IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

MEDIA CONTENT PROTECTION LLC,

Plaintiff,

v.

C.A. No.: 20-cv-1243-CFC

INTEL CORP.,

Defendant.

JURY TRIAL DEMANDED

SECOND AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Media Content Protection LLC ("MCP" or "Plaintiff") brings this action for patent infringement under 35 U.S.C. § 271 against Intel Corporation ("Intel" or "Defendant"), and alleges as follows:

THE PARTIES

1. Plaintiff Media Content Protection LLC ("MCP") is a limited liability company duly organized and existing under the laws of the State of Delaware with its principal place of business at 533 Congress Street, Portland, ME 04101.

2. Defendant Intel Corporation is a corporation duly organized and existing under the laws of the State of Delaware with a principal place of business located at 2200 Mission College Boulevard, Santa Clara, California.

3. Defendant, either itself and/or through the activities of its subsidiaries, affiliates, or intermediaries (including distributors, retailers, and others), makes, uses, sells, offers for sale, and/or imports throughout the United States, including

within the District of Delaware (this "District"), products, such as digital videocapable integrated circuits and associated firmware that infringe the Asserted Patents, defined below. Defendant makes, uses, sells, offers for sale, and/or imports digital video-capable integrated circuits, that it or its customers incorporate into digital video-capable devices that are made, used, sold, offered for sale, and/or imported throughout the United States, including within this District. These digital video-capable devices may include, but are not limited to, laptops, desktops, all-inone PCs, thin clients, tablets, smartphones, convertible PCs, workstations, servers, video adapters, and/or video hubs.

THE ASSERTED PATENTS

U.S. Patent No. 9,436,809

4. United States Patent No. 9,436,809 (the "'809 Patent") is entitled "Secure Authenticated Distance Measurement" and issued on September 6, 2016 to inventor Franciscus L. A. J. Kamperman. The '809 Patent issued from United States Patent Application No. 14/538,493 filed on November 11, 2014. A copy of the '809 Patent is attached hereto as <u>Exhibit A</u>.

U.S. Patent No. 10,091,186

5. United States Patent No. 10,091,186 (the "'186 Patent") is entitled "Secure Authenticated Distance Measurement" and issued on October 2, 2018 to inventor Franciscus L. A. J. Kamperman. The '186 Patent issued from United States

Patent Application No. 15/352,646 filed on November 16, 2016. A copy of the '186 Patent is attached hereto as Exhibit B.

6. By way of assignment, MCP owns all right, title, and interest to the '809 Patent and '186 Patent (collectively, the "Asserted Patents").

7. The Asserted Patents are each valid and enforceable.

JURISDICTION AND VENUE

8. This is a civil action for patent infringement arising under the Patent Act, 35 U.S.C. § 1 *et seq*.

9. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

10. Venue in this District is proper pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400(b) because Defendant resides and has committed acts of infringement in this District.

11. This Court has personal jurisdiction over Defendant. Defendant resides in this district. Defendant has and does conduct business within the State of Delaware. Defendant, directly or through subsidiaries or intermediaries (including distributors, retailers, and others), ships, distributes, makes, uses, offers for sale, imports and/or advertises (including by providing an interactive web page) its products and/or services in the United States and this District and/or contribute to and actively induce their customers to ship, distribute, make, use, offer for sale, sell,

import, and/or advertise (including the provision of interactive web pages) infringing products and/or services in the United States and this District. Defendant, directly or through subsidiaries, affiliates, or intermediaries (including distributors, retailers, and others), has purposefully and voluntarily placed one or more of its infringing products, or components thereof as described below, into the stream of commerce with the expectation that those products will be purchased, used and/or incorporated into digital video-capable devices made, used, sold, offered for sale, purchased, and/or imported into the United States by customers and/or consumers in this District.

BACKGROUND

12. MCP incorporates the allegations of all of the foregoing paragraphs as if fully restated herein.

13. Koninklijke Philips N.V. (formerly known as Koninklijke Philips Electronics N.V.) ("Philips N.V.") and Philips North America LLC (formerly known as Philips Electronics North America Corporation) ("Philips North America") (collectively, "Philips") is a world-renowned company that engages in research and development in numerous fields. One of these fields pertains to digital video-capable devices for delivering and displaying content to users. Exemplary products in this field include laptops, desktops, all-in-one PCs, thin clients, tablets, smartphones, convertible PCs, workstations, servers, video adapters, and/or video hubs. The

Asserted Patents derive from Philips's efforts in this field and claim protection for, among other things, delivering and displaying content to users.

14. Defendant made, used, sold, offered for sale, imported, tested, designed, and/or marketed in the United States digital video-capable integrated circuits and associated firmware displaying content to users that infringe the Asserted Patents. Such integrated circuits and associate firmware are incorporated in digital video-capable devices made, used, sold, offered for sale or imported into the United States by companies, including but not limited to, Dell Technologies, Inc., HP Inc., and Lenovo Group Ltd., and/or their affiliates, subsidiaries or intermediaries (the "Exemplary Customers").

15. Defendant has actual notice of the Asserted Patents and of its infringement. For example, Defendant received actual notice of the Asserted Patents at least as early as September 17, 2020 by way of a letter to Defendant dated September 17, 2020. That letter included allegations of infringement of the Asserted Patents. Additionally, the filing of the original Complaint and the filing of the First Amended Complaint also constitute notice in accordance with 35 U.S.C. § 287.

16. With actual notice of the Asserted Patents, Defendant has directly infringed, and continues to directly infringe the Asserted Patents under 35 U.S.C. § 271(a) and (g) by one or more of making, using, selling and/or offering to sell, in this District and elsewhere in the United States, and importing into this District and

elsewhere in the United States, certain infringing digital video-capable integrated circuits and associated firmware that infringe the Asserted Patents (the, "Accused Products"), as further described in detail in Counts I–II *infra*.

The Accused Products include, but are not limited to, all digital video-17. capable devices, integrated circuits, and associated firmware designed to facilitate digital video-capable playback supporting the HDCP 2.0 protocol and above (referred to hereafter as HDCP 2+) that Defendant, either itself and/or through the activities of its subsidiaries, affiliates, or intermediaries (including distributors, retailers, and others), makes, uses, sells, offers for sale, and/or imports throughout the United States, including, but not limited to, the following products and/or product lines, their associated firmware/software, and/or any development boards, printed circuit board assemblies, Server Boards, Systems, Chassis, or Data Center Blocks containing the same: NUC Mini PCs, NUC Kits, NUC Boards, NUC Laptop Kits, Intel 6th Generation Processors (Skylake), Intel 7th Generation Processors (Kaby Lake), Intel 8th Generation Processors (Coffee Lake), Intel 9th Generation Processors (Coffee Lake Refresh); Intel 10th Generation Processors (Ice Lake); Intel later generation processors; associated firmware. This list of Defendant's currently known digital video-capable integrated circuits, associated firmware, and devices containing the same is exemplary and, on information and belief, many other of Defendant's digital video-capable integrated circuits and associated firmware infringe the Asserted Patents.

18. Defendant has also indirectly infringed, and continues to indirectly infringe the Asserted Patents under 35 U.S.C. § 271(b) and (c). Defendant knew and intended to induce and contribute to the infringement of the Asserted Patents. The Accused Products have no substantial non-infringing use, are a material part of the invention of each Asserted Patent, especially made or especially adapted for use in an infringement of each Asserted Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

19. Upon information and belief, Defendant possessed knowledge of the Asserted Patents and of its infringement even before the September 17, 2020 date of the original Complaint in this action.

20. For example, upon information and belief, Defendant possessed knowledge of the '809 Patent, its infringement thereof, and its customers' infringement thereof on or shortly after November 23, 2016 when Plaintiff Koninklijke Philips N.V. filed amended complaints for patent infringement against ASUSTEK Computer Inc., ASUS Computer International, HTC Corp., HTC America, Acer Inc., and Acer America Corporation in the United States District Court for the District of Delaware (C.A. Nos. 15-1125-GMS, 15-1126-GMS, and 15-1170-GMS) and specifically identified Defendant's "High-bandwidth Digital

Content Protection (HDCP) 2.2" technology as infringing the '809 Patent. Upon information and belief, Defendant was notified of the '809 Patent, its infringement thereof, and its customers' infringement thereof as a result of the filing of such amended complaints, for example, including by way of Defendant's own monitoring efforts or by way of notice from a third party such as ASUSTeK Computer Inc., ASUS Computer International, HTC Corp., HTC America, Acer Inc., Acer America Corporation or their affiliates, which upon information and belief, were Defendant's customers and/or licensed adopters of Defendant's infringing HDCP 2+ technology.

21. Upon information and belief, Defendant was again notified of the '809 Patent, its infringement thereof, and its customers' infringement thereof on multiple additional occasions. For example, on or shortly after January 23, 2018, Plaintiff Koninklijke Philips N.V. served Defendant with a subpoena for documents and deposition testimony in each of the above-identified patent infringement lawsuits in the United States District Court for the District of Delaware (C.A. Nos. 15-1125-GMS, 15-1126-GMS, and 15-1170-GMS). The subpoena specifically requested documents and testimony regarding the HDCP 2+ technology identified in such lawsuits as infringing the '809 Patent. As another example, upon information and belief, the defendants in Delaware C.A. No. 15-1125 (GMS) served Defendant's wholly-owned subsidiary Digital Content Protection LLC ("DCP") with a subpoena for documents and deposition testimony regarding the HDCP 2+ technology identified and belief.

identified in such lawsuit as infringing the '809 Patent. In addition, Koninklijke Philips N.V. again served Defendant with a subpoena for documents and deposition testimony on August 13, 2018 in the United States District Court for the District of California (4:18-cv-1885-HSG-EDL) ("the California litigation") seeking information regarding the HDCP 2+ technology identified in such lawsuit as infringing the '809 Patent. In addition, upon information and belief, on or before January 4, 2019, each of Plaintiff Koninklijke Philips N.V. and certain defendants in the California litigation served DCP with a subpoena seeking information regarding the HDCP 2+ technology identified in such lawsuit as infringing the '809 Patent. Upon information and belief, Defendant, as a large technology company, knew that it and its customers infringed the '809 Patent as of each date it was notified of the '809 Patent. To the extent Defendant failed to investigate its infringement upon learning of the '809 Patent in each such instance, upon information and belief Defendant was willfully blind to its infringement of the '809 Patent.

22. Upon information and belief, Defendant was again notified of the '809 Patent, its infringement thereof, and its customers' infringement thereof on or shortly after January 12, 2017, and again on or shortly after May 29, 2018, when on each such date Philips sent a letter to Lenovo, Defendant's customer and/or licensed adopter of Defendant's infringing HDCP 2+ technology, notifying Lenovo that certain of its products, at least some of which incorporated Defendant's processors

and firmware, infringed the '809 Patent. Upon information and belief, Defendant received notice of the '809 Patent and its infringement thereof from Lenovo as a result of each such letter.

23. Upon information and belief, Defendant, as a large technology company, upon becoming aware of the '809 Patent monitored its child patent application that ultimately issued as the '186 Patent and became aware of the '186 Patent on or about October 2, 2018, which is the date the '186 Patent issued. Upon information and belief, Defendant knew that it infringed the '186 Patent as of the date it was notified of the '186 Patent. To the extent Defendant failed to investigate its infringement upon learning of the '186 Patent, upon information and belief Defendant to its infringement of the '186 Patent.

24. Upon information and belief, Defendant was again notified of the '809 Patent and the '186 Patent, its infringement thereof, and its customers' infringement thereof on or shortly after July 31, 2019, and again on or shortly after February 20, 2020, when on each such date Philips sent a letter to LG Electronics, Inc. and its affiliates ("LG"), Defendant's customer and/or licensed adopter of Defendant's infringing HDCP 2+ technology, notifying LG that its products incorporating Defendant's HDCP 2+ technology infringed the '809 Patent and the '186 Patent. Upon information and belief, Defendant received notice of the '809 Patent and the '186 Patent and its infringement thereof from LG as a result of each such letter. 25. Upon information and belief, Defendant upon learning of the Asserted Patents and its infringement thereof did not possess a good-faith belief of non-infringement. For example, upon information and belief, before the September 17, 2020 date of the original Complaint in this case, Defendant became aware that Philips had successfully licensed its patents, including the Asserted Patents, and Defendant lacked a good-faith belief at that time that it did not need to license the Asserted Patents.

26. Upon information and belief, Defendant also published Errata to its infringing HDCP 2.3 technology on July 1, 2021 ("Errata") in an effort to design around the Asserted Patents, which further demonstrates that Defendant lacked a good-faith belief of noninfringement with regard to the Asserted Patents before that date. In any event, Philips sent a letter to Defendant on September 22, 2021 notifying Defendant of its continuing infringement notwithstanding the Errata and thus Defendant continued to lack a good-faith belief of noninfringement notwithstanding the Errata.

27. Upon information and belief, Defendant also created a "version of Intel's driver software" (*see* D. Del. C.A. No. 20-1243 (CFC), D.I. 14, at 6 n.2) in an effort to design around the Asserted Patents, which further demonstrates that Defendant lacked a good-faith belief of noninfringement with regard to the Asserted Patents before that date. In any event, the Administrative Law Judge ("ALJ") in

International Trade Commission ("ITC") Investigation No. 337-TA-1224 found that such version of Defendant's driver software infringed (*id*.) and thus Defendant continued to lack a good-faith belief of noninfringement notwithstanding Defendant's attempted design-around.

28. Upon information and belief, Defendant lacks a good faith belief of noninfringement of the Asserted Patents when the claims of the Asserted Patents are properly construed.

29. After receiving actual notice of the Asserted Patents, Defendant continued to actively induce, and materially contribute to, its customers' infringement of the Asserted Patents by making, using, selling, offering for sale, marketing, advertising, and/or importing digital video-capable integrated circuits and associated firmware that are incorporated into Defendant's digital video-capable devices that infringe the Asserted Patents, and instructing customers to infringe the Asserted Patents.

30. For example, Defendant specifically intended and advertised its digital video-capable integrated circuits and associated firmware for use within digital video-capable devices such as laptops and desktops.¹ Such digital video-capable integrated circuits and associated firmware are advertised as providing "HDCP 2.2"

¹ https://www.intel.com/content/dam/www/public/us/en/documents/product-briefs/ 10th-gen-core-mobile-processors-brief.pdf.

support. Thus, Defendant induces their customers to infringe the Asserted Patents by advertising and/or instructing their customers regarding infringing uses of the Accused Products. On information and belief, Defendant did so with the specific intent to bring about infringement in the United States knowing that, among others, at least the Exemplary Customers would incorporate Defendant's digital-video capable integrated circuits and associated firmware in digital-video capable devices made, used, sold, offered for sale or imported into the United States.

31. As another example, Defendant contributes to the same infringement by selling digital video-capable integrated circuits and associated firmware to customers who incorporate said digital video-capable integrated circuits and associated firmware into their infringing digital video-capable devices. On information and belief, Defendant had knowledge that digital video-capable integrated circuits and associated firmware were especially made or especially adapted for use in an infringement of the Asserted Patents by practicing HDCP 2+, and were not a staple article or commodity of commerce suitable for substantial noninfringing use. Upon information and belief, Defendant is aware that there is no way to comply with HDCP 2+ and not infringe the Asserted Patents.

32. Thus, Defendant has indirectly infringed, and continues to indirectly infringe, the Asserted Patents under 35 U.S.C. § 271(b) by actively inducing its customers to infringe the Asserted Patents by making, using, selling, offering for

sale, marketing, advertising, and/or importing the Accused Products to its customers and by instructing customers to infringe the Asserted Patents, as described in detail in Counts I–II *infra*. Additionally, Defendant has indirectly infringed, and continues to indirectly infringe the Asserted Patents under 35 U.S.C. § 271(c) by materially contributing to their own customers' infringement of the Asserted Patents by making, using, selling, offering for sale, advertising, marketing, and/or importing the Accused Products to its customers and instructing customers to infringe the Asserted Patents, as described in detail in Counts I–II *infra*.

33. Defendant's acts of infringement have caused damage to MCP. MCP is entitled to recover from Defendant the damages incurred by MCP as a result of Defendant's wrongful acts.

<u>Count I</u> Defendant's Infringement of the '809 Patent

34. MCP incorporates the allegations of all of the foregoing paragraphs as if fully restated herein.

35. Defendant has directly infringed, and continue to directly infringe, the '809 Patent by making, using, selling, offering for sale, or importing throughout the United States products and/or methods covered by one or more claims of the '809 Patent including, but not limited to, digital video-capable integrated circuits and associated firmware for inclusion in digital video-capable devices. The products that infringe one or more claims of the '809 Patent include, but are not limited to, at least the Accused Products. Further discovery may reveal additional infringing products and/or models.

36. For example and without limitation, the Accused Products infringe claims 1, 17 and 49 of the '809 Patent.

37. Attached hereto as <u>Exhibit C</u>, and incorporated into this Second Amended Complaint, is a claim chart showing where in the 10th Gen Intel Core i3-10110U Processor and associated firmware incorporated in the Dell Inspiron 13 5000, Model No. Inspiron 13 5391 each limitation of claims 1, 17 and 49 are met. This claim chart is exemplary and, on information and belief, many other products provided by Defendant or Defendant's customers infringe the '809 Patent.

38. Defendant has, and continues to, indirectly infringe the '809 Patent by actively inducing and contributing to the infringement of the '809 Patent by others, such as customers, resellers, and retailers. These others include, but are not limited to, the Exemplary Customers, who, for example, sell, offer for sale, and/or import throughout the United States, including within this District, the digital video-capable devices incorporating the Accused Products.²

39. Defendant specifically intended others, such as customers, resellers, and retailers, to infringe the '809 Patent and knew that these others perform acts that

² https://www.walmart.com/ip/Dell-Inspiron-13-5391-13-3-Full-HD-Laptop-i5-10210U-8GB-256GB-SSD-W10H/569725508.

constituted direct infringement. For example, <u>Exhibit C</u> shows that an exemplary product, the 10th Gen Intel Core i3-10110U Processor and associated firmware incorporated in the Dell Inspiron 13 5000, Model No. Inspiron 13 5391, which is sold by Walmart Inc., infringes the '809 Patent. Defendant designed the Accused Products such that they would each infringe the '809 Patent as described in <u>Exhibit C</u> if made, used, sold, offered for sale, or imported throughout the United States. Defendant provided, directly or indirectly, Accused Products to others, such as, but not limited to, customers, knowing and intending that those others would use, sell, offer for sale, and/or import the Accused Products throughout the United States, thereby directly infringing one or more claims of the '809 Patent.

40. In addition, upon information and belief, Defendant provides instructions, user guides, and/or other documentation to the infringing others regarding the use and operation of the Accused Products. When others follow such instructions, user guides, and/or other documentation, they directly infringe one or more claims of the '809 Patent. By providing such instructions, user guides, and/or other documentation, user guides, and other documentation, and thereby directly infringe one or instructions, user guides, and other documentation, and thereby directly infringe one or more claims of the '809 Patent. Thus, Defendant knows that its actions actively induce infringement.

41. The Accused Products have no substantial non-infringing uses and are a material part of the invention. As described in <u>Exhibit C</u>, any manufacture, use, sale offer for sale or importation throughout the United States of an Accused Product, or incorporation of any of the Accused Products in digital video-capable devices infringes the '809 Patent. Thus, the Accused Products have no substantial non-infringing uses.

42. MCP is entitled to recover damages under 35 U.S.C. § 284 to adequately compensate for Defendant's infringement of the '809 Patent.

<u>Count II</u> Defendant's Infringement of the '186 Patent

43. MCP incorporates the allegations of all of the foregoing paragraphs as if fully restated herein.

44. Defendant has directly infringed, and continue to directly infringe, the '186 Patent by making, using, selling, offering for sale, or importing throughout the United States products and/or methods covered by one or more claims of the '186 Patent including, but not limited to, digital video-capable integrated circuits and associated firmware for inclusion in digital video-capable devices. The products that infringe one or more claims of the '186 Patent include, but are not limited to, at least the Accused Products. Further discovery may reveal additional infringing products and/or models. 45. For example and without limitation, the Accused Products infringe claim 1 of the '186 Patent.

46. Attached hereto as <u>Exhibit D</u>, and incorporated into this Second Amended Complaint, is a claim chart showing where in the 10th Gen Intel Core i3-10110U Processor and associated firmware incorporated in the Dell Inspiron 13 5000, Model No. Inspiron 13 5391 each limitation of claim 1 is met. This claim chart is exemplary and, on information and belief, many other products provided by Defendant or Defendant's customers infringe the '186 Patent.

47. Defendant has, and continues to, indirectly infringe the '186 Patent by actively inducing and contributing to the infringement of the '186 Patent by others, such as customers, resellers, and retailers. These others include, but are not limited to, the Exemplary Customers, who, for example, sell, offer for sale, and/or import throughout the United States, including within this District, digital video-capable devices incorporating the Accused Products.

48. Defendant specifically intended others, such as customers, resellers, and retailers, to infringe the '186 Patent and knew that these others perform acts that constituted direct infringement. For example, <u>Exhibit D</u> shows that an exemplary product, the 10th Gen Intel Core i3-10110U Processor and associated firmware incorporated in the Dell Inspiron 13 5000, Model No. Inspiron 13 5391, which is sold by Walmart Inc., infringes the '186 Patent. Defendant designed the Accused

Products such that they would each infringe the '186 Patent as described in <u>Exhibit D</u> if made, used, sold, offered for sale, or imported throughout the United States. Defendant provided, directly or indirectly, Accused Products to others, such as, but not limited to, customers, knowing and intending that those others would use, sell, offer for sale, and/or import the Accused Products throughout the United States, thereby directly infringing one or more claims of the '186 Patent.

49. In addition, upon information and belief, Defendant provides instructions, user guides, and/or other documentation to the infringing others regarding the use and operation of the Accused Products. When others follow such instructions, user guides, and/or other documentation, they directly infringe one or more claims of the '186 Patent. By providing such instructions, user guides, and/or other documentation, user guides, and other documentation, and thereby directly infringe one or more claims of the '186 Patent. Thus, Defendant knows that their actions actively induce infringement.

50. The Accused Products have no substantial non-infringing uses and are a material part of the invention. As described in <u>Exhibit D</u>, any manufacture, use, sale offer for sale or importation throughout the United States of an Accused Product, or incorporation of any of the Accused Products in digital video-capable devices infringes the '186 Patent. Thus, the Accused Products have no substantial non-infringing uses.

51. MCP is entitled to recover damages under 35 U.S.C. § 284 to adequately compensate for Defendant's infringement of the '186 Patent.

DAMAGES

52. Defendant has refused to compensate MCP for its infringement of the Asserted Patents. MCP is entitled to monetary damages adequate to compensate MCP for Defendant's infringement in an amount no less than a reasonable royalty for the use made of the patented inventions by Defendant. The precise amount of damages will be determined through discovery in this action and proven at trial.

MARKING

53. MCP and its licensees of the Asserted Patents have complied with 35 U.S.C. § 287, and relative to its licensees, MCP has taken reasonable steps to ensure compliance with marking.

PRAYER FOR RELIEF

WHEREFORE, MCP respectfully asks the Court for an order granting the following relief:

- a) A judgment that the Asserted Patents are valid and enforceable;
- b) A judgment that Defendant has infringed, directly and indirectly, either literally or under the Doctrine of Equivalents, one or more claims of the '809 Patent;

- A judgment that Defendant has infringed, directly and indirectly, either literally or under the Doctrine of Equivalents, one or more claims of the '186 Patent;
- A judgment awarding MCP all appropriate damages under 35 U.S.C.
 § 284 for Defendant's past infringement, and any continuing or future infringement of the Asserted Patents, including pre and post judgment interest, costs, and disbursements pursuant to 35 U.S.C. § 284;
- e) An accounting for infringing sales not presented at trial and an award by the Court of additional damages for any such infringing sales;
- f) A finding that this case is exceptional within the meaning of 35 U.S.C.
 § 285 and that MCP be awarded its reasonable attorneys' fees against
 Defendant incurred in prosecuting this action;
- g) An award of reasonable attorneys' fees, costs, and expenses incurredby MCP in connection with prosecuting this action; and
- h) Any and all other relief as the Court finds just, equitable, and proper under the circumstances.

DEMAND FOR JURY TRIAL

Pursuant to Fed. R. Civ. P. 38, MCP hereby respectfully demands trial by jury on all claims and issues so triable.

Dated: September 20, 2024

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan

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Attorneys for Plaintiff Media Content Protection LLC Case 1:20-cv-01243-CFC Document 92 Filed 09/23/24 Page 24 of 228 PageID #: 4956

EXHIBIT A



(12) United States Patent

Kamperman

(54) SECURE AUTHENTICATED DISTANCE MEASUREMENT

- (71) Applicant: KONINKLIJKE PHILIPS N.V., Eindhoven (NL)
- (72) Inventor: Franciscus Lucas Antonius Johannes Kamperman, Geldrop (NL)
- (73) Assignee: KONINKLIJKE PHILIPS N.V., Eindhoven (NL)
- (*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.

This patent is subject to a terminal disclaimer.

- (21) Appl. No.: 14/538,493
- (22) Filed: Nov. 11, 2014

(65) **Prior Publication Data**

US 2015/0074822 A1 Mar. 12, 2015

Related U.S. Application Data

(63) Continuation of application No. 10/521,858, filed as application No. PCT/IB03/02932 on Jun. 27, 2003, now Pat. No. 8,886,939.

(30) Foreign Application Priority Data

Jul. 26, 2002 (EP) 02078076

(51) Int. Cl. *G06F 21/10* (2013.01) *H04L 29/06* (2006.01)

(Continued)

(10) Patent No.: US 9,436,809 B2

(45) **Date of Patent:** *Sep. 6, 2016

2221/2111 (2013.01); H04L 2463/101 (2013.01); H04W 12/06 (2013.01); H04W 24/00 (2013.01)

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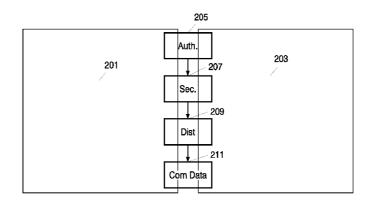
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Primary Examiner - Darren B Schwartz

(57) **ABSTRACT**

The invention relates to a method for a first communication device to perform authenticated distance measurement between the first communication device and a second communication device, wherein the first and the second communication device share a common secret and the common secret is used for performing the distance measurement between the first and the second communication device. The invention also relates to a method of determining whether data stored on a first communication device are to be accessed by a second communication device. Moreover, the invention relates to a communication device for performing authenticated distance measurement to a second communication device. The invention also relates to an apparatus for playing back multimedia content comprising a communication device.

60 Claims, 3 Drawing Sheets



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| (51) | Int. Cl. H04W 12/06 H04W 24/00 | (2009.01) (2009.01) |
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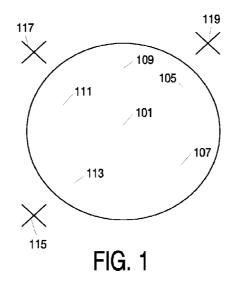
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Sheet 1 of 3

US 9,436,809 B2



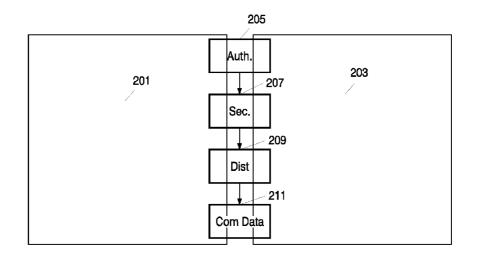


FIG. 2

| U.S. Patent | Sep. 6, 2016 | Sheet 2 of 3 | US 9,436,809 B2 |
|-------------|--------------|--------------|-----------------|
| | ····· | | |

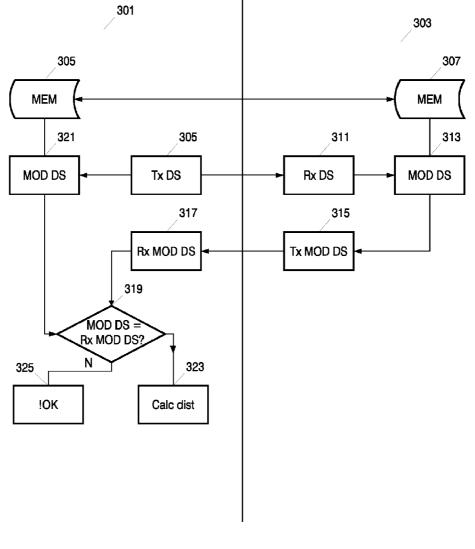


FIG. 3

| U.S. Patent | Sep. 6, 2016 | Sheet 3 of 3 | US 9,436,809 B2 |
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|-------------|--------------|--------------|-----------------|

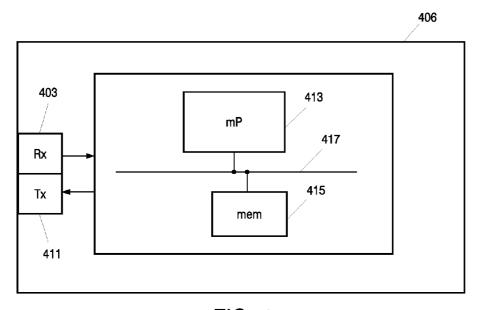


FIG. 4

SECURE AUTHENTICATED DISTANCE MEASUREMENT

This application claims, pursuant to 35 USC 120, priority to and the benefit of the earlier filing date of, that patent 5 application entitled "Secure Authenticated Distance Measurement", filed on Jan. 21, 2005 and afforded Ser. No. 10/521,858 (now U.S. Pat. No. 8,886,939), which claimed priority to and the benefit of the earlier filing date, as a National Stage Filing of that international patent application 10 filed on Jun. 27, 2003 and afforded serial number PCT/IB03/ 02932 (WO2004014037), which claimed priority to and the benefit of the earlier filing date of that patent application filed on Jul. 26, 2002 and afforded serial number EP02078076.3, the contents of all of which are incorporated 15 by reference, herein.

