

## Exhibit 883-B: Additional References

To the extent any reference charted in Exhibits 883-01 through 883-11 is found not to disclose any limitation, such a limitation would have been obvious alone based on the state of the art or in combination with one or more of the references cited in 883-01 through 883-11 because the '883 patent is merely a collection of prior art elements that fails to meet the statutory requirement of non-obviousness under § 103, and the factors delineated in *KSR Int'l Co. v. Teleflex, Inc.*, 550 U.S. 398 (2007) weigh against a finding of non-obviousness.

In particular, any disclosures identified for each limitation of the '883 patent in the aforementioned Exhibits may be combined with the disclosure identified below for the same limitation. A POSITA would have found such a combination/modification obvious for the reasons discussed herein and in Defendant's cover pleading.

The citations to portions of any reference in this chart are exemplary only. Citations to the written description should be interpreted to include the figures associated with or relevant to the cited passages. Similarly, citations to a figure should be understood to encompass any description, text, or discussion of that figure. Defendant reserves the right to use the entirety of any reference cited in this chart to show that the asserted claims are anticipated and/or are obvious. Citations presented for one claim limitation are expressly incorporated by reference into all other limitations for that claim as well as all limitations of all claims on which that claim depends.

## Exhibit 883-B: Additional References

### Exemplary Disclosures

#### **1[pre] A playback device comprising:**

A POSITA would have found it obvious to use a playback device.

At the time of the alleged invention, it was well known to use playback devices including wireless streaming media players. A POSITA would have been motivated to use a playback device as this was and remains one of the finite types of devices used in connection with a computing device for playing audio files on a wireless network.

The disclosures listed under claim element 1[pre] in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.

#### **1[a] a network interface that is configured to provide an interconnection with at least one data network;**

A POSITA would have found it obvious to use a playback device with a network interface.

At the time of the alleged invention, it was well known that wireless streaming media players had a network interface. Indeed, network interface, particularly wireless network interface, was regarded as one of the main components of this kind of playback devices. A POSITA would have been motivated to use a playback device with a network interface as this was and remains one of the finite set of mechanisms for allowing this kind of playback devices to interact with a computing device and offer flexibility for users.

The disclosures listed under claim element 1[a] in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.

#### **1[b] at least one processor;**

A POSITA would have found it obvious to use a playback device with at least one processor.

At the time of the alleged invention, it was well known that playback devices such as wireless streaming media players had a processor. Indeed, processors were regarded as one of the main components of digital playback devices. A POSITA would have been motivated to use a playback device with a processor as processors were and remain a fundamental building block of digital playback devices.

The disclosures listed under claim element 1[b] in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.

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Exemplary Disclosures
<b>1[c] a non-transitory computer-readable medium; and;</b>
<p>A POSITA would have found it obvious to use a playback device with a non-transitory computer-readable medium.</p> <p>At the time of the alleged invention, it was well known that wireless streaming media players had non-transitory computer-readable medium. Indeed, memory was regarded as one of the main components of digital playback devices. A POSITA would have been motivated to use a digital playback device with a non-transitory computer-readable medium as memory was and remains a fundamental building block of digital playback devices.</p> <p>The disclosures listed under claim element 1[c] in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.</p>
<b>1[d] program instructions stored on the non-transitory computer-readable medium that, when executed by the at least one processor, cause the playback device to perform functions comprising:</b>
<p>A POSITA would have found it obvious to use a playback device with program instructions stored on the non-transitory computer-readable medium.</p> <p>At the time of the alleged invention, it was well known that wireless streaming media players had program instructions. Indeed, program instructions were regarded as one of the main components of digital playback devices. A POSITA would have been motivated to use a digital playback device with program instructions as such program instructions were and remain a fundamental building block of digital playback devices.</p> <p>The disclosures listed under claim element 1[d] in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.</p>
<b>1[e] detecting a triggering event that causes the playback device to enter a setup mode in which the playback device transmits at least a first message indicating that the playback device is available for setup;</b>
<p>A POSITA would have found it obvious to detect a triggering event that causes the playback device to enter a setup mode in which the playback device transmits at least a first message indicating that the playback device is available for setup.</p> <p>At the time of the alleged invention, it was well known to detect a triggering event that causes the playback device to enter a setup mode, send a message, and initiate a configuration or setup process for that playback device. Such a message would alert a computing device to the presence</p>

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of the playback device available for setup and would further improve efficiency and security by avoiding requiring the computing device to constantly transmit information. Moreover, there are two basic approaches to allowing a computing device and a playback device to communicate: either the computing device initiates communication, or the playback device initiates communication. In light of these finite choices, at a minimum it would have been obvious for the playback device to transmit a first message indicating it is available for setup.

In addition, this limitation is met by numerous foundational standards/technologies that a POSITA working in the relevant field would be aware of and that are a staple of any computer system or network. These include USB, IEEE 802.11 (Wi-Fi), IEEE 802.3 (Ethernet), TCP/IP, SSL/TLS, Bluetooth, USB, Wireless USB, UPnP, zeroconf, Rendezvous, SSDP, and Near Field Communication. Many of these technologies are expressly referenced by the primary prior art reference, and a POSITA would thus look to these standards for guidance on implementation. A POSITA would have been motivated to use these standards/technologies, including to implement the teachings of the prior art, due to their familiarity and widespread use and because they are a well-known and dependable foundation that can be implemented with less effort and resources than creating a new technology. Moreover, technologies such as SSL/TLS and NFC would provide additional security when transmitting potentially sensitive information, such as a user's network configuration parameters.

Finally, the larger number of products entering or already on the market at the relevant time with this feature would further motivate a POSITA to implement this feature.

The disclosures listed under claim element 1[e] in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.

The exemplary disclosures identified below further demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system:

IEEE 802.11-1999 at Sections 7.2.3, 8.2.

“Transmission Control Protocol,” RFC 793 (Sept. 1981) at 23, 31.

T. Dierks et al., “The TLS Protocol Version 1.0” (Jan. 1999), RFC 2246 at 3-5, 29.

R. Fielding et al., “Hypertext Transfer Protocol -- HTTP/1.1” (June 1999), RFC 2616 at 10.

Compaq et al., Universal Serial Bus Specification Revision 2.0,” Apr. 27, 2000 at 248, 261.

ECMA, “Near Field Communication White Paper” (February 2004) at 6-7.

Apple, “Developer Connection – About” (2003).

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Apple, “Developer Connection – Resolving and Using Network Services” (2003).

Tom Fout (Microsoft), “Universal Plug and Play in Windows XP” (July 2001) at 16.

“UPnP AV Architecture:0.83” (June 12, 2002) at 3, 5-6, 9-10, 15, 20.

U.S. Patent No. 7,308,489 (“Weast”) at FIG. 1, 3B, 5A, 5B, 2:51-59, 4:31-38, 6:56-64, 7:61-8:12.

U.S. Patent No. 7,643,894 (“Braithwaite”) at FIG. 1, 9:66-10:11.

J. Case et al., “A Simple Network Management Protocol (SNMP)” (May 1990) at 5-7.

Erik Guttman, “Autoconfiguration for IP Networking” (June 2001).

Erik Guttman, “Zeroconf Host Profile Applicability Statement,” (July 20, 2001).

Yaron Y. Goland et al., “Simple Service Discovery Protocol 1.0” (Oct. 28, 1999) at 1, 11-12.

Sound & Vision, “Omnifi DMS1 Wi-Fi Media Receiver” at 2.

Bose, “The Bose® Lifestyle® 50 System, Owner’s Guide” (Oct. 17, 2001) at 41-43.

Bose, “The Bose® Lifestyle® Powered Speaker System, Owner’s Guide” (Dec. 20, 2001) at 18, 22, 42-43.

Bose, “The Bose® Lifestyle® Amplifier, Owner’s Guide” (Jan. 4, 2002) at 8.

Associated Press, “Home theater systems that are a real blast” (Jan. 6, 2000) at 2.

U.S. Patent App. Pub. No. 2002/0124097 (“Isely”) at Abstract, [0002]-[0004], [0008], [0015], [0017], [0031], [0037], [0039]-[0040], [0047]-[0049], [0052]-[0053], [0059].

