

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

FILED

April 19, 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY: Jennifer Clark
DEPUTY

IOENGINE, LLC,
Plaintiff/Counterclaim Defendant,

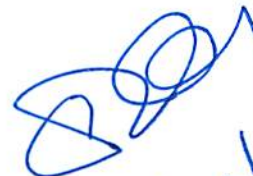
v.

ROKU, INC.,
Defendant/Counterclaim Plaintiff.

C.A. No. 6:21-cv-01296-ADA-DTG

JURY TRIAL DEMANDED

JURY VERDICT FORM


4/19/24
2:41 pm

Instructions: When answering the following questions and filling out this Jury Verdict Form, please follow the directions provided throughout the Form. Your answer to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Jury Instructions. Please refer to the Jury Instructions if you are unsure about the meaning or usage of any legal term that appears in the questions below.

As used herein:

“IOENGINE” means Plaintiff IOENGINE, LLC.

“Roku” means Defendant Roku, Inc.

“’819 Patent” refers to U.S. Patent No. 10,447,819.

“’584 Patent” refers to U.S. Patent No. 10,972,584.

The “Asserted Patents” collectively refer to the ’819 Patent and the ’584 Patent.

We, the jury, unanimously agree to the answers to the following questions and return them as our verdict in this case:

I. DIRECT INFRINGEMENT

In answering the Question below, please check "Yes" or "No" for each listed asserted claim in the space provided.

Question No. 1: Has IOENGINE proven, by a preponderance of the evidence, that Roku has infringed the following asserted claims of the Asserted Patents?

"Yes" is a finding for IOENGINE. "No" is a finding for Roku.

Claim	Yes (for IOENGINE)	No (for Roku)
'819 Patent Claim #187		NO
'819 Patent Claim #192		NO
'584 Patent Claim #10		NO
'584 Patent Claim #11		NO
'584 Patent Claim #18		NO
'584 Patent Claim #20		NO
'584 Patent Claim #26		NO
'584 Patent Claim #27		NO
'584 Patent Claim #29		NO
'584 Patent Claim #48		NO
'584 Patent Claim #60		NO
'584 Patent Claim #61		NO

PROCEED TO QUESTION NO. 2.

II. INDIRECT INFRINGEMENT

In answering the Question below, please check “Yes” or “No” for each listed asserted claim in the space provided.

Question No. 2: Has IOENGINE proven, by a preponderance of the evidence, that Roku has indirectly infringed the following asserted claims of the Asserted Patents?

“Yes” is a finding for IOENGINE. “No” is a finding for Roku.

Claim	Yes (for IOENGINE)	No (for Roku)
'819 Patent Claim #187		NO
'819 Patent Claim #192		NO
'584 Patent Claim #10		NO
'584 Patent Claim #11		NO
'584 Patent Claim #18		NO
'584 Patent Claim #20		NO
'584 Patent Claim #26		NO
'584 Patent Claim #27		NO
'584 Patent Claim #29		NO
'584 Patent Claim #48		NO
'584 Patent Claim #60		NO
'584 Patent Claim #61		NO

IF YOU ANSWERED “YES” TO ANY OF THE CLAIMS OF QUESTION NO. 1 OR QUESTION NO. 2, THEN PROCEED TO QUESTION NO. 3. IF YOU ANSWERED “NO” TO ALL CLAIMS OF QUESTION NO. 1 AND QUESTION NO. 2, THEN DO NOT ANSWER ANY FURTHER QUESTIONS. PROCEED TO THE LAST PAGE, HAVE YOUR JURY FOREPERSON SIGN AND DATE THIS VERDICT FORM, AND THEN DELIVER IT TO THE COURT SECURITY OFFICER.

III. INVALIDITY

In answering the Question below, please check “Yes” or “No” for each listed asserted claim in the space provided.

Question No. 3: Has Roku proven, by clear and convincing evidence, that the following claims of the Asserted Patents are invalid?

“Yes” is a finding for Roku. “No” is a finding for IOENGINE.

Claim	No (for IOENGINE)	Yes (for Roku)
'819 Patent Claim #187		
'819 Patent Claim #192		
'584 Patent Claim #10		
'584 Patent Claim #11		
'584 Patent Claim #18		
'584 Patent Claim #20		
'584 Patent Claim #26		
'584 Patent Claim #27		
'584 Patent Claim #29		
'584 Patent Claim #48		
'584 Patent Claim #60		
'584 Patent Claim #61		

IF YOU ANSWERED “YES” TO ALL OF THE CLAIMS IN QUESTION 3 (I.E., YOU FOUND ALL CLAIMS INVALID), THEN DO NOT ANSWER ANY FURTHER QUESTIONS. PROCEED TO THE LAST PAGE, HAVE YOUR JURY FOREPERSON SIGN AND DATE THIS VERDICT FORM, AND THEN DELIVER IT TO THE COURT SECURITY OFFICER. OTHERWISE, PROCEED TO QUESTION NO. 4.

IV. DAMAGES

In answering the Question below, please provide a **dollar amount** in the space provided.

Question No. 4: What is the amount of damages that you find IOENGINE has proven, by a preponderance of the evidence, would compensate IOENGINE for infringement of the claims that you have found are infringed and not invalid?

\$ _____

You have now reached the end of the verdict form and should review it to ensure it accurately reflects your unanimous determinations. The Jury Foreperson should then sign and date this Verdict Form in the spaces below. Once that is done, notify the Court Security Officer that you have reached a verdict. The Jury Foreperson should retain possession of the Verdict Form and bring it when the jury is brought back into the courtroom.

I certify that the jury unanimously concurs in every element of the above verdict.

Signed this 19 day of April, 2024

A solid black rectangular redaction box covering the signature of the Jury Foreperson.

Jury Foreperson