## UNITED STATES INTERNATIONAL TRADE COMMISSION WASHINGTON, D.C.

### Before the Honorable MaryJoan McNamara Administrative Law Judge

In the Matter of

## CERTAIN DIGITAL VIDEO RECEIVERS, BROADBAND GATEWAYS, AND RELATED HARDWARE AND SOFTWARE COMPONENTS

Investigation No. 337-TA-1158

#### **COMCAST RESPONDENTS' NOTICE OF WITHDRAWAL OF CLAIM TERMS**

In the interests of efficiency and for purposes of this Investigation only, Respondents

Comcast Corporation, Comcast Cable Communications, LLC, Comcast Cable Communications

Management, LLC, and Comcast Holdings Corporation (collectively "Comcast" or

"Respondents") hereby provides notice of the following:

1. Comcast withdraws and waives its proposed constructions of the terms reflected

in Slide 22 of Exhibit CDX-0012, shown below, and agrees to proceed under Rovi's proposed

constructions of those terms.

Claim Term	Rovi's Proposed Construction	Comcast's Proposed Construction
Claim 53 - "monitoring shared bus"	"monitoring <u>a</u> shared bus"	Indefinite
Claim 53 - "processing the plurality of channel selection requests to determine whether the request can supported"	"process[] the plurality of channel selection requests to determine whether the request can be supported"	Indefinite
Claim 53 - "encoding each of the selected channels bused on the data conveyance protocol"	"encod[ $\underline{\mathbf{e}}$ ] each of the selected channels based on the data conveyance protocol"	Indefinite
Claim 53 - "memory operably coupled to the processing module, wherein the memory includes operational instructions that cause the processing module to: receiving receiving processing selectingencoding"	"memory operably coupled to the processing module, wherein the memory includes operational instructions that cause the processing module to: receiv[e] receive[] process[] select[]encod[e]"	Indefinite
Claim 59 - "operational instructions that cause the processing module to encoding each of the selected channels"	"operational instructions that cause the processing module to encod <u>[e]</u> each of the selected channels"	Indefinite
Claim 59 - "identity the selected channel"	"identity <u>of</u> the selected channel"	Indefinite
Claim 63 - "encrypt tho selected channels"	"encrypt the selected channels"	Indefinite

CDX-0012.22.

1

2. Comcast does not contend that any of Claims 53, 59, 60 and 63 is indefinite under

Rovi's proposed constructions.

Dated: January 22, 2020

Respectfully submitted, COUNSEL FOR COMCAST RESPONDENTS

#### /s/ Micah G. Block

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# **CERTIFICATE OF SERVICE**

I, Monica Lee, hereby certify that on January 22, 2020 copies of the foregoing COMCAST RESPONDENTS' NOTICE OF WITHDRAWAL OF CLAIM TERMS were served upon the following as indicated:

The Honorable Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E Street, S.W., Room 112 Washington, DC 20436	<ul> <li>□ Via First Class Mail</li> <li>□ Via Express Delivery</li> <li>□ Via Hand Delivery</li> <li>□ Via Email</li> <li>⊠ Via EDIS</li> </ul>
The Honorable MaryJoan McNamara Administrative Law Judge U.S. International Trade Commission 500 E Street, S.W., Room 317 Washington, DC 20436 <u>michael.buckler@usitc.gov</u>	<ul> <li>□ Via First Class Mail</li> <li>□ Via Express Delivery</li> <li>⊠ Via Hand Delivery</li> <li>⊠ Via Email</li> </ul>
Jae Lee, Esq. Attorney Advisor U.S. International Trade Commission 500 E Street, S.W., Room 317 Washington, DC 20436 jae.lee@usitc.gov	
Cortney Hoecherl Office of Unfair Import Investigations U.S. International Trade Commission 500 E Street, S.W., Suite 401 Washington, DC 20436 cortney.hoecherl@usitc.gov	<ul> <li>□ Via First Class Mail</li> <li>□ Via Express Delivery</li> <li>□ Via Hand Delivery</li> <li>⊠ Via Email</li> </ul>
Douglas A. Cawley MCKOOL SMITH, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 rovi_comcast_itc_III@mckoolsmith.com matthew.rizzolo@ropesgray.com For Complainants	<ul> <li>□ Via First Class Mail</li> <li>□ Via Express Delivery</li> <li>□ Via Hand Delivery</li> <li>⊠ Via Email</li> </ul>

/s/ Monica Lee

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3