a corresponding second collection of one or more presentations being accessible via the computer network and includes no data representing</p>	<p>The Accused Products store feed data that represents a collection of one or more feeds using the computer system. Hulu stores feed data representing TV shows and movies that have been recommended to the user. For example, "Line Up" is a collection of presentations recommended to the user. Upon information and belief, Hulu uses identifiers, such as "2b4f6451..." corresponding to "Chicago Med", to represent the "Line Up" collection. These identifiers do not represent the content of the second collection of presentations.</p>


Claim	Accused Products
<p>content of the second collection of presentations;</p>	<div data-bbox="682 276 1873 784"> <p>LINEUP</p> </div> <p>"For You" is another example of a collection of presentations recommended to the user through the browse category pages.</p>




Claim	Accused Products
	<p>Kids</p>  <p>The screenshot shows a 'FOR YOU >' section with five thumbnails: Teen Titans Go!, Big City Greens, Jumanji, Muppet Babies, and Alvin and the Chipmunks: The Road Chip. Below this is a 'KEEP WATCHING >' section with a thumbnail for DuckTales (2017).</p> <p>The Accused Products store feed data in connection with the operation of its recommendation engine. In the case of displaying the Hulu homepage, the client queries the discover.hulu.com host to identify a second collection of presentations (<i>i.e.</i>, recommendations labeled "Line Up"). The recommendations are identified by id numbers, such as "2b4f6451..." (corresponding to "Chicago Med"), which do not represent content of any of the presentations. This operation reflects the storage of feed data corresponding to the second collection by Hulu, prior to transmission of the id numbers to the client.</p>

Claim	Accused Products
	<pre data-bbox="674 269 1866 1081"> { "_type": "hub", "id": "urn:hulu:hub:home", "components": [{ "_type": "collection", "id": "135", "artwork": {}, "device_context_failure": false, "href": "https://discover.hulu.com/content/v3/hubs/home/collections/135?schema=3", "id": "135", "is_fallback": false, "items": [{ "_type": "view", "id": "2b4f6451-b084-450a-a6d7-f116ecc85af6", "actions": { "playback": { "eab": "EAB::9b2dd699-11ec-4464-b973-122b59311637::61117927::26004819", "browse": { "device_context_failure": false, "entity_metadata": { "genre_names": ["Medical", "Drama", "Romance", "Action"], "premiere_date": "2018-05-15T00:00:00Z", "rating": { "code": "TV14" }, "series_description": "Executive producer Dick Wolf delivers the newest installment of the compelling", "id": "2b4f6451-b084-450a-a6d7-f116ecc85af6" }, "metrics_info": { "reco_tags": "ncr nr uf", "entity_id": "2b4f6451-b084-450a-a6d7-f116ecc85af6", "entity_type": "series", "entity_name": "Chicago Med", "promo_text_format": "Start Watching", "reco_reasons": "For Fans of The Good Doctor", "reco_tags": "ncr nr uf", "target_id": "2b4f6451-b084-450a-a6d7-f116ecc85af6", "target_name": "Chicago Med", "target_type": "series" }, "personalization": { "bowie_context": "cover_story", "eab": "EAB::9b2dd699-11ec-4464-b973-122b59311637::6111", "view_template": "cover_story_standard" }, "visuals": { "artwork": { "_type": "artwork_orientation" }, "headline": "Chicago Med", "action_text": "Start Wat", "_type": "view" } } }] }] }] }</pre> <p data-bbox="667 1114 2024 1312">In the case of displaying a browse category page, the client queries the discover.hulu.com host to identify a second collection of presentations (<i>i.e.</i>, recommendations labeled "For You"). The recommendations are identified by id numbers, such as "671bc3fd..." (corresponding to "Teen Titans Go!"). This operation reflects the storage of feed data corresponding to the second collection by Hulu, prior to transmission of the id numbers to the client.</p>