U.S. Patent App. Pub. No. 2003//022070 (“Ibey”) at [0026], [0046], [0062], [0066], [0076], [0080].

U.S. Patent No. 7,483,538 (“McCarty”) at 12:61-65.

U.S. Patent No. 6,741,708 (“Nakatsugawa”) at 4:35-5:4, 7:11-16.

U.S. Patent No. 7,657,224 (“Goldberg”) at Abstract.

NetStreams Product Catalog 2003/2004 (2003) at 1.

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NetStreams Musica Data Sheet (2004) at 2.

NetStreams Musica R2E Network Interface (2004) at 1-2.

United States Provisional Application No. 60/379,313 at 2-10, 12, 23.

U.S. Patent No. 7,710,941 (“Reitschel”) at 3:24-44, 4:10-28, 6:17-29, 7:13-25, 7:66-8:13, 8:30-32, 8:45-56, 9:7-17, 10:40-47.

C-Media Xear 3d Sound Solution User Manual, Rev. 2.1 at 18.

U.S. Patent No. 7,392,102 (“Sullivan”) at Abstract.

U.S. Patent No. 7,391,791 (“Balassanian”) at Abstract, 2:28-42, 3:12-26, 4:15-28, 6:13-50.

U.S. Patent No. 7,269,338 (“Janevski”) at 6:40-44, 7:4-24, 7:51-83, 11:4-11, 11:12-42, 15:6-21, 15:32-47.

Intel 478 Mainboard User’s Manual, Revision 1.0 at 5-3.

Crestron Adagio Brochure at 8.

Crestron Adagio® AMS Media System Operations Guide at 92-93.

Xear 3D User Manual, Revision 1.0 at 18-19.

U.S. Patent No. 5,182,552 (“Paynting”) at 10:34-38.

U.S. Patent No. 5,761,320 (“Farinelli”) at 2:1-12, 26:60-65.

U.S. Patent No. 6,336,219 (“Nathan”) at 7:24-30.

Korean Patent Publication No. KR20030011128A (“Hoon”) at Abstract, 41.

PR Newswire, “Slim Devices Introduces Squeezebox,” November 18, 2003.

Synchronizing MP3 Playback ([https://snarfed.org/synchronizing\\_mp3\\_playback](https://snarfed.org/synchronizing_mp3_playback)) at 1-3.

Step-by-step P4 Connection ([https://snarfed.org/p4\\_poster/index.html](https://snarfed.org/p4_poster/index.html)), at 1-5.

U.S. Patent Pub. No. 20020072816 (“Shdema”) at Abstract, FIG. 6, [0002], [0008], [0010]-[0014], [0028]-[0029].

U.S. Patent No. 5,808,662 (“Kinney”) at FIG. 1, 2:5-14, 15-29, 3:16-26.

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U.S. Patent No. 6,757,517 (“Chang”) at Abstract, 1:9-13, 1:51-62, 1:63-2:9, 2:10-32, 4:10-30, 4:64-5:14.
U.S. Patent No. 6,778,493 (“Ishii”) at Abstract, 1:8-11, 1:14-25, 5:15-33, 5:34-45, 7:1-19.
U.S. Patent No. 7,162,315 (“Gilbert”) at Abstract, 1:9-12, 2:32-45, 3:45-53.
U.S. Patent Pub. No. 20030050058 (“Walsh”) at Abstract, [0001], [0042], [0081].
U.S. Patent Pub. No. 20030002849 (“Lord”) at [0031].
U.S. Patent No. 7,076,204 (“Richenstein”) at Abstract, 1:34-44, 10:8-17, 10:18-25, 31:4-39, 33:7-12.
U.S. Patent No. 7,206,367 (“Moore”) at FIG. 1, 7:47-60, 8:9-22, 9:13-24, 9:58-10:20, 10:21-41, 10:56-11:9, 11:38-54, 12:39-55.
“Wireless Home Networks — DECT, Bluetooth, HomeRF, and Wireless LANs” at 1, 4, 5
U.S. Patent No. 6,131,130 (“”) at FIG. 1, Abstract, 1:62-2:7.
D. Evans, “In-home wireless networking: an entertainment perspective,” Electronics & Communication Engineering Journal, Vo. 13, Issue 5 213-19 (October 2001).
DNLA White Paper, Use Case Scenarios (June 2004).
Home Networks: A Standards Perspective, Bill Rose, WJR Consulting, Inc., IEEE Communications Magazine at 78 (December 2001).
Specification of the Bluetooth System (Covered Core Package version: 1.2, November 5, 2003).
Universal Serial Bus Specification (Revision 1.1, September 23, 1998) (“USB Spec”).
<b>1[f] while in the setup mode, receiving a response to the first message that facilitates establishing an initial communication path with a computing device that is installed with an application for controlling the playback device, wherein the computing device is operating on a secure wireless local area network (WLAN) that is defined by an access point, wherein the initial communication path with the computing device does not traverse the access point;</b>
A POSITA would have found it obvious to use a playback device to receive a response to the first message that facilitates establishing an initial communication path with a computing device

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that is installed with an application for controlling the playback device, wherein the computing device is operating on a secure wireless local area network (WLAN) that is defined by an access point, wherein the initial communication path with the computing device does not traverse the access point.

At the time of the alleged invention, it was well known that computing devices could operate on a secure wireless local area network (WLAN). A POSITA would have been motivated to operate a computing device on a secure wireless local area network (WLAN) because it allowed even portable devices to connect to a network, including the Internet, which is a core benefit of computing devices in the first instance. Moreover, using a secure WLAN protects against third parties attempting to intercept a user's network traffic containing potentially sensitive information, and the desirability of using a secure WLAN was well known in the art.

At the time of the alleged invention, it was well known to use a computer that is installed with an application for controlling a playback device, including either setting up the playback device for use or streaming music to the playback device or both. Such software features could be divided among multiple applications or be centralized in a single application. Either option would have been obvious and the actual implementation would only reflect a design choice.

At the time of the alleged invention, it was well known to use a playback device to receive a response in order to facilitate establishing an initial communication path with the computing device. The playback device needs to know the computing device is available and willing to setup/configure the playback device, which requires a response from the computing device. This process is commonly referred to as a handshake in the art, and a POSITA would have been motivated to utilize such a handshake to ensure the availability and reliability of the communication path.

In addition, this limitation is met by numerous foundational standards/technologies that a POSITA working in the relevant field would be aware of and that are a staple of any computer system or network. These include USB, IEEE 802.11 (Wi-Fi), IEEE 802.3 (Ethernet), TCP/IP, SSL/TLS, Bluetooth, USB, Wireless USB, UPnP, zeroconf, Rendezvous, SSDP, and Near Field Communication. Many of these technologies are expressly referenced by the primary prior art reference, and a POSITA would thus look to these standards for guidance on implementation. A POSITA would have been motivated to use these standards/technologies, including to implement the teachings of the prior art, due to their familiarity and widespread use and because they are a well-known and dependable foundation that can be implemented with less effort and resources than creating a new technology. Moreover, technologies such as SSL/TLS and NFC would provide additional security when transmitting potentially sensitive information, such as a user's network configuration parameters.

Finally, the larger number of products entering or already on the market at the relevant time with this feature would further motivate a POSITA to implement this feature.

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The disclosures listed under claim element 1[f] in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.

The exemplary disclosures identified below further demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system:

IEEE 802.11-1999 at Sections 7.2.3, 8.2.

“Transmission Control Protocol,” RFC 793 (Sept. 1981) at 23, 31.

T. Dierks et al., “The TLS Protocol Version 1.0” (Jan. 1999), RFC 2246 at 3-5, 29.

R. Fielding et al., “Hypertext Transfer Protocol -- HTTP/1.1” (June 1999), RFC 2616 at 10.

Compaq et al., Universal Serial Bus Specification Revision 2.0,” Apr. 27, 2000 at 248, 261.

ECMA, “Near Field Communication White Paper” (February 2004) at 6-7.

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Tom Fout (Microsoft), “Universal Plug and Play in Windows XP” (July 2001) at 16.

“UPnP AV Architecture:0.83” (June 12, 2002) at 3, 5-6, 9-10, 15, 20.

U.S. Patent No. 7,308,489 (“Weast”) at FIG. 1, 3B, 5A, 5B, 2:51-59, 4:31-38, 6:56-64, 7:61-8:12.