This application is further related to that patent application entitled "Secure authenticated Distance Measurement", filed on Jul. 24, 2009 and afforded Ser. No. 12/508,917 (now U.S. Pat. No. 8,543,819), issued Sep. 24, 2013), which 20 claimed priority to and the benefit of the earlier filing date of that patent application entitled "Secure Authenticated Distance Measurement", filed on Jan. 21, 2005 and afforded Ser. No. 10/521,858 (now U.S. Pat. No. 8,886,939), the contents of which are incorporated by reference herein. 25

The invention relates to a method for a first communication device to perform authenticated distance measurement between a first communication device and a second communication device. The invention also relates to a method of determining whether data stored on a first communication ³⁰ device is to be accessed by a second communication device. Moreover, the invention relates to a communication device for performing authenticated distance measurement to a second communication device. The invention also relates to an apparatus for playing back multimedia content compris-³⁵ ing a communication device.

Digital media have become popular carriers for various types of data information. Computer software and audio information, for instance, are widely available on optical compact disks (CDs) and recently also on digital video/ 40 versatile discs (DVDs) which have been gaining in distribution share. The CD and the DVD utilize a common standard for the digital recording of data, software, images, audio and multimedia. Additional media, such as recordable discs, solid-state memory, and the like, are making consid- 45 erable gains in the software and data distribution market.

The substantially superior quality of the digital format as compared to the analog format renders the former substantially more prone to unauthorized copying and pirating, further a digital format is both easier and faster to copy. 50 Copying of a digital data stream, whether compressed, uncompressed, encrypted or non-encrypted, typically does not lead to any appreciable loss of quality in the data. Digital copying thus is essentially unlimited in terms of multigeneration copying. Analog data with its signal to noise ratio 55 loss with every sequential copy, on the other hand, is naturally limited in terms of multi-generation and mass copying.

The advent of the recent popularity in the digital format has also brought about a slew of copy protection and digital 60 rights management (DRM) systems and methods. These systems and methods use technologies such as encryption, watermarking and right descriptions (e.g. rules for accessing and copying data).

One way of protecting content in the form of digital data 65 is to ensure that content will only be transferred between devices if:

the receiving device has been authenticated as being a compliant device, and

the user of the content has the right to transfer (move, copy) that content to another device.

If transfer of content is allowed, this will typically be performed in an encrypted way to make sure that the content cannot be captured illegally in a useful format.

Technology to perform device authentication and encrypted content transfer is available and is called a secure authenticated channel (SAC). Although it might be allowed to make copies of content over a SAC, the content industry is very bullish on content distribution over the Internet. This results in disagreement of the content industry on transferring content over interfaces that match well with the Internet, e.g. Ethernet.

Further, it should be possible for a user visiting his neighbor to watch a movie, which he owns, on the neighbor's big television screen. Typically, the content owner will disallow this, but it might become acceptable if it can be proved that a license holder of that movie (or a device that the license holder owns) is near that television screen.

It is therefore of interest to be able to include an authenticated distance measurement when deciding whether con-25 tent should be accessed or copied by other devices.

In the article by Stefan Brands and David Chaum, "Distance-Bounding protocols", Eurocrypt '93 (1993), Pages 344-359, integration of distance-bounding protocols with public-key identification schemes is described. Here distance measurement is described based on time measurement using challenge and response bits and with the use of a commitment protocol. This does not allow authenticated device compliancy testing and is not efficient when two devices must also authenticate each other.

It is an object of the invention to obtain a solution to the problem of performing a secure transfer of content within a limited distance.

This is obtained by a method for a first communication device to performing authenticated distance measurement between the first communication device and a second communication device, wherein the first and the second communication device share a common secret and the common secret is used for performing the distance measurement between the first and the second communication device.

Because the common secret is being used for performing the distance measurement, it can be ensured that when measuring the distance from the first communication device to the second communication device, it is the distance between the right devices that is being measured.

The method combines a distance measurement protocol with an authentication protocol. This enables authenticated device compliancy testing and is efficient, because a secure channel is anyhow needed to enable secure communication between devices and a device can first be tested on compliancy before a distance measurement is executed.

In a specific embodiment, the authenticated distance measurement is performed according to the following steps;

transmitting a first signal from the first communication device to the second communication device at a first time t1, the second communication device being adapted for receiving the first signal, generating a second signal by modifying the received first signal according to the common secret and transmitting the second signal to the first device,

receiving the second signal at a second time t2,

checking if the second signal has been modified according to the common secret, and

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determining the distance between the first and the second communication device according to a time difference between t1 and t2.

When measuring a distance by measuring the time difference between transmitting and receiving a signal and 5 using a secret, shared between the first and the second communication device, for determining whether the returned signal really originated from the second communication device, the distance is measured in a secure authenticated way ensuring that the distance will not be measured 10 to a third communication device (not knowing the secret). Using the shared secret for modifying the signal is a simple way to perform a secure authenticated distance measurement.

In a specific embodiment, the first signal is a spread 15 spectrum signal. Thereby a high resolution is obtained and it is possible to cope with bad transmission conditions (e.g. wireless environments with a lot of reflections).

In another embodiment the step of checking if the second signal has been modified according to the common secret is 20 performed by the steps of:

- generating a third signal by modifying the first signal according to the common secret, and
- comparing the third signal with the received second signal.

This method is an easy and simple way of performing the check, but it requires that both the first communication device and the second communication device know how the first signal is being modified using the common secret.

In a specific embodiment the first signal and the common 30 secret are bit words and the second signal comprises information being generated by performing an exclusive OR operation (XOR) between the bit words. Thereby, it is a very simple operation that has to be performed, resulting in demand for few resources by both the first and the second 35 communication device when performing the operation.

In an embodiment, the common secret has been shared before performing the distance measurement, the sharing being performed by the steps of:

- performing an authentication check from the first com- 40 munication device on the second communication device by checking whether the second communication device is compliant with a set of predefined compliance rules, and
- if the second communication device is compliant, sharing 45 the common secret by transmitting the secret to the second communication device.

This is a secure way of performing the sharing of the secret, ensuring that only devices being compliant with compliance rules can receive the secret. Further, the shared 50 secret can afterwards be used for generating a SAC channel between the two devices. The secret could be shared using e.g. key transport mechanisms as described in ISO 11770-3. Alternatively, a key agreement protocol could be used, which e.g. is also described in ISO 11770-3. 55

In another embodiment the authentication check further comprises checking if the identification of the second device is compliant with an expected identification. Thereby, it is ensured that the second device really is the device that it should be. The identity could be obtained by checking a 60 certificate stored in the second device.

The invention also relates to a method of determining whether data stored on a first communication device are to be accessed by a second communication device, the method comprising the step of performing a distance measurement 65 between the first and the second communication device and checking whether the measured distance is within a pre4

defined distance interval, wherein the distance measurement is an authenticated distance measurement according to the above. By using the authenticated distance measurement in connection with sharing data between devices, unauthorized distribution of content can be reduced.

In a specific embodiment the data stored on the first device is sent to the second device if it is determined that the data stored on the first device are to be accessed by the second device.

The invention also relates to a method of determining whether data stored on a first communication device are to be accessed by a second communication device, the method comprising the step of performing a distance measurement between a third communication device and the second communication device and checking whether the measured distance is within a predefined distance interval, wherein the distance measurement is an authenticated distance measurement according to the above. In this embodiment, the distance is not measured between the first communication device, on which the data are stored, and the second communication device. Instead, the distance is measured between a third communication device and the second communication device, where the third communication device could be personal to the owner of the content.

The invention also relates to a communication device for performing authenticated distance measurement to a second communication device, where the communication device shares a common secret with the second communication device and where the communication device comprises means for measuring the distance to the second device using the common secret.

In an embodiment, the device comprises:

- means for transmitting a first signal to a second communication device at a first time t1, the second communication device being adapted for receiving the first signal, generating a second signal by modifying the received first signal according to the common secret and transmitting the second signal,
- means for receiving the second signal at a second time **t2**, means for checking if the second signal has been modified according to the common secret, and
- means for determining the distance between the first and the second communication device according to a time difference between t1 and t2.

The invention also relates to an apparatus for playing back multimedia content comprising a communication device according to the above.

In the following preferred embodiments of the invention will be described referring to the figures, wherein:

FIG. 1 illustrates authenticated distance measurement being used for content protection,

FIG. **2** is a flow diagram illustrating the method of performing authenticated distance measurement,

FIG. 3 illustrates in further detail the step of performing 55 the authenticated distance measurement shown in FIG. 2, and

FIG. 4 illustrates a communication device for performing authenticated distance measurement.

FIG. 1 illustrates an embodiment wherein the authenticated distance measurement is being used for content protection. In the center of the circle 101 a computer 103 is placed. The computer comprises content, such as data, software, images, multimedia content being video and/or audio, stored on e.g. a hard disk, solid state memory, a DVD or a CD. The owner of the computer 103 owns the content and therefore the computer is authorized to access and present the multimedia content for the user. When the user

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wants to make a legal copy of the content on another device via e.g. a SAC, the distance between the other device and the computer 103 is measured and only devices within a predefined distance illustrated by the devices 105, 107, 109, 111, 113 inside the circle 101 are allowed to receive the 5 content. Whereas the devices 115, 117, 119 having a distance to the computer 103 being larger than the predefined distance are not allowed to receive the content.

In the example a device is a computer 103, but it could e.g. also be a DVD drive, a CD drive or a Video display device, as long as the device comprises a communication device for performing the distance measurement.

In a specific example, the distance might not be measured between the computer 103, on which the data are stored, and the other device, it could be determined between a third 15 device (e.g. a device being personal to the owner of the content and which does not contain the data) and the other device

In FIG. 2 a flow diagram illustrates the general idea of performing authenticated distance measurement between 20 two devices, 201 and 203 each comprising communication devices for performing the authenticated distance measurement. In the example the first device 201 comprises content which the second device 203 has requested. The authenticated distance measurement then is as follows. In step 205 25 the first device 201 authenticates the second device 203; this could comprise the steps of checking whether the second device 203 is a compliant device and might also comprise the step of checking whether the second device 203 really is the device identified to the first device 201. Then in step 207, 30 the first device 201 exchanges a secret with the second device 203, which e.g. could be performed by transmitting a random generated bit word to the second device 203. The secret should be shared securely, e.g. according to some key management protocol as described in e.g. ISO 11770.

Then in step 209, a signal for distance measurement is transmitted to the second device 203; the second device modifies the received signal according to the secret and retransmits the modified signal back to the first device. The first device 201 measures the round trip time between the 40 signal leaving and the signal returning and checks if the returned signal was modified according to the exchanged secret. The modification of the returned signal according to some secret will most likely be dependent on the transmission system and the signal used for distance measurement, 45 i.e. it will be specific for each communication system (such as 1394, Ethernet, Bluetooth, IEEE 802.11, etc.).

The signal used for the distance measurement may be a normal data bit signal, but also special signals other than for data communication may be used. In an embodiment spread 50 spectrum signals are used to be able to get high resolution and to be able to cope with bad transmission conditions (e.g. wireless environments with a lot of reflections).

In a specific example a direct sequence spread spectrum signal is used for distance measurement; this signal could be 55 modified by XORing the chips (e.g. spreading code consisting of 127 chips) of the direct sequence code by the bits of the secret (e.g. secret consists also of 127 bits). Also, other mathematical operations similar to XOR could be used.

The authentication 205 and exchange of secret 207 could 60 be performed using the protocols described in some known ISO standards e.g. ISO 9798 and ISO 11770. For example the first device 201 could authenticate the second device 203 according to the following communication scenario: First device->Second device: $R_B ||$ Text 1 where R_B is a random number Second device->First device: CertA||TokenAB

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Where CertA is a certificate of A

TokenAB= $R_A ||R_B||B||$ Text3|| $sS_A (R_A ||R_B||B||$ Text2)

 R_{A} is a random number

Indentifier B is an option

 sS_A is a signature set by A using private key S_A

If TokenAB is replaced with the token as specified in ISO 11770-3 we at the same time can do secret key exchange. We can use this by substituting Text2 by:

Text2:= $eP_B(A||K||Text2)||Text3$ Where eP_B is encrypted with Public key B

A is identifier of A

K is a secret to be exchanged

In this case the second device 203 determines the key (i.e. has key control), this is also called a key transport protocol, but also a key agreement protocol could be used. This may be undesirable in which case it can be reversed, such that the first device determines the key. A secret key has now been exchanged according to step 207 in FIG. 2. Again, the secret key could be exchanged by e.g. a key transport protocol or a key agreement protocol.

After the distance has been measured in a secure authenticated way as described above, content data can be sent between the first and the second device in step 211 in FIG. 2.

FIG. 3 illustrates in further detail, the step of performing the authenticated distance measurement. As described above, the first device 301 and the second device 303 have exchanged a secret; the secret is stored in the memory 305 of the first device and the memory 307 of the second device. In order to perform the distance measurement, a signal is transmitted to the second device via a transmitter 305. The second device receives the signal via a receiver 311, and microprocessor 313 modifies the signal by using the locally stored secret. The signal is modified by the second device 35 according to rules known by the first device 301 and transmitted back to the first device **301** via a transmitter **315**. The first device 301 receives the modified signal via a receiver 317 and in 319 the received modified signal is compared to a signal, which has been modified locally i.e. by the first device. The local modification is performed in microprocessor 321 by using the signal transmitted to the second device in transmitter 305 and then modifying the signal using the locally stored secret similar to the modification rules used by the second device. If the received modified signal and the locally modified signal are identical, then the received signal is authenticated and can be used for determining the distance between the first and the second device. If the two signals are not identical, then the received signal cannot be authenticated and can therefore not be used for measuring the distance as illustrated by 325. In microprocessor 323 the distance is calculated between the first and the second device; this could e.g. be performed by measuring the time, when the signal is transmitted by the transmitter 309 from the first device to the second device and measuring when the receiver 317 receives the signal from the second device. The time difference between a transmittal time and a reception time can then be used for determining the physical distance between the first device and the second device.

In FIG. 4 a communication device for performing authenticated distance measurement is illustrated. The device 406 comprises a receiver 403 and a transmitter 411. The device further comprises means for performing the steps described above, which could be performed by executing software using a microprocessor 413 connected to memory 415 via a communication bus 417. The communication device could then be placed inside devices such as a DVD, a DVD

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recorder, a computer, a CD, a CD recorder, a solid state memory, a television and other devices for providing protected content, accessing protected content, or authorizing the access to protected content.

What is claimed is:

1. A first device for controlling delivery of protected content to a second device, the first device comprising:

a memory:

a processor, said processor arranged to: receive a certificate of the second device, the certificate providing information regarding the second device;

- determine whether the second device is compliant with a set of compliance rules utilizing said information provided in said certificate;
- provide a first signal to the second device depending when the second device is determined to be compliant with the set of compliance rules;
- receive a second signal from the second device after providing the first signal: 20
- determine whether the second signal is derived from a secret known by the first device;
- determine whether a time difference between providing the first signal and receiving the second signal is less than a predetermined time; and 25
- allow the protected content to be provided to the second device when at least the second signal is determined to be derived from the secret and the time difference is less than the predetermined time.

2. The first device of claim 1, wherein the first signal 30 comprises a random number.

3. The first device of claim 1, wherein the second signal is formed by modifying the first signal based on the secret, wherein the modification comprises performing an XOR operation on the first signal.

4. The first device of claim 1, wherein the processor is further arranged to provide the secret to the second device.

5. The first device of claim 4, wherein the secret is securely provided using one of: a key transport protocol, a key management protocol and a key agreement protocol. 40

6. The first device of claim 4, wherein the processor arranged to provide the secret to the second device comprises the processor arranged to provide the secret to the second device via encryption by a public key of a private/ public key-pair of the second device, if the second device is 45 compliant, said secret comprising a random number.

7. The first device of claim 1, wherein the processor is further arranged to receive the secret from the second device.

8. The first device of claim 7, wherein the secret is 50 the requesting device and the content provider. securely received using one of: a key transport protocol, a key management protocol and a key agreement protocol.

9. The first device of claim 1, wherein the processor arranged to determine whether the second signal is derived from the secret is arranged to: 55

modify the first signal according to the secret;

compare the modified first signal with the second signal; and

provide an indication when said modified first signal is identical to the second signal. 60

10. The first device of claim 1, wherein the first signal and the secret are of comparable length.

11. The first device of claim **1**, wherein the processor is further arranged to determine an identity of the second device using the certificate. 65

12. The first device of claim 1, wherein the certificate comprises a public key.

13. The first device of claim 1, wherein the processor is further arranged to provide a certificate to the second device.

14. The first device of claim 1, wherein the predetermined time is based on a communication system associated with the first device.

15. The first device of claim 1, wherein the second signal comprises the first signal modified by the secret.

16. The first device of claim 1, wherein the processor is further arranged to:

provide instruction to a third device to transmit said protected content, wherein said protected content is stored on said third device.

17. A system for controlling the transmission of protected content from a content provider to a requesting device, the 15 content provider comprising:

- means for receiving a certificate of the requesting device, the certificate providing information for validating the requesting device as being compliant with a set of compliancy rules;
- means for validating that the requesting device is compliant with the set of compliancy rules using said information contained in said certificate;
- means for transmitting a first signal to the requesting device at a first time when said requesting device is validated as being compliant with the set of compliancy rules:
- means for receiving a second signal at a second time from the requesting device;
- means for providing the protected content to the requesting device after determining the second signal depends on a secret known to the content provider, and
 - a time difference between the first time and the second time is less than a predetermined time.

18. The system of claim 17, wherein said protected 35 content is stored on a third device.

19. The system of claim 18, wherein said means for providing the requested content comprises:

means for providing instruction to said third device to provide said content to said requesting device.

20. The system of claim 18, wherein the third device is one of: a DVD, CD and a storage device.

21. The system of claim 17, wherein the secret is securely received by the content provider.

22. The system of claim 17, wherein the secret is securely transmitted by the content provider.

23. The system of claim 17, wherein the certificate identifies the requesting device.

24. The system of claim 17, wherein the predetermined time is based on a type of communication protocol between

25. The system of claim 17, wherein the content provider is one of: a DVD, CD and a storage device.

26. The system of claim 17, wherein the second signal comprises the first signal modified by the secret.

27. A first device in communication with a second device, the first device comprising:

a memory;

- a processor in communication with the memory, the processor arranged to execute software stored on the first device, the software configured to:
 - receive from the second device a request for a protected content and a certificate providing information associated with the second device;
 - determine whether the second device is suitable for receiving said protected content, wherein determining suitability of said second device is based on said information provided in said certificate;

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provide a first signal to said second device when said second device is determined to be suitable for receiving said protected content;

receive from said second device a second signal;

- determine whether said second signal is representative ⁵ of said first signal modified according to a secret known by said first device and said second device;
- determine whether a time difference between a time of providing the first signal and receiving the second signal is less than a predetermined time; and
- initiate transmission of said protected content to said second device when at least said second signal is representative of said first signal modified according to a secret known by said first device and said second device and said time difference is less than the predetermined time.

28. The first device of claim **27**, wherein said protected content is stored on said first device.

29. The first device of claim **27**, wherein the software $_{20}$ configured to initiate said initiating transmission of said protected content is further configured to provide instruction to a third device to transmit said protected content, wherein said protected content is stored on said third device.

30. The first device of claim **29**, wherein said third device ²⁵ a certificate to the second device. **46**. The method of claim **34**, w

31. The first device of claim **29**, wherein said third device is remotely located from said first device.

32. The first device of claim **27**, wherein suitability is determined as being compliant with a set of compliancy 30 rules.

33. The first device of claim **27**, wherein the software is further arranged to:

provide the secret to the second device via encryption by a public key of a private/public key-pair of the second 35 device, if the second device is suitable, said secret comprising a random number.

34. A method of a first device controlling delivery of protected content to a second device, the method comprising: 40

receiving a certificate of the second device, the certificate providing information regarding the second device;

- determining whether the second device is compliant with a set of compliance rules utilizing said information provided in said certificate; 45
- providing a first signal to the second device depending when the second device is determined to be compliant with the set of compliance rules;
- receiving a second signal from the second device after providing the first signal; 50

determining whether the second signal is derived from a secret known by the first device;

- determining whether a time difference between providing the first signal and receiving the second signal is less than a predetermined time; and 55
- allowing the protected content to be provided to the second device when at least the second signal is determined to be derived from the secret and the time difference is less than the predetermined time.

35. The method of claim **34**, wherein the first signal 60 comprises a random number.

36. The method of claim **34**, wherein the second signal is formed by modifying the first signal based on the secret, wherein the modification comprises performing an XOR operation on the first signal.

37. The method of claim **34**, further comprising providing the secret to the second device.

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38. The method of claim **37**, wherein the secret is securely provided using one of: a key transport protocol, a key management protocol and a key agreement protocol.

39. The method of claim **34**, further comprising receiving the secret from the second device.

40. The method of claim **39**, wherein the secret is securely received using one of: a key transport protocol, a key management protocol and a key agreement protocol.

41. The method of claim **34**, wherein the step of determining whether the second signal is derived from the secret comprises:

modifying the first signal according to the secret;

- comparing the modified first signal with the second signal; and
- providing an indication when said modified first signal is identical to the second signal.

42. The method of claim 34, wherein the first signal and the secret are of comparable length.

43. The method of claim **34**, further comprising determining an identity of the second device using the certificate.

44. The method of claim 34, wherein the certificate comprises a public key.

45. The method of claim **34**, further comprising providing a certificate to the second device.

46. The method of claim **34**, wherein the predetermined time is based on a communication system associated with the first device.

47. The method of claim 34, wherein the second signal comprises the first signal modified by the secret.

48. The method of claim **34**, further comprising providing instruction to a third device to transmit said protected content, wherein said protected content is stored on said third device.

49. A first device for controlling delivery of protected content to a second device, the first device comprising:

a memory;

a processor, the processor arranged to:

- receive a certificate from the second device prior to sending a first signal;
- determine from the certificate if the second device is compliant;
- provide a secret to the second device via encryption by a public key of a private/public key-pair of the second device, if the second device is compliant, said secret comprising a random number;

provide the first signal to the second device;

- receive a second signal from the second device after providing the first signal;
 - determine if the second signal is derived from the secret by determining whether the second signal is the first signal modified based on the secret;
- determine whether a time difference between providing the first signal and receiving the second signal is less than a predetermined time; and
- allow the protected content to be provided to the second device at least when the second signal is determined to be derived from the secret and the time difference is less than the predetermined time.

50. The first device of claim **49**, wherein the processor is further arranged to:

- use the secret to generate a secure authenticated channel between the first device and the second device,
- use the secure authenticated channel to provide the protected content to the second device.

51. The first device of claim **49**, wherein the secret and the first signal are of comparable length.

52. The first device of claim **49**, wherein the modification is a XOR operation using the first signal.

53. The first device of claim **49**, wherein the processor, arranged to determine that the second signal is derived from the secret, is further arranged to: 5

modify the first signal according to the secret;

compare the modified first signal with the second signal; and

determine that the modified first signal is identical to the second signal.

54. The first device of claim **49**, wherein the first signal comprises a random number.

55. A method of a first device controlling delivery of protected content to a second device, the method comprising:

- receiving a certificate from the second device prior to ¹⁵ sending a first signal;
- determining from the certificate if the second device is compliant;

providing a secret to the second device via encryption by a public key of a private/public key-pair of the second device, if the second device is compliant, said secret comprising a random number;

providing the first signal to the second device;

receiving a second signal from the second device after providing the first signal; 25

determining if the second signal is derived from the secret by determining whether the second signal is the first signal modified based on the secret; 12

determining whether a time difference between providing the first signal and receiving the second signal is less than a predetermined time; and

allowing the protected content to be provided to the second device at least when the second signal is determined to be derived from the secret and the time difference is less than the predetermined time.

56. The method of claim 55, further comprising:

using the secret to generate a secure authenticated channel between the first device and the second device,

using the secure authenticated channel to provide the protected content to the second device.

57. The method of claim **55**, wherein the secret and the first signal have the same bit length.

58. The method of claim **55**, wherein the modification is a XOR operation using the first signal.

59. The method of claim **55**, wherein the step of determining that the second signal is derived from the secret 20 comprises:

modifying the first signal according to the secret;

- comparing the modified first signal with the second signal; and
- determining that the modified first signal is identical to the second signal.

60. The method of claim **55**, wherein the first signal comprises a random number.

* * * * *

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EXHIBIT B

Case 1:20-cv-01243-CFC Document 92



US010091186B2

(12) United States Patent

Kamperman

(54) SECURE AUTHENTICATED DISTANCE MEASUREMENT

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- (73) Assignee: Koninklijke Philips N.V., Eindhoven (NL)
- (*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 72 days.

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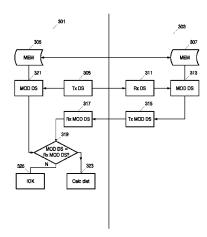
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Primary Examiner - Darren B Schwartz

(57) **ABSTRACT**

The invention relates to a method for a first communication device to perform authenticated distance measurement between the first communication device and a second communication device, wherein the first and the second communication device share a common secret and the common secret is used for performing the distance measurement between the first and the second communication device. The invention also relates to a method of determining whether data stored on a first communication device are to be accessed by a second communication device. Moreover, the invention relates to a communication device for performing authenticated distance measurement to a second communication device. The invention also relates to an apparatus for playing back multimedia content comprising a communication device.

36 Claims, 3 Drawing Sheets



Page 2

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Related U.S. Application Data

continuation of application No. 14/538,493, filed on Nov. 11, 2014, now Pat. No. 9,436,809, which is a continuation of application No. 10/521,858, filed as application No. PCT/IB03/02932 on Jun. 27, 2003, now Pat. No. 8,886,939.

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See application file for complete search history.

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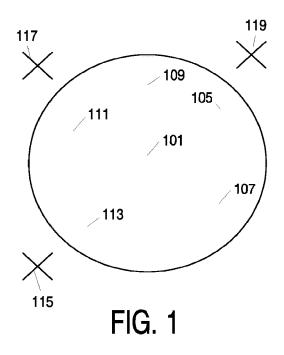
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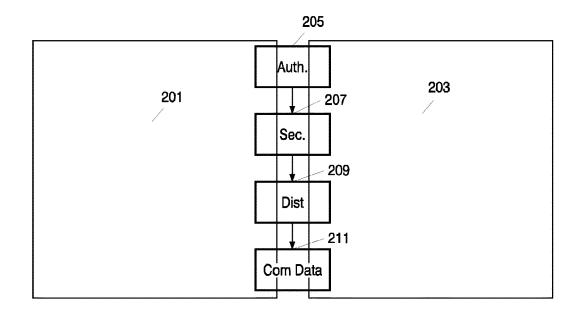


FIG. 2

| U.S. Patent oc | t. 2, 2018 | Sheet 2 of 3 | US 10,091,186 B2 |
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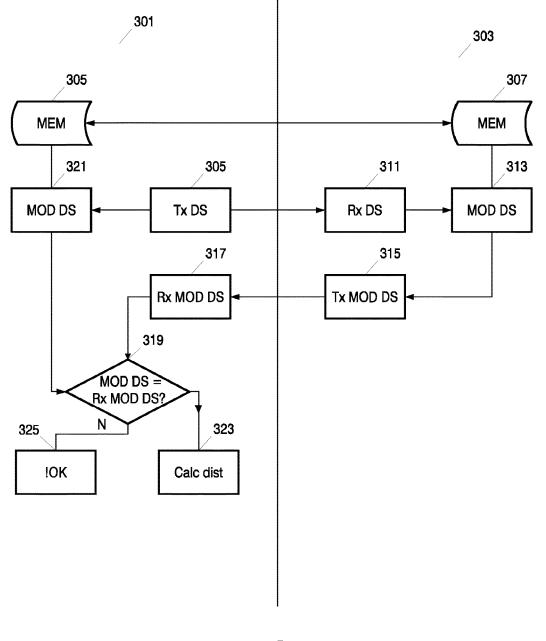


FIG. 3

| U.S. Patent | Oct. 2, 2018 | Sheet 3 of 3 | US 10,091,186 B2 |
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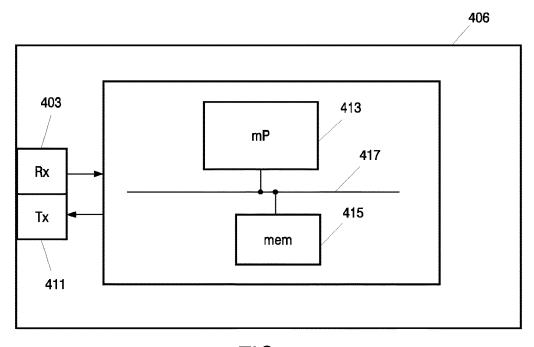


FIG. 4

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SECURE AUTHENTICATED DISTANCE MEASUREMENT

This application is a continuation of the patent applications entitled "Secure Authenticated Distance Measure- 5 ment", filed on Aug. 5, 2016 and afforded Ser. No. 15/229, 207 which is a continuation of the application filed Nov. 11, 2014 and afforded Ser. No. 14/538,493 which claims priority pursuant to 35 USC 120, priority to and the benefit of the earlier filing date of, that patent application entitled "Secure 10 Authenticated Distance Measurement", filed on Jan. 21, 2005 and afforded Ser. No. 10/521,858 (now U.S. Pat. No. 8,886,939), which claimed priority to and the benefit of the earlier filing date, as a National Stage Filing of that international patent application filed on Jun. 27, 2003 and 15 afforded serial number PCT/IB2003/02932 (WO2004014037), which claimed priority to and the benefit of the earlier filing date of that patent application filed on Jul. 26, 2002 and afforded serial number EP 02078076.3, the contents of all of which are incorporated by reference, 20 herein.