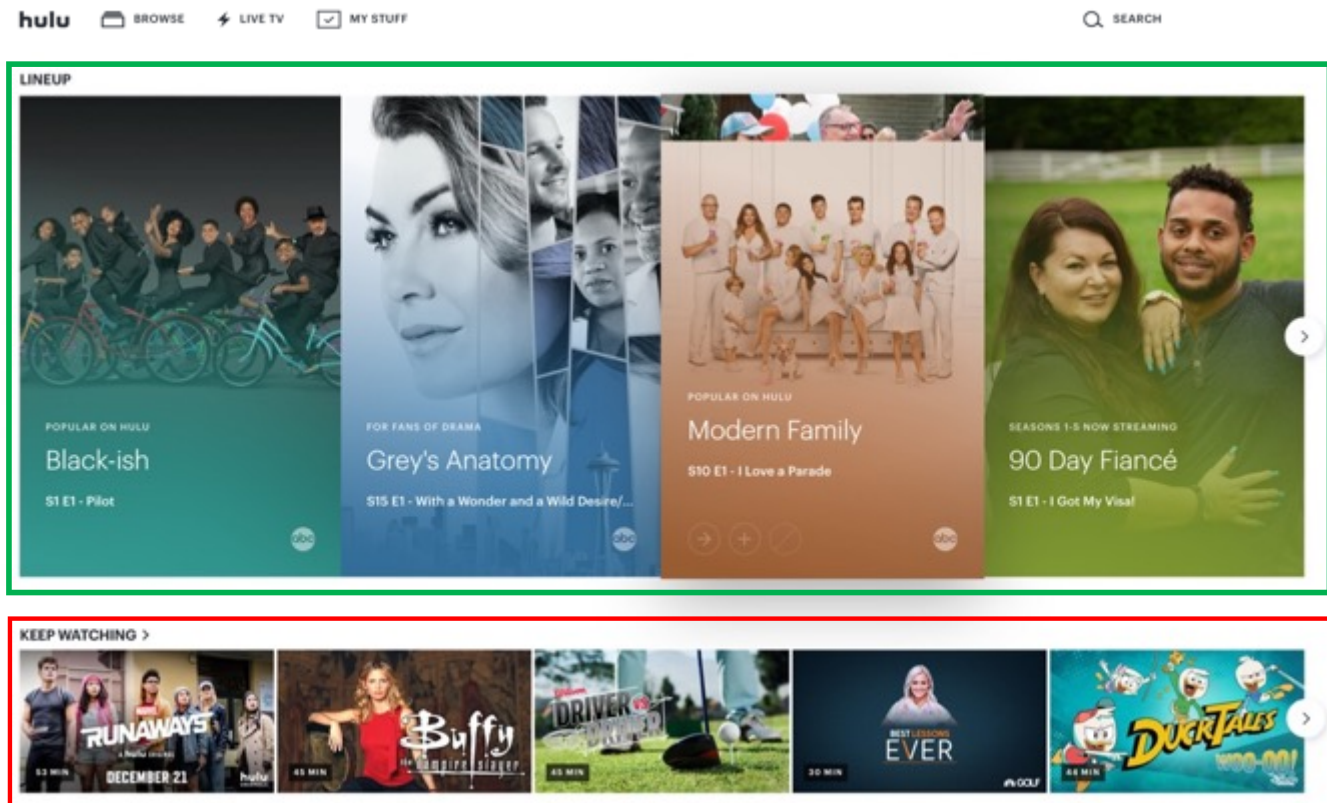
Claim	Accused Products
	<pre> "device_context_failure": false, "components": [{ "_type": "collection", "id": "113", "href": "https://discover.hulu.com/content/v3/hubs/kids/collections/113?schema=3" "p13n_href": "https://discover.hulu.com/content/v3/me/state?schema=3&eab_ids=EAB::4677c039-314f-4dfc-8dc1- c533a76e8a07::NULL::NULL,EAB::671bc3fd-114f-4044-986b-b961ca527024::NULL::NULL,EAB::4f96cfd5-73b9-4975-8021- ea504d4c5780::NULL::NULL,EAB::4d1be259-c261-45e7-bf79-72cdf44fb9ad::NULL::NULL,EAB::2a70a30b-3ba2-4b7e-aaeb- 384e56596a19::NULL::NULL,EAB::f2f9e217-801f-460c-9a53-4e92ee82fe92::NULL::NULL,EAB::c4636d35-eb1b-4ac3-bf02- cb83dce0ecf6::NULL::NULL,EAB::253eeea4-50d0-4b28-ab4b-1c0c015e0fa0::NULL::NULL,EAB::38364d89-c44f-47ce-985b- a37a360f2b7e::NULL::NULL,EAB::bc47d2cf-6f24-4ea7-9219-1cb7ea84daba::NULL::NULL,EAB::3cb3f3c4-e908-458f-8db8- 5d43031995e6::NULL::NULL,EAB::45e51af5-3da2-4129-a715-51cdd5a34ccf::NULL::NULL,EAB::aaed007e-c365-4509-9eab- d3713a19eab8::NULL::NULL,EAB::39dedbce-8fcd-431b-ac3f-15b562b9c742::NULL::NULL,EAB::27cefa35-f959-45df-a87b- 7622bec3d18f::NULL::NULL,EAB::115dd69e-a60c-4c00-8ba0-166715fb21a2::NULL::NULL,EAB::bffd458e-794f-4cb3-b748- 6df6ad452b7f::NULL::NULL,EAB::6f39a5a0-6e20-4bbf-b8b7-364025897b03::NULL::NULL,EAB::b86922f3-5c46-4871-adc0- 071e48d2d611::NULL::NULL,EAB::01b0d3e4-8b57-4cbe-9b74-e379bc60ac5a::NULL::NULL,EAB::ec95e86e-ee98-4726-9794- e9dea449757c::NULL::NULL,EAB::bc455c45-a11d-43fe-ac7d-3afdfc264909::NULL::NULL,EAB::a996307f-0d34-4376-86e6- b2132be03f68::NULL::NULL,EAB::7b4bf05d-a7dc-47a7-85c8-82d7a69be484::NULL::NULL,EAB::03db8986-d082-45dc-a45b- 586f9f85c82b::NULL::NULL,EAB::9b75f792-44c6-4a49-a2a2-48a746c6c26d::NULL::NULL,EAB::0721150b-9e72-4970-b83a- f2db08fbae54::NULL::NULL,EAB::eb0bb177-6278-48ec-902d-4efb916a7a39::NULL::NULL,EAB::b7833196-8dab-411e-8728- 46759d8402ba::NULL::NULL,EAB::14dcb999-615b-4a66-835c-4c1d00717df8::NULL::NULL,EAB::87e268f4-1dc3-4fd3-8e41- 41dc246eed02::NULL::NULL,EAB::139507fa-07d2-43ca-8991-370d5306989d::NULL::NULL,EAB::f20a0f3e-b96b-48d1-bfaf- 13eb4616b504::NULL::NULL,EAB::c8b9c799-b81e-4522-a05b-40212f69e7a6::NULL::NULL,EAB::d072c7a0-5570-45bd-80fb- 227ff42aca49::NULL::NULL,EAB::031f9f6e-6de8-4482-866c-e6682208b63e::NULL::NULL,EAB::3c0bf4eb-2d7a-4b7c-a9a4- 668427a22aba::NULL::NULL,EAB::9626bd57-00a7-4d44-8629-543811e439ee::NULL::NULL,EAB::8baef83e-f316-4846-8ba2- 21cdf4c40823::NULL::NULL,EAB::5c5f6041-ff38-4670-a7f8-30033a28f4bc::NULL::NULL,EAB::7983e75d-2897-4259-8f1d- 50be6d2ca263::NULL::NULL,EAB::eea4f209-0f98-4b51-8b2e-ecb2fbdb058::NULL::NULL,EAB::a4a06e0c-c4d8-4b34-a55e- a28c57ecc429::NULL::NULL,EAB::5d931e25-bd29-46f2-9baf-b5a0b4c001f8::NULL::NULL,EAB::6cfc220-59c1-4a89-b187- e990b4c51b08::NULL::NULL,EAB::b4f327be-b835-4e82-99cd-40ab04543a2d::NULL::NULL,EAB::a5481b97-adb7-4583-af31- d89772d93eb9::NULL::NULL,EAB::8a15de0d-8c39-4a94-bc8f-0bfe73062d7d::NULL::NULL,EAB::4b8401fa-eb03-4871-8da0- e821012cf43e::NULL::NULL,EAB::a17afce6-e552-491c-86be-6a422f518c68::NULL::NULL&bowie_context=browse", "name": "For You", "theme": "collection_theme_3", "artwork": {}, "personalization": { "bowie_context": "browse" } }] </pre> <p>Each of the feeds identifies a corresponding second collection of one or more presentations being accessible via the computer network, and includes no data representing the video/audio content of the second collection of presentations. As shown above, the feed data includes the identifiers and other metadata associated with the presentations, which is not the video/audio content of the presentations. In addition, the "Line Up" feed data includes other information that is apart from the video/audio content, such as the reason(s) for recommending a particular presentation to the user and tags associated therewith.</p>