U.S. Patent No. 7,643,894 (“Braithwaite”) at FIG. 1, 9:66-10:11.

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U.S. Patent No. 6,741,708 (“Nakatsugawa”) at 4:35-5:4, 7:11-16.

U.S. Patent No. 7,657,224 (“Goldberg”) at Abstract.

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U.S. Patent No. 7,269,338 (“Janevski”) at 6:40-44, 7:4-24, 7:51-83, 11:4-11, 11:12-42, 15:6-21, 15:32-47.

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U.S. Patent No. 6,336,219 (“Nathan”) at 7:24-30.

Korean Patent Publication No. KR20030011128A (“Hoon”) at Abstract, 41.

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Step-by-step P4 Connection ([https://snarfed.org/p4\\_poster/index.html](https://snarfed.org/p4_poster/index.html)), at 1-5.

U.S. Patent Pub. No. 20020072816 (“Shdema”) at Abstract, FIG. 6, [0002], [0008], [0010]-[0014], [0028]-[0029].

U.S. Patent No. 5,808,662 (“Kinney”) at FIG. 1, 2:5-14, 15-29, 3:16-26.

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U.S. Patent No. 7,162,315 (“Gilbert”) at Abstract, 1:9-12, 2:32-45, 3:45-53.

U.S. Patent Pub. No. 20030050058 (“Walsh”) at Abstract, [0001], [0042], [0081].

U.S. Patent Pub. No. 20030002849 (“Lord”) at [0031].

U.S. Patent No. 7,076,204 (“Richenstein”) at Abstract, 1:34-44, 10:8-17, 10:18-25, 31:4-39, 33:7-12.

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“Wireless Home Networks — DECT, Bluetooth, HomeRF, and Wireless LANs” at 1, 4, 5

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<p><b>1[g] receiving, from the computing device via the initial communication path, at least a second message containing network configuration parameters for the secure WLAN, wherein the network configuration parameters comprise an identifier of the secure WLAN and a security key for the secure WLAN;</b></p>
<p>A POSITA would have found it obvious to use a playback device to receive from the computing device via the initial communication path, at least a second message containing network configuration parameters for the secure WLAN, wherein the network configuration parameters comprise an identifier of the secure WLAN and a security key for the secure WLAN.</p> <p>At the time of the alleged invention, it was well known to receive a message with network configuration parameters, and a POSITA would have been motivated to receive the same in order to achieve the goal of actually setting up/configuring the playback device, which include connecting the playback device to the user’s secure WLAN. Moreover, joining a WLANs are commonly requires a network identifier, such as an SSID, and (at the relevant time) a security key, such as a WEP key. Thus, a POSITA would have been motivated to receive this information at the playback device from the computing device.</p> <p>In addition, this limitation is met by numerous foundational standards/technologies that a person of ordinary skill working in the relevant field would be aware of and that are a staple of any computer system or network. These include USB, IEEE 802.11 (Wi-Fi), IEEE 802.3 (Ethernet), TCP/IP, SSL/TLS, Bluetooth, USB, Wireless USB, UPnP, zeroconf, Rendezvous, SSDP, and Near Field Communication. Many of these technologies are expressly referenced by the primary prior art reference, and a person of ordinary skill would thus look to these standards for guidance on implementation. A person of ordinary skill would have been motivated to use these standards/technologies, including to implement the teachings of the prior art, due to their familiarity and widespread use and because they are a well-known and dependable foundation that can be implemented with less effort and resources than creating a new technology. Moreover, technologies such as SSL/TLS and NFC would provide additional security when transmitting potentially sensitive information, such as a user’s network configuration parameters.</p>

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Finally, the larger number of products entering or already on the market at the relevant time with this feature would further motivate a POSITA to implement this feature.

The disclosures listed under claim element 1[g] in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.

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R. Fielding et al., “Hypertext Transfer Protocol -- HTTP/1.1” (June 1999), RFC 2616 at 10.

Compaq et al., Universal Serial Bus Specification Revision 2.0,” Apr. 27, 2000 at 248, 261.

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Apple, “Developer Connection – Publishing Network Services” (2003).

Apple, “Developer Connection – Resolving and Using Network Services” (2003).

Tom Fout (Microsoft), “Universal Plug and Play in Windows XP” (July 2001) at 16.

“UPnP AV Architecture:0.83” (June 12, 2002) at 3, 5-6, 9-10, 15, 20.

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Bose, “The Bose® Lifestyle® Powered Speaker System, Owner’s Guide” (Dec. 20, 2001) at 18, 22, 42-43.

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U.S. Patent No. 7,483,538 (“McCarty”) at 12:61-65.

U.S. Patent No. 6,741,708 (“Nakatsugawa”) at 4:35-5:4, 7:11-16.

U.S. Patent No. 7,657,224 (“Goldberg”) at Abstract.

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NetStreams Musica R2E Network Interface (2004) at 1-2.

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U.S. Patent No. 7,710,941 (“Reitschel”) at 3:24-44, 4:10-28, 6:17-29, 7:13-25, 7:66-8:13, 8:30-32, 8:45-56, 9:7-17, 10:40-47.

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U.S. Patent No. 7,391,791 (“Balassanian”) at Abstract, 2:28-42, 3:12-26, 4:15-28, 6:13-50.

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Step-by-step P4 Connection ([https://snarfed.org/p4\\_poster/index.html](https://snarfed.org/p4_poster/index.html)), at 1-5.

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<p>D. Evans, "In-home wireless networking: an entertainment perspective," <i>Electronics &amp; Communication Engineering Journal</i>, Vo. 13, Issue 5 213-19 (October 2001).</p> <p>DNLA White Paper, Use Case Scenarios (June 2004).</p> <p>Home Networks: A Standards Perspective, Bill Rose, WJR Consulting, Inc., <i>IEEE Communications Magazine</i> at 78 (December 2001).</p> <p>Specification of the Bluetooth System (Covered Core Package version: 1.2, November 5, 2003).</p> <p>Universal Serial Bus Specification (Revision 1.1, September 23, 1998) ("USB Spec").</p>
<p><b>1[h] using the network configuration parameters to connect to the secure WLAN that is defined by the access point; and</b></p>
<p>A POSITA would have found it obvious to use the network configuration parameters to connect to the secure WLAN that is defined by the access point.</p> <p>At the time of the alleged invention, it was well known to connect the playback device to a secure WLAN and doing so would require network configuration parameters. A POSITA would have been motivated to use the network configuration parameters received from the computing device to connect the playback device to the secure WLAN so that the playback device can perform its intended functions of streaming music via the WLAN.</p> <p>Finally, the larger number of products entering or already on the market at the relevant time with this feature would further motivate a POSITA to implement this feature.</p> <p>The disclosures listed under claim element 1[h] in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.</p> <p>The exemplary disclosures identified below further demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system:</p> <p>IEEE 802.11-1999 at Sections 7.2.3, 8.2.</p> <p>"Transmission Control Protocol," RFC 793 (Sept. 1981) at 23, 31.</p> <p>T. Dierks et al., "The TLS Protocol Version 1.0" (Jan. 1999), RFC 2246 at 3-5, 29.</p> <p>R. Fielding et al., "Hypertext Transfer Protocol -- HTTP/1.1" (June 1999), RFC 2616 at 10.</p>

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U.S. Patent No. 7,483,538 (“McCarty”) at 12:61-65.

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U.S. Patent No. 7,710,941 (“Reitschel”) at 3:24-44, 4:10-28, 6:17-29, 7:13-25, 7:66-8:13, 8:30-32, 8:45-56, 9:7-17, 10:40-47.

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Step-by-step P4 Connection ([https://snarfed.org/p4\\_poster/index.html](https://snarfed.org/p4_poster/index.html)), at 1-5.