This application is further related to that patent application entitled "Secure authenticated Distance Measurement", filed on Jul. 24, 2009 and afforded Ser. No. 12/508,917 (now U.S. Pat. No. 8,543,819), issued Sep. 24, 2013), which 25 claimed priority to and the benefit of the earlier filing date of that patent application entitled "Secure Authenticated Distance Measurement", filed on Jan. 21, 2005 and afforded Ser. No. 10/521,858 (now U.S. Pat. No. 8,886,939), the contents of which are incorporated by reference herein. 30

The invention relates to a method for a first communication device to performing authenticated distance measurement between a first communication device and a second communication device. The invention also relates to a method of determining whether data stored on a first com- 35 munication device is to be accessed by a second communication device. Moreover, the invention relates to a communication device for performing authenticated distance measurement to a second communication device. The invention also relates to an apparatus for playing back multimedia 40 content comprising a communication device.

Digital media have become popular carriers for various types of data information. Computer software and audio information, for instance, are widely available on optical compact disks (CDs) and recently also DVD has gained in 45 distribution share. The CD and the DVD utilize a common standard for the digital recording of data, software, images, and audio. Additional media, such as recordable discs, solid-state memory, and the like, are making considerable gains in the software and data distribution market.

The substantially superior quality of the digital format as compared to the analog format renders the former substantially more prone to unauthorized copying and pirating, further a digital format is both easier and faster to copy. Copying of a digital data stream, whether compressed, 55 uncompressed, encrypted or non-encrypted, typically does not lead to any appreciable loss of quality in the data. Digital copying thus is essentially unlimited in terms of multigeneration copying. Analog data with its signal to noise ratio loss with every sequential copy, on the other hand, is 60 naturally limited in terms of multi-generation and mass copying.

The advent of the recent popularity in the digital format has also brought about a slew of copy protection and DRM systems and methods. These systems and methods use 65 technologies such as encryption, watermarking and right descriptions (e.g. rules for accessing and copying data).

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One way of protecting content in the form of digital data is to ensure that content will only be transferred between devices if

the receiving device has been authenticated as being a compliant device, and

the user of the content has the right to transfer (move, copy) that content to another device.

If transfer of content is allowed, this will typically be performed in an encrypted way to make sure that the content cannot be captured illegally in a useful format.

Technology to perform device authentication and encrypted content transfer is available and is called a secure authenticated channel (SAC). Although it might be allowed to make copies of content over a SAC, the content industry is very bullish on content distribution over the Internet. This results in disagreement of the content industry on transferring content over interfaces that match well with the Internet, e.g. Ethernet.

Further, it should be possible for a user visiting his neighbor to watch a movie, which he owns, on the neighbor's big television screen. Typically, the content owner will disallow this, but it might become acceptable if it can be proved that a license holder of that movie (or a device that the license holder owns) is near that television screen.

It is therefore of interest to be able to include an authenticated distance measurement when deciding whether content should be accessed or copied by other devices.

In the article by Stefan Brands and David Chaum, "Distance-Bounding protocols", Eurocrypt '93 (1993), Pages 344-359, integration of distance-bounding protocols with public-key identification schemes is described. Here distance measurement is described based on time measurement using challenge and response bits and with the use of a commitment protocol. This does not allow authenticated device compliancy testing and is not efficient when two devices must also authenticate each other.

It is an object of the invention to obtain a solution to the problem of performing a secure transfer of content within a limited distance.

This is obtained by a method for a first communication device to performing authenticated distance measurement between the first communication device and a second communication device, wherein the first and the second communication device share a common secret and the common secret is used for performing the distance measurement between the first and the second communication device.

Because the common secret is being used for performing the distance measurement, it can be ensured that when measuring the distance from the first communication device to the second communication device, it is the distance between the right devices that is being measured.

The method combines a distance measurement protocol with an authentication protocol. This enables authenticated device compliancy testing and is efficient, because a secure channel is anyhow needed to enable secure communication between devices and a device can first be tested on compliancy before a distance measurement is executed.

In a specific embodiment, the authenticated distance measurement is performed according to the following steps,

transmitting a first signal from the first communication device to the second communication device at a first time t1, the second communication device being adapted for receiving the first signal, generating a second signal by modifying

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the received first signal according to the common secret and transmitting the second signal to the first device,

receiving the second signal at a second time t2,

checking if the second signal has been modified according to the common secret,

determining the distance between the first and the second communication device according to a time difference between t1 and t2.

When measuring a distance by measuring the time difference between transmitting and receiving a signal and 10 using a secret, shared between the first and the second communication device, for determining whether the returned signal really originated from the second communication device, the distance is measured in a secure authenticated way ensuring that the distance will not be measured 15 to a third communication device (not knowing the secret). Using the shared secret for modifying the signal is a simple way to perform a secure authenticated distance measurement

In a specific embodiment the first signal is a spread 20 spectrum signal. Thereby a high resolution is obtained and it is possible to cope with bad transmission conditions (e.g. wireless environments with a lot of reflections).

In another embodiment the step of checking if the second signal has been modified according to the common secret is 25 performed by the steps of,

generating a third signal by modifying the first signal according to the common secret,

comparing the third signal with the received second signal.

This method is an easy and simple way of performing the check, but it requires that both the first communication device and the second communication device know how the first signal is being modified using the common secret.

In a specific embodiment the first signal and the common 35 secret are bit words and the second signal comprises information being generated by performing an XOR between the bit words. Thereby, it is a very simple operation that has to be performed, resulting in demand for few resources by both the first and the second communication device when per- 40 forming the operation.

In an embodiment the common secret has been shared before performing the distance measurement, the sharing being performed by the steps of,

performing an authentication check from the first com- 45 according to the common secret, and munication device on the second communication device by checking whether the second communication device is compliant with a set of predefined compliance rules,

if the second communication device is compliant, sharing the common secret by transmitting the secret to the second 50 communication device.

This is a secure way of performing the sharing of the secret, ensuring that only devices being compliant with compliance rules can receive the secret. Further, the shared secret can afterwards be used for generating a SAC channel 55 being used for content protection, between the two devices. The secret could be shared using e.g. key transport mechanisms as described in ISO 11770-3. Alternatively, a key agreement protocol could be used, which e.g. is also described in ISO 11770-3.

In another embodiment the authentication check further 60 comprises checking if the identification of the second device is compliant with an expected identification. Thereby, it is ensured that the second device really is the device that it should be. The identity could be obtained by checking a certificate stored in the second device. 65

The invention also relates to a method of determining whether data stored on a first communication device are to

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be accessed by a second communication device, the method comprising the step of performing a distance measurement between the first and the second communication device and checking whether the measured distance is within a predefined distance interval, wherein the distance measurement is an authenticated distance measurement according to the above. By using the authenticated distance measurement in connection with sharing data between devices, unauthorized distribution of content can be reduced.

In a specific embodiment the data stored on the first device is sent to the second device if it is determined that the data stored on the first device are to be accessed by the second device.

The invention also relates to a method of determining whether data stored on a first communication device are to be accessed by a second communication device, the method comprising the step of performing a distance measurement between a third communication device and the second communication device and checking whether the measured distance is within a predefined distance interval, wherein the distance measurement is an authenticated distance measurement according to the above. In this embodiment, the distance is not measured between the first communication device, on which the data are stored, and the second communication device. Instead, the distance is measured between a third communication device and the second communication device, where the third communication device could be personal to the owner of the content.

The invention also relates to a communication device for performing authenticated distance measurement to a second communication device, where the communication device shares a common secret with the second communication device and where the communication device comprises means for measuring the distance to the second device using the common secret.

In an embodiment the device comprises:

means for transmitting a first signal to a second communication device at a first time t1, the second communication device being adapted for receiving the first signal, generating a second signal by modifying the received first signal according to the common secret and transmitting the second signal,

means for receiving the second signal at a second time t2, means for checking if the second signal has been modified

means for determining the distance between the first and the second communication device according to a time difference between t1 and t2.

The invention also relates to an apparatus for playing back multimedia content comprising a communication device according to the above.

In the following preferred embodiments of the invention will be described referring to the figures, wherein:

FIG. 1 illustrates authenticated distance measurement

FIG. 2 is a flow diagram illustrating the method of performing authenticated distance measurement,

FIG. 3 illustrates in further detail the step of performing the authenticated distance measurement shown in FIG. 2,

FIG. 4 illustrates a communication device for performing authenticated distance measurement.

FIG. 1 illustrates an embodiment where authenticated distance measurement is being used for content protection. In the center of the circle 101 a computer 103 is placed.

The computer comprises content, such as multimedia content being video or audio, stored on e.g. a hard disk, DVD or a CD. The owner of the computer owns the content

and therefore the computer is authorized to access and present the multimedia content for the user. When the user wants to make a legal copy of the content to another device via e.g. a SAC, the distance between the other device and the computer **103** is measured and only devices within a predefined distance illustrated by the devices **105**, **107**, **109**, **111**, **113** inside the circle **101** are allowed to receive the content. Whereas the devices **115**, **117**, **119** having a distance to the computer **101** being larger than the predefined distance are not allowed to receive the content.

In the example a device is a computer, but it could e.g. also be a DVD drive, a CD drive or a Video, as long as the device comprises a communication device for performing the distance measurement.

In a specific example the distance might not have to be measured between the computer, on which the data are stored, and the other device, it could also be a third device e.g. a device being personal to the owner of the content which is within the predefined distance.

In FIG. 2 a flow diagram illustrates the general idea of performing authenticated distance measurement between two devices, 201 and 203 each comprising communication devices for performing the authenticated distance measurement. In the example the first device 201 comprises content ²⁵ which the second device 203 has requested. The authenticated distance measurement then is as follows. In step 205 the first device 201 authenticates the second device 203; this could comprise the steps of checking whether the second device 203 is a compliant device and might also comprise the step of checking whether the second device 203 really is the device identified to the first device 201. Then in step 207, the first device 201 exchanges a secret with the second device 203, which e.g. could be performed by transmitting 35 a random generated bit word to second device 203. The secret should be shared securely, e.g. according to some key management protocol as described in e.g. ISO 11770.

Then in step **209**, a signal for distance measurement is transmitted to the second device **203**; the second device $_{40}$ modifies the received signal according to the secret and retransmits the modified signal back to the first device. The first device **201** measures the round trip time between the signal leaving and the signal returning and checks if the returned signal was modified according to the exchanged 45 secret. The modification of the returned signal according to some secret will most likely be dependent on the transmission system and the signal used for distance measurement, i.e. it will be specific for each communication system (such as 1394, Ethernet, Bluetooth, IEEE 802.11, etc.). 50

The signal used for the distance measurement may be a normal data bit signal, but also special signals other than for data communication may be used. In an embodiment spread spectrum signals are used to be able to get high resolution and to be able to cope with bad transmission conditions (e.g. 55 wireless environments with a lot of reflections).

In a specific example a direct sequence spread spectrum signal is used for distance measurement; this signal could be modified by XORing the chips (e.g. spreading code consisting of 127 chips) of the direct sequence code by the bits of 60 the secret (e.g. secret consists also of 127 bits). Also, other mathematical operations as XOR could be used.

The authentication **205** and exchange of secret **207** could be performed using the protocols described in some known ISO standards ISO 9798 and ISO 11770. For example the 65 first device **201** could authenticate the second device **203** according to the following communication scenario: 6

First device->Second device: $R_B ||$ Text 1 where R_B is a random number Second device->First device: CertA||TokenAB

Where CertA is a certificate of A

 $TokenAB = R_A ||R_B||B||Text3 ||sS_A(R_A||R_B||B||Text2)$

 R_A is a random number

Indentifier B is an option

 sS_A is a signature set by A using private key S_A

If TokenAB is replaced with the token as specified in ISO 11770-3 we at the same time can do secret key exchange. We

can use this by substituting Text2 by:

Text2:= $eP_B(A||K||||Text2)||Text3$ Where ePB is encrypted with Public key B

A is identifier of A

15 K is a secret to be exchanged

In this case the second device **203** determines the key (i.e. has key control), this is also called a key transport protocol, but also a key agreement protocol could be used. This may be undesirable in which case it can be reversed, such that the first device determines the key. A secret key has now been exchanged according to step **207** in FIG. **2**. Again, the secret key could be exchanged by e.g. a key transport protocol or a key agreement protocol.

After the distance has been measured in a secure authenticated way as described above content, data can be sent between the first and the second device in step **211** in FIG. **2**.

FIG. 3 illustrates in further detail the step of performing the authenticated distance measurement. As described above the first device 301 and the second device 303 have exchanged a secret; the secret is stored in the memory 305 of the first device and the memory 307 of the second device. In order to perform the distance measurement, a signal is transmitted to the second device via a transmitter 309. The second device receives the signal via a receiver 311 and 313 modifies the signal by using the locally stored secret. The signal is modified according to rules known by the first device 301 and transmitted back to the first device 301 via a transmitter 315. The first device 301 receives the modified signal via a receiver 317 and in 319 the received modified signal is compared to a signal, which has been modified locally. The local modification is performed in 321 by using the signal transmitted to the second device in transmitter 309 and then modifying the signal using the locally stored secret similar to the modification rules used by the second device. If the received modified signal and the locally modified signal are identical, then the received signal is authenticated and can be used for determining the distance between the first and the second device. If the two signals are not identical, then the received signal cannot be authenticated and can therefore not be used for measuring the distance as illustrated by 325. In 323 the distance is calculated between the first and the second device; this could e.g. be performed by measuring the time, when the signal is transmitted by the transmitter 309 from the first device to the second device and measuring when the receiver 317 receives the signal from the second device. The time difference between transmittal time and receive time can then be used for determining the physical distance between the first device and the second device.

In FIG. 4 a communication device for performing authenticated distance measurement is illustrated. The device 401 comprises a receiver 403 and a transmitter 411. The device further comprises means for performing the steps described above, which could be by executing software using a microprocessor 413 connected to memory 415 via a communication bus 417. The communication device could then be

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placed inside devices such as a DVD, a computer, a CD, a CD recorder, a television and other devices for accessing protected content.

What is claimed is:

1. A first device for controlling delivery of protected 5 content to a second device, the first device comprising a processor circuit, the processor circuit arranged to execute instructions, the instructions arranged to:

- receive a second device certificate from the second device prior to sending a first signal;
- provide the first signal to the second device when the second device certificate indicates that the second device is compliant with at least one compliance rule; receive a second signal from the second device after
- providing the first signal; and provide the protected content to the second device when
- the second signal is derived from a secret and a time between the providing of the first signal and the receiving of the second signal is less than a predetermined time, 20

wherein the secret is known by the first device.

2. The first device of claim 1, wherein the secret is securely provided to the second device by the first device.

- **3**. The first device of claim **2**, wherein determining that the second signal is derived from the secret comprises: 25
- modifying the first signal, wherein the modifying requires the secret; and
 - determining that the modified first signal is identical to the second signal.
- **4**. The first device of claim **3** wherein the secret comprises 30 a first random number.
- 5. The first device of claim 4 wherein the secret is encrypted with a public key.
- 6. The first device of claim 5 wherein the first signal comprises a second random number.
- 7. The first device of claim **2**, wherein the second signal comprises the first signal modified by the secret.

8. The first device of claim **2**, wherein determining that the second signal is derived from the secret comprises:

- modifying the second signal, wherein the modifying 40 requires the secret; and
- determining that the modified second signal is identical to the first signal.
- **9**. The first device of claim **1**, wherein determining that the second signal is derived from the secret comprises:
- modifying the first signal, wherein the modifying requires the secret; and
- determining that the modified first signal is identical to the second signal.
- **10**. The first device of claim **1**, wherein the predetermined 50 time is based on a communication system associated with the first device.
- **11**. The first device of claim **1**, further comprising instructions arranged to provide the secret to the second device.
- **12**. The first device of claim **1**, wherein the second signal 55 comprises the first signal modified by the secret.

13. The first device of claim 1 wherein the secret comprises a random number.

14. The first device of claim 1 wherein the secret is encrypted with a public key.

15. The first device of claim 1 wherein the first signal comprises a random number.

16. The first device of claim **1**, wherein the second signal comprises an XOR operation of the first signal with the secret.

17. The first device of claim **1**, further comprising instructions arranged to receive the secret from the second device.

18. The first device of claim **1**, wherein determining that the second signal is derived from the secret comprises:

- modifying the second signal, wherein the modifying requires the secret; and
- determining that the modified second signal is identical to the first signal.

19. A method of controlling delivery of protected content from a first device to a second device, the first device comprising a processor circuit the processor circuit arranged to execute instructions implementing the method, the method comprising:

- receiving a second device certificate from the second device prior to sending a first signal;
- providing the first signal to the second device when the second device certificate indicates that the second device is compliant with at least one compliance rule;
- receiving a second signal from the second device after providing the first signal;
- sending the protected content from the first device to the second device when the second signal is derived from the secret and a time between the providing of the first signal and the receiving of the second signal is less than a predetermined time,

wherein the secret is known by the first device.

20. The method of claim **19**, wherein the secret is securely provided to the second device by the first device.

- 21. The method of claim 20, wherein determining that the second signal is derived from the secret comprises:
- modifying the first signal according to the secret; and determining that the modified first signal is identical to the second signal.
- **22**. The method of claim **21**, wherein the secret comprises a first random number.
- **23**. The method of claim **22**, wherein the secret is 35 encrypted with a public key.
 - 24. The method of claim 23, wherein the first signal comprises a second random number.
 - **25**. The method of claim **20**, wherein the second signal comprises the first signal modified by the secret.
 - **26**. The method of claim **20**, wherein determining that the second signal is derived from the secret comprises:
 - modifying the second signal according to the secret; and determining that the modified second signal is identical to the first signal.
 - **27**. The method of claim **19**, wherein determining that the second signal is derived from the secret comprises:
 - modifying the first signal according to the secret; and determining that the modified first signal is identical to the second signal.
 - **28**. The method of claim **19**, wherein the predetermined time is based on a communication system associated with the first device.
 - **29**. The method of claim **19**, further comprising providing the secret to the second device.
 - **30**. The method of claim **19**, wherein the second signal comprises the first signal modified by the secret.

31. The method of claim **19**, wherein the secret comprises a random number.

32. The method of claim **19**, wherein the secret is 60 encrypted with a public key.

33. The method of claim **19**, wherein the first signal comprises a random number.

34. The method of claim **19**, wherein the second signal comprises an XOR operation of the first signal with the secret.

35. The method of claim **19**, further comprising instructions arranged to receive the secret from the second device.

36. The method of claim 19, wherein determining that the second signal is derived from the secret comprises: modifying the second signal according to the secret; and determining that the modified second signal is identical to the first signal.

* * * * *

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EXHIBIT C

U.S. Patent No. 9,436,809 Dell Product Containing Intel Product HDMI with HDCP 2.2

| Case 1:20-cv-01243-CFC Document 92 Fil | ed 09/23/24 Page 50 of 228 PageID #: 4982 |
|---|--|
| | Processor More Info 10th Generation Intel® Core [™] i3-10110U Processor (4MB Cache, up to 4.1 GHz) |
| Dell Inspiron 13 5000 Laptop (Inspiron 13 5391) ("Dell Product") | Intel video processing system and components thereof including 10th Generation Intel Core i3-10110U Processor, main board hardware, integrated operating system, middleware, application program, video processing, and/or digital rights management ("DRM") software that runs on the Dell Product ("Intel Product") |

Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24. Page 51 of 228 PageID #: 4983 U.S. Patent No. 9,436,809: Claim 1

| 1. A first device for | controlling delivery of protected content to a second device, the first device comprising:" |
|--|---|
| 1. A first device for controlling delivery of protected content to a second device, the first device comprising: | The Dell Inspiron 13 5000 Laptop (Inspiron 13 5391) (the "Dell Product") is a first device for controlling delivery of protected content to a second device.For example, the Dell Product is an HDMI transmitter with HDCP 2.2 for controlling delivery of protected |
| | content to another device, such as an HDMI receiver with HDCP 2.2. |
| | |
| | Dell, Inspiron 13 5000 Laptop, <u>https://www.Dell.com/en-us/member/shop/Dell-laptops/inspiron-13-5000-laptop/spd/inspiron-13-5391-wifi-laptop/nn5391dopvh#features_section</u> . |
| | The Dell Product includes an HDMI 1.4b port for delivery of protected content to another device. |
| | Ports & Slots 1. Headphone & Microphone Audio Jack (2. USB 3.1 Gen 1 (3. Power) LIDM (1.44) 5. USB 3.1 Gen 1 Type C* (DP/PowerDelivery) 16. Micro SD Card Reader |
| | Id. |

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| (4MB Cache | oduct comprises a processor, including a "10th Generation Intel® Core TM i3-10110U Processor e, up to 4.1 GHz)" (the "Intel Processor") integrated with the Intel UHD Graphics 620 graphics he "Intel GPU"). |
|--------------|---|
| | Inspiron 13 5000 Laptop |
| | Configurations |
| | Processor More Info |
| | 10th Generation Intel® Core [™] i3-10110U Processor (4MB Cache, up to 4.1 GHz) |
| | |
| | Operating System More Info |
| | Windows 10 Home in S mode 64-bit, English |
| | Graphics Card |
| | Intel UHD Graphics with shared graphics memory |
| | Memory |
| | 4GB, onboard, LPDDR3, 2133MHz |
| | Hard Drive More Info |
| | 128GB M.2 PCIe NVMe Solid State Drive |
| Laptop-Proce | NotebookCheck, Intel Core i3-10110U, <u>https://www.notebookcheck.net/Intel-Core-i3-10110U-essor-Comet-Lake-U.430588.0.html</u> . |

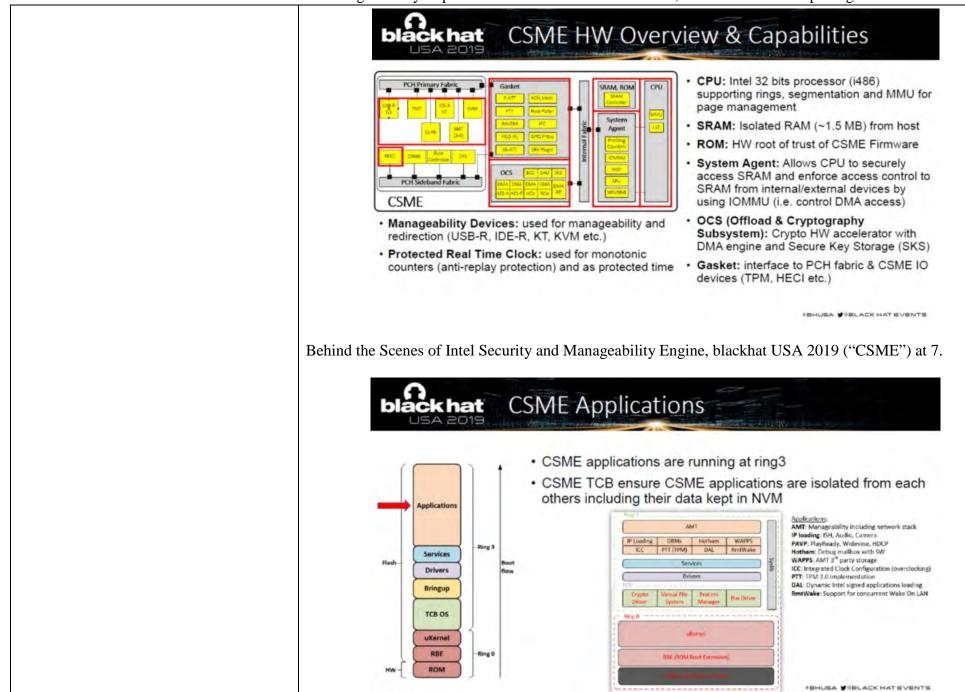
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 53 of 228 PageID #: 4985 U.S. Patent No. 9,436,809: Claim 1

| Table 2-24. | | lay supporte | d Implicati | | | | |
|--|------------------|-----------------------|------------------|-------------------------------|---------------------|-------------------------------------|------------------------|
| Торіс | HDCP Revision | Maximum Resolution | HDR ¹ | HDCP Solution ² | BPC ³ | Comments | |
| | HDCP1.4 | 4K@60 | No | iHDCP | 10 bit | Legacy Integrated for HDCP1.4 | |
| DP | HDCP2.2 | 4K@60 | Yes | iHDCP | 10 bit | New Integrated for HDCP2.2 | |
| | HDCP1.4 | 4K@30 | No | iHDCP | 8 bit | Legacy Integrated for HDCP1.4 | |
| | HDCP2.2 | 4K@30 | No | LSPCON | 8 bit | LSPCON HDCP2.2 required | |
| HDMI 1.4 | HDCP2.2 | 4K@30 | No | iHDCP4 | 8 bit | New Integrated for HDCP2.2 | |
| HDMI 2.0 | HDCP2.2 | 4K@60 | No | LSPCON | 12 bit (YUV 420) | LSPCON HDCP2.2 required | |
| HDMI2.0a | HDCP2.2 | 4K@60 | Yes | LSPCON | 12 bit (YUV 420) | LSPCON HDCP2.2 required | |
| tel, How | to | | enable | Hig | | Dynamic | Rang |
| tps://www.intel.com/co tel-processors.html. | ntent/www | <u>v/us/en/sup</u> | port/artic | <u>cies/0000321</u> | <u>12/graphic</u> | <u>s/graphics-fo</u> | <u>r-/th-generatio</u> |

| 6 | |
|------------------------|---|
| | Supported Technologies |
| | Intel[®] Virtualization Technology (Intel[®] VT) |
| | Intel[®] Active Management Technology 11.0 (Intel[®] AMT 11.0) |
| | Intel[®] Trusted Execution Technology (Intel[®] TXT) |
| | Intel[®] Streaming SIMD Extensions 4.2 (Intel[®] SSE4.2) |
| | Intel[®] Hyper-Threading Technology (Intel[®] HT Technology) |
| | • Intel [®] 64 Architecture |
| | Execute Disable Bit |
| | Intel [®] Turbo Boost Technology 2.0 |
| | Intel[®] Advanced Vector Extensions 2 (Intel[®] AVX2) Intel[®] Advanced Encryption Standard New Instructions (Intel[®] AES-NI) |
| | PCLMULQDQ (Perform Carry-Less Multiplication Quad word) Instruction |
| | Intel[®] Transactional Synchronization Extensions (Intel[®] TSX-NI) |
| | PAIR – Power Aware Interrupt Routing |
| | SMEP – Supervisor Mode Execution Protection |
| | Intel [®] Boot Guard |
| | Intel[®] Software Guard Extensions (Intel[®] SGX) |
| | Intel[®] Memory Protection Extensions (Intel[®] MPX) |
| | GMM Scoring Accelerator |
| | Intel [®] Processor Trace |
| | High Definition Content Protection (HDCP) 2.2 |
| Intel, 10 ^t | th Generation Intel Core Processors, Datasheet, Volume 1 or 2 (Jul. 2020, rev. 5), available at |
| | Irdv2.intel.com/v1/dl/getContent/615211, at 11-12. |
| source | is the technology for protecting high-definition content against unauthorized copy between a . and the sink The [Intel] [P]rocessor supports HDCP 1.4/2.3 for 4 k Premium content protection ed displays (HDMI* and DisplayPort*)." |
| | |

| Use heredwidth Digital Castert Protection (UDCD) |
|--|
| High-bandwidth Digital Content Protection (HDCP) |
| HDCP is the technology for protecting high-definition content against unauthorized copy or unreceptive between a source (computer, digital set top boxes, and so on) and the sink (panels, monitor, and TVs). The processor supports HDCP 1.4/2.3 for 4 k Premium content protection over wired displays (HDMI* and DisplayPort*). |
| <i>Id.</i> at 44 |
| Intel's "UHD" processor nomenclature also indicates support for HDCP 2.2: |
| Another change from 7 Gen to 8 Gen will be in the graphics. Intel is upgrading the nomenclature of the integrated graphics from HD 620 to UHD 620, indicating that the silicon is suited for 4K playback and processing. During our pre-briefing it was categorically stated several times that there was no change between the two, however we have since confirmed that the new chips will come with HDCP 2.2 support as standard for DP1.2a, removing the need for an external LSPCON for this feature. Other than this display controller change however, it appears that these new UHD iGPUs are architecturally the same as their HD predecessors. |
| AnandTech, <u>https://www.anandtech.com/show/11738/intel-launches-8th-generation-cpus-starting-with-kaby-lake-refresh-for-15w-mobile</u> . |
| HDCP 2.2 is implemented in Intel-based systems with Core-i series Processors within the Converged Security & Manageability Engine (CSME) also known as the Management Engine (ME). The CSME contains a processor (x86 core) which executes instructions including but not limited to the uKernel/OS, drivers, services, and applications for the CSME. |

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"1. A first device for controlling delivery of protected content to a second device, the first device comprising:"

Id. at 23.

One such application is "PAVP" which provides HDCP capabilities within the Intel processor.