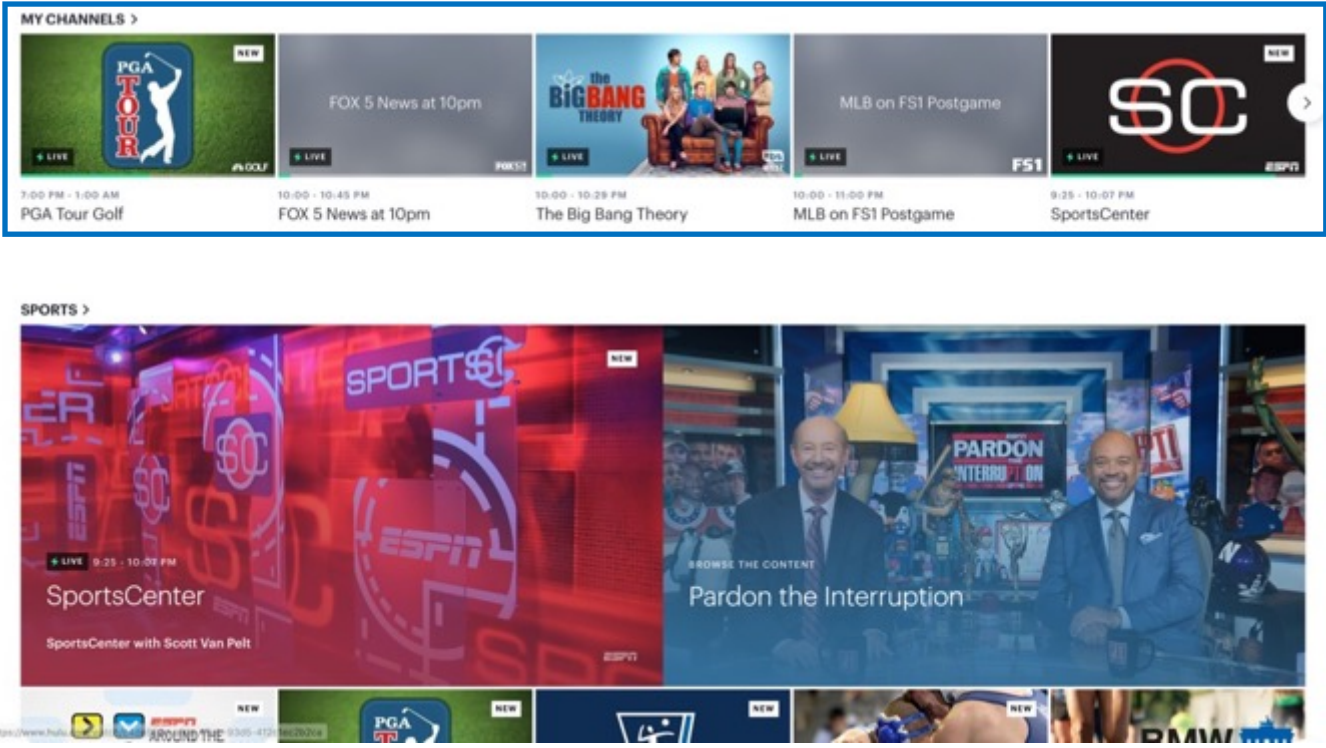
Claim	Accused Products
	 <p>An analysis of Hulu's source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff.</p>
<p>automatically and periodically accessing each of the feeds to identify each of the</p>	<p>The Accused Products automatically and periodically access each of the feeds to identify each of the corresponding second collection of presentations using the computer system. For example, Hulu's catalog of TV shows and movies is constantly changing. https://www.hulu.com/press/new-this-month/.</p>