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U.S. Patent No. 6,757,517 (“Chang”) at Abstract, 1:9-13, 1:51-62, 1:63-2:9, 2:10-32, 4:10-30, 4:64-5:14.
U.S. Patent No. 6,778,493 (“Ishii”) at Abstract, 1:8-11, 1:14-25, 5:15-33, 5:34-45, 7:1-19.
U.S. Patent No. 7,162,315 (“Gilbert”) at Abstract, 1:9-12, 2:32-45, 3:45-53.
U.S. Patent Pub. No. 20030050058 (“Walsh”) at Abstract, [0001], [0042], [0081].
U.S. Patent Pub. No. 20030002849 (“Lord”) at [0031].
U.S. Patent No. 7,076,204 (“Richenstein”) at Abstract, 1:34-44, 10:8-17, 10:18-25, 31:4-39, 33:7-12.
U.S. Patent No. 7,206,367 (“Moore”) at FIG. 1, 7:47-60, 8:9-22, 9:13-24, 9:58-10:20, 10:21-41, 10:56-11:9, 11:38-54, 12:39-55.
“Wireless Home Networks — DECT, Bluetooth, HomeRF, and Wireless LANs” at 1, 4, 5
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D. Evans, “In-home wireless networking: an entertainment perspective,” <i>Electronics &amp; Communication Engineering Journal</i> , Vo. 13, Issue 5 213-19 (October 2001).
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Specification of the Bluetooth System (Covered Core Package version: 1.2, November 5, 2003).
Universal Serial Bus Specification (Revision 1.1, September 23, 1998) (“USB Spec”).
<b>1[i] transitioning from communicating with the computing device via the initial communication path to communicating with the computing device via the secure WLAN that is defined by the access point.</b>

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### Exemplary Disclosures

A POSITA would have found it obvious transition from communicating with the computing device via the initial communication path to communicating with the computing device via the secure WLAN that is defined by the access point.

At the time of the alleged invention, it was well known to allow communication between a computing device and a playback device over a secure WLAN defined by an access point. Indeed, the purpose of setting up/configuring a playback device is generally to then allow that device to join the secure WLAN and to communicate with the device over that secure WLAN. Thus, a POSITA would have been motivated to switch to the secure WLAN once setup/configuration was complete.

Finally, the larger number of products entering or already on the market at the relevant time with this feature would further motivate a POSITA to implement this feature.

The disclosures listed under claim element 1[i] in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.

The exemplary disclosures identified below further demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system:

IEEE 802.11-1999 at Sections 7.2.3, 8.2.

“Transmission Control Protocol,” RFC 793 (Sept. 1981) at 23, 31.

T. Dierks et al., “The TLS Protocol Version 1.0” (Jan. 1999), RFC 2246 at 3-5, 29.

R. Fielding et al., “Hypertext Transfer Protocol -- HTTP/1.1” (June 1999), RFC 2616 at 10.

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“UPnP AV Architecture:0.83” (June 12, 2002) at 3, 5-6, 9-10, 15, 20.

U.S. Patent No. 7,308,489 (“Weast”) at FIG. 1, 3B, 5A, 5B, 2:51-59, 4:31-38, 6:56-64, 7:61-8:12.

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U.S. Patent No. 7,643,894 (“Braithwaite”) at FIG. 1, 9:66-10:11.

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U.S. Patent No. 7,483,538 (“McCarty”) at 12:61-65.

U.S. Patent No. 6,741,708 (“Nakatsugawa”) at 4:35-5:4, 7:11-16.

U.S. Patent No. 7,657,224 (“Goldberg”) at Abstract.

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U.S. Patent No. 7,710,941 (“Reitschel”) at 3:24-44, 4:10-28, 6:17-29, 7:13-25, 7:66-8:13, 8:30-32, 8:45-56, 9:7-17, 10:40-47.

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U.S. Patent No. 7,162,315 (“Gilbert”) at Abstract, 1:9-12, 2:32-45, 3:45-53.

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Exemplary Disclosures
<p>U.S. Patent No. 7,076,204 (“Richenstein”) at Abstract, 1:34-44, 10:8-17, 10:18-25, 31:4-39, 33:7-12.</p> <p>U.S. Patent No. 7,206,367 (“Moore”) at FIG. 1, 7:47-60, 8:9-22, 9:13-24, 9:58-10:20, 10:21-41, 10:56-11:9, 11:38-54, 12:39-55.</p> <p>“Wireless Home Networks — DECT, Bluetooth, HomeRF, and Wireless LANs” at 1, 4, 5</p> <p>U.S. Patent No. 6,131,130 (“”) at FIG. 1, Abstract, 1:62-2:7.</p> <p>D. Evans, “In-home wireless networking: an entertainment perspective,” Electronics &amp; Communication Engineering Journal, Vo. 13, Issue 5 213-19 (October 2001).</p> <p>DNLA White Paper, Use Case Scenarios (June 2004).</p> <p>Home Networks: A Standards Perspective, Bill Rose, WJR Consulting, Inc., IEEE Communications Magazine at 78 (December 2001).</p> <p>Specification of the Bluetooth System (Covered Core Package version: 1.2, November 5, 2003).</p> <p>Universal Serial Bus Specification (Revision 1.1, September 23, 1998) (“USB Spec”).</p>
<p><b>2. The playback device of claim 1, wherein the triggering event comprises one of (a) powering on the playback device or (b) receiving user input via a physical interface of the playback device.</b></p>
<p>A POSITA would have found it obvious to use a triggering event comprising one of (a) powering on the playback device or (b) receiving user input via a physical interface of the playback device.</p> <p>At the time of the alleged invention, it was well known to trigger a playback device into entering a setup mode by powering on the playback device or receiving user input via a physical interface of the playback device. A POSITA would have known that initiating configuration process for the playback device through either means would be intuitive for a user to simplify the configuration process. Thus a POSITA would have been motivated to include this feature into the playback device as part of the device’s auto configuration capability.</p> <p>Finally, the larger number of products entering or already on the market at the relevant time with this feature would further motivate a POSITA to implement this feature.</p> <p>The disclosures listed under claim element 2 in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.</p>

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### Exemplary Disclosures

The exemplary disclosures identified below further demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system:

Apple, “Developer Connection – Resolving and Using Network Services”(2003).

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U.S. Patent No. 7,269,338 (“Janevski”) at 6:40-44, 7:4-24, 7:51-83, 11:4-11, 11:12-42, 15:6-21, 15:32-47.

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## Exhibit 883-B: Additional References

### Exemplary Disclosures

U.S. Patent No. 7,076,204 (“Richenstein”) at Abstract, 1:34-44, 10:8-17, 10:18-25, 31:4-39, 33:7-12.

U.S. Patent No. 7,206,367 (“Moore”) at FIG. 1, 7:47-60, 8:9-22, 9:13-24, 9:58-10:20, 10:21-41, 10:56-11:9, 11:38-54, 12:39-55.

U.S. Patent Pub. No. 2002/0174243 (“Spurgat”) at FIGs. 1, 10-13, [0021], [0034]-[0036], [0043], [0057], [0069]-[0085], [0091]-[0097], [0107] –[0108].

**4. The playback device of claim 1, further comprising program instructions stored on the non-transitory computer-readable medium that, when executed by the at least one processor, cause the playback device to perform functions comprising:**

**after receiving the second message, providing an indication that the playback device has successfully received the network configuration parameters for the secure WLAN.**

A POSITA would have found it obvious to use a playback device further comprising program instructions stored on the non-transitory computer-readable medium that, when executed by the at least one processor, cause the playback device to perform functions comprising: after receiving the second message, providing an indication that the playback device has successfully received the network configuration parameters for the secure WLAN.

At the time of the alleged invention, it was well known to provide an indication the previous message was successfully received. This helps ensure the message was actually received, and allows the computing device to re-transmit the message in the event it was not received. This process was well known in the art, often referred to as acknowledgements, and it would have been obvious to use the same in the context of setting up/configuring a playback device.

In addition, this limitation is met by numerous foundational standards/technologies that a person of ordinary skill working in the relevant field would be aware of and that are a staple of any computer system or network. These include USB, IEEE 802.11 (Wi-Fi), IEEE 802.3 (Ethernet), TCP/IP, SSL/TLS, Bluetooth, USB, Wireless USB, UPnP, zeroconf, Rendezvous, SSDP, and Near Field Communication. Many of these technologies are expressly referenced by the primary prior art reference, and a person of ordinary skill would thus look to these standards for guidance on implementation. A person of ordinary skill would have been motivated to use these standards/technologies, including to implement the teachings of the prior art, due to their familiarity and widespread use and because they are a well-known and dependable foundation that can be implemented with less effort and resources than creating a new technology. Moreover, technologies such as SSL/TLS and NFC would provide additional security when transmitting potentially sensitive information, such as a user’s network configuration parameters.