- CSME applications are running at ring3
- CSME TCB ensure CSME applications are isolated from each others including their data kept in NVM

| | AN | AT | | |
|------------------|------------------------|--------------------|------------|--------|
| PLoading | DRMs | Hotham | WAPPS | |
| ICC | PTT (TPM) | DAL | RmtWake | |
| | Serv | ices | | Syslib |
| 1 | Driv | ers | | |
| Crypto Driver | Virtual File System | Process Managet | Bus Driver | |

Applications: AMT: Manageability including network stack IP loading: ISH, Audio, Camera PAVP: PlayReady, Widevine, HDCP Hotham: Debug mailbox with SW WAPPS: AMT 3rd party storage ICC: Integrated Clock Configuration (overclocking) PTT: TPM 2.0 implementation DAL: Dynamic Intel signed applications loading RmtWake: Support for concurrent Wake On LAN

Id.

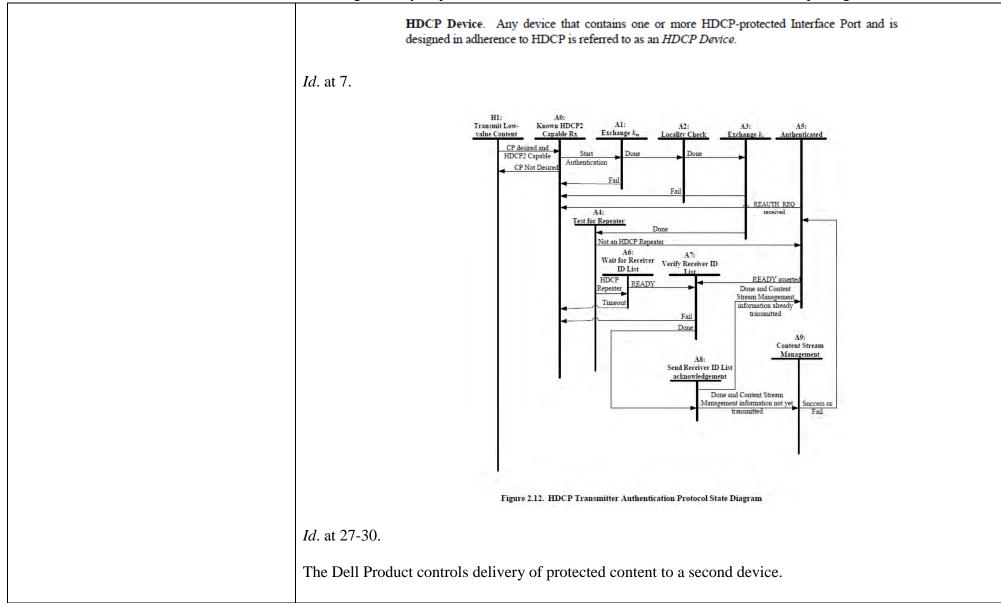
Upon information and belief, the Dell Product is compliant with the High-bandwidth Digital Content Protection System Revision 2.2 ("HDCP 2.2") protocol. The Dell Product supports HDCP 2.2 for protecting content between devices.

For the purpose of this specification, it is assumed that the Audiovisual content is transmitted over a HDMI based wired display link. In an HDCP System, two or more HDCP Devices are interconnected through an HDCP-protected Interface. The Audiovisual Content flows from the Upstream Content Control Function into the HDCP System at the most upstream HDCP Transmitter. From there the Audiovisual Content encrypted by the HDCP System, referred to as HDCP Content, flows through a tree-shaped topology of HDCP Receivers over HDCP-protected Interfaces. This specification describes a content protection mechanism for: (1) authentication of HDCP Receivers to their immediate upstream connection (i.e., an HDCP Transmitter), (2) revocation of HDCP Receivers that are determined by the Digital Content Protection, LLC, to be invalid, and (3) HDCP Encryption of Audiovisual Content over the HDCP-protected Interfaces between HDCP Transmitters and their downstream HDCP Receivers. HDCP Receivers may render the HDCP Content in audio and visual form for human consumption. HDCP Receivers may be HDCP Repeaters that serve as downstream HDCP Transmitters emitting the HDCP Content further downstream to one or more additional HDCP Receivers.

High-bandwidth Digital Content Protection System Mapping HDCP to HDMI Revision 2.2 13 February, 2013 ("HDMI HDCP 2.2") at 5.

| There are three elements of the content protection system. Each element plays a specific role in the system. First, there is the authentication protocol, through which the HDCP Transmitter verifies that a given HDCP Receiver is licensed to receive HDCP Content. The authentication protocol is implemented between the HDCP Transmitter and its corresponding downstream HDCP Receiver. With the legitimacy of the HDCP Receiver determined, encrypted HDCP Content is transmitted between the two devices based on shared secrets established during the authentication protocol. This prevents eavesdropping devices from utilizing the content. Finally, in the event that legitimate devices are compromised to permit unauthorized use of HDCP Content, renewability allows an HDCP Transmitter to identify such compromised devices and prevent the transmission of HDCP Content. This document contains chapters describing in detail the requirements of each of these elements. In addition, a chapter is devoted to describing the cipher structure that is used in the encryption of HDCP Content. |
|---|
| <i>Id.</i> at 9. |
| The Dell Product is an HDCP Device, and more specifically an HDCP 2.2-compliant Device, capable of functioning as an HDCP Transmitter and that implements required functionality of HDMI HDCP 2.2 including the functions required by the HDCP Transmitter State Diagram. |
| The state machines in this specification define the required behavior of HDCP Devices. The link- visible behavior of HDCP Devices implementing the specified state machines must be identical, even if implementations differ from the descriptions. The behavior of HDCP Devices implementing the specified state machines must also be identical from the perspective of an entity outside of the HDCP System. |
| Implementations must include all elements of the content protection system described herein, unless the element is specifically identified as informative or optional. Adopters must also ensure that implementations satisfy the robustness and compliance rules described in the technology license. |
| <i>Id.</i> at 5. |
| HDCP 2.2-compliant Device. An HDCP Device that is designed in adherence to HDCP 2.2 is referred to as an HDCP 2.2-compliant Device. |
| <i>Id.</i> at 6. |

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| 0 | | |
|--------------------|-----|---|
| | 2.1 | Overview The HDCP authentication protocol is an exchange between an HDCP Transmitter and an HDCP Receiver that affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. It is comprised of the following stages Authentication and Key Exchange (AKE) – The HDCP Receiver's public key certificate is verified by the HDCP Transmitter. A Master Key k_m is exchanged. |
| | | Locality Check – The HDCP Transmitter enforces locality on the content by requiring that the Round Trip Time (RTT) between a pair of messages is not more than 20 ms. Session Key Exchange (SKE) – The HDCP Transmitter exchanges Session Key k_s with the HDCP Receiver. |
| | | Authentication with Repeaters – The step is performed by the HDCP Transmitter only with HDCP Repeaters. In this step, the repeater assembles downstream topology information and forwards it to the upstream HDCP Transmitter. Successful completion of AKE and locality check stages affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. At the end of the authentication protocol, a communication path is established between the HDCP Transmitter and HDCP Receiver that only Authorized Devices can access. |
| <i>Id</i> . at 11. | | |

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| | "a memory;" |
|-----------|--|
| a memory; | The Dell Product includes a memory. |
| | For example, the Intel Processor includes a 4MB cache and the Dell Product also includes a 4GB onboard LPDDR3 memory in addition to a 128GB solid state hard drive. |
| | Inspiron 13 5000 Laptop |
| | Configurations |
| | Processor More Info |
| | 10th Generation Intel® Core™ i3-10110U Processor (4MB Cache, up to 4.1 GHz) |
| | Operating System More Info |
| | Windows 10 Home in S mode 64-bit, English |
| | Graphics Card |
| | Intel UHD Graphics with shared graphics memory |
| | Memory |
| | 4GB, onboard, LPDDR3, 2133MHz |
| | Hard Drive More Info |
| | 128GB M.2 PCIe NVMe Solid State Drive |
| | Dell Inspiron 13 5000 Laptop, <u>https://www.dell.com/en-us/member/shop/dell-laptops/inspiron-13-5000 laptop/spd/inspiron-13-5391-wifi-laptop/nn5391dopvh#features_section</u> . |
| | |

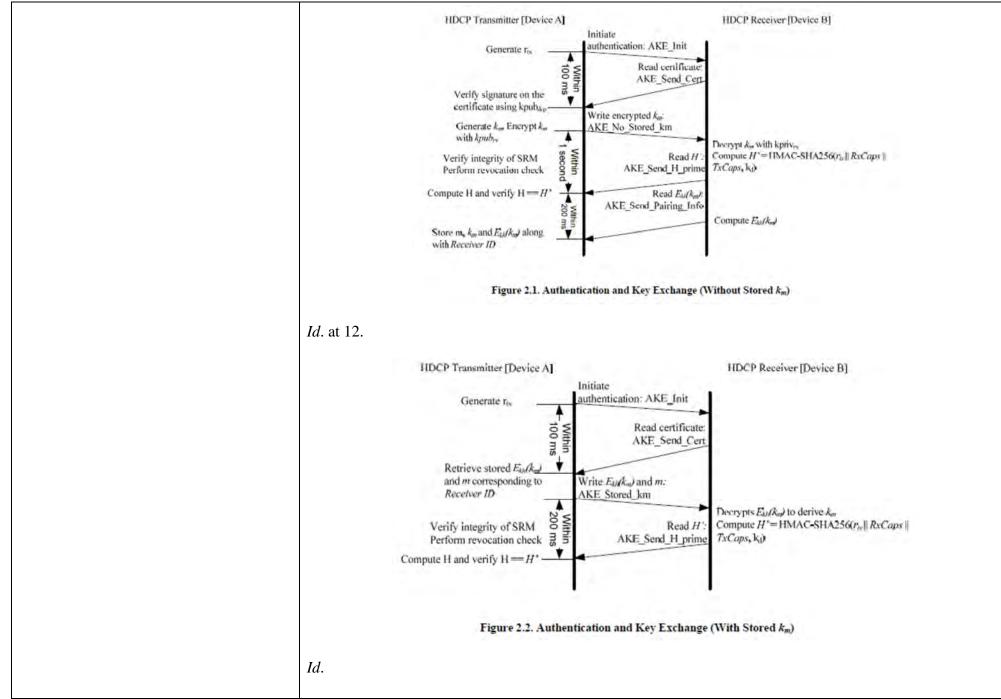
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 62 of 228 PageID #: 4994 U.S. Patent No. 9,436,809: Claim 1

"a processor, said processor arranged to:"

| ., . | | |
|--|---|--|
| a processor, said processor arranged to: | The Dell Product includes a processor. | |
| | For example, the Dell Product includes the Intel Processor integrated with the Intel GPU. | |
| | Inspiron 13 5000 Laptop | |
| | Configurations | |
| | Processor More Info | |
| | 10th Generation Intel® Core™ i3-10110U Processor (4MB Cache, up to 4.1 GHz) | |
| | Operating System More Info | |
| | Windows 10 Home in S mode 64-bit, English | |
| | Graphics Card | |
| | Intel UHD Graphics with shared graphics memory | |
| | Memory | |
| | 4GB, onboard, LPDDR3, 2133MHz | |
| | Hard Drive More Info | |
| | 128GB M.2 PCIe NVMe Solid State Drive | |
| | Dell Inspiron 13 5000 Laptop, <u>https://www.dell.com/en-us/member/shop/dell-laptops/inspiron-13-5000-laptop/spd/inspiron-13-5391-wifi-laptop/nn5391dopvh#features_section</u> ; <i>see also</i> NotebookCheck, Intel Core i3-10110U, <u>https://www.notebookcheck.net/Intel-Core-i3-10110U-Laptop-Processor-Comet-Lake-U.430588.0.html</u> . | |

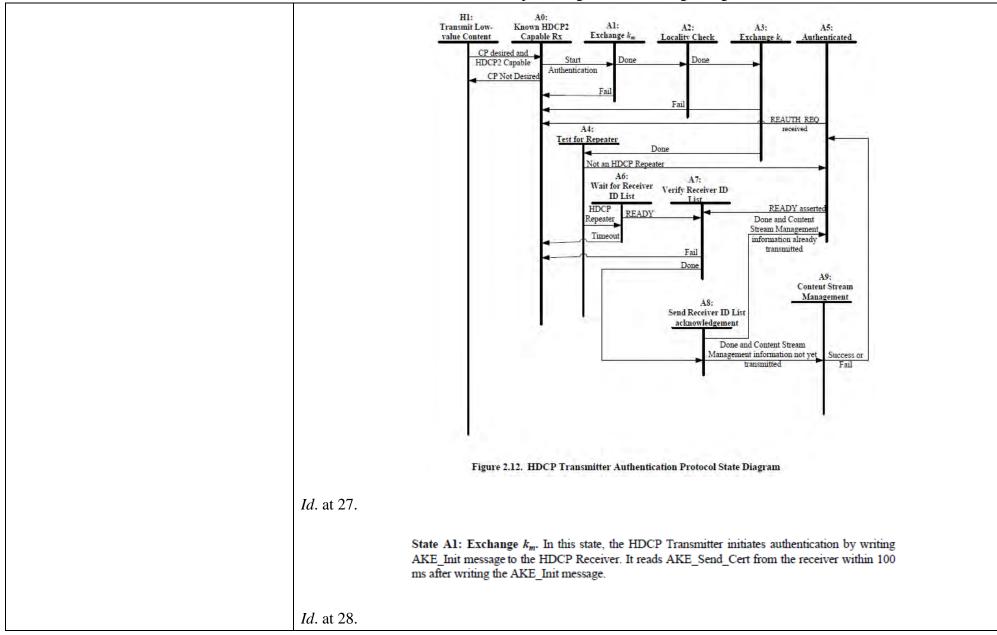
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24. Page 63 of 228 PageID #: 4995 U.S. Patent No. 9,436,809: Claim 1

| receive a certificate of the second device. | , | | 1 | arranged to receive a certificate of the second device, $e.g.$, $cert_{rx}$, as | part |
|---|--|----------------|-----------------|--|-------|
| the certificate providing information | of the Authentication and Key Exchange (AKE) stage of the HDCP 2.2 protocol, the certificate providing | | | - | |
| regarding the second device; | information regarding the second device. | | | - | |
| | | | | | |
| | | | | iver ID for the second device, Receiver Public Key for the second dev | vice, |
| | and a cryptographic s | ignatu | ire, among | st other information. | |
| | | | | | |
| | | | | ed 1024-bit RSA public and private keys. The public key is stored in a ed by DCP LLC, denoted by <i>cert_{re}</i> . Table 2.1 gives the fields contained | |
| | | | | are stored in big-endian format. | |
| | | | | | |
| | Name | Size (bits) | Bit position | Function | |
| | Receiver ID | 40 | 4175:4136 | Unique receiver identifier. It has the same format as an HDCP 1.x KSV i.e. it contains 20 ones and 20 zeroes | |
| | Receiver Public Key | 1048 | 4135:3088 | Unique RSA public key of HDCP Receiver denoted by $kpub_m$. The first 1024 bits is the big-endian representation of the modulus n and the trailing 24 bits is the big-endian representation of the public exponent e | |
| | Reserved2 | 4 | 3087:3084 | Reserved for future definition. Must be 0x0 or 0x1. | |
| | Reserved1 | 12 | 3083:3072 | Reserved for future definition. Must be 0x000 | |
| | DCP LLC Signature | 3072 | 3071:0 | A cryptographic signature calculated over all preceding fields of the certificate. RSASSA-PKCS1-v1_5 is the signature scheme used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function | |
| | | | Table | 2.1. Public Key Certificate of HDCP Receiver | |
| | | | | | |
| | HDMI HDCP 2.2 at 1 | 11. | | | |
| | | | | | |
| | Public Key Certificate. Each HDCP Receiver is issued a Public Key Certificate signed by DCP | | | | |
| | LLC, and | contair | is the Receiv | ver ID and RSA public key corresponding to the HDCP Receiver. | |
| | | | | | |
| | <i>Id</i> . at 8. | | | | |
| | | | .1 | | 0 |
| | | | | cate from the second device as part of the AKE stage, irrespectiv r Key k_m stored corresponding to the Receiver ID. | e of |
| | | | | | |



| | - <u>B</u> |
|---|---|
| The Dell Product receives the certificate from the second device | as part of the AKE_Send_Cert message. |
| Reads AKE_Send_Cert from the receiver containing cert (r_m) and <i>RxCaps</i> . REPEATER bit in <i>RxCaps</i> indicates we an HDCP Repeater. If REPEATER is set to one, it ind Repeater. If REPEATER is zero, the receiver is a AKE_Send_Cert message must be available for the transform the time the transmitter finishes writing the AKE_HDCP Receiver. If the AKE_Send_Cert message is not read within 100 ms, the transmitter aborts the authentication of the transmitter aborts the authentication of the transmitter aborts the authentication. | thether the connected receiver is licates the receiver is an HDCP not an HDCP Repeater. The nomitter to read within 100 ms Init message parameters to the t available for the transmitter to |
| <i>Id.</i> at 13. | |
| The HDCP Receiver | |
| Makes available the AKE_Send_Cert message for the AKE_Init. The AKE_Send_Cert message must be a within 100 ms from the time the transmitter finish parameters to the HDCP Receiver. | vailable for the transmitter to read |
| <i>Id</i> . at 14. | |
| 4.2.2 AKE_Send_Cert (Read) | |
| The HDCP Transmitter attempts to read AKE_Send_C after writing the AKE_Init message i.e. after the last byte | |
| Syntax | No. of Bytes |
| AKE_Send_Cert { | . to. or Dytes |
| msg id (=3) | 1 |
| cert _m [41750] | 522 |
| r _{rz} [630] | 8 |
| RxCaps | 3 |
| Table 4.3. AKE_Send_Cert Format | |
| | |
| <i>Id</i> . at 57. | |
| See also: | |
| | |

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Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 67 of 228 PageID #: 4999 U.S. Patent No. 9,436,809: Claim 1

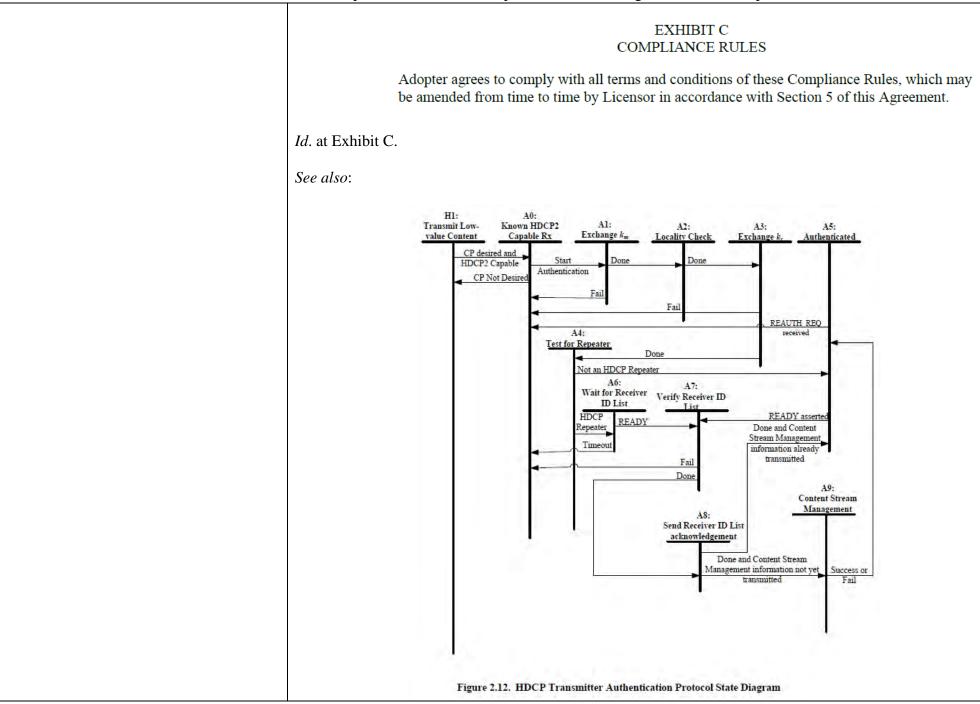
"determine whether the second device is compliant with a set of compliance rules utilizing said information provided in said certificate;"

| determine whether the second device is | The processor of the Dell Product is arranged to determine whether the second device is compliant with a set | | | | | | |
|---|---|---|-----------------|--|--|--|--|
| compliant with a set of compliance rules | of compliance rules utilizing said information provided in said certificate. | | | | | | |
| utilizing said information provided in said | | | | | | | |
| certificate; | The Dell Product dete | The Dell Product determines, as part of the Authentication and Key Exchange (AKE) stage, whether the second | | | | | |
| | device is compliant w | vith a s | set of comp | pliance rules using the information provided in the certificate, e.g., cert _{rx} | | | |
| | For example, $cert_{rx}$ in | nclude | s a Receiv | er ID, Receiver Public Key, and a cryptographic signature. | | | |
| | | | | | | | |
| | The | HDCP R | eceiver is issi | aed 1024-bit RSA public and private keys. The public key is stored in a | | | |
| | | | | ed by DCP LLC, denoted by <i>cert_{re}</i> . Table 2.1 gives the fields contained | | | |
| | in the | certifica | ate. All values | are stored in big-endian format. | | | |
| | | | 1.2 | | | | |
| | Name | Size (bits) | Bit position | Function | | | |
| | Receiver ID | 40 | 4175:4136 | Unique receiver identifier. It has the same format as an HDCP 1.x KSV i.e. it contains 20 ones and 20 zeroes | | | |
| | Receiver Public Key | 1048 | 4135:3088 | Unique RSA public key of HDCP Receiver denoted by $kpub_{rx}$. The first 1024 bits is the big-endian representation of the modulus n and the trailing 24 bits is the big-endian representation of the public exponent e | | | |
| | Reserved2 | 4 | 3087:3084 | Reserved for future definition. Must be 0x0 or 0x1. | | | |
| | Reserved1 | 12 | 3083:3072 | Reserved for future definition. Must be 0x000 | | | |
| | DCP LLC Signature | 3072 | 3071:0 | A cryptographic signature calculated over all preceding fields of the certificate. RSASSA-PKCS1-v1_5 is the signature scheme used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function | | | |
| | Table 2.1. Public Key Certificate of HDCP Receiver | | | | | | |
| | | | | | | | |
| | HDMI HDCP 2.2 at | 11. | | | | | |
| | | • | | | | | |
| | The Dell Product determines, for example, whether the certificate conforms with the format established by the | | | | | | |
| | | | | (corpted above) and indicates a valid signature and a Receiver ID that is | | | |
| | not in a revocation lis | • | . at 11, CA | corpled above) and moleates a valid signature and a Receiver ID that is | | | |
| | not in a revocation ins | st. | | | | | |
| | | | | | | | |

"determine whether the second device is compliant with a set of compliance rules utilizing said information provided in said certificate;"

| Extracts Receiver ID from cert _{rx} |
|---|
| If the HDCP Transmitter does not have a 128-bit Master Key k_m stored corresponding to the <i>Receiver ID</i> (See Section 2.2.1) |
| Verifies the signature on the certificate using kpub_{dcp}. Failure of signature verification constitutes an authentication failure and the HDCP Transmitter aborts the authentication protocol. |
| Generates a pseudo-random 128-bit Master Key k_m. Encrypts k_m with kpub_{rx} (E_{kpub}(km)) and sends AKE_No_Stored_km message to the receiver containing the 1024-bit E_{kpub}(km). RSAES-OAEP encryption scheme must be used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function. The mask generation function used is MGF1 which uses SHA-256 as its underlying hash function. |
| Verifies integrity of the System Renewability Message (SRM). It does this by checking the signature of the SRM using kpub_{dcp}. Failure of this integrity check constitutes an authentication failure and causes the HDCP Transmitter to abort authentication protocol. |
| The top-level HDCP Transmitter checks to see if the <i>Receiver ID</i> of the connected device is found in the revocation list. If the <i>Receiver ID</i> of the connected HDCP Device is found in the revocation list, authentication fails and the authentication protocol is aborted. SRM integrity check and revocation check are performed only by the top-level HDCP Transmitter. |
| <i>Id.</i> at 13. |
| A valid signature in the certificate indicates, for example, that the second device is compliant with a set of compliance rules of the HDCP specification. |
| 1.9 " Compliance Rules " means the technical requirements set out in Exhibit C, as such exhibit may be amended by Licensor from time to time in accordance with the terms of this Agreement. |
| HDCP License Agreement, March 6, 2017, at 2, <i>available at</i> <u>https://digital-cp.com/sites/default/files/HDCP%20License%20Agreement_March%206%2C%202017_FOR%20REVIEW%20ONLY.pdf</u> . |

"determine whether the second device is compliant with a set of compliance rules utilizing said information provided in said certificate;"



| r | |
|---|---|
| | HDMI HDCP 2.2 at 27. |
| | State A0: Rx Known to be HDCP 2 Capable. If state A0 is reached when content protection is desired by the Upstream Content Control Function, authentication must be started immediately by the transmitter if the receiver is HDCP 2 capable. A valid video screen is displayed to the user with encryption disabled during this time. |
| | Transition A0:A1. The transmitter initiates the authentication protocol. |
| | State A1: Exchange k_m . In this state, the HDCP Transmitter initiates authentication by writing AKE_Init message to the HDCP Receiver. It reads AKE_Send_Cert from the receiver within 100 ms after writing the AKE_Init message. |
| | If the HDCP Transmitter does not have k_m stored corresponding to the <i>Receiver ID</i> , it generates $E_{kpub}(km)$ and sends $E_{kpub}(km)$ as part of the AKE_No_Stored_km message to the receiver after verification of signature on <i>cert_{mx}</i> . It performs integrity check on the SRM and checks to see whether the <i>Receiver ID</i> of the connected HDCP Device is in the revocation list. It computes H, reads AKE_Send_H_prime message from the receiver containing H' within one second after writing AKE_No_Stored_km to the receiver and compares H' against H. |
| | If the HDCP Transmitter has k_m stored corresponding to the <i>Receiver ID</i> , it writes AKE_Stored_km message containing $E_{kh}(k_m)$ and <i>m</i> to the receiver, performs integrity check on the SRM and checks to see whether the <i>Receiver ID</i> of the connected HDCP Device is in the revocation list. It computes H, reads AKE_Send_H_prime message from the receiver containing H' within 200 ms after writing AKE_Stored_km to the receiver and compares H' against H. |
| | <i>Id.</i> at 28. |

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"provide a first signal to the second device depending when the second device is determined to be compliant with the set of compliance rules;"

provide a first signal to the second device depending when the second device is determined to be compliant with the set of compliance rules;

The processor of the Dell Product is arranged to provide a first signal, e.g., the LC_Init message including r_n , to the second device depending when the second device is determined to be compliant with the set of compliance rules.

The Dell Product provides the LC_Init message including r_n to the second device when the Dell Product determines in the Authentication and Key Exchange (AKE) stage that the certificate, *cert_{rx}*, indicates that the second device is compliant with the set of compliance rules. For example, the certificate, *cert_{rx}*, includes a Receiver ID, Receiver Public Key, and a cryptographic signature.

The HDCP Receiver is issued 1024-bit RSA public and private keys. The public key is stored in a Public Key Certificate issued by DCP LLC, denoted by $cert_{rx}$. Table 2.1 gives the fields contained in the certificate. All values are stored in big-endian format.

| Name | Size (bits) | Bit position | Function |
|---------------------------|----------------|-----------------|--|
| Receiver ID | 40 | 4175:4136 | Unique receiver identifier. It has the same format as an HDCP 1.x KSV i.e. it contains 20 ones and 20 zeroes |
| Receiver Public Key | 1048 | 4135:3088 | Unique RSA public key of HDCP Receiver denoted by $kpub_{rx}$. The first 1024 bits is the big-endian representation of the modulus n and the trailing 24 bits is the big-endian representation of the public exponent e |
| Reserved2 | 4 | 3087:3084 | Reserved for future definition. Must be 0x0 or 0x1. |
| Reserved1 | 12 | 3083:3072 | Reserved for future definition. Must be 0x000 |
| DCP LLC Signature | 3072 | 3071:0 | A cryptographic signature calculated over all preceding fields of the certificate. RSASSA-PKCS1-v1_5 is the signature scheme used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function |

Table 2.1. Public Key Certificate of HDCP Receiver

HDMI HDCP 2.2 at 11.

2.3 Locality Check

Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r_n to the downstream receiver.

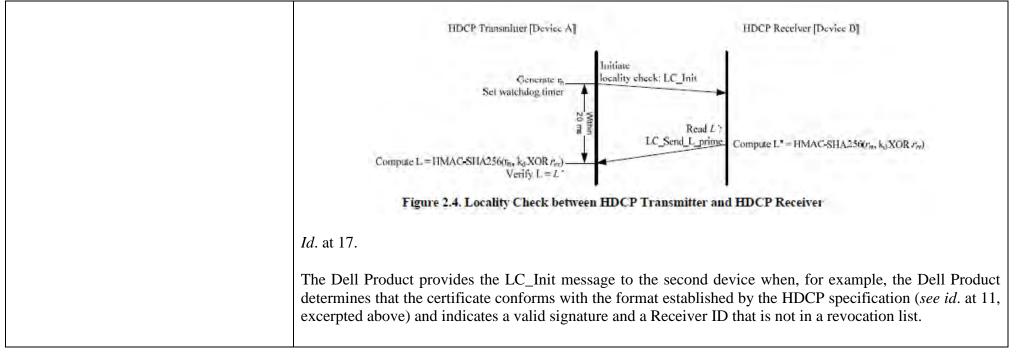
The HDCP Transmitter

 Initiates locality check by writing the LC_Init message containing a 64-bit pseudorandom nonce r_n to the HDCP Receiver.