Claim	Accused Products
<p>corresponding second collection of presentations, using the computer system;</p>	<p>The Accused Products also provide a recommendations engine that automatically and periodically provides updated recommendations:</p> <p>"And for the times when you reluctantly agreed to watch something you wish you hadn't— or maybe your babysitter forgot to switch profiles— we're giving you the option to "Remove" items from your Keep Watching collection on Home and Watch History hub. Just select "Remove" on the program's cover story in Home or within the context menu within the Watch History hub and our recommendation engine will forget it ever happened."</p> <p>https://www.hulu.com/press/hulu-update/mobile-features-and-your-new-web/</p> <p>An analysis of Hulu's source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff.</p>
<p>storing data associated with a third collection of one or more presentations; and</p>	<p>The Accused Products store data associated with a third collection of one or more presentations. For example, Hulu displays additional rows, each corresponding to a separate collection of presentations. For example, on the Hulu homepage, Hulu stores data associated with "New Episodes" and "My Channels."</p>  <p>The screenshot shows a horizontal carousel titled "NEW EPISODES >". It contains five promotional cards for TV shows. From left to right: 1. "THIS IS US" (NBC, 43 MIN), 2. "The CONNERS" (ABC, 22 MIN), 3. "NEW AMSTERDAM" (NBC, 43 MIN), 4. "black-ish" (ABC, 22 MIN), and 5. "NCIS" (CBS, 43 MIN). Each card features a "WATCH NOW" button and the show's title.</p>