Finally, the larger number of products entering or already on the market at the relevant time with this feature would further motivate a POSITA to implement this feature.

## Exhibit 883-B: Additional References

### Exemplary Disclosures

The disclosures listed under claim element 4 in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.

The exemplary disclosures identified below further demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system:

IEEE 802.11-1999 at Sections 7.2.3, 8.2.

“Transmission Control Protocol,” RFC 793 (Sept. 1981) at 23, 31.

T. Dierks et al., “The TLS Protocol Version 1.0” (Jan. 1999), RFC 2246 at 3-5, 29.

R. Fielding et al., “Hypertext Transfer Protocol -- HTTP/1.1” (June 1999), RFC 2616 at 10.

Compaq et al., Universal Serial Bus Specification Revision 2.0,” Apr. 27, 2000 at 248, 261.

ECMA, “Near Field Communication White Paper” (February 2004) at 6-7.

Apple, “Developer Connection – About” (2003).

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Apple, “Developer Connection – Resolving and Using Network Services” (2003).

Tom Fout (Microsoft), “Universal Plug and Play in Windows XP” (July 2001) at 16.

“UPnP AV Architecture:0.83” (June 12, 2002) at 3, 5-6, 9-10, 15, 20.

U.S. Patent No. 7,308,489 (“Weast”) at FIG. 1, 3B, 5A, 5B, 2:51-59, 4:31-38, 6:56-64, 7:61-8:12.

U.S. Patent No. 7,643,894 (“Braithwaite”) at FIG. 1, 9:66-10:11.

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Yaron Y. Golland et al., “Simple Service Discovery Protocol 1.0” (Oct. 28, 1999) at 1, 11-12.

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## Exhibit 883-B: Additional References

### Exemplary Disclosures

Bose, “The Bose® Lifestyle® Powered Speaker System, Owner’s Guide” (Dec. 20, 2001) at 18, 22, 42-43.

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U.S. Patent App. Pub. No. 2003//022070 (“Ibey”) at [0026], [0046], [0062], [0066], [0076], [0080].

U.S. Patent No. 7,483,538 (“McCarty”) at 12:61-65.

U.S. Patent No. 6,741,708 (“Nakatsugawa”) at 4:35-5:4, 7:11-16.

U.S. Patent No. 7,657,224 (“Goldberg”) at Abstract.

NetStreams Product Catalog 2003/2004 (2003) at 1.

NetStreams Musica Data Sheet (2004) at 2.

NetStreams Musica R2E Network Interface (2004) at 1-2.

United States Provisional Application No. 60/379,313 at 2-10, 12, 23.

U.S. Patent No. 7,710,941 (“Reitschel”) at 3:24-44, 4:10-28, 6:17-29, 7:13-25, 7:66-8:13, 8:30-32, 8:45-56, 9:7-17, 10:40-47.

C-Media Xear 3d Sound Solution User Manual, Rev. 2.1 at 18.

U.S. Patent No. 7,392,102 (“Sullivan”) at Abstract.

U.S. Patent No. 7,391,791 (“Balassanian”) at Abstract, 2:28-42, 3:12-26, 4:15-28, 6:13-50.

U.S. Patent No. 7,269,338 (“Janevski”) at 6:40-44, 7:4-24, 7:51-83, 11:4-11, 11:12-42, 15:6-21, 15:32-47.

Intel 478 Mainboard User’s Manual, Revision 1.0 at 5-3.

Crestron Adagio Brochure at 8.

Crestron Adagio® AMS Media System Operations Guide at 92-93.

## Exhibit 883-B: Additional References

### Exemplary Disclosures

Xear 3D User Manual, Revision 1.0 at 18-19.

U.S. Patent No. 5,182,552 (“Paynting”) at 10:34-38.

U.S. Patent No. 5,761,320 (“Farinelli”) at 2:1-12, 26:60-65.

U.S. Patent No. 6,336,219 (“Nathan”) at 7:24-30.

Korean Patent Publication No. KR20030011128A (“Hoon”) at Abstract, 41.

PR Newswire, “Slim Devices Introduces Squeezebox,” November 18, 2003.

Synchronizing MP3 Playback ([https://snarfed.org/synchronizing\\_mp3\\_playback](https://snarfed.org/synchronizing_mp3_playback)) at 1-3.

Step-by-step P4 Connection ([https://snarfed.org/p4\\_poster/index.html](https://snarfed.org/p4_poster/index.html)), at 1-5.

U.S. Patent Pub. No. 20020072816 (“Shdema”) at Abstract, FIG. 6, [0002], [0008], [0010]-[0014], [0028]-[0029].

U.S. Patent No. 5,808,662 (“Kinney”) at FIG. 1, 2:5-14, 15-29, 3:16-26.

U.S. Patent No. 6,757,517 (“Chang”) at Abstract, 1:9-13, 1:51-62, 1:63-2:9, 2:10-32, 4:10-30, 4:64-5:14.

U.S. Patent No. 6,778,493 (“Ishii”) at Abstract, 1:8-11, 1:14-25, 5:15-33, 5:34-45, 7:1-19.

U.S. Patent No. 7,162,315 (“Gilbert”) at Abstract, 1:9-12, 2:32-45, 3:45-53.

U.S. Patent Pub. No. 20030050058 (“Walsh”) at Abstract, [0001], [0042], [0081].

U.S. Patent Pub. No. 20030002849 (“Lord”) at [0031].

U.S. Patent No. 7,076,204 (“Richenstein”) at Abstract, 1:34-44, 10:8-17, 10:18-25, 31:4-39, 33:7-12.

U.S. Patent No. 7,206,367 (“Moore”) at FIG. 1, 7:47-60, 8:9-22, 9:13-24, 9:58-10:20, 10:21-41, 10:56-11:9, 11:38-54, 12:39-55.

“Wireless Home Networks — DECT, Bluetooth, HomeRF, and Wireless LANs” at 1, 4, 5

U.S. Patent No. 6,131,130 (“”) at FIG. 1, Abstract, 1:62-2:7.

D. Evans, “In-home wireless networking: an entertainment perspective,” *Electronics & Communication Engineering Journal*, Vo. 13, Issue 5 213-19 (October 2001).

## Exhibit 883-B: Additional References

Exemplary Disclosures
<p>DNLA White Paper, Use Case Scenarios (June 2004).</p> <p>Home Networks: A Standards Perspective, Bill Rose, WJR Consulting, Inc., IEEE Communications Magazine at 78 (December 2001).</p> <p>Specification of the Bluetooth System (Covered Core Package version: 1.2, November 5, 2003).</p> <p>Universal Serial Bus Specification (Revision 1.1, September 23, 1998) (“USB Spec”).</p>
<p><b>5. The playback device of claim 4, wherein providing the indication comprises transmitting, to the computing device via the initial communication path, at least a third message indicating that the playback device has successfully received the network configuration parameters.</b></p>
<p>A POSITA would have found it obvious to use a playback device to provide the indication that comprises transmitting, to the computing device via the initial communication path, at least a third message indicating that the playback device has successfully received the network configuration parameters.</p> <p>At the time of the alleged invention, it was well known to transmit a message indicating the previous message was successfully received. This helps ensure the message was actually received, and allows the computing device to re-transmit the message in the event it was not received. This process was well known in the art, often referred to as acknowledgements, and it would have been obvious to use the same in the context of setting up/configuring a playback device.</p> <p>In addition, this limitation is met by numerous foundational standards/technologies that a person of ordinary skill working in the relevant field would be aware of and that are a staple of any computer system or network. These include USB, IEEE 802.11 (Wi-Fi), IEEE 802.3 (Ethernet), TCP/IP, SSL/TLS, Bluetooth, USB, Wireless USB, UPnP, zeroconf, Rendezvous, SSDP, and Near Field Communication. Many of these technologies are expressly referenced by the primary prior art reference, and a person of ordinary skill would thus look to these standards for guidance on implementation. A person of ordinary skill would have been motivated to use these standards/technologies, including to implement the teachings of the prior art, due to their familiarity and widespread use and because they are a well-known and dependable foundation that can be implemented with less effort and resources than creating a new technology. Moreover, technologies such as SSL/TLS and NFC would provide additional security when transmitting potentially sensitive information, such as a user’s network configuration parameters.</p> <p>Finally, the larger number of products entering or already on the market at the relevant time with this feature would further motivate a POSITA to implement this feature.</p>

## Exhibit 883-B: Additional References

### Exemplary Disclosures

The disclosures listed under claim element 5 in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.