Id. at 16.

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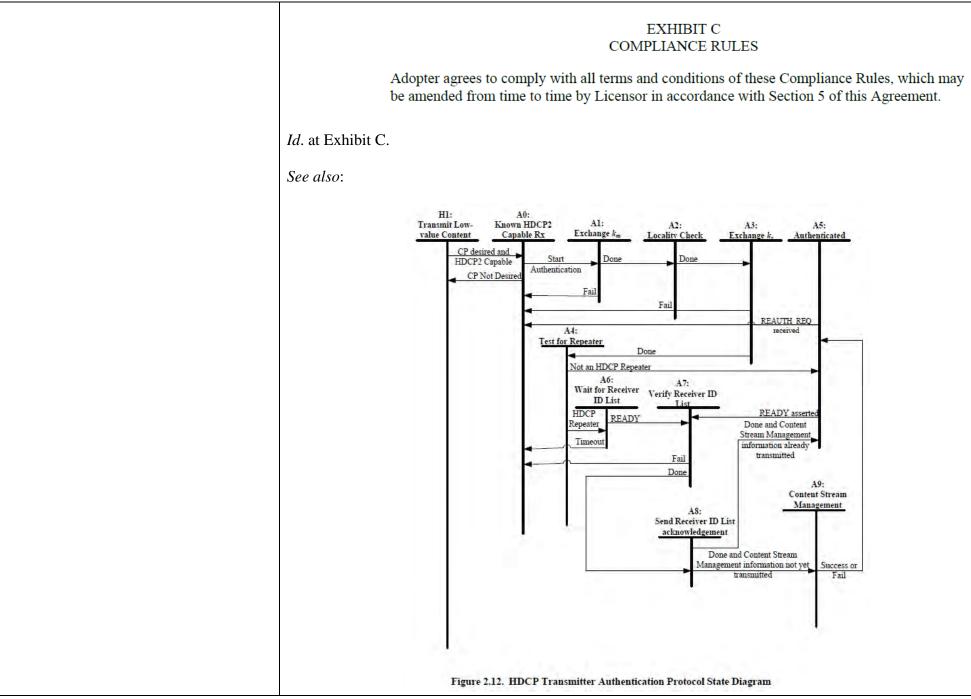
"provide a first signal to the second device depending when the second device is determined to be compliant with the set of compliance rules;"



"provide a first signal to the second device depending when the second device is determined to be compliant with the set of compliance rules;"

| provide a first signal to the second de | evice depending when the second device is determined to be compliant with the set of compliance rules; |
|---|---|
| | Extracts Receiver ID from cert _{rx} |
| | If the HDCP Transmitter does not have a 128-bit Master Key k_m stored corresponding to the <i>Receiver ID</i> (See Section 2.2.1) |
| | Verifies the signature on the certificate using kpub_{dep}. Failure of signature verification constitutes an authentication failure and the HDCP Transmitter aborts the authentication protocol. |
| | Generates a pseudo-random 128-bit Master Key k_m. Encrypts k_m with kpub_{rx} (E_{kpub}(km)) and sends AKE_No_Stored_km message to the receiver containing the 1024-bit E_{kpub}(km). RSAES-OAEP encryption scheme must be used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function. The mask generation function used is MGF1 which uses SHA-256 as its underlying hash function. |
| | Verifies integrity of the System Renewability Message (SRM). It does this by checking the signature of the SRM using kpub_{dcp}. Failure of this integrity check constitutes an authentication failure and causes the HDCP Transmitter to abort authentication protocol. |
| | The top-level HDCP Transmitter checks to see if the <i>Receiver ID</i> of the connected device is found in the revocation list. If the <i>Receiver ID</i> of the connected HDCP Device is found in the revocation list, authentication fails and the authentication protocol is aborted. SRM integrity check and revocation check are performed only by the top-level HDCP Transmitter. |
| | <i>Id.</i> at 13. |
| | A valid signature in the certificate indicates, for example, that the second device is compliant with a set of compliance rules of the HDCP specification. |
| | 1.9 " Compliance Rules " means the technical requirements set out in Exhibit C, as such exhibit may be amended by Licensor from time to time in accordance with the terms of this Agreement. |
| | HDCP License Agreement, March 6, 2017, at 2. |

"provide a first signal to the second device depending when the second device is determined to be compliant with the set of compliance rules;"



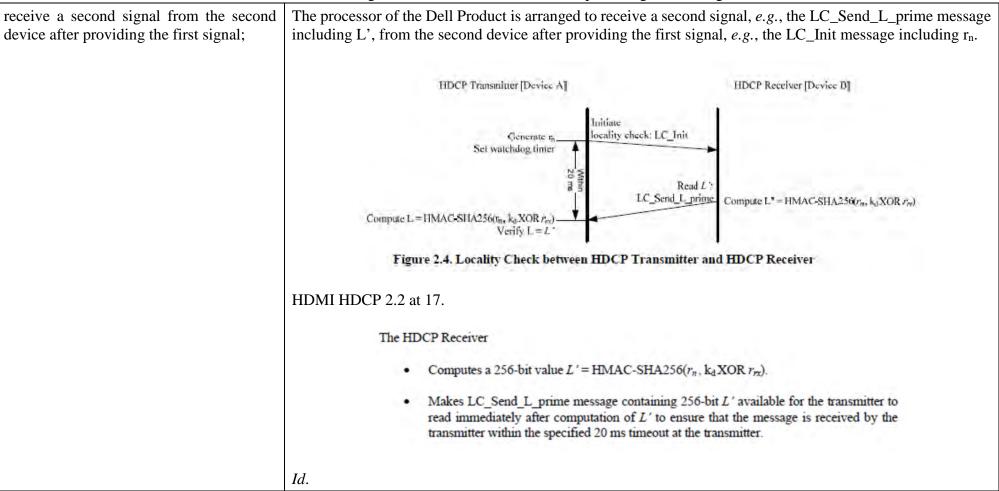
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24 . Page 75 of 228 PageID #: 5007 U.S. Patent No. 9,436,809: Claim I

"provide a first signal to the second device depending when the second device is determined to be compliant with the set of compliance rules;"

| HDMI HDCP 2.2 at 27. |
|---|
| Transition A1:A2. The HDCP Transmitter implements locality check after successful completion of AKE and pairing. |
| State A2: Locality Check. In this state, the HDCP Transmitter implements the locality check as explained in Section 2.3 with the HDCP Receiver. |
| <i>Id.</i> at 28. |

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"receive a second signal from the second device after providing the first signal;"

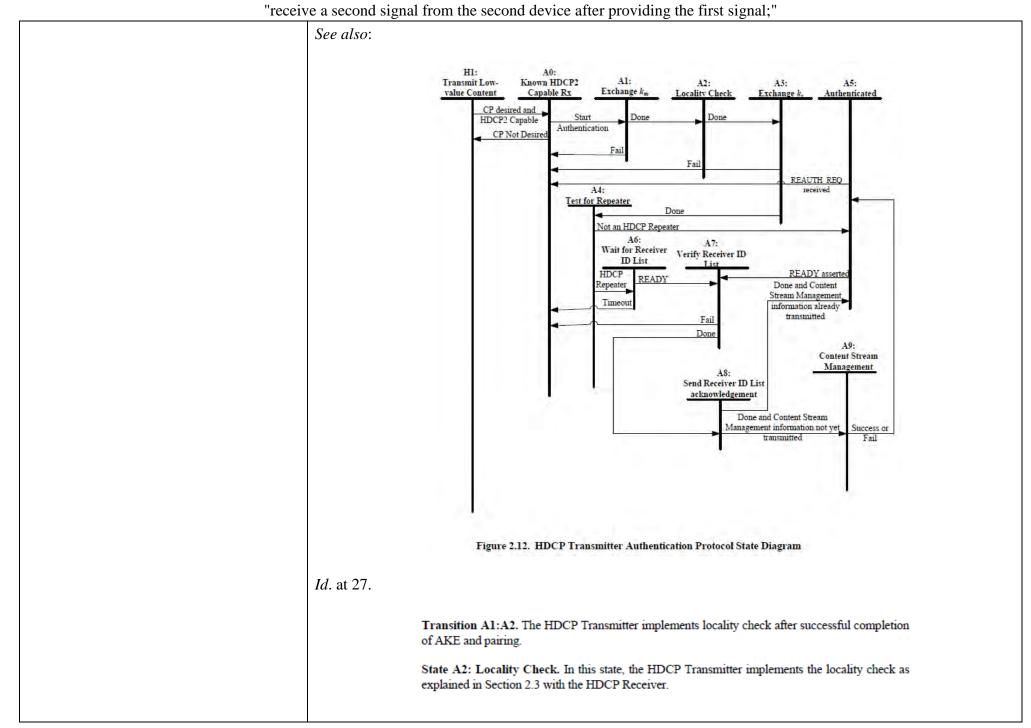


Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 77 of 228 PageID #: 5009 U.S. Patent No. 9,436,809: Claim 1

"receive a second signal from the second device after providing the first signal;"

| U | | 1 0 | 6 | |
|--------------------|--------|--|--|----------------------------|
| 2 | 2.3 Lo | cality Check | | |
| | | Locality check is performed after AKE and pairing. The | | cality check |
| | | by sending a 64-bit pseudo-random nonce r_n to the down | istream receiver. | |
| | | The HDCP Transmitter | | |
| | | Initiates locality check by writing the LC_I random nonce r_n to the HDCP Receiver. | nit message containing a 64- | bit pseudo- |
| | | Sets its watchdog timer to 20 ms. The LC_Set the transmitter within 20 ms from the time th message parameters to the HDCP Receiver. I expires before the last byte of the LC_Set transmitter. The transmitter then aborts the autility | the transmitter finishes writing the Locality check fails if the water ad_L_prime message is received. | the LC_Init chdog timer |
| | | Computes L = HMAC-SHA256(r_n, k_d XOR over r_n and the key used for HMAC is k_d XO significant 64-bits of k_d. | r_{ix}) where HMAC-SHA256 is DR r_{ix} , where r_{ix} is XORed with | s computed h the least- |
| | | On reading LC_Send_L_prime message from check fails if L is not equal to L'. | the receiver, compares L and I | L'. Locality |
| <i>Id</i> . at 16. | | | | |
| | | | | |
| | | 4.2.7 LC_Init (Write) | | |
| | | Syntax | No. of Bytes | |
| | | LC_Init { msg_id (=9) | 1 | |
| | | r _n [630] | 8 | |
| | | } | | |
| | | Table 4.9. LC_Init Format | | |
| | | | | |
| <i>Id.</i> at 59. | | | | |
| | | | | |
| | | 4.2.8 LC_Send_L_prime (Read) | terrent and anishin 20 mm form | |
| | | The LC_Send_L_prime message must be available for the the time the transmitter finishes writing the LC_Init messag after the last byte of r_n has been written. | | |
| | | Syntax | No. of Bytes | |
| | | LC_Send_L_prime{ | | |
| | | msg_id (=10) L [255.0] | 1 32 | |
| | |) Table 4.10. LC_Send_L_prime Format | | |
| | | · · · · · · · · · · · · · · · · · · · | | |
| Id. | | | | |
| | | | | |
| | | | | |

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Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 79 of 228 PageID #: 5011 U.S. Patent No. 9,436,809: Claim 1

"receive a second signal from the second device after providing the first signal;"

|--|

Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 80 of 228 PageID #: 5012 U.S. Patent No. 9,436,809: Claim 1

| determine whether the second signal is | |
|--|--|
| derived from a secret known by the first | a secret known by the Dell Product (first device). |
| device; | The HDCP 2.2 Locality Check must be passed prior to session key exchange and establishment of a secure communications path for the Dell Product to provide protected content to the second device. |
| | The HDCP authentication protocol is an exchange between an HDCP Transmitter and an HDCP Receiver that affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. It is comprised of the following stages |
| | Authentication and Key Exchange (AKE) – The HDCP Receiver's public key certificate is verified by the HDCP Transmitter. A Master Key k_m is exchanged. |
| | Locality Check – The HDCP Transmitter enforces locality on the content by requiring that the Round Trip Time (RTT) between a pair of messages is not more than 20 ms. |
| | Session Key Exchange (SKE) – The HDCP Transmitter exchanges Session Key k_s with the HDCP Receiver. |
| | Authentication with Repeaters – The step is performed by the HDCP Transmitter only with HDCP Repeaters. In this step, the repeater assembles downstream topology information and forwards it to the upstream HDCP Transmitter. |
| | Successful completion of AKE and locality check stages affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. At the end of the authentication protocol, a communication path is established between the HDCP Transmitter and HDCP Receiver that only Authorized Devices can access. |
| | HDMI HDCP 2.2 at 11. |
| | The Locality Check requires the Dell Product (transmitter) to determine that L' received via the LC_Send_L_prime message is derived from a secret by matching L' to value L which is derived from the secret (<i>e.g.</i> , L is computed based on k_d , which is based on dkey ₀ and dkey ₁ , each of which is based on the Master Key, k_m). |
| | |

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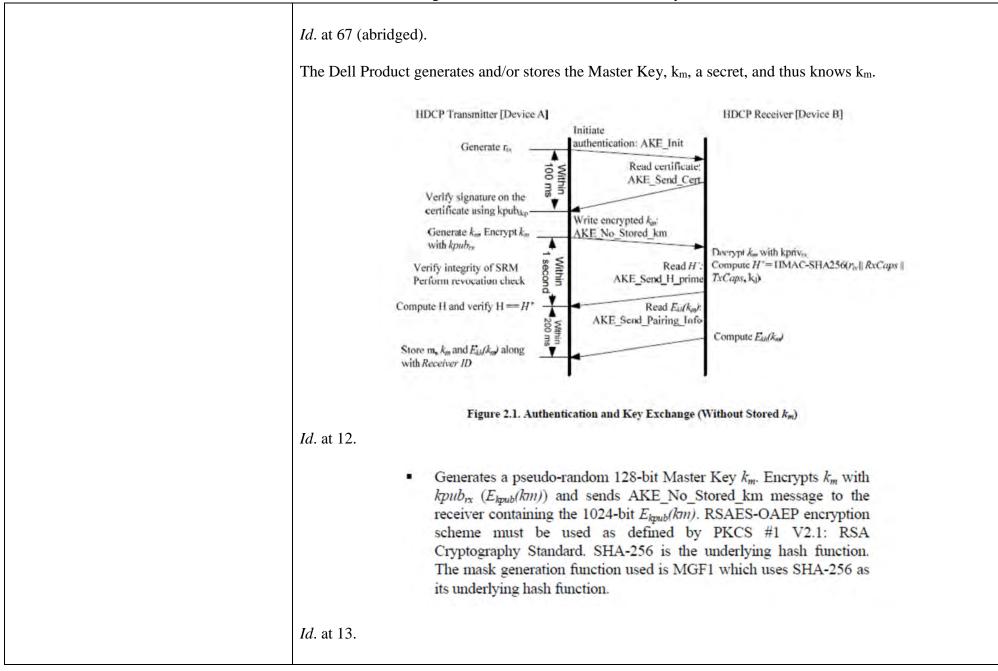
| 2.3 | Locality Check Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r _n to the downstream receiver. The HDCP Transmitter |
|-------------------|---|
| | Initiates locality check by writing the LC_Init message containing a 64-bit pseudo-random nonce r_n to the HDCP Receiver. Sets its watchdog timer to 20 ms. The LC_Send_L_prime message must be received by the transmitter within 20 ms from the time the transmitter finishes writing the LC_Init |
| | message parameters to the HDCP Receiver. Locality check fails if the watchdog timer expires before the last byte of the LC_Send_L_prime message is received by the transmitter. The transmitter then aborts the authentication protocol. Computes L = HMAC-SHA256(r_n, k_d XOR r_{rx}) where HMAC-SHA256 is computed |
| | over r_n and the key used for HMAC is k_dXOR r_n, where r_n is XORed with the least-significant 64-bits of k_d. On reading LC_Send_L_prime message from the receiver, compares L and L'. Locality check fails if L is not equal to L'. |
| <i>Id.</i> at 16. | |

| HDCP Transmitter [Device A] HDCP Receiver [Device B] | |
|---|----|
| Generate r _n Initiate locality check: L.C_Init Set watchdog timer Read L.': L.C_Send L. prime. Compute L'=HMAC-SHA256(r., k/XOR r.) | |
| Compute L = HMAC-SHA256(r_n , k_d XOR r_{r_d}) Verify L = L' | |
| Figure 2.4. Locality Check between HDCP Transmitter and HDCP Receiver | |
| The HDCP Receiver | |
| • Computes a 256-bit value $L' = \text{HMAC-SHA256}(r_n, k_d \text{XOR } r_m)$. | |
| Makes LC_Send_L_prime message containing 256-bit L' available for the transmitter to read immediately after computation of L' to ensure that the message is received by the transmitter within the specified 20 ms timeout at the transmitter. | |
| In the case of a locality check failure due to expiration of the watchdog timer or due to mismatch of L and L' at the HDCP Transmitter, locality check may be reattempted by the HDCP Transmitter for a maximum of 1023 additional attempts (for a maximum allowed 1024 total trials) with the transmission of an LC_Init message containing a new r_n . Failure of locality check on the first attempt and subsequent zero or more reattempts results in an authentication failure and the authentication protocol is aborted. | |
| <i>Id.</i> at 17. | |
| The second signal, <i>e.g.</i> , L', is derived from a secret. | |
| The value of L' is derived from k_d . | |
| Compute L' = HMAC-SHA256(r_n , k_d XOR r_r) | |
| Id. | |
| The value of k_d is based upon dkey ₀ and dkey ₁ , each of which is derived from k_m , the Master Ke | у. |

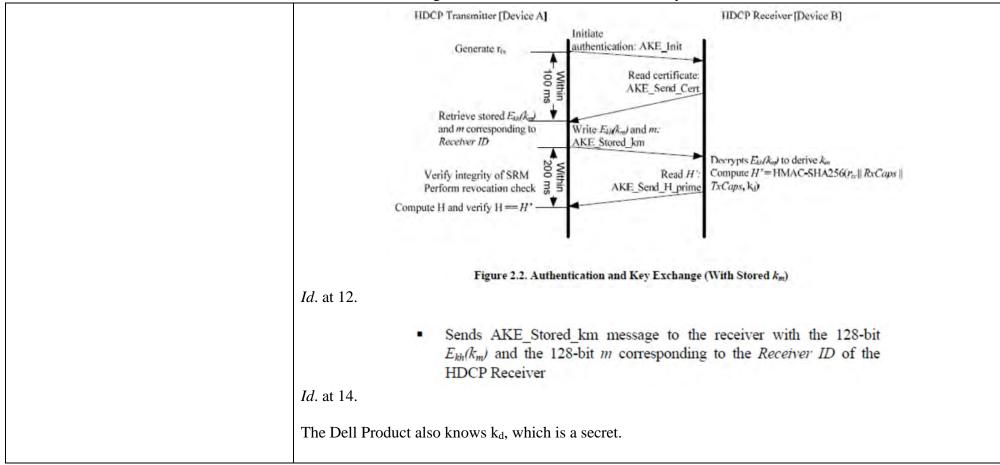
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| | Per dke | forms key deriv ey ₀ dkey ₁ , wh | vation as exp ere dkey ₀ an | plained in Sec d dkey ₁ are d | ction 2.7 to generate 256-bit k_d . k_d = erived keys generated when ctr = 0 in big-endian order. |
|---------------|---|--|---|---|---|
| Id. a | t 14-15. | | | | |
| | | | | $r_{tx} \parallel 0$ | r_{xx} XOR etr) |
| | | | | | 128/ |
| | | | $k_m \operatorname{XOR} i$ | r _a 128 | JES-CTR |
| | | | | | 128 |
| | | | | | dkeyi |
| | | | F | igure 2.10. Key De | rivation |
| Id. a | t 25. | | | | |
| | Tran | ter Key. A 128 smitter and the HI P Transmitter with | OCP Receiver | during Authenti | raphic key negotiated between the HDCP cation and Key Exchange and used to pair the |
| <i>Id</i> . a | | | | | |
| Each | n of k _m , k _d , dk | ey_0 and $dkey_1$ is | is a secret. | | |
| | Value | Confidentiality Required [±] ? | Integrity Required [±] ? | Value used by Core Functions? | Core Function |
| | k _m | Yes | Yes* | Yes | Handling of Master Key, during AKE (including Pairing) and Key Derivation, in plaintext form |
| | ks | Yes | Yes* | No | N/A |
| | dkey0,dkey1 | Yes | Yes* | No | N/A |

Document 92, Filed 09/23/24, Page 84 of 228 PageID #: 5016 U.S. Patent No. 9,436,809: Claim I Case 1:20-cv-01243-CFC



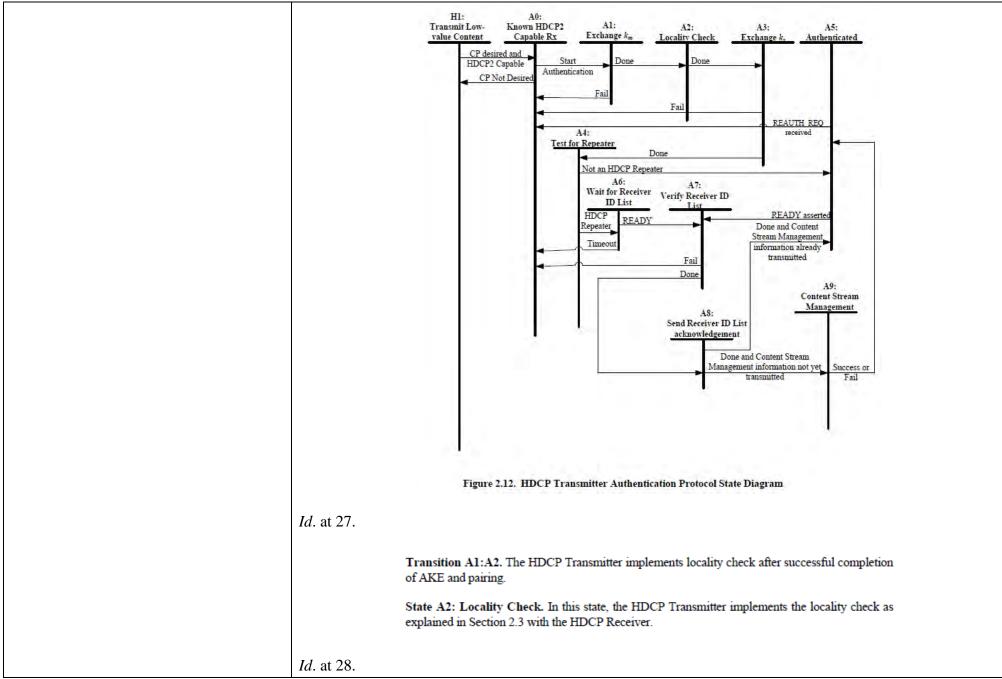
Case 1:20-cv-01243-CFC Document 92 Filed 09/23/24 . Page 85 of 228 PageID #: 5017 U.S. Patent No. 9,436,809: Claim 1



Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 86 of 228 PageID #: 5018 U.S. Patent No. 9,436,809: Claim 1

| 2.3 Locality Check Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r _n to the downstream receiver. |
|--|
| The HDCP Transmitter |
| Initiates locality check by writing the LC_Init message containing a 64-bit pseudo- random nonce r_n to the HDCP Receiver. |
| Sets its watchdog timer to 20 ms. The LC_Send_L_prime message must be received by the transmitter within 20 ms from the time the transmitter finishes writing the LC_Init message parameters to the HDCP Receiver. Locality check fails if the watchdog timer expires before the last byte of the LC_Send_L_prime message is received by the transmitter. The transmitter then aborts the authentication protocol. |
| • Computes L = HMAC-SHA256(r_n , k_d XOR r_{rx}) where HMAC-SHA256 is computed over r_n and the key used for HMAC is k_d XOR r_{rx} , where r_{rx} is XORed with the least-significant 64-bits of k_d . |
| On reading LC_Send_L_prime message from the receiver, compares L and L'. Locality check fails if L is not equal to L'. |
| <i>Id.</i> at 16. |
| HDCP Transmitter [Device A] HDCP Receiver [Device B] |
| Generate rn Set watchdog timer |
| $Compute L = HMAC-SHA256(r_{0}, k_{d}XOR r_{0})$ $Verify L = L^{2}$ $Compute L = HMAC-SHA256(r_{0}, k_{d}XOR r_{0})$ |
| Figure 2.4. Locality Check between HDCP Transmitter and HDCP Receiver |
| <i>Id.</i> at 17. |
| See also: |

Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24. Page 87 of 228 PageID #: 5019 U.S. Patent No. 9,436,809: Claim 1



Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 88 of 228 PageID #: 5020 U.S. Patent No. 9,436,809: Claim 1

"determine whether a time difference between providing the first signal and receiving the second signal is less than a predetermined time; and"

| determine whether a time difference between providing the first signal and | The processor of the Dell Product is arranged to determine whether a time difference between providing the first signal, <i>e.g.</i> , the LC_Init message including r_n , and receiving the second signal, <i>e.g.</i> , the LC_Send_L_prime | | |
|---|--|--|--|
| receiving the second signal is less than a predetermined time; and | nessage including L', is less than a predetermined time. | | |
| | The Locality Check requires the Dell Product to determine that the time between the providing of the LC_Init message and receiving L' via the LC_Send_L_prime message is less than a predetermined time of 20 ms. | | |
| | 2.3 Locality Check Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r _n to the downstream receiver. | | |
| | The HDCP Transmitter | | |
| | • Initiates locality check by writing the LC_Init message containing a 64-bit pseudo- random nonce r_n to the HDCP Receiver. | | |
| | • Sets its watchdog timer to 20 ms. The LC_Send_L_prime message must be received by the transmitter within 20 ms from the time the transmitter finishes writing the LC_Init message parameters to the HDCP Receiver. Locality check fails if the watchdog timer expires before the last byte of the LC_Send_L_prime message is received by the transmitter. The transmitter then aborts the authentication protocol. | | |
| | • Computes L = HMAC-SHA256(r_n , k_d XOR r_{rx}) where HMAC-SHA256 is computed over r_n and the key used for HMAC is k_d XOR r_{rx} , where r_{rx} is XORed with the least-significant 64-bits of k_d . | | |
| | On reading LC_Send_L_prime message from the receiver, compares L and L'. Locality check fails if L is not equal to L'. | | |
| | <i>Id.</i> at 16. | | |

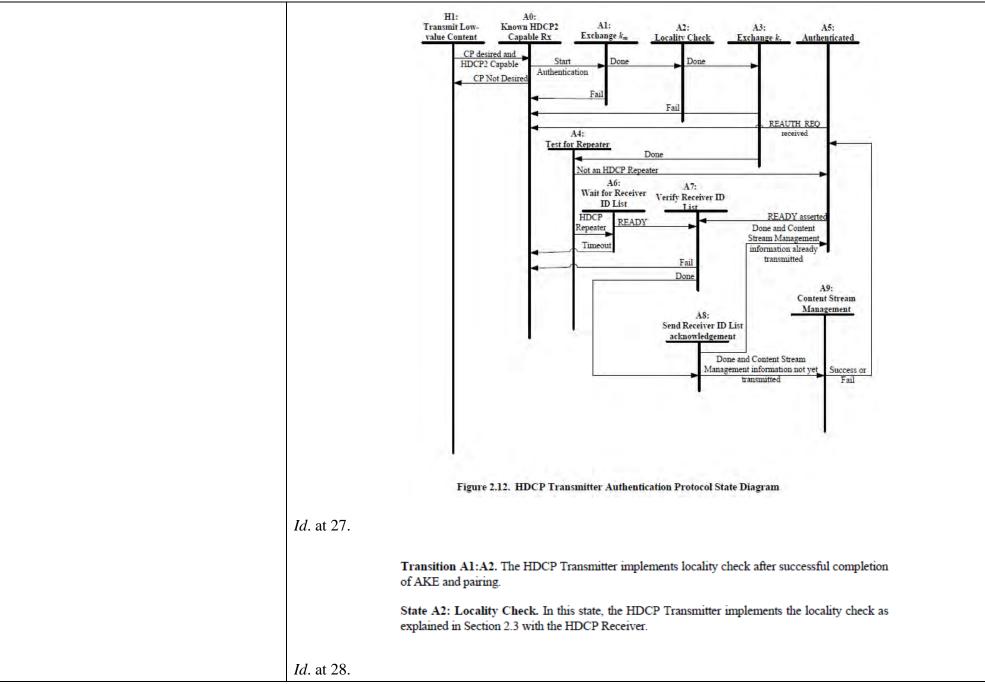
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24. Page 89 of 228 PageID #: 5021 U.S. Patent No. 9,436,809: Claim 1

"determine whether a time difference between providing the first signal and receiving the second signal is less than a predetermined time; and"

| HDCP Transmitter [Device A] | HDCP Receiver [Device B] |
|--|---|
| Compute L = HMAC-SHA256 $(r_n, k_d XOR r_n)$ Figure 2.4. Locality Check between HDC The HDCP Receiver Computes a 256-bit value L' = HMAC-SH Makes LC_Send_L_prime message conta | The introduction of the transmitter to the message is received by the interval to the terms interval terms interval to the terms interval terms interva |
| In the case of a locality check failure due to expirat of L and L' at the HDCP Transmitter, locality check for a maximum of 1023 additional attempts(for a transmission of an LC_Init message containing a attempt and subsequent zero or more reattempts authentication protocol is aborted. | ation of the watchdog timer or due to mismatch k may be reattempted by the HDCP Transmitter a maximum allowed 1024 total trials) with the new r_n . Failure of locality check on the first |
| 'ee also: | |

Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 90 of 228 PageID #: 5022 U.S. Patent No. 9,436,809: Claim 1

"determine whether a time difference between providing the first signal and receiving the second signal is less than a predetermined time; and"



Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24. Page 91 of 228 PageID #: 5023 U.S. Patent No. 9,436,809: Claim 1

| | difference is less than the predetermined time. |
|---|---|
| allow the protected content to be provided to the second device when at least the second signal is determined to be derived from the secret and the time difference is | The processor of the Dell Product is arranged to allow the protected content to be provided to the second device when at least the second signal, <i>e.g.</i> , L', is determined to be derived from the secret and the time difference is less than the predetermined time. |
| less than the predetermined time. | The HDCP 2.2 Locality Check must be passed prior to session key exchange and establishment of a secure communications path for the Dell Product to provide protected content to the second device. |
| | The HDCP authentication protocol is an exchange between an HDCP Transmitter and an HDCP Receiver that affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. It is comprised of the following stages |
| | Authentication and Key Exchange (AKE) – The HDCP Receiver's public key certificate is verified by the HDCP Transmitter. A Master Key k_m is exchanged. |
| | Locality Check – The HDCP Transmitter enforces locality on the content by requiring that the Round Trip Time (RTT) between a pair of messages is not more than 20 ms. |
| | Session Key Exchange (SKE) – The HDCP Transmitter exchanges Session Key k_s with the HDCP Receiver. |
| | Authentication with Repeaters – The step is performed by the HDCP Transmitter only with HDCP Repeaters. In this step, the repeater assembles downstream topology information and forwards it to the upstream HDCP Transmitter. |
| | Successful completion of AKE and locality check stages affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. At the end of the authentication protocol, a communication path is established between the HDCP Transmitter and HDCP Receiver that only Authorized Devices can access. |
| | HDMI HDCP 2.2 at 11. |
| | The Dell Product provides protected content to the second device when, as part of the Locality Check: the L' received via the LC_Send_L_prime message is derived from a secret (as determined by matching L' to value L which is derived from the secret (<i>e.g.</i> , L is computed based on k_d , which is based on dkey ₀ and dkey ₁ , each of which is based on the Master Key, k_m); and a time between the providing of the LC_Init message and receiving L' via the LC_Send_L_prime message is less than a predetermined time of 20 ms. |

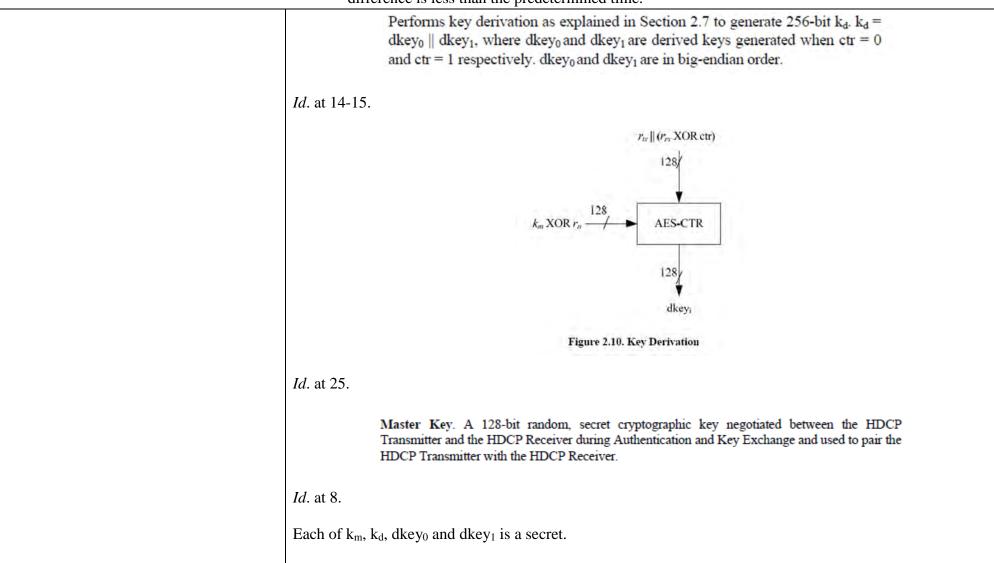
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 92 of 228 PageID #: 5024 U.S. Patent No. 9,436,809: Claim 1

| 2.3 Locality Check Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r_n to the downstream receiver. The HDCP Transmitter Initiates locality check by writing the LC_Init message containing a 64-bit pseudo-random nonce r_n to the HDCP Receiver. |
|--|
| Sets its watchdog timer to 20 ms. The LC_Send_L_prime message must be received by the transmitter within 20 ms from the time the transmitter finishes writing the LC_Init message parameters to the HDCP Receiver. Locality check fails if the watchdog timer expires before the last byte of the LC_Send_L_prime message is received by the transmitter. The transmitter then aborts the authentication protocol. Computes L = HMAC-SHA256(r_n, k_d XOR r_n) where HMAC-SHA256 is computed over r_n and the key used for HMAC is k_dXOR r_n, where r_n is XORed with the least-significant 64-bits of k_d. On reading LC_Send_L_prime message from the receiver, compares L and L'. Locality check fails if L is not equal to L'. |

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| - | |
|--|---|
| HDCP Transmitter [Device A] | HDCP Receiver [Device B] |
| Compute L = HMAC-SHA256(r_n , k_d XOR r_{r_2}) | Read L' Send L prime Compute L'=HMAC-SHA256(r _n , k ₀ XOR r _n) |
| Verify L=L' Figure 2.4. Locality Check between HDCP Tra | ansmitter and HDCP Receiver |
| The HDCP Receiver | |
| Computes a 256-bit value L' = HMAC-SHA256 | $i(r_n, \mathbf{k}_d \mathbf{XOR} \ r_{rx}).$ |
| Makes LC_Send_L_prime message containing 2 read immediately after computation of L' to en transmitter within the specified 20 ms timeout at | sure that the message is received by the |
| In the case of a locality check failure due to expiration of of L and L' at the HDCP Transmitter, locality check may for a maximum of 1023 additional attempts(for a maxim transmission of an LC_Init message containing a new τ attempt and subsequent zero or more reattempts result authentication protocol is aborted. | be reattempted by the HDCP Transmitter mum allowed 1024 total trials) with the r_n . Failure of locality check on the first |
| <i>Id.</i> at 17. | |
| The second signal, e.g., L', is derived from a secret. | |
| The value of L' is derived from k_d . | |
| Compute L'=HMAC-SHA | A256(r_n , k _d XOR r_m) |
| Id. | |
| The value of k_d is based upon dkey ₀ and dkey ₁ , each of w | which is derived from k_m , the Master Key. |

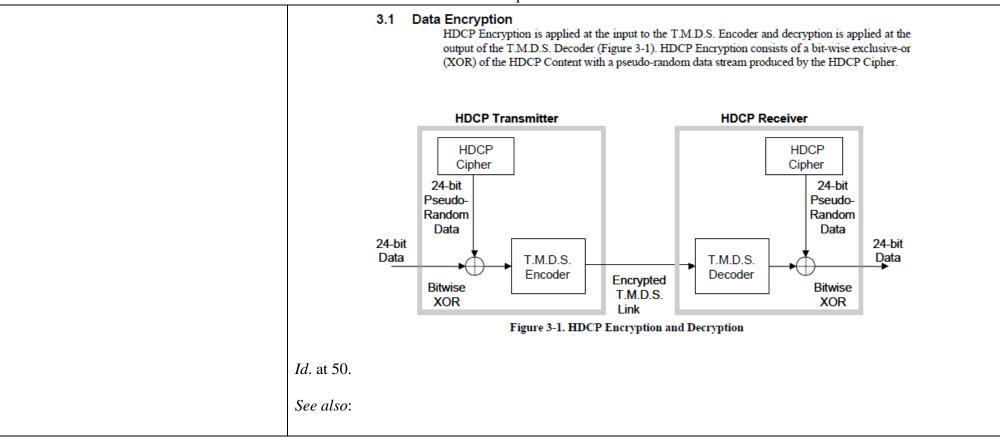
Case 1:20-cv-01243-CFC Document 92 Filed 09/23/24 . Page 94 of 228 PageID #: 5026 U.S. Patent No. 9,436,809: Claim 1



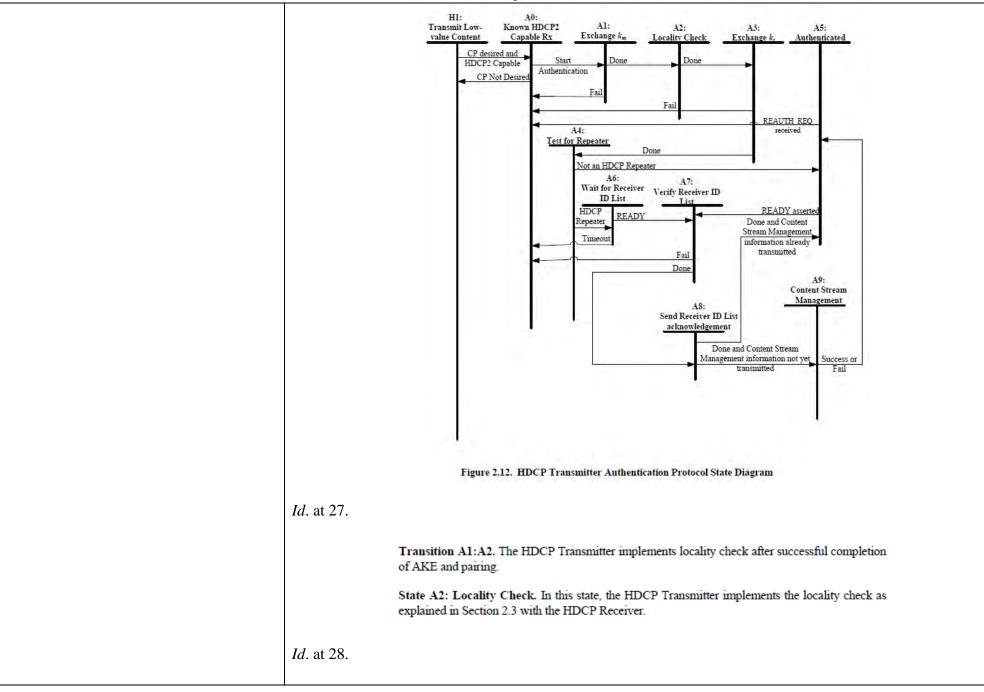
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24. Page 95 of 228 PageID #: 5027 U.S. Patent No. 9,436,809: Claim 1

| Value | Confidentiality Required [±] ? | Integrity Required [±] ? | Value used by Core Functions? | Core Function |
|---|---|--|---|--|
| k _m | Yes | Yes* | Yes | Handling of Master Key, during AKE (including Pairing) and Key Derivation, in plaintext form |
| k _d | Yes | Yes* | No | N/A |
| dkey ₀ ,dkey ₁ | Yes | Yes* | No | N/A |
| <i>Id.</i> at 67 (abridg The Dell Produc after successful 2.4 <i>Id.</i> at 17. | t proceeds to sess completion of the Session Key E Successful HDCP Rect by the HD encrypted S and beginni the transmis encrypted v | Exchange completion of A eiver is authorized CP Transmitter dession Key to the ng the transmiss ision of the encry with the Session IDCP Encryptio | AKE and locality attend to receive HDC after a success the HDCP Receive ion of HDCP Con ypted Session Key to Key k _s starts to | coviding of the protected content to the second device y Check. check stages affirms to HDCP Transmitter that the P Content. Session Key Exchange (SKE) is initiated ful locality check. The HDCP Transmitter sends r at least 200 ms before enabling HDCP Encryption tent. HDCP Encryption may be enabled 200 ms after to the HDCP Receiver and at no time prior. Content flow between the HDCP Transmitter and HDCP d only after successful completion of AKE, locality |

Case 1:20-cv-01243-CFC Document 92 Filed 09/23/24 Page 96 of 228 PageID #: 5028 U.S. Patent No. 9,436,809: Claim 1



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Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 98 of 228 PageID #: 5030 U.S. Patent No. 9,436,809: Claim 1

| * |
|---|
| Transition A2:A3. The HDCP Transmitter implements SKE after successful completion of locality check. |
| State A3: Exchange k_s . The HDCP Transmitter sends encrypted Session Key, $E_{dhep}(k_s)$, and r_{iv} to the HDCP Receiver as part of the SKE_Send_Eks message. It may enable HDCP Encryption 200 |
| ms after sending encrypted Session Key. HDCP Encryption must be enabled only after successful completion of AKE, locality check and SKE stages. |
| Transition A3:A4. This transition occurs after completion of SKE. |
| <i>Id.</i> at 28-29. |

Case 1:20-cv-01243-CFC Document 92 Filed 09/23/24. Page 99 of 228 PageID #: 5031 U.S. Patent No. 9,436,809: Claim 1/

"17. A system for controlling the transmission of protected content from a content provider to a requesting device, the content provider comprising:"

17. A system for controlling the transmission of protected content from a content provider to a requesting device, the content provider comprising:

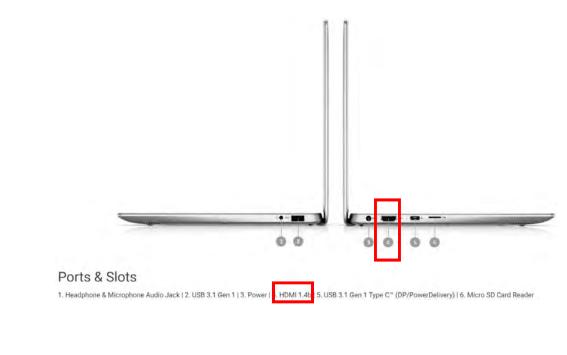
The Dell Inspiron 13 5000 Laptop (Inspiron 13 5391) (the "Dell Product") is a system for controlling the transmission of protected content from a content provider to a requesting device.

For example, the Dell Product is an HDMI transmitter with HDCP 2.2 for controlling transmission of protected content to a requesting device, such as an HDMI receiver with HDCP 2.2.



Dell, Inspiron 13 5000 Laptop, <u>https://www.Dell.com/en-us/member/shop/Dell-laptops/inspiron-13-5000-laptop/spd/inspiron-13-5391-wifi-laptop/nn5391dopvh#features_section</u>.

The Dell Product includes an HDMI 1.4b port for delivery of protected content to another device.



Id.

Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24 . Page 100 of 228 PageID #: 5032 U.S. Patent No. 9,436,809: Claim 17

| The Dell Product comprises a processor, including a "10th Generation Intel® Core [™] i3-10110U Processor (4MB Cache, up to 4.1 GHz)" (the "Intel Processor") integrated with the Intel UHD Graphics 620 graphics processor (the "Intel GPU"). |
|--|
| Inspiron 13 5000 Laptop |
| Configurations |
| Processor More Info |
| 10th Generation Intel® Core™ i3-10110U Processor (4MB Cache, up to 4.1 GHz) |
| Operating System More Info |
| Windows 10 Home in S mode 64-bit, English |
| Graphics Card |
| Intel UHD Graphics with shared graphics memory |
| Memory |
| 4GB, onboard, LPDDR3, 2133MHz |
| Hard Drive More Info |
| 128GB M.2 PCIe NVMe Solid State Drive |
| <i>Id.; see also</i> NotebookCheck, Intel Core i3-10110U, <u>https://www.notebookcheck.net/Intel-Core-i3-10110U-Laptop-Processor-Comet-Lake-U.430588.0.html</u> . |
| The Intel Processor supports HDCP 2.2 via HDMI 1.4. |

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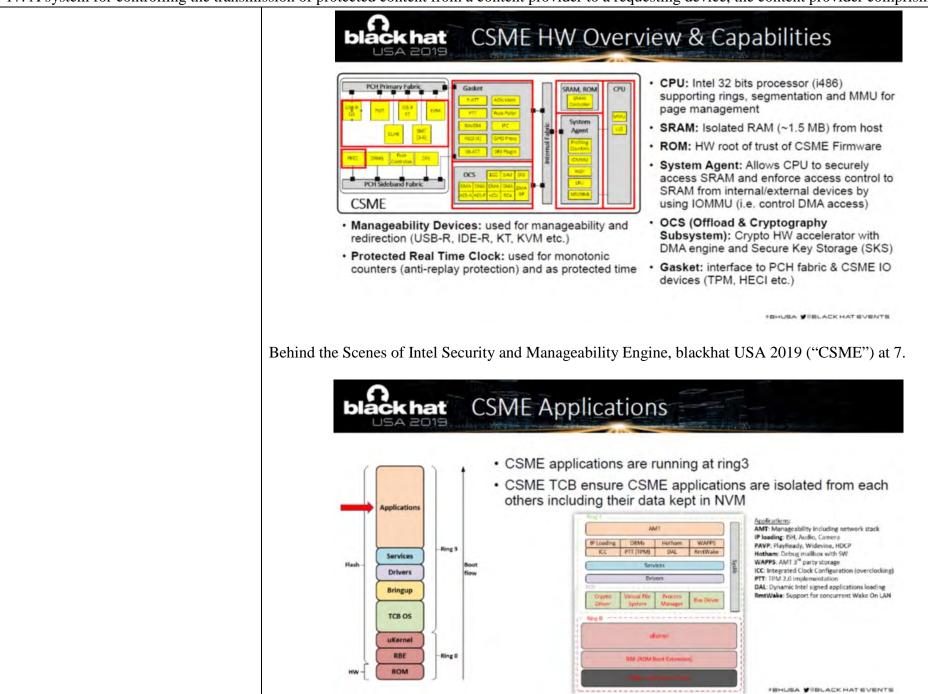
| | Торіс | HDCP Revision | lay supported Maximum Resolution | HDR ¹ | HDCP Solution ² | BPC ³ | Comments |
|--------|----------|------------------|--|------------------|-------------------------------|---------------------|-------------------------------------|
| | | HDCP1.4 | 4K@60 | No | iHDCP | 10 bit | Legacy Integrated for HDCP1.4 |
| | DP | HDCP2.2 | 4K@60 | Yes | iHDCP | 10 bit | New Integrated for HDCP2.2 |
| | | HDCP1.4 | 4K@30 | No | iHDCP | 8 bit | Legacy Integrated for HDCP1.4 |
| | | HDCP2.2 | 4K@30 | No | LSPCON | 8 bit | LSPCON HDCP2.2 required |
| | HDMI 1.4 | HDCP2.2 | 4K@30 | No | iHDCP4 | 8 bit | New Integrated for HDCP2.2 |
| | HDMI 2.0 | HDCP2.2 | 4K@60 | No | LSPCON | 12 bit (YUV 420) | LSPCON HDCP2.2 required |
| | HDMI2.0a | HDCP2.2 | 4K@60 | Yes | LSPCON | 12 bit (YUV 420) | LSPCON HDCP2.2 required |
| Intel, | How | to | (| enable | Hig | ch | Dynamic |

| | Supported Technologies |
|--------|---|
| | Intel[®] Virtualization Technology (Intel[®] VT) |
| | Intel[®] Active Management Technology 11.0 (Intel[®] AMT 11.0) |
| | Intel[®] Trusted Execution Technology (Intel[®] TXT) |
| | Intel[®] Streaming SIMD Extensions 4.2 (Intel[®] SSE4.2) |
| | Intel[®] Hyper-Threading Technology (Intel[®] HT Technology) |
| | • Intel [®] 64 Architecture |
| | Execute Disable Bit |
| | Intel[®] Turbo Boost Technology 2.0 |
| | Intel[®] Advanced Vector Extensions 2 (Intel[®] AVX2) Intel[®] Advanced Encryption Standard New Instructions (Intel[®] AES-NI) |
| | PCLMULQDQ (Perform Carry-Less Multiplication Quad word) Instruction |
| | Intel[®] Transactional Synchronization Extensions (Intel[®] TSX-NI) |
| | PAIR – Power Aware Interrupt Routing |
| | SMEP – Supervisor Mode Execution Protection |
| | Intel [®] Boot Guard |
| | Intel[®] Software Guard Extensions (Intel[®] SGX) |
| | Intel[®] Memory Protection Extensions (Intel[®] MPX) |
| | GMM Scoring Accelerator |
| | Intel [®] Processor Trace |
| | High Definition Content Protection (HDCP) 2.2 |
| | |
| | ^a Generation Intel Core Processors, Datasheet, Volume 1 or 2 (Jul. 2020, rev. 5), <i>available at</i> rdv2.intel.com/v1/dl/getContent/615211, at 11-12. |
| source | s the technology for protecting high-definition content against unauthorized copy between a and the sink The [Intel] [P]rocessor supports HDCP 1.4/2.3 for 4 k Premium content protection d displays (HDMI* and DisplayPort*)." |

Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 103 of 228 PageID #: 5035 U.S. Patent No. 9,436,809: Claim 17

| High-bandwidth Digital Content Protection (HDCP) |
|--|
| HDCP is the technology for protecting high-definition content against unauthorized copy or unreceptive between a source (computer, digital set top boxes, and so on) and the sink (panels, monitor, and TVs). The processor supports HDCP 1.4/2.3 for 4 k Premium content protection over wired displays (HDMI* and DisplayPort*). |
| <i>Id.</i> at 44 |
| Intel's "UHD" processor nomenclature also indicates support for HDCP 2.2: |
| Another change from 7 Gen to 8 Gen will be in the graphics. Intel is upgrading the nomenclature of the integrated graphics from HD 620 to UHD 620, indicating that the silicon is suited for 4K playback and processing. During our pre-briefing it was categorically stated several times that there was no change between the two, however we have since confirmed that the new chips will come with HDCP 2.2 support as standard for DP1.2a, removing the need for an external LSPCON for this feature. Other than this display controller change however, it appears that these new UHD iGPUs are architecturally the same as their HD predecessors. |
| https://www.anandtech.com/show/11738/intel-launches-8th-generation-cpus-starting-with-kaby-lake- refresh-for-15w-mobile. |
| HDCP 2.2 is implemented in Intel-based systems with Core-i series Processors within the Converged Security & Manageability Engine (CSME) also known as the Management Engine (ME). The CSME contains a processor (x86 core) which executes instructions including but not limited to the uKernel/OS, drivers, services, and applications for the CSME. |

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"17. A system for controlling the transmission of protected content from a content provider to a requesting device, the content provider comprising:"

Id. at 23.

One such application is "PAVP" which provides HDCP capabilities within the Intel processor.

- CSME applications are running at ring3
- CSME TCB ensure CSME applications are isolated from each others including their data kept in NVM

| | AN | AT | | |
|------------------|------------------------|--------------------|------------|--------|
| IP Loading | DRMs | Hotham | WAPPS | |
| ICC | PTT (TPM) | DAL | RmtWake | |
| | Serv Driv | | | CINCAC |
| B | | | | |
| Crypto Driver | Virtual File System | Process Manager | Bus Driver | |

Applications: AMT: Manageability including network stack IP loading: ISH, Audio, Camera PAVP: PlayReady, Widevine, HDCP Hotham: Debug mailbox with SW WAPPS: AMT 3rd party storage ICC: Integrated Clock Configuration (overclocking) PTT: TPM 2.0 implementation DAL: Dynamic Intel signed applications loading RmtWake: Support for concurrent Wake On LAN

Id.

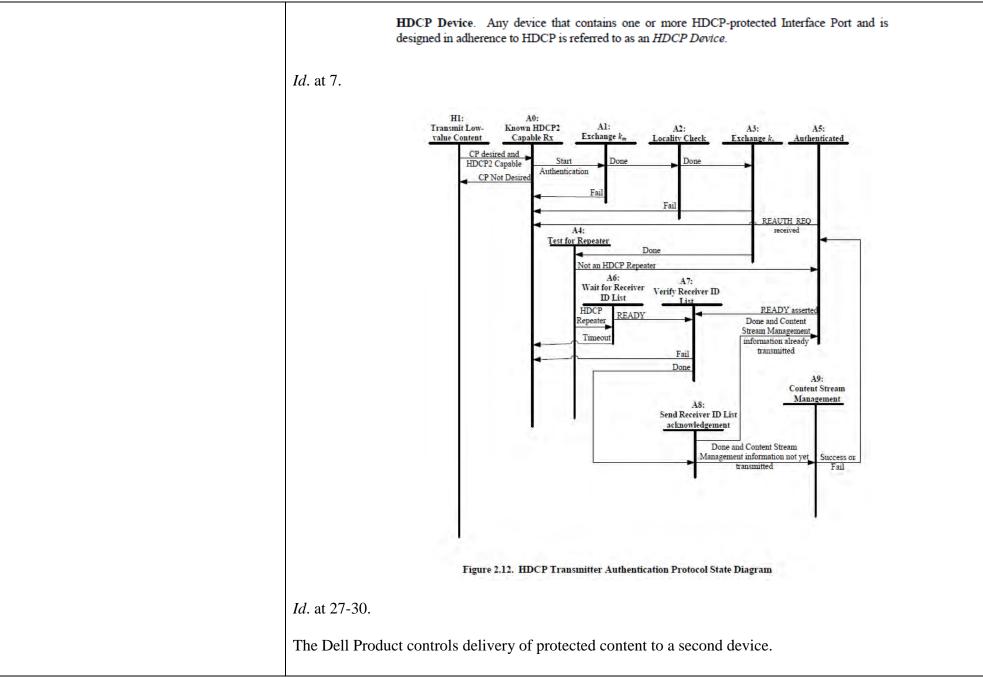
Upon information and belief, the Dell Product is compliant with the High-bandwidth Digital Content Protection System Revision 2.2 ("HDCP 2.2") protocol. The Dell Product supports HDCP 2.2 for protecting content between devices.

For the purpose of this specification, it is assumed that the Audiovisual content is transmitted over a HDMI based wired display link. In an HDCP System, two or more HDCP Devices are interconnected through an HDCP-protected Interface. The Audiovisual Content flows from the Upstream Content Control Function into the HDCP System at the most upstream HDCP Transmitter. From there the Audiovisual Content encrypted by the HDCP System, referred to as HDCP Content, flows through a tree-shaped topology of HDCP Receivers over HDCP-protected Interfaces. This specification describes a content protection mechanism for: (1) authentication of HDCP Receivers to their immediate upstream connection (i.e., an HDCP Transmitter), (2) revocation of HDCP Receivers that are determined by the Digital Content Protection, LLC, to be invalid, and (3) HDCP Encryption of Audiovisual Content over the HDCP-protected Interfaces between HDCP Transmitters and their downstream HDCP Receivers. HDCP Receivers may render the HDCP Content in audio and visual form for human consumption. HDCP Receivers may be HDCP Repeaters that serve as downstream HDCP Transmitters emitting the HDCP Content further downstream to one or more additional HDCP Receivers.