Claim	Accused Products
	<p data-bbox="678 272 800 289">MY CHANNELS ></p> <div data-bbox="678 297 2001 492">  <p data-bbox="678 456 1896 492"> 1:30 - 2:00 PM Golf Advisor Round Trip 1:00 - 2:00 PM FOX 5 News at 1:00pm 1:30 - 2:00 PM Friends 1:30 - 2:30 PM Lock It In 1:30 - 2:00 PM Highly Questionable </p> </div> <p data-bbox="678 532 1948 605">In addition on the browse category pages, Hulu stores data associated with collections of "Live" and "Upcoming" TV shows.</p> <p data-bbox="709 654 758 670">LIVE ></p> <div data-bbox="709 678 1990 865">  <p data-bbox="709 829 1885 865"> 9:00-11:00PM (58M LEFT) Hotel Transylvania 9:40-10:05PM (3M LEFT) Raven's Home 9:45-10:10PM (8M LEFT) Puppy Dog Pals 10:00-10:30PM (28M LEFT) Codename: Kids Next Door 10:00-10:30PM (28M LEFT) Gravity Falls </p> </div> <p data-bbox="709 946 806 963">UPCOMING ></p> <div data-bbox="709 971 1990 1157">  <p data-bbox="709 1122 1938 1157"> TODAY AT 10:05PM BUNK'D TODAY AT 10:10PM PJ Masks TODAY AT 10:30PM BUNK'D TODAY AT 10:30PM Marvel's Spider-Man TODAY AT 10:30PM Codename: Kids Next Door </p> </div> <p data-bbox="678 1214 2001 1328">An analysis of Hulu's source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff.</p>

Claim	Accused Products
<p>aggregating each of the first, identified second, and third collections of presentations for delivery via the computer network using a common web page.</p>	<p>The Accused Products aggregate the first, second, and third collections of presentations for delivery via the computer network using a common web page. Both the Hulu.com homepage and browse category pages include rows corresponding to first, second, and third collections of presentations.</p> <p>Hulu Homepage:</p>



Claim	Accused Products
	 <p>Category (e.g., Kids) Browse Page:</p>

Kids

FOR YOU >



Teen Titans Go!