The exemplary disclosures identified below further demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system:

IEEE 802.11-1999 at Sections 7.2.3, 8.2.

“Transmission Control Protocol,” RFC 793 (Sept. 1981) at 23, 31.

T. Dierks et al., “The TLS Protocol Version 1.0” (Jan. 1999), RFC 2246 at 3-5, 29.

R. Fielding et al., “Hypertext Transfer Protocol -- HTTP/1.1” (June 1999), RFC 2616 at 10.

Compaq et al., Universal Serial Bus Specification Revision 2.0,” Apr. 27, 2000 at 248, 261.

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“UPnP AV Architecture:0.83” (June 12, 2002) at 3, 5-6, 9-10, 15, 20.

U.S. Patent No. 7,308,489 (“Weast”) at FIG. 1, 3B, 5A, 5B, 2:51-59, 4:31-38, 6:56-64, 7:61-8:12.

U.S. Patent No. 7,643,894 (“Braithwaite”) at FIG. 1, 9:66-10:11.

J. Case et al., “A Simple Network Management Protocol (SNMP)” (May 1990) at 5-7.

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Erik Guttman, “Zeroconf Host Profile Applicability Statement,” (July 20, 2001).

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### Exemplary Disclosures

Bose, “The Bose® Lifestyle® Powered Speaker System, Owner’s Guide” (Dec. 20, 2001) at 18, 22, 42-43.

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U.S. Patent App. Pub. No. 2002/0124097 (“Isely”) at Abstract, [0002]-[0004], [0008], [0015], [0017], [0031], [0037], [0039]-[0040], [0047]-[0049], [0052]-[0053], [0059].

U.S. Patent App. Pub. No. 2003//022070 (“Ibey”) at [0026], [0046], [0062], [0066], [0076], [0080].

U.S. Patent No. 7,483,538 (“McCarty”) at 12:61-65.

U.S. Patent No. 6,741,708 (“Nakatsugawa”) at 4:35-5:4, 7:11-16.

U.S. Patent No. 7,657,224 (“Goldberg”) at Abstract.

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NetStreams Musica R2E Network Interface (2004) at 1-2.

United States Provisional Application No. 60/379,313 at 2-10, 12, 23.

U.S. Patent No. 7,710,941 (“Reitschel”) at 3:24-44, 4:10-28, 6:17-29, 7:13-25, 7:66-8:13, 8:30-32, 8:45-56, 9:7-17, 10:40-47.

C-Media Xear 3d Sound Solution User Manual, Rev. 2.1 at 18.

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U.S. Patent No. 7,391,791 (“Balassanian”) at Abstract, 2:28-42, 3:12-26, 4:15-28, 6:13-50.

U.S. Patent No. 7,269,338 (“Janevski”) at 6:40-44, 7:4-24, 7:51-83, 11:4-11, 11:12-42, 15:6-21, 15:32-47.

Intel 478 Mainboard User’s Manual, Revision 1.0 at 5-3.

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## Exhibit 883-B: Additional References

### Exemplary Disclosures

Xear 3D User Manual, Revision 1.0 at 18-19.

U.S. Patent No. 5,182,552 (“Paynting”) at 10:34-38.

U.S. Patent No. 5,761,320 (“Farinelli”) at 2:1-12, 26:60-65.

U.S. Patent No. 6,336,219 (“Nathan”) at 7:24-30.

Korean Patent Publication No. KR20030011128A (“Hoon”) at Abstract, 41.

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Synchronizing MP3 Playback ([https://snarfed.org/synchronizing\\_mp3\\_playback](https://snarfed.org/synchronizing_mp3_playback)) at 1-3.

Step-by-step P4 Connection ([https://snarfed.org/p4\\_poster/index.html](https://snarfed.org/p4_poster/index.html)), at 1-5.

U.S. Patent Pub. No. 20020072816 (“Shdema”) at Abstract, FIG. 6, [0002], [0008], [0010]-[0014], [0028]-[0029].

U.S. Patent No. 5,808,662 (“Kinney”) at FIG. 1, 2:5-14, 15-29, 3:16-26.

U.S. Patent No. 6,757,517 (“Chang”) at Abstract, 1:9-13, 1:51-62, 1:63-2:9, 2:10-32, 4:10-30, 4:64-5:14.

U.S. Patent No. 6,778,493 (“Ishii”) at Abstract, 1:8-11, 1:14-25, 5:15-33, 5:34-45, 7:1-19.

U.S. Patent No. 7,162,315 (“Gilbert”) at Abstract, 1:9-12, 2:32-45, 3:45-53.

U.S. Patent Pub. No. 20030050058 (“Walsh”) at Abstract, [0001], [0042], [0081].

U.S. Patent Pub. No. 20030002849 (“Lord”) at [0031].

U.S. Patent No. 7,076,204 (“Richenstein”) at Abstract, 1:34-44, 10:8-17, 10:18-25, 31:4-39, 33:7-12.

U.S. Patent No. 7,206,367 (“Moore”) at FIG. 1, 7:47-60, 8:9-22, 9:13-24, 9:58-10:20, 10:21-41, 10:56-11:9, 11:38-54, 12:39-55.

“Wireless Home Networks — DECT, Bluetooth, HomeRF, and Wireless LANs” at 1, 4, 5

U.S. Patent No. 6,131,130 (“”) at FIG. 1, Abstract, 1:62-2:7.

D. Evans, “In-home wireless networking: an entertainment perspective,” *Electronics & Communication Engineering Journal*, Vo. 13, Issue 5 213-19 (October 2001).

## Exhibit 883-B: Additional References

Exemplary Disclosures
<p>DNLA White Paper, Use Case Scenarios (June 2004).</p> <p>Home Networks: A Standards Perspective, Bill Rose, WJR Consulting, Inc., IEEE Communications Magazine at 78 (December 2001).</p> <p>Specification of the Bluetooth System (Covered Core Package version: 1.2, November 5, 2003).</p> <p>Universal Serial Bus Specification (Revision 1.1, September 23, 1998) (“USB Spec”).</p>
<p><b>9. The playback device of claim 1, further comprising program instructions stored on the non-transitory computer-readable medium that, when executed by the at least one processor, cause the playback device to perform functions comprising: receiving, from the computing device, a command to assign a name to the playback device.</b></p>
<p>A POSITA would have found it obvious to use a playback device further comprising program instructions stored on the non-transitory computer-readable medium that, when executed by the at least one processor, cause the playback device to perform functions comprising: receiving, from the computing device, a command to assign a name to the playback device.</p> <p>At the time of the alleged invention, it was well known receive a command from the computing device to assign a name to the playback device. This allows for provision of user-friendly operations of the device since multiple devices are likely to be connected and assigning an easy to remember and easy to distinguish name would improve user experiences. A POSITA would have been motivated to include this feature in the configuration process of the playback device.</p> <p>Finally, the larger number of products entering or already on the market at the relevant time with this feature would further motivate a POSITA to implement this feature.</p> <p>The disclosures listed under claim element 9 in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.</p> <p>The exemplary disclosures identified below further demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system:</p> <p>Apple, “Developer Connection – Resolving and Using Network Services”(2003).</p> <p>“UPnP AV Architecture:0.83” (June 12, 2002), at 5-6, 9-10, 15, 20.</p> <p>U.S. Patent No. 7,308,489 (“Weast”) at FIGs. 1, 3B, 5A, 5B, 2:51-59, 4:31-38, 6:56-64, 7:61-8:12.</p>

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### Exemplary Disclosures

U.S. Patent No. 7,643,894 (“Braithwaite”) at FIG. 1, 9:66-10:11.

Sound & Vision, “Omnifi DMS1 Wi-Fi Media Receiver” at 2.