High-bandwidth Digital Content Protection System Mapping HDCP to HDMI Revision 2.2 13 February, 2013 ("HDMI HDCP 2.2") at 5.

| There are three elements of the content protection system. Each element plays a specific role in the system. First, there is the authentication protocol, through which the HDCP Transmitter verifies that a given HDCP Receiver is licensed to receive HDCP Content. The authentication protocol is implemented between the HDCP Transmitter and its corresponding downstream HDCP Receiver. With the legitimacy of the HDCP Receiver determined, encrypted HDCP Content is transmitted between the two devices based on shared secrets established during the authentication protocol. This prevents eavesdropping devices from utilizing the content. Finally, in the event that legitimate devices are compromised to permit unauthorized use of HDCP Content, renewability allows an HDCP Transmitter to identify such compromised devices and prevent the transmission of HDCP Content. | | | |
|---|--|--|--|
| <i>Id</i> . at 9. | | | |
| The Dell Product is an HDCP Device, and more specifically an HDCP 2.2-compliant Device, capable of functioning as an HDCP Transmitter and that implements required functionality of HDMI HDCP 2.2 including the functions required by the HDCP Transmitter State Diagram. | | | |
| The state machines in this specification define the required behavior of HDCP Devices. The link- visible behavior of HDCP Devices implementing the specified state machines must be identical, even if implementations differ from the descriptions. The behavior of HDCP Devices implementing the specified state machines must also be identical from the perspective of an entity outside of the HDCP System. | | | |
| Implementations must include all elements of the content protection system described herein, unless the element is specifically identified as informative or optional. Adopters must also ensure that implementations satisfy the robustness and compliance rules described in the technology license. | | | |
| <i>Id.</i> at 5. | | | |
| HDCP 2.2-compliant Device . An HDCP Device that is designed in adherence to HDCP 2.2 is referred to as an <i>HDCP 2.2-compliant Device</i> . | | | |
| <i>Id.</i> at 6. | | | |

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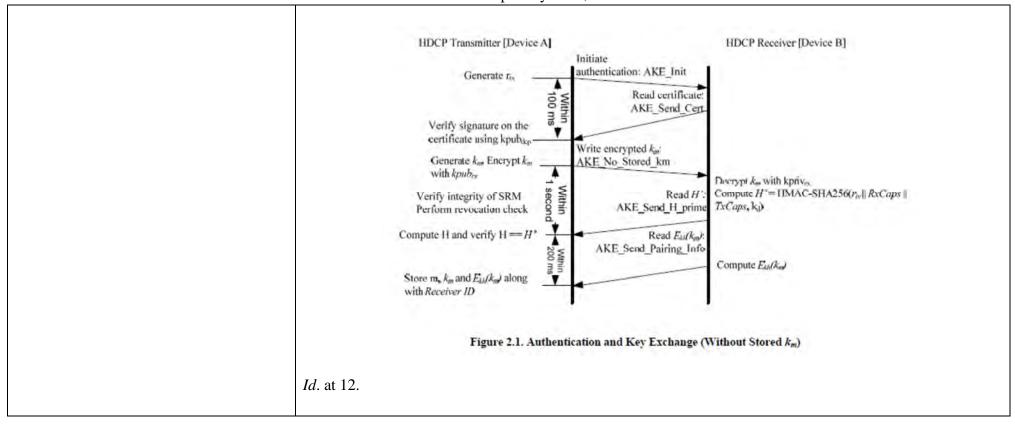
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24 Page 108 of 228 PageID #: 5040 U.S. Patent No. 9,436,809: Claim 17

| <u> </u> | |
|--------------------|---|
| 2.1 | Overview The HDCP authentication protocol is an exchange between an HDCP Transmitter and an HDCP Receiver that affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. It is comprised of the following stages Authentication and Key Exchange (AKE) – The HDCP Receiver's public key certificate is verified by the HDCP Transmitter. A Master Key k_m is exchanged. |
| | Locality Check – The HDCP Transmitter enforces locality on the content by requiring that the Round Trip Time (RTT) between a pair of messages is not more than 20 ms. Session Key Exchange (SKE) – The HDCP Transmitter exchanges Session Key k₅ with the HDCP Receiver. |
| | Authentication with Repeaters – The step is performed by the HDCP Transmitter only with HDCP Repeaters. In this step, the repeater assembles downstream topology information and forwards it to the upstream HDCP Transmitter. Successful completion of AKE and locality check stages affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. At the end of the authentication protocol, a communication path is established between the HDCP Transmitter and HDCP Receiver that only Authorized Devices can access. |
| <i>Id</i> . at 11. | Autionzed Devices can access. |

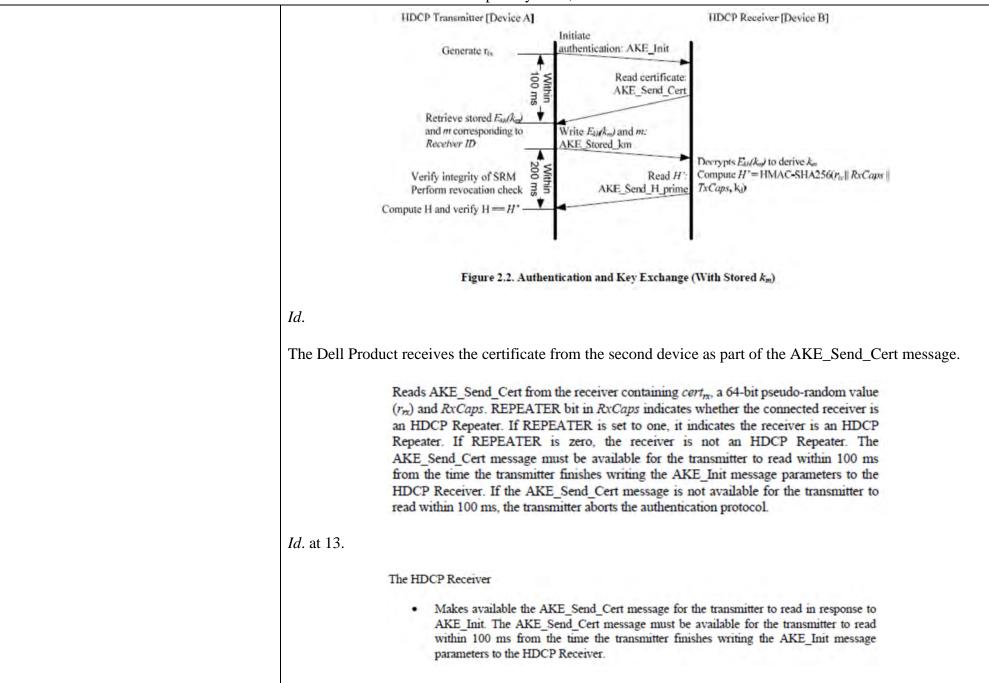
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| | a | set of c | complianc | y rules;" | | | | |
|---|---|---|---|---|--|--|--|--|
| means for receiving a certificate of the requesting device, the certificate providing information for validating the requesting device as being compliant with a set of compliancy rules; | The Dell Product con providing information For example, the Del receiving a certificate (AKE) stage of the H device as being comp The certificate, <i>cert_{rx}</i> and a cryptographic | mprises on for v Il Prod e of the IDCP 2 pliant v , inclue signatu | s means for ralidating t uct compr e requestin 2.2 protoco with a set of des a Rece ure, among | r receiving a certificate of the requesting device, the certificate he requesting device as being compliant with a set of compliancy rules. ises a receiver and a microprocessor programmed with software for ag device, <i>e.g.</i> , <i>cert_{rx}</i> , as part of the Authentication and Key Exchange ol, the certificate providing information for validating the requesting of compliancy rules. iver ID for the second device, Receiver Public Key for the second device, est other information. | | | | |
| | The HDCP Receiver is issued 1024-bit RSA public and private keys. The public key is stored in a Public Key Certificate issued by DCP LLC, denoted by cert _{rx} . Table 2.1 gives the fields contained in the certificate. All values are stored in big-endian format. Name Size Bit Function | | | | | | | |
| | Receiver | (bits) 40 | position 4175:4136 | Unique receiver identifier. It has the same format as an HDCP 1.x KSV i.e. it contains 20 ones and 20 zeroes | | | | |
| | Receiver Public Key | 1048 | 4135:3088 | Unique RSA public key of HDCP Receiver denoted by $kpub_{rx}$. The first 1024 bits is the big-endian representation of the modulus n and the trailing 24 bits is the big-endian representation of the public exponent e | | | | |
| | Reserved2 | 4 | 3087:3084 | Reserved for future definition. Must be 0x0 or 0x1. | | | | |
| | Reserved1 | 12 | 3083:3072 | Reserved for future definition. Must be 0x000 | | | | |
| | DCP LLC Signature | 3072 | 3071:0 | A cryptographic signature calculated over all preceding fields of the certificate. RSASSA-PKCS1-v1_5 is the signature scheme used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function | | | | |
| | Table 2.1. Public Key Certificate of HDCP Receiver | | | | | | | |
| | HDMI HDCP 2.2 at 11. Public Key Certificate. Each HDCP Receiver is issued a Public Key Certificate signed by DCP LLC and contains the Receiver ID and RSA public key corresponding to the HDCP Receiver. | | | | | | | |
| | LLC, and contains the Receiver ID and RSA public key corresponding to the HDCP Receiver. Id. at 8. The Dell Product receives the certificate from the second device as part of the AKE stage, irrespective of | | | | | | | |
| | whether the Dell Product has a Master Key k _m stored corresponding to the Receiver ID. | | | | | | | |

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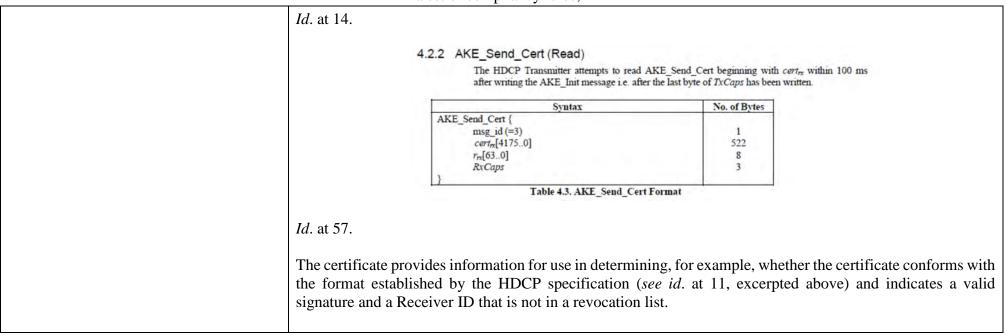
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24. Page 111 of 228 PageID #: 5043 U.S. Patent No. 9,436,809: Claim 17



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"means for receiving a certificate of the requesting device, the certificate providing information for validating the requesting device as being compliant with

a set of compliancy rules;"



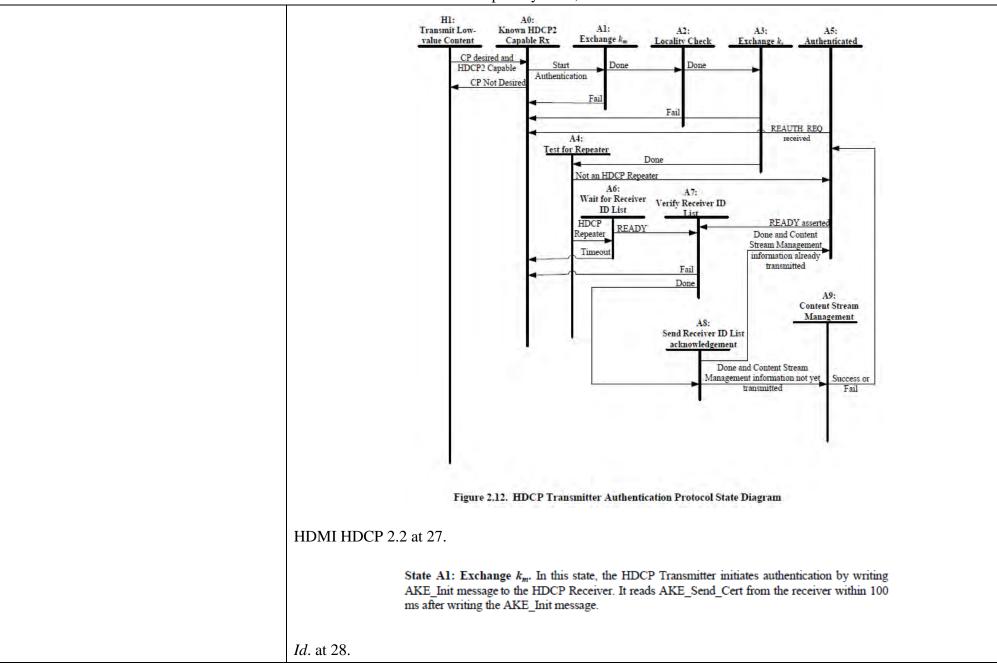
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24 . Page 113 of 228 PageID #: 5045 U.S. Patent No. 9,436,809: Claim 17

| a set of compliancy rules; |
|---|
| Extracts Receiver ID from cert _{rx} |
| • If the HDCP Transmitter does not have a 128-bit Master Key k_m stored corresponding to the <i>Receiver ID</i> (See Section 2.2.1) |
| Verifies the signature on the certificate using kpub_{dcp}. Failure of signature verification constitutes an authentication failure and the HDCP Transmitter aborts the authentication protocol. |
| Generates a pseudo-random 128-bit Master Key k_m. Encrypts k_m with kpub_{rx} (E_{kpub}(km)) and sends AKE_No_Stored_km message to the receiver containing the 1024-bit E_{kpub}(km). RSAES-OAEP encryption scheme must be used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function. The mask generation function used is MGF1 which uses SHA-256 as its underlying hash function. |
| Verifies integrity of the System Renewability Message (SRM). It does this by checking the signature of the SRM using kpub_{dep}. Failure of this integrity check constitutes an authentication failure and causes the HDCP Transmitter to abort authentication protocol. |
| The top-level HDCP Transmitter checks to see if the <i>Receiver ID</i> of the connected device is found in the revocation list. If the <i>Receiver ID</i> of the connected HDCP Device is found in the revocation list, authentication fails and the authentication protocol is aborted. SRM integrity check and revocation check are performed only by the top-level HDCP Transmitter. |
| <i>Id.</i> at 13. |
| A valid signature in the certificate indicates, for example, that the second device is compliant with a set of compliance rules of the HDCP specification. |
| 1.9 " Compliance Rules " means the technical requirements set out in Exhibit C, as such exhibit may be amended by Licensor from time to time in accordance with the terms of this Agreement. |
| HDCP License Agreement, March 6, 2017, at 2, <i>available at</i> <u>https://digital-cp.com/sites/default/files/HDCP%20License%20Agreement_March%206%2C%202017_FOR%20REVIEW%20ONLY.pdf</u> . |

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| EXHIBIT C COMPLIANCE RULES Adopter agrees to comply with all terms and conditions of these Compliance Rules, which may be amended from time to time by Licensor in accordance with Section 5 of this Agreement. |
|--|
| <i>Id.</i> at Exhibit C. <i>See also</i> : |

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Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24 Page 116 of 228 PageID #: 5048 U.S. Patent No. 9,436,809: Claim 17

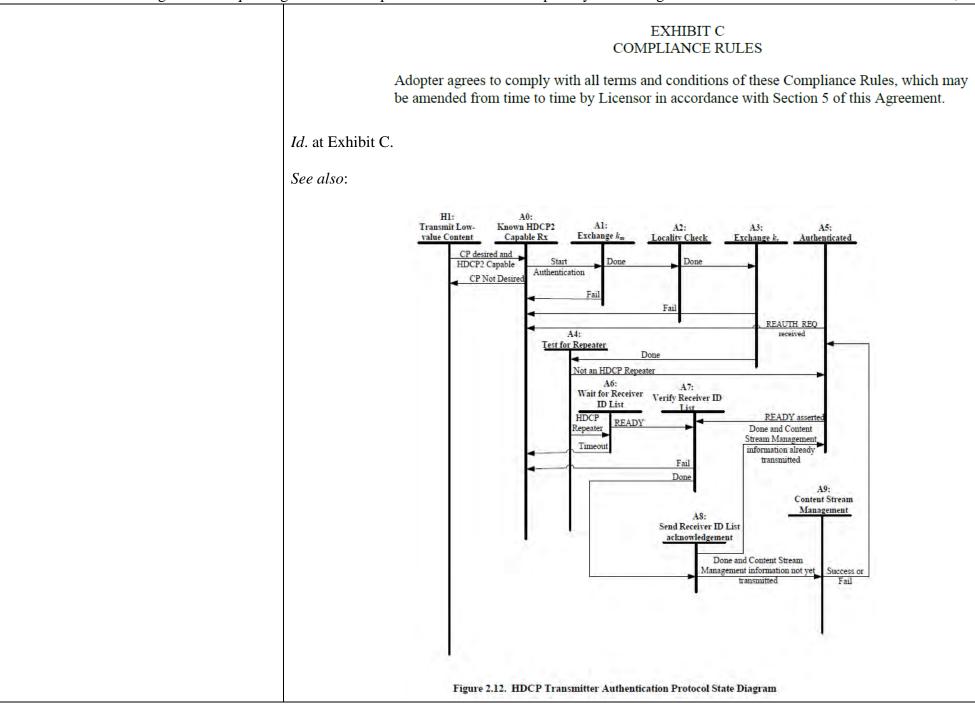
"means for validating that the requesting device is compliant with the set of compliancy rules using said information contained in said certificate;"

| means for validating that the requesting device is compliant with the set of compliancy rules using said information | The Dell Product comprises means for validating that the requesting device is compliant with the set of compliancy rules using said information contained in said certificate. | | | | | | | |
|--|---|---------------------------------------|---|---|--|--|--|--|
| contained in said certificate; | For example, the Dell Product comprises a microprocessor programmed with software for validating that the requesting device is compliant with the set of compliancy rules using said information contained in said certificate. | | | | | | | |
| | device is compliant w For example, <i>cert_{rx}</i> in The H Public | ith a s clude IDCP R c Key C | et of comp s a Receiv eceiver is issuertificate issue | If the Authentication and Key Exchange (AKE) stage, whether the second and the information contained in the certificate, <i>e.g.</i> , <i>co</i> er ID, Receiver Public Key, and a cryptographic signature. Het 1024-bit RSA public and private keys. The public key is stored in a ed by DCP LLC, denoted by <i>cert</i> _n . Table 2.1 gives the fields contained are stored in big-endian format. | | | | |
| | Name Size Bit Function (bits) position | | | | | | | |
| | Receiver ID | 40 | 4175:4136 | Unique receiver identifier. It has the same format as an HDCP 1.x KSV i.e. it contains 20 ones and 20 zeroes | | | | |
| | Receiver Public Key | 1048 | 4135:3088 | Unique RSA public key of HDCP Receiver denoted by $kpub_{rx}$. The first 1024 bits is the big-endian representation of the modulus n and the trailing 24 bits is the big-endian representation of the public exponent e | | | | |
| | Reserved2 | 4 | 3087:3084 | Reserved for future definition. Must be 0x0 or 0x1. | | | | |
| | Reserved1 | 12 | 3083:3072 | Reserved for future definition. Must be 0x000 | | | | |
| | DCP LLC Signature | 3072 | 3071:0 | A cryptographic signature calculated over all preceding fields of the certificate. RSASSA-PKCS1-v1_5 is the signature scheme used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function | | | | |
| | Table 2.1. Public Key Certificate of HDCP Receiver | | | | | | | |
| | HDMI HDCP 2.2 at 11. | | | | | | | |
| | | see id | | nple, whether the certificate conforms with the format established by cerpted above) and indicates a valid signature and a Receiver ID th | | | | |

"means for validating that the requesting device is compliant with the set of compliancy rules using said information contained in said certificate;"

| means for validating that the requesting | g device is compliant with the set of compliancy rules using said information contained in said certificate;" | | |
|--|---|--|--|
| | Extracts <i>Receiver ID</i> from <i>cert_{rx}</i> | | |
| | If the HDCP Transmitter does not have a 128-bit Master Key k_m stored corresponding to the <i>Receiver ID</i> (See Section 2.2.1) | | |
| | Verifies the signature on the certificate using kpub_{dcp}. Failure of signature verification constitutes an authentication failure and the HDCP Transmitter aborts the authentication protocol. | | |
| | Generates a pseudo-random 128-bit Master Key k_m. Encrypts k_m with kpub_{rx} (E_{kpub}(km)) and sends AKE_No_Stored_km message to the receiver containing the 1024-bit E_{kpub}(km). RSAES-OAEP encryption scheme must be used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function. The mask generation function used is MGF1 which uses SHA-256 as its underlying hash function. | | |
| | Verifies integrity of the System Renewability Message (SRM). It does this by checking the signature of the SRM using kpub_{dcp}. Failure of this integrity check constitutes an authentication failure and causes the HDCP Transmitter to abort authentication protocol. | | |
| | The top-level HDCP Transmitter checks to see if the <i>Receiver ID</i> of the connected device is found in the revocation list. If the <i>Receiver ID</i> of the connected HDCP Device is found in the revocation list, authentication fails and the authentication protocol is aborted. SRM integrity check and revocation check are performed only by the top-level HDCP Transmitter. | | |
| | <i>Id.</i> at 13. | | |
| | A valid signature in the certificate indicates, for example, that the second device is compliant with a set of compliance rules of the HDCP specification. | | |
| | 1.9 " Compliance Rules " means the technical requirements set out in Exhibit C, as such exhibit may be amended by Licensor from time to time in accordance with the terms of this Agreement. | | |
| | HDCP License Agreement, March 6, 2017, at 2. | | |

"means for validating that the requesting device is compliant with the set of compliancy rules using said information contained in said certificate;"



| "means for validating that the requesting | levice is compliant with the set of compliancy rules using said information contained in said certification | ıte;" |
|---|---|-------|
| | | |

| HDMI HDCP 2.2 at 27. |
|---|
| State A0: Rx Known to be HDCP 2 Capable. If state A0 is reached when content protection is desired by the Upstream Content Control Function, authentication must be started immediately by the transmitter if the receiver is HDCP 2 capable. A valid video screen is displayed to the user with encryption disabled during this time. |
| Transition A0:A1. The transmitter initiates the authentication protocol. |
| State A1: Exchange k_m . In this state, the HDCP Transmitter initiates authentication by writing AKE_Init message to the HDCP Receiver. It reads AKE_Send_Cert from the receiver within 100 ms after writing the AKE_Init message. |
| If the HDCP Transmitter does not have k_m stored corresponding to the <i>Receiver ID</i> , it generates $E_{kpub}(km)$ and sends $E_{kpub}(km)$ as part of the AKE_No_Stored_km message to the receiver after verification of signature on <i>cert_{rx}</i> . It performs integrity check on the SRM and checks to see whether the <i>Receiver ID</i> of the connected HDCP Device is in the revocation list. It computes H, reads AKE_Send_H_prime message from the receiver containing H' within one second after writing AKE_No_Stored_km to the receiver and compares H' against H. |
| If the HDCP Transmitter has k_m stored corresponding to the <i>Receiver ID</i> , it writes AKE_Stored_km message containing $E_{kh}(k_m)$ and <i>m</i> to the receiver, performs integrity check on the SRM and checks to see whether the <i>Receiver ID</i> of the connected HDCP Device is in the revocation list. It computes H, reads AKE_Send_H_prime message from the receiver containing <i>H</i> ' within 200 ms after writing AKE_Stored_km to the receiver and compares <i>H</i> ' against H. |
| <i>Id.</i> at 28. |

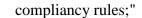
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24 Page 120 of 228 PageID #: 5052 U.S. Patent No. 9,436,809: Claim 17

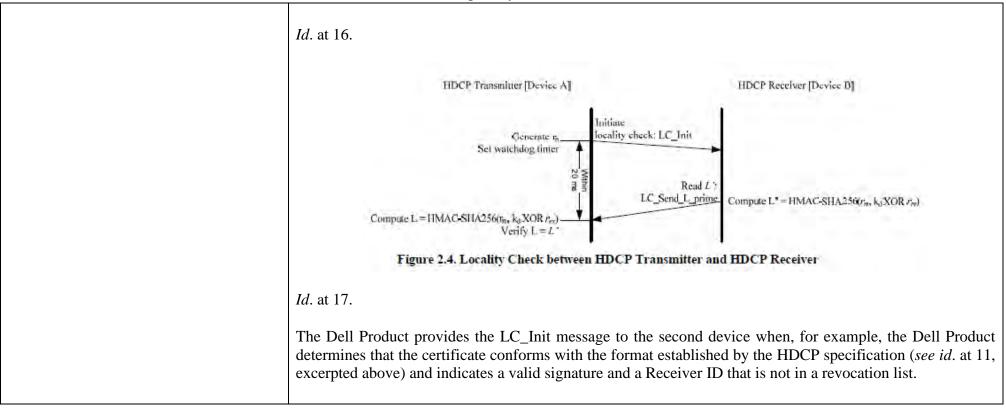
"means for transmitting a first signal to the requesting device at a first time when said requesting device is validated as being compliant with the set of compliancy rules;"

| aid requesting devic For example, the Del ransmitting a first si aid requesting devic | e is va ll Prod gnal, <i>e</i> | lidated as uct compr .g., the LC | ises a transmitter and a microprocessor programmed with softwa C_Init message including r _n , to the requesting device at a first tim | | |
|--|---|--|---|---|--|
| The Dell Product comprises means for transmitting a first signal to the requesting device at a first time when said requesting device is validated as being compliant with the set of compliancy rules. For example, the Dell Product comprises a transmitter and a microprocessor programmed with software for transmitting a first signal, <i>e.g.</i> , the LC_Init message including r_n , to the requesting device at a first time when said requesting device is validated as being compliant with the set of compliancy rules. The Dell Product provides the LC_Init message including r_n to the second device when the Dell Product determines in the Authentication and Key Exchange (AKE) stage that the certificate, <i>cert_{rx}</i> , indicates that the second device is compliant with the set of compliancy rules. For example, the certificate, <i>cert_{rx}</i> , includes a Receiver ID, Receiver Public Key, and a cryptographic signature. The HDCP Receiver is issued 1024-bit RSA public and private keys. The public key is stored in a Public Key Certificate issued by DCP LLC, denoted by <i>cert_{rx}</i> . Table 2.1 gives the fields contained in the certificate. All values are stored in big-endian format. | | | | | |
| Name | Size (bits) | Bit position | Function | | |
| Receiver ID | 40 | 4175:4136 | Unique receiver identifier. It has the same format as an HDCP 1.x KSV i.e. it contains 20 ones and 20 zeroes | - | |
| Receiver Public Key | 1048 | 4135:3088 | Unique RSA public key of HDCP Receiver denoted by <i>kpub_{rx}</i> . The first 1024 bits is the big-endian representation of the modulus n and the trailing 24 bits | | |
| Reserved2 | 4 | 3087:3084 | Reserved for future definition. Must be 0x0 or 0x1. | | |
| Reserved1 | 12 | 3083:3072 | Reserved for future definition. Must be 0x000 | | |
| DCP LLC Signature | 3072 | 3071:0 | A cryptographic signature calculated over all preceding fields of the certificate. RSASSA-PKCS1-v1_5 is the signature scheme used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function | | |
| | | Table | 2.1. Public Key Certificate of HDCP Receiver | | |
| | ality Cl Locality by send The HI | y check is per ing a 64-bit p OCP Transmitt | seudo-random nonce r_n to the downstream receiver. ter | | |
| ΗC | Receiver Public Key Reserved2 Reserved1 DCP LLC Signature | Receiver 1048 Public Key Reserved2 4 Reserved1 12 DCP LLC 3072 Signature 3072 OMI HDCP 2.2 at 11. Locality Ch Locality by send The HE The HE | Receiver Public Key 1048 4135:3088 Reserved2 4 3087:3084 Reserved1 12 3083:3072 DCP LLC 3072 3071:0 Signature 3072 3071:0 Table DMI HDCP 2.2 at 11. Coality Check Locality check is per by sending a 64-bit p The HDCP Transmit Initiates loo | Receiver Public10484135:3088Unique RSA public key of HDCP Receiver denoted by kpub _{rx} . The first 1024 bits is the big-endian representation of the modulus n and the trailing 24 bits is the big-endian representation of the public exponent eReserved243087:3084Reserved for future definition. Must be 0x0 or 0x1.Reserved1123083:3072Reserved for future definition. Must be 0x000DCP LLC30723071:0A cryptographic signature calculated over all preceding fields of the certificate. RSASSA-PKCS1-v1_5 is the signature scheme used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash functionTable 2.1. Public Key Certificate of HDCP Receiver | |

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"means for transmitting a first signal to the requesting device at a first time when said requesting device is validated as being compliant with the set of





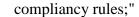
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24. Page 122 of 228 PageID #: 5054 U.S. Patent No. 9,436,809: Claim 17

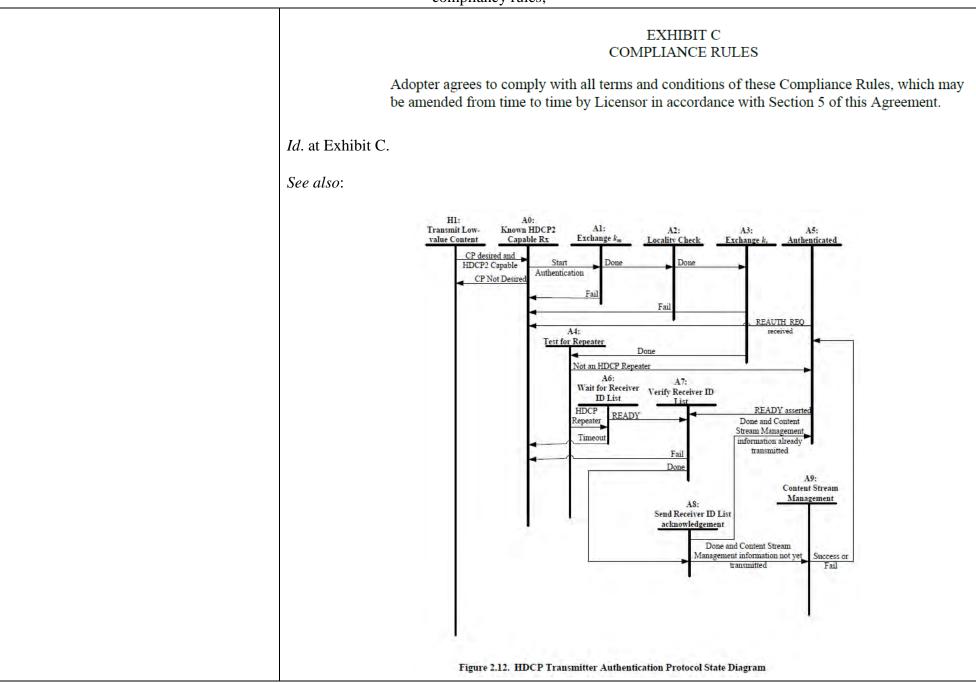
"means for transmitting a first signal to the requesting device at a first time when said requesting device is validated as being compliant with the set of compliancy rules:"

| compliancy rules;" |
|---|
| Extracts <i>Receiver ID</i> from <i>cert_{rx}</i> |
| If the HDCP Transmitter does not have a 128-bit Master Key k_m stored corresponding to the <i>Receiver ID</i> (See Section 2.2.1) |
| Verifies the signature on the certificate using kpub_{dcp}. Failure of signature verification constitutes an authentication failure and the HDCP Transmitter aborts the authentication protocol. |
| • Generates a pseudo-random 128-bit Master Key k_m . Encrypts k_m with $kpub_{rx}$ ($E_{kpub}(km)$) and sends AKE_No_Stored_km message to the receiver containing the 1024-bit $E_{kpub}(km)$. RSAES-OAEP encryption scheme must be used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function. The mask generation function used is MGF1 which uses SHA-256 as its underlying hash function. |
| Verifies integrity of the System Renewability Message (SRM). It does this by checking the signature of the SRM using kpub_{dep}. Failure of this integrity check constitutes an authentication failure and causes the HDCP Transmitter to abort authentication protocol. |
| The top-level HDCP Transmitter checks to see if the <i>Receiver ID</i> of the connected device is found in the revocation list. If the <i>Receiver ID</i> of the connected HDCP Device is found in the revocation list, authentication fails and the authentication protocol is aborted. SRM integrity check and revocation check are performed only by the top-level HDCP Transmitter. |
| <i>Id.</i> at 13. |
| A valid signature in the certificate indicates, for example, that the second device is compliant with a set of compliance rules of the HDCP specification. |
| 1.9 " Compliance Rules " means the technical requirements set out in Exhibit C, as such exhibit may be amended by Licensor from time to time in accordance with the terms of this Agreement. |
| HDCP License Agreement, March 6, 2017, at 2. |