Phineas and Ferb



Jumanji



Fancy Nancy

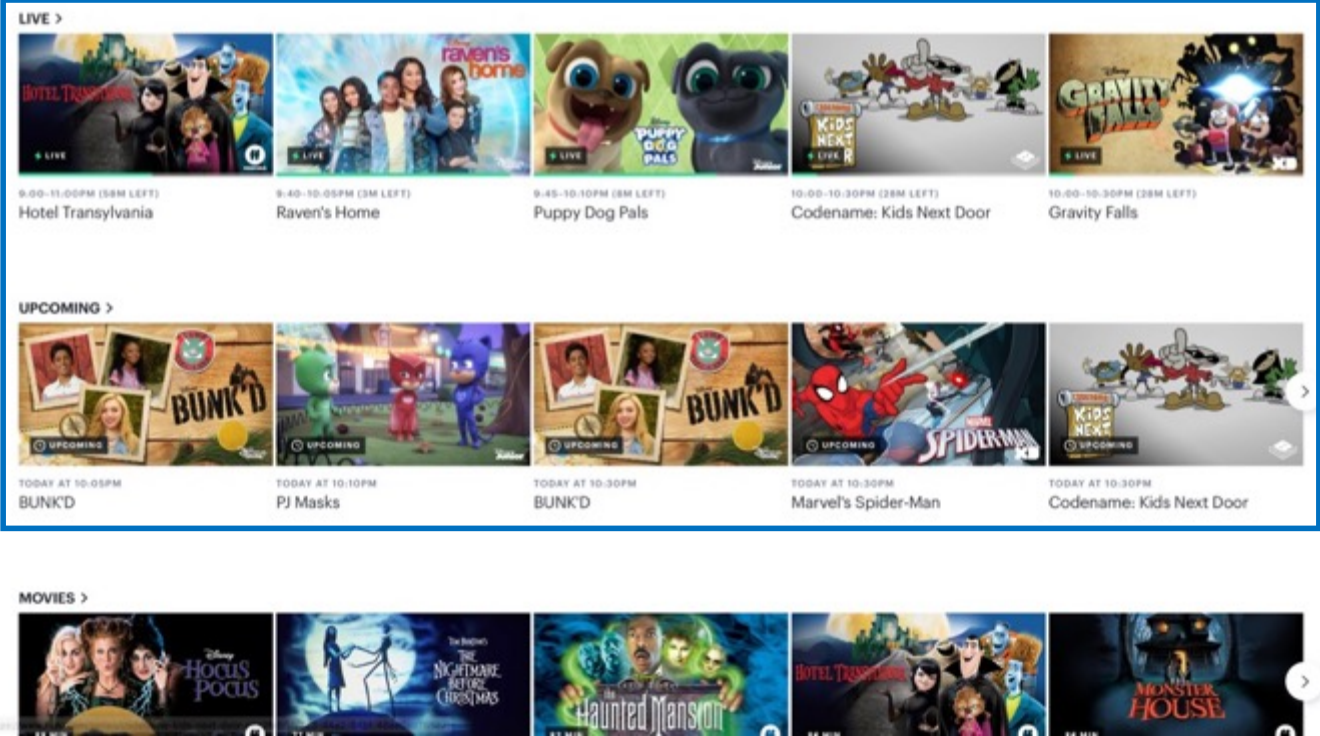


Octonauts

KEEP WATCHING >



DuckTales (2017)

Claim	Accused Products
	 <p>The screenshot displays Hulu's interface for live and upcoming content. The 'LIVE' section features five cards: Hotel Transylvania (9:00-11:00PM), Raven's Home (9:40-10:05PM), Puppy Dog Pals (9:45-10:10PM), Codename: Kids Next Door (10:00-10:30PM), and Gravity Falls (10:00-10:30PM). The 'UPCOMING' section shows Bunk'd (today at 10:05PM), PJ Masks (today at 10:10PM), Bunk'd (today at 10:30PM), Marvel's Spider-Man (today at 10:30PM), and Codename: Kids Next Door (today at 10:30PM). The 'MOVIES' section includes Hocus Pocus, The Nightmare Before Christmas, The Haunted Mansion, Hotel Transylvania, and Monster House.</p> <p>An analysis of Hulu's source code may be necessary to fully and accurately describe functionality of the Accused Products with respect to this limitation and, accordingly, Plaintiff reserves the right to supplement these infringement contentions once such information is made available to Plaintiff.</p>