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Bose, “The Bose® Lifestyle® Powered Speaker System, Owner’s Guide” (Dec. 20, 2001) at 7.

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U.S. Patent No. 7,483,538 (“McCarty”) at 12:61-65.

U.S. Patent No. 7,123,731 (“Cohen”) at 1:19-21.

U.S. Patent No. 6,741,708 (“Nakatsugawa”) at 4:35-5:4, 7:11-16.

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U.S. Patent No. 7,391,791 (“Balassanian”) at Abstract, 2:28-42, 3:12-26, 4:15-28, 6:13-50.

U.S. Patent No. 7,269,338 (“Janevski”) at 6:40-44, 7:4-24, 7:51-83, 11:4-11, 11:12-42, 15:6-21, 15:32-47.

Intel 478 Mainboard User’s Manual, Revision 1.0 at 5-3.

## Exhibit 883-B: Additional References

### Exemplary Disclosures

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Crestron Adagio® AMS Media System Operations Guide at 92-93.

Crestron Adagio® AMS Media System Operations Guide at 62-63.

Xear 3D User Manual, Revision 1.0 at 18-19.

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Step-by-step P4 Connection ([https://snarfed.org/p4\\_poster/index.html](https://snarfed.org/p4_poster/index.html)), at 1-5.

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U.S. Patent No. 5,808,662 (“Kinney”) at FIG. 1, 2:5-14, 15-29, 3:16-26.

U.S. Patent No. 6,757,517 (“Chang”) at Abstract, 1:9-13, 1:51-62, 1:63-2:9, 2:10-32, 4:10-30, 4:64-5:14.

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U.S. Patent No. 7,162,315 (“Gilbert”) at Abstract, 1:9-12, 2:32-45, 3:45-53.

U.S. Patent Pub. No. 20030050058 (“Walsh”) at Abstract, [0001], [0042], [0081].

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U.S. Patent No. 7,076,204 (“Richenstein”) at Abstract, 1:34-44, 10:8-17, 10:18-25, 31:4-39, 33:7-12.

U.S. Patent No. 7,206,367 (“Moore”) at FIG. 1, 7:47-60, 8:9-22, 9:13-24, 9:58-10:20, 10:21-41, 10:56-11:9, 11:38-54, 12:39-55.

U.S. Patent Pub. No. 2002/0174243 (“Spurgat”) at FIGs. 1, 10-13, [0021], [0034]-[0036], [0043], [0057], [0069]-[0085], [0091]-[0097], [0107]-[0108].

## Exhibit 883-B: Additional References

### Exemplary Disclosures

#### **10. The playback device of claim 1, wherein communicating with the computing device via the secure WLAN comprises receiving a command related to playback of audio content.**

A POSITA would have found it obvious to use a playback device communicating with the computing device via the secure WLAN and receiving a command related to playback of audio content.

At the time of the alleged invention, it was well known receive commands from a computing device related to the playback of audio content. A POSITA would appreciate that a computing device may have a more convenient user interface for, for example, selecting songs to make available, play, or add to a playlist. And a POSITA would thus be motivated to allow users to take any associated actions at the computing device and then transmit the relevant information to the playback device.

Finally, the larger number of products entering or already on the market at the relevant time with this feature would further motivate a POSITA to implement this feature.

The disclosures listed under claim element 10 in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.

The exemplary disclosures identified below further demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system:

Apple, “Developer Connection – Resolving and Using Network Services”(2003).

“UPnP AV Architecture:0.83” (June 12, 2002), at 5-6, 9-10, 15, 20.

U.S. Patent No. 7,308,489 (“Weast”) at FIGs. 1, 3B, 5A, 5B, 2:51-59, 4:31-38, 6:56-64, 7:61-8:12.

U.S. Patent No. 7,643,894 (“Braithwaite”) at FIG. 1, 9:66-10:11.

Sound & Vision, “Omnifi DMS1 Wi-Fi Media Receiver” at 2.

Bose, “The Bose® Lifestyle® 50 System, Owner’s Guide” at 22, 41-43.

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U.S. Patent No. 7,123,731 (“Cohen”) at 1:19-21.

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<p>PR Newswire, “Slim Devices Introduces Squeezebox,” November 18, 2003.</p> <p>Synchronizing MP3 Playback (<a href="https://snarfed.org/synchronizing_mp3_playback">https://snarfed.org/synchronizing_mp3_playback</a>) at 1-3.</p> <p>Step-by-step P4 Connection (<a href="https://snarfed.org/p4_poster/index.html">https://snarfed.org/p4_poster/index.html</a>), at 1-5.</p> <p>U.S. Patent Pub. No. 20020072816 (“Shdema”) at Abstract, FIG. 6, [0002], [0008], [0010]-[0014], [0028]-[0029].</p> <p>U.S. Patent No. 5,808,662 (“Kinney”) at FIG. 1, 2:5-14, 15-29, 3:16-26.</p> <p>U.S. Patent No. 6,757,517 (“Chang”) at Abstract, 1:9-13, 1:51-62, 1:63-2:9, 2:10-32, 4:10-30, 4:64-5:14.</p> <p>U.S. Patent No. 6,778,493 (“Ishii”) at Abstract, 1:8-11, 1:14-25, 5:15-33, 5:34-45, 7:1-19.</p> <p>U.S. Patent No. 7,162,315 (“Gilbert”) at Abstract, 1:9-12, 2:32-45, 3:45-53.</p> <p>U.S. Patent Pub. No. 20030050058 (“Walsh”) at Abstract, [0001], [0042], [0081].</p> <p>U.S. Patent Pub. No. 20030002849 (“Lord”) at [0031].</p> <p>U.S. Patent No. 7,076,204 (“Richenstein”) at Abstract, 1:34-44, 10:8-17, 10:18-25, 31:4-39, 33:7-12.</p> <p>U.S. Patent No. 7,206,367 (“Moore”) at FIG. 1, 7:47-60, 8:9-22, 9:13-24, 9:58-10:20, 10:21-41, 10:56-11:9, 11:38-54, 12:39-55.</p> <p>U.S. Patent Pub. No. 2002/0174243 (“Spurgat”) at FIGs. 1, 10-13, [0021], [0034]-[0036], [0043], [0057], [0069]-[0085], [0091]-[0097], [0107]-[0108].</p>
<p><b>11. The playback device of claim 10, wherein the command comprises a command to retrieve audio content for playback from an audio source that is accessible via a communication path that includes the secure WLAN, and wherein the playback device further comprises program instructions stored on the non-transitory computer-readable medium that, when executed by the at least one processor, cause the playback device to perform functions comprising:</b></p> <p><b>in response to receiving the command, retrieving the audio content from the audio source via the communication path that includes the secure WLAN.</b></p>
<p>A POSITA would have found it obvious to use a playback device to which the command comprises a command to retrieve audio content for playback from an audio source that is accessible via a communication path that includes the secure WLAN, and wherein the playback device further comprises program instructions stored on the non-transitory computer-readable medium that, when executed by the at least one processor, cause the playback device to perform</p>

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functions comprising: in response to receiving the command, retrieving the audio content from the audio source via the communication path that includes the secure WLAN..

At the time of the alleged invention, it was well known for the playback device to receive a command to retrieve audio for playback. As explained above, POSITA would have been motivated to transmit commands related to playback to a playback device, including commands to play specific audio content. At that point, there are two techniques for the playback device to receive the audio content: the audio content could be pushed to the playback device, or the playback device could retrieve the audio content. Thus, there are finite implementation choices, both of which would be well known to a POSITA, and a POSITA would thus be motivated to use either method. Moreover, retrieving audio content has the additional advantage of allowing the playback device to control the rate of streaming of content based on the availability of its internal buffer and playback rate, which would further motivate a POSITA to implement a playback device that retrieves audio content.

Finally, the larger number of products entering or already on the market at the relevant time with this feature would further motivate a POSITA to implement this feature.

The disclosures listed under claim element 11 in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.

The exemplary disclosures identified below further demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system:

Apple, “Developer Connection – Resolving and Using Network Services”(2003).

“UPnP AV Architecture:0.83” (June 12, 2002), at 5-6, 9-10, 15, 20.

U.S. Patent No. 7,308,489 (“Weast”) at FIGs. 1, 3B, 5A, 5B, 2:51-59, 4:31-38, 6:56-64, 7:61-8:12.

U.S. Patent No. 7,643,894 (“Braithwaite”) at FIG. 1, 9:66-10:11.

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U.S. Patent No. 7,710,941 (“Reitschel”) at 3:24-44, 4:10-28, 6:17-29, 7:13-25, 7:66-8:13, 8:30-32, 8:45-56, 9:7-17, 10:40-47.

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U.S. Patent No. 5,182,552 (“Paynting”) at 10:34-38.

U.S. Patent No. 5,761,320 (“Farinelli”) at 2:1-12, 26:60-65.

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<p>PR Newswire, “Slim Devices Introduces Squeezebox,” November 18, 2003.</p> <p>Synchronizing MP3 Playback (<a href="https://snarfed.org/synchronizing_mp3_playback">https://snarfed.org/synchronizing_mp3_playback</a>) at 1-3.</p> <p>Step-by-step P4 Connection (<a href="https://snarfed.org/p4_poster/index.html">https://snarfed.org/p4_poster/index.html</a>), at 1-5.</p> <p>U.S. Patent Pub. No. 20020072816 (“Shdema”) at Abstract, FIG. 6, [0002], [0008], [0010]-[0014], [0028]-[0029].</p> <p>U.S. Patent No. 5,808,662 (“Kinney”) at FIG. 1, 2:5-14, 15-29, 3:16-26.</p> <p>U.S. Patent No. 6,757,517 (“Chang”) at Abstract, 1:9-13, 1:51-62, 1:63-2:9, 2:10-32, 4:10-30, 4:64-5:14.</p> <p>U.S. Patent No. 6,778,493 (“Ishii”) at Abstract, 1:8-11, 1:14-25, 5:15-33, 5:34-45, 7:1-19.</p> <p>U.S. Patent No. 7,162,315 (“Gilbert”) at Abstract, 1:9-12, 2:32-45, 3:45-53.</p> <p>U.S. Patent Pub. No. 20030050058 (“Walsh”) at Abstract, [0001], [0042], [0081].</p> <p>U.S. Patent Pub. No. 20030002849 (“Lord”) at [0031].</p> <p>U.S. Patent No. 7,076,204 (“Richenstein”) at Abstract, 1:34-44, 10:8-17, 10:18-25, 31:4-39, 33:7-12.</p> <p>U.S. Patent No. 7,206,367 (“Moore”) at FIG. 1, 7:47-60, 8:9-22, 9:13-24, 9:58-10:20, 10:21-41, 10:56-11:9, 11:38-54, 12:39-55.</p> <p>U.S. Patent Pub. No. 2002/0174243 (“Spurgat”) at FIGs. 1, 10-13, [0021], [0034]-[0036], [0043], [0057], [0069]-[0085], [0091]-[0097], [0107]-[0108].</p>
<p><b>13. The computing device of claim 1, further comprising program instructions stored on the non-transitory computer-readable medium that, when executed by the at least one processor, cause the computing device to perform functions comprising:</b></p> <p><b>after transitioning to communicating with computing device via the secure WLAN, receiving, from the computing device, a command to form a group with at least a first playback device of a networked audio system such that the playback device is configured to play back audio content in synchrony with at least the first playback device.</b></p>
<p>Claim 13 recites “The computing device of claim 1, further comprising ...” and “cause the computing device to perform functions comprising.” The term “the computing device” lacks antecedent basis. As such, claim 13 is indefinite.</p> <p>To the extent the court finds claim 13 not indefinite, a POSITA would have found it obvious to have the playback device further comprising program instructions stored on the non-transitory</p>

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computer-readable medium that, when executed by the at least one processor, cause the computing device to perform functions comprising: after transitioning to communicating with the given playback device via the secure WLAN, transmitting a command to the given playback device to form a group with at least a first playback device of a networked audio system such that the given playback device is configured to play back audio content in synchrony with at least the first playback device.

At the time of the alleged invention, it was well known to allow two or more playback devices to play back audio content in synchrony. A person of ordinary skill would be motivated to implement this functionality because, e.g., users may want to listen to the same song or playlist in more than one room of their house.

Finally, the larger number of products entering or already on the market at the relevant time with this feature would further motivate a POSITA to implement this feature.

The disclosures listed under claim element 13 in Exhibits 883-1 through 883-11 demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system. Defendant incorporates by reference each of those disclosures here.

The exemplary disclosures identified below further demonstrate that the limitation was known and a POSITA would have been motivated to incorporate it into an existing audio system:

Apple, “Developer Connection – Resolving and Using Network Services”(2003).

“UPnP AV Architecture:0.83” (June 12, 2002), at 5-6, 9-10, 15, 20.

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U.S. Patent Pub. No. 20020072816 (“Shdema”) at Abstract, FIG. 6, [0002], [0008], [0010]-[0014], [0028]-[0029].
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U.S. Patent No. 6,757,517 (“Chang”) at Abstract, 1:9-13, 1:51-62, 1:63-2:9, 2:10-32, 4:10-30, 4:64-5:14.
U.S. Patent No. 6,778,493 (“Ishii”) at Abstract, 1:8-11, 1:14-25, 5:15-33, 5:34-45, 7:1-19.
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U.S. Patent Pub. No. 2002/0174243 (“Spurgat”) at FIGs. 1, 10-13, [0021], [0034]-[0036], [0043], [0057], [0069]-[0085], [0091]-[0097], [0107] –[0108].
<b>14[pre]. A non-transitory, computer-readable storage medium, wherein the non-transitory computer-readable storage medium is provisioned with program instructions that are executable to cause a playback device to perform functions comprising:</b>
<i>See supra</i> Claim 1[pre], 1[c], 1[d].
<b>14[a] detecting a triggering event that causes the playback device to enter a setup mode in which the playback device transmits at least a first message indicating that the playback device is available for setup;</b>
<i>See supra</i> Claim 1[e].
<b>14[b] while in the setup mode, receiving a response to the first message that facilitates establishing an initial communication path with a computing device that is installed with an application for controlling the playback device, wherein the computing device is operating on a secure wireless local area network (WLAN) that is defined by an access</b>

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<b>point, wherein the initial communication path with the computing device does not traverse the access point;</b>
<i>See supra</i> Claim 1[f].
<b>14[c] receiving, from the computing device via the initial communication path, at least a second message containing network configuration parameters for the secure WLAN, wherein the network configuration parameters comprise an identifier of the secure WLAN and a security key for the secure WLAN;</b>
<i>See supra</i> Claim 1[g].
<b>14[d] using the network configuration parameters to connect to the secure WLAN that is defined by the access point; and</b>
<i>See supra</i> Claim 1[h].
<b>14[e] transitioning from communicating with the computing device via the initial communication path to communicating with the computing device via the secure WLAN that is defined by the access point.</b>
<i>See supra</i> Claim 1[i].
<b>15. The non-transitory, computer-readable storage medium of claim 14, wherein the triggering event comprises one of (a) powering on the playback device or (b) receiving user input via a physical interface of the playback device.</b>
<i>See supra</i> Claim 2.
<b>16. The non-transitory, computer-readable storage medium of claim 14, wherein the non-transitory computer-readable medium is also provisioned with program instructions that are executable to cause the playback device to perform functions comprising:  after receiving the second message, providing an indication that the playback device has successfully received the network configuration parameters for the secure WLAN.</b>
<i>See supra</i> Claim 4.
<b>17. The non-transitory, computer-readable storage medium of claim 16, wherein providing the indication comprises transmitting, to the computing device via the initial</b>

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<b>Exemplary Disclosures</b>
<b>communication path, at least a third message indicating that the playback device has successfully received the network configuration parameters.</b>
<i>See supra</i> Claim 5.
<b>19. The non-transitory, computer-readable storage medium of claim 14, wherein communicating with the computing device via the secure WLAN comprises receiving a command to retrieve audio content for playback from an audio source that is accessible via a communication path that includes the secure WLAN, and wherein the non-transitory computer-readable medium is also provisioned with program instructions that are executable to cause the playback device to perform functions comprising:  in response to receiving the command, retrieving the audio content from the audio source via the communication path that includes the secure WLAN.</b>
<i>See supra</i> Claim 10.