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"means for transmitting a first signal to the requesting device at a first time when said requesting device is validated as being compliant with the set of





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"means for transmitting a first signal to the requesting device at a first time when said requesting device is validated as being compliant with the set of

compliancy rules;"

| HDMI HDCP 2.2 at 27. |
|---|
| Transition A1:A2. The HDCP Transmitter implements locality check after successful completion of AKE and pairing. State A2: Locality Check. In this state, the HDCP Transmitter implements the locality check as explained in Section 2.3 with the HDCP Receiver. |
| <i>Id.</i> at 28. |

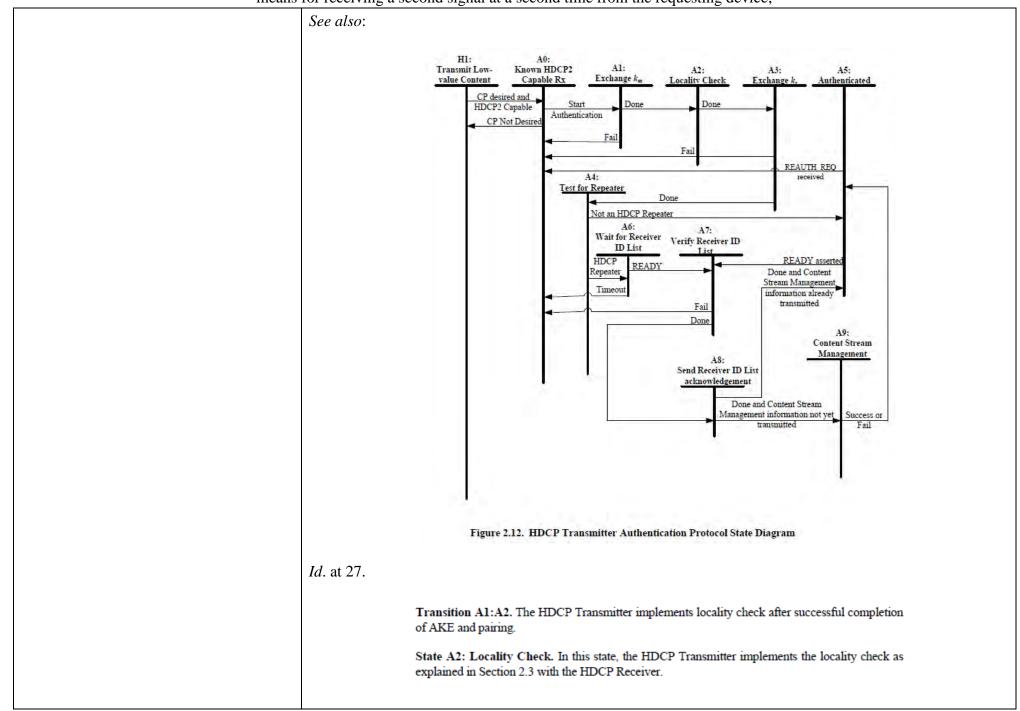
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24 Page 125 of 228 PageID #: 5057 U.S. Patent No. 9,436,809: Claim 17

| mean | s to receiving a second signal at a second time from the requesting device, | | | | | |
|--|--|--|--|--|--|--|
| means for receiving a second signal at a second time from the requesting device; | The Dell Product comprises means for receiving a second signal at a second time from the requesting device. For example, the Dell Product comprises a receiver and a microprocessor programmed with software for receiving a second signal, <i>e.g.</i> , the LC_Send_L_prime message including L', at a second time from the requesting device. | | | | | |
| | | | | | | |
| | HDCP Transmitter [Device A] HDCP Receiver [Device B] | | | | | |
| | Generate rn Ioeality check: LC_Init Set watchdog timer | | | | | |
| | $\begin{array}{c} \overset{\texttt{N} \\ \texttt{M} \\ \texttt{R} \\ \texttt{L} \\ \texttt{L} \\ \texttt{C} \\ \texttt{S} \\ \texttt{R} \\ \texttt{R} \\ \texttt{R} \\ \texttt{L} \\ \texttt{L} \\ \texttt{S} \\ \texttt{R} \\ \texttt{R} \\ \texttt{R} \\ \texttt{L} \\ \texttt{L} \\ \texttt{C} \\ \texttt{S} \\ \texttt{R} \\ \texttt{R} \\ \texttt{R} \\ \texttt{L} \\ \texttt{L} \\ \texttt{C} \\ \texttt{S} \\ \texttt{R} \\ \texttt{R} \\ \texttt{R} \\ \texttt{L} \\ \texttt{L} \\ \texttt{L} \\ \texttt{S} \\ \texttt{R} \\ \texttt{R} \\ \texttt{R} \\ \texttt{L} \\ \texttt{L} \\ \texttt{C} \\ \texttt{S} \\ \texttt{R} \\ \texttt{R} \\ \texttt{R} \\ \texttt{L} \\ \texttt{L} \\ \texttt{L} \\ \texttt{S} \\ \texttt{R} \\ \texttt{R} \\ \texttt{R} \\ \texttt{L} \\ \texttt{L} \\ \texttt{L} \\ \texttt{S} \\ \texttt{R} \\ \texttt{R} \\ \texttt{R} \\ \texttt{L} \\ \texttt{L} \\ \texttt{L} \\ \texttt{L} \\ \texttt{S} \\ \texttt{L} \\ \texttt{L} \\ \texttt{S} \\ \texttt{L} \\ \texttt{L} \\ \texttt{L} \\ \texttt{L} \\ \texttt{S} \\ \texttt{L} \\ $ | | | | | |
| | Figure 2.4. Locality Check between HDCP Transmitter and HDCP Receiver | | | | | |
| | HDMI HDCP 2.2 at 17. | | | | | |
| | The HDCP Receiver | | | | | |
| | • Computes a 256-bit value $L' = \text{HMAC-SHA256}(r_n, \text{k}_d \text{XOR } r_r)$. | | | | | |
| | Makes LC_Send_L_prime message containing 256-bit L' available for the transmitter to read immediately after computation of L' to ensure that the message is received by the transmitter within the specified 20 ms timeout at the transmitter. | | | | | |
| | Id. | | | | | |

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| | | | 0 , | |
|--------------------|-----|---|---|---|
| | 2.3 | Locality Check | | |
| | | Locality check is performed after AKE and pairing. The | | ates locality check |
| | | by sending a 64-bit pseudo-random nonce r_n to the down | nstream receiver. | |
| | | The HDCP Transmitter | | |
| | | Initiates locality check by writing the LC_ random nonce r_n to the HDCP Receiver. | Init message containing | a 64-bit pseudo- |
| | | Sets its watchdog timer to 20 ms. The LC_Set the transmitter within 20 ms from the time to message parameters to the HDCP Receiver. expires before the last byte of the LC_Set transmitter. The transmitter then aborts the automatical set of the set of the transmitter. | the transmitter finishes w Locality check fails if the end_L_prime message is | riting the LC_Init ne watchdog timer |
| | | Computes L = HMAC-SHA256(r_n, k_d XOR over r_n and the key used for HMAC is k_dXO significant 64-bits of k_d. | | |
| | | On reading LC_Send_L_prime message from check fails if L is not equal to L'. | n the receiver, compares | L and L'. Locality |
| <i>Id</i> . at 16. | | | | |
| | | 4.2.7 LC Init (M/rite) | | |
| | | 4.2.7 LC_Init (Write) | | - |
| | | LC_Init { | No. of Bytes | 5 |
| | | $r_n[630]$ | 1 8 | |
| | | Table 4.9. LC_Init Format | | |
| | | | | |
| <i>Id</i> . at 59. | | | | |
| | | | | |
| | | 4.2.8 LC_Send_L_prime (Read) | | |
| | | The LC_Send_L_prime message must be available for t the time the transmitter finishes writing the LC_Init mess after the last byte of r_n has been written. | | |
| | | Syntax | No. of Bytes | |
| | | LC_Send_L_prime{ | | |
| | | msg_id (=10) L [255.0] | 1 32 | |
| | | Table 4.10. LC_Send_L_prime Format | | |
| | | · · · · · · · · · · · · · · · · · · · | | |
| Id | | | | |
| Id. | | | | |
| | | | | |

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| <i>Id.</i> at 28. |
|-------------------|
| |

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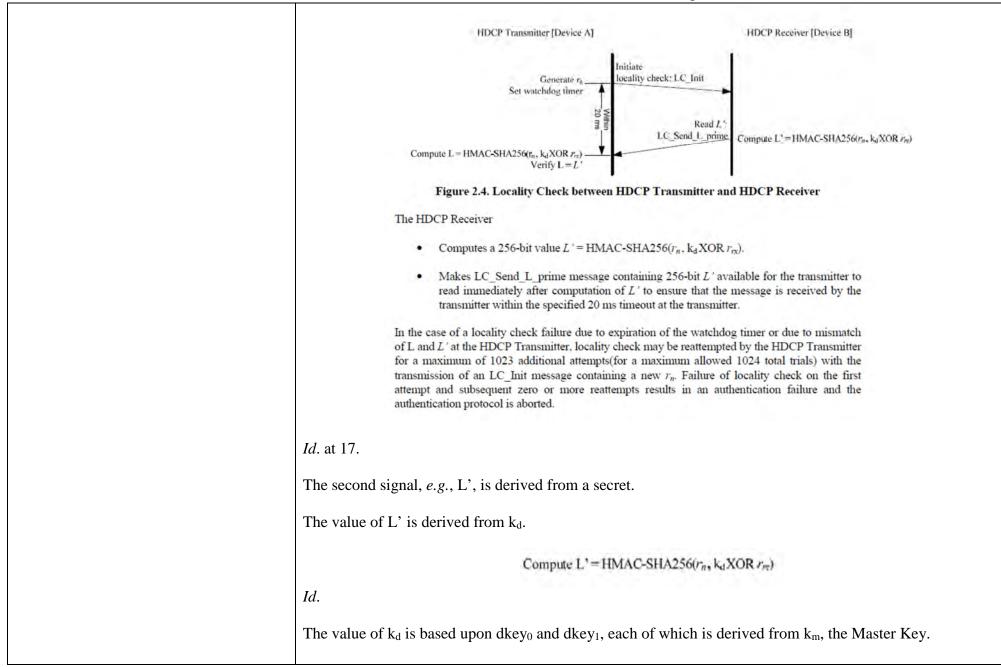
"means for providing the protected content to the requesting device after determining the second signal depends on a secret known to the content provider, and a time difference between the first time and the second time is less than a predetermined time."

means for providing the protected content The Dell Product comprises means for providing the protected content to the requesting device after to the requesting device after determining determining the second signal depends on a secret known to the Dell Product, and a time difference between the second signal depends on a secret the first time and the second time is less than a predetermined time. known to the content provider, and a time difference between the first time and the For example, the Dell Product comprises a transmitter and a microprocessor programmed with software for second time is less than a predetermined providing the protected content to the requesting device after determining the second signal, *e.g.*, L', depends on a secret known to the Dell Product and a time difference between the first time and the second time. time is less than a predetermined time. The HDCP 2.2 Locality Check must be passed prior to session key exchange and establishment of a secure communications path for the Dell Product to provide protected content to the second device. The HDCP authentication protocol is an exchange between an HDCP Transmitter and an HDCP Receiver that affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. It is comprised of the following stages Authentication and Key Exchange (AKE) - The HDCP Receiver's public key certificate ٠ is verified by the HDCP Transmitter. A Master Key km is exchanged. Locality Check – The HDCP Transmitter enforces locality on the content by requiring that the Round Trip Time (RTT) between a pair of messages is not more than 20 ms. Session Key Exchange (SKE) - The HDCP Transmitter exchanges Session Key ks with the HDCP Receiver. Authentication with Repeaters - The step is performed by the HDCP Transmitter only with HDCP Repeaters. In this step, the repeater assembles downstream topology information and forwards it to the upstream HDCP Transmitter. Successful completion of AKE and locality check stages affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. At the end of the authentication protocol, a communication path is established between the HDCP Transmitter and HDCP Receiver that only Authorized Devices can access. HDMI HDCP 2.2 at 11. The Dell Product provides protected content to the requesting device when, as part of the Locality Check: the L' received via the LC Send L prime message depends on a secret (as determined by matching L' to value L which is derived from the secret (*e.g.*, L is computed based on k_d , which is based on dkey₀ and dkey₁, each

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| | ed on the Master Key, k_m); and a time between the providing of the LC_Init message and the LC_Send_L_prime message is less than a predetermined time of 20 ms. |
|--------------------|--|
| 2.3 | Locality Check Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r_n to the downstream receiver. The HDCP Transmitter Initiates locality check by writing the LC_Init message containing a 64-bit pseudo-random nonce r_n to the HDCP Receiver. Sets its watchdog timer to 20 ms. The LC_Send_L_prime message must be received by the transmitter within 20 ms from the time the transmitter finishes writing the LC_Init message parameters to the HDCP Receiver. Locality check fails if the watchdog timer expires before the last byte of the LC_Send_L_prime message is received by the transmitter. The transmitter then aborts the authentication protocol. Computes L = HMAC-SHA256(r_n, k_d XOR r_{rx}) where HMAC-SHA256 is computed over r_n and the key used for HMAC is k_dXOR r_{rx}, where r_{rx} is XORed with the least-significant 64-bits of k_d. On reading LC_Send_L_prime message from the receiver, compares L and L'. Locality |
| <i>Id</i> . at 16. | check fails if L is not equal to L' . |

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| | d | key ₀ dkey ₁ , wh | nere dkey ₀ an | nd dkey1 are d | etion 2.7 to generate 256-bit k_d . $k_d =$ erived keys generated when $ctr = 0$ in big-endian order. |
|-----|--------------------------------------|--|--------------------------------------|-------------------------------------|---|
| Id. | at 14-15. | | | | |
| Id. | at 25. | | | | |
| | Tra HI at 8. | | DCP Receiver th the HDCP F | during Authenti | raphic key negotiated between the HDCP cation and Key Exchange and used to pair the |
| | Value | Confidentiality Required [±] ? | Integrity Required [±] ? | Value used by Core Functions? | Core Function |
| | k _m | Yes | Yes" | Yes | Handling of Master Key, during AKE (including Pairing) and Key Derivation, in plaintext form |
| | k _d | Yes | Yes* | No | N/A. |
| | dkey ₀ ,dkey ₁ | Yes | Yes' | No | N/A |
| | at 67 (abridg e Dell Produc | | generates and | d/or stores the | Master Key k_m and thus knows the secret. |

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| If the HDCP Transmitter does not have a 128-bit Master Key k_m stored corresponding to the <i>Receiver ID</i> (See Section 2.2.1) |
|---|
| Verifies the signature on the certificate using kpub_{dcp}. Failure of signature verification constitutes an authentication failure and the HDCP Transmitter aborts the authentication protocol. Generates a pseudo-random 128-bit Master Key k_m. Encrypts k_m with kpub_{rx} (E_{kpub}(km)) and sends AKE_No_Stored_km message to the receiver containing the 1024-bit E_{kpub}(km). RSAES-OAEP encryption scheme must be used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function. The mask generation function used is MGF1 which uses SHA-256 as |
| its underlying hash function. Id. at 13. |
| If the HDCP Transmitter has a 128-bit Master Key k_m stored corresponding to the <i>Receiver ID</i> (See Section 2.2.1) |
| • Sends AKE_Stored_km message to the receiver with the 128-bit $E_{kh}(k_m)$ and the 128-bit <i>m</i> corresponding to the <i>Receiver ID</i> of the HDCP Receiver |
| <i>Id.</i> at 14. |
| The Dell Product also knows k _d . |
| |

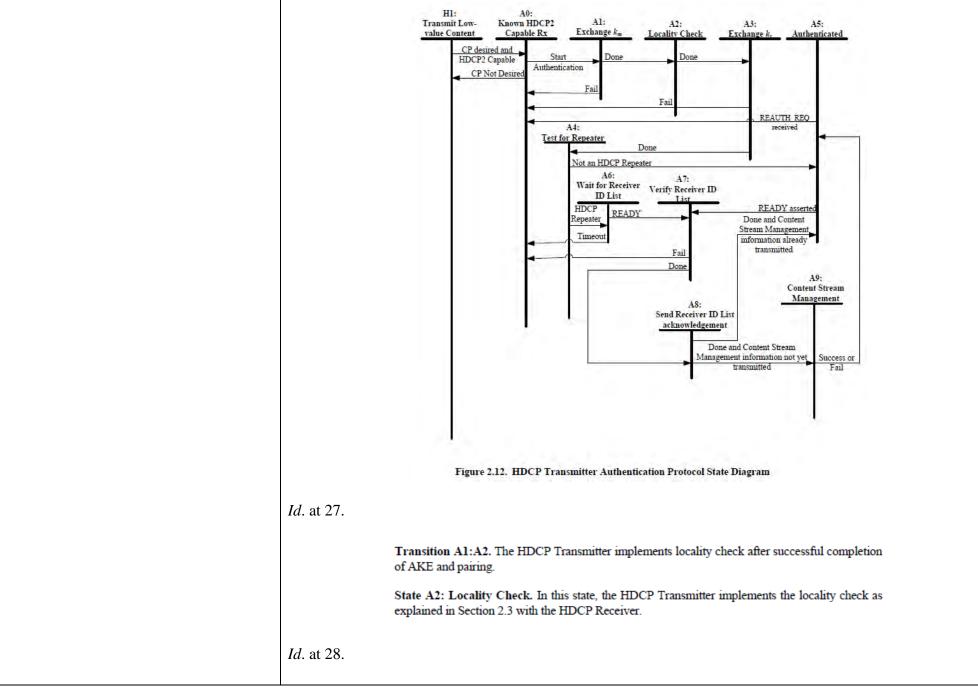
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| 2.3 Locality Check |
|--|
| Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r_n to the downstream receiver. |
| The HDCP Transmitter |
| Initiates locality check by writing the LC_Init message containing a 64-bit pseudo- random nonce r_n to the HDCP Receiver. |
| • Sets its watchdog timer to 20 ms. The LC_Send_L_prime message must be received by the transmitter within 20 ms from the time the transmitter finishes writing the LC_Init message parameters to the HDCP Receiver. Locality check fails if the watchdog timer expires before the last byte of the LC_Send_L_prime message is received by the transmitter. The transmitter then aborts the authentication protocol. |
| • Computes L = HMAC-SHA256(r_n , k _d XOR r_{rx}) where HMAC-SHA256 is computed over r_n and the key used for HMAC is k _d XOR r_{rx} , where r_{rx} is XORed with the least-significant 64-bits of k _d . |
| On reading LC_Send_L_prime message from the receiver, compares L and L'. Locality check fails if L is not equal to L'. |
| <i>Id.</i> at 16. |
| HDCP Transmitter [Device A] HDCP Receiver [Device B] |
| Generate rn Infiliate Iocality check: LC_Init Set watchdog timer |
| $\overrightarrow{L} = HMAC-SHA256(r_n, k_d XOR r_n)$ Compute L = HMAC-SHA256(r_n, k_d XOR r_n) Verify L = L' |
| Figure 2.4. Locality Check between HDCP Transmitter and HDCP Receiver |
| <i>Id.</i> at 17. |
| The Dell Product proceeds to session key exchange and providing of the protected content to the second device after successful completion of the AKE stage and Locality Check. |

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| 2.4 | HDCP Receiver is authorized to receive HDC by the HDCP Transmitter after a success encrypted Session Key to the HDCP Receive and beginning the transmission of HDCP Con the transmission of the encrypted Session Key encrypted with the Session Key k_s starts to | check stages affirms to HDCP Transmitter that the P Content. Session Key Exchange (SKE) is initiated ful locality check. The HDCP Transmitter sends r at least 200 ms before enabling HDCP Encryption tent. HDCP Encryption may be enabled 200 ms after to the HDCP Receiver and at no time prior. Content flow between the HDCP Transmitter and HDCP d only after successful completion of AKE, locality |
|--|---|--|
| <i>Id</i> . at 17. 3.1 | output of the T.M.D.S. Decoder (Figure 3-1). (XOR) of the HDCP Content with a pseudo-ra | e T.M.D.S. Encoder and decryption is applied at the HDCP Encryption consists of a bit-wise exclusive-or andom data stream produced by the HDCP Cipher. |
| 24-bi Data | | XOR |
| <i>Id.</i> at 50. <i>See also</i> : | | |

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| Transition A2:A3. The HDCP Transmitter implements SKE after successful completion of locality check. | |
|---|--|
| State A3: Exchange k_s . The HDCP Transmitter sends encrypted Session Key, $E_{dheg}(k_s)$, and r_{iv} to the HDCP Receiver as part of the SKE_Send_Eks message. It may enable HDCP Encryption 200 | |
| ms after sending encrypted Session Key. HDCP Encryption must be enabled only after successful completion of AKE, locality check and SKE stages. | |
| Transition A3:A4. This transition occurs after completion of SKE. | |
| <i>Id.</i> at 28-29. | |

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| 49. A lifst device for | controlling delivery of protected content to a second device, the first device comprising: |
|---|---|
| 49. A first device for controlling delivery of protected content to a second device, the first device comprising: | The Dell Inspiron 13 5000 Laptop (Inspiron 13 5391) (the "Dell Product") is a first device for controlling delivery of protected content to a second device. |
| | For example, the Dell Product is an HDMI transmitter with HDCP 2.2 for controlling delivery of protected content to another device, such as an HDMI receiver with HDCP 2.2. |
| | |
| | Dell, Inspiron 13 5000 Laptop, <u>https://www.Dell.com/en-us/member/shop/Dell-laptops/inspiron-13-5000-laptop/spd/inspiron-13-5391-wifi-laptop/nn5391dopvh#features_section</u> . |
| | The Dell Product includes an HDMI 1.4b port for delivery of protected content to another device. |
| | Ports & Slots |
| | 1. Headphone & Microphone Audio Jack 2. USB 3.1 Gen 1 3. Power . HDMI 1.4b 5. USB 3.1 Gen 1 Type C ⁺⁺ (DP/PowerDelivery) 6. Micro SD Card Reader |
| | Id. |
| | The Dell Product comprises a processor, including a "10th Generation Intel® Core TM i3-10110U Processor (4MB Cache, up to 4.1 GHz)" (the "Intel Processor") integrated with the Intel UHD Graphics 620 graphics processor (the "Intel GPU"). |

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| | Inspiron 13 5000 Laptop |
|-------------|---|
| | Configurations |
| | Processor More Info |
| | 10th Generation Intel® Core™ i3-10110U Processor (4MB Cache, up to 4.1 GHz) |
| | Operating System More Info |
| | Windows 10 Home in S mode 64-bit, English |
| | Graphics Card |
| | Intel UHD Graphics with shared graphics memory |
| | Memory |
| | 4GB, onboard, LPDDR3, 2133MHz |
| | Hard Drive More Info |
| | 128GB M.2 PCIe NVMe Solid State Drive |
| | so NotebookCheck, Intel Core i3-10110U, <u>https://www.notebookcheck.net/Intel-Core-i3-10110U-</u> ocessor-Comet-Lake-U.430588.0.html. |
| The Intel P | Processor supports HDCP 2.2 via HDMI 1.4. |

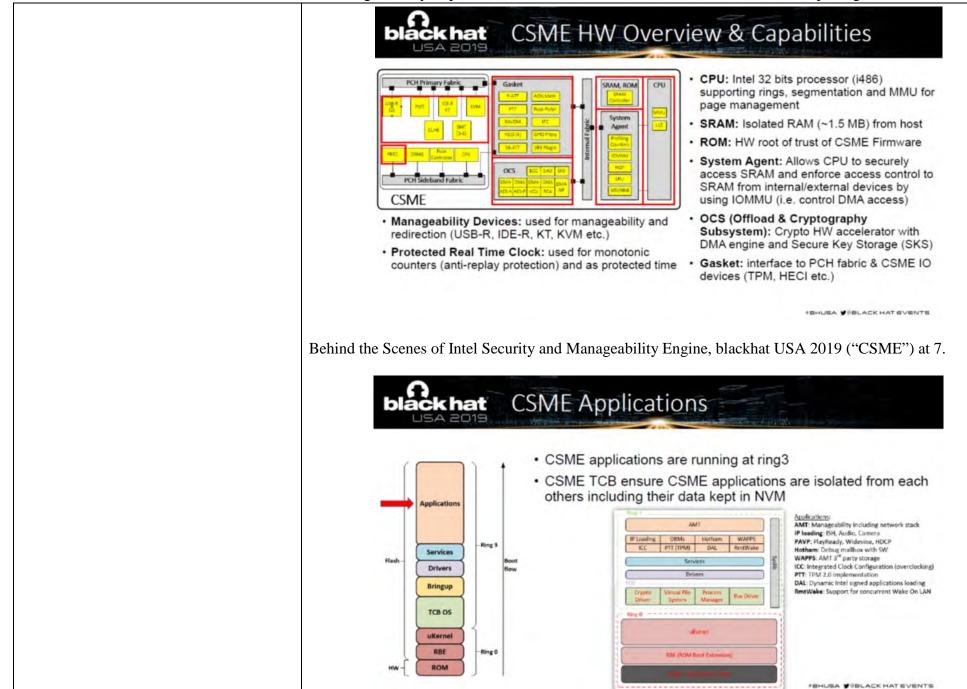
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| | Topic | HDCP HDCP | lay supporte Maximum | HDR ¹ | HDCP | BPC ³ | Comments | |
|----------------|------------------|------------|-------------------------|------------------|-----------------------|---------------------|-------------------------------------|--------------|
| | торіс | Revision | Resolution | NUK | Solution ² | DPC | | |
| | | HDCP1.4 | 4K@60 | No | iHDCP | 10 bit | Legacy Integrated for HDCP1.4 | |
| | DP | HDCP2.2 | 4K@60 | Yes | iHDCP | 10 bit | New Integrated for HDCP2.2 | |
| | | HDCP1.4 | 4K@30 | No | iHDCP | 8 bit | Legacy Integrated for HDCP1.4 | |
| | | HDCP2.2 | 4K@30 | No | LSPCON | 8 bit | LSPCON HDCP2.2 required | |
| | HDMI 1.4 | HDCP2.2 | 4K@30 | No | iHDCP4 | 8 bit | New Integrated for HDCP2.2 | |
| | HDMI 2.0 | HDCP2.2 | 4K@60 | No | LSPCON | 12 bit (YUV 420) | LSPCON HDCP2.2 required | |
| | HDMI2.0a | HDCP2.2 | 4K@60 | Yes | LSPCON | 12 bit (YUV 420) | LSPCON HDCP2.2 required | |
| Intel, | How | to | | enable | Hig | çh | Dynamic | Ran |
| | | ontent/www | v/us/en/sup | port/artic | cles/0000321 | 12/graphic | s/graphics-for- | -7th-generat |
| intel-processo | <u>rs.ntml</u> . | | | | | | | |

| Supported Technologies |
|--|
| Intel[®] Virtualization Technology (Intel[®] VT) |
| Intel[®] Active Management Technology 11.0 (Intel[®] AMT 11.0) |
| Intel[®] Trusted Execution Technology (Intel[®] TXT) |
| Intel[®] Streaming SIMD Extensions 4.2 (Intel[®] SSE4.2) |
| Intel[®] Hyper-Threading Technology (Intel[®] HT Technology) |
| Intel [®] 64 Architecture |
| Execute Disable Bit |
| Intel[®] Turbo Boost Technology 2.0 |
| Intel[®] Advanced Vector Extensions 2 (Intel[®] AVX2) Intel[®] Advanced Encryption Standard New Instructions (Intel[®] AES-NI) |
| PCLMULQDQ (Perform Carry-Less Multiplication Quad word) Instruction |
| Intel[®] Transactional Synchronization Extensions (Intel[®] TSX-NI) |
| PAIR – Power Aware Interrupt Routing |
| SMEP – Supervisor Mode Execution Protection |
| Intel [®] Boot Guard |
| Intel[®] Software Guard Extensions (Intel[®] SGX) |
| Intel[®] Memory Protection Extensions (Intel[®] MPX) |
| GMM Scoring Accelerator |
| Intel [®] Processor Trace |
| High Definition Content Protection (HDCP) 2.2 |
| |
| Intel, 10 th Generation Intel Core Processors, Datasheet, Volume 1 or 2 (Jul. 2020, rev. 5), <i>available at</i> <u>https://cdrdv2.intel.com/v1/dl/getContent/615211</u> , at 11-12. |
| "HDCP is the technology for protecting high-definition content against unauthorized copy between a source and the sink The [Intel] [P]rocessor supports HDCP 1.4/2.3 for 4 k Premium content protection over wired displays (HDMI* and DisplayPort*)." |

| controlling derivery of protected content to a second device, the first device comprising. |
|--|
| High-bandwidth Digital Content Protection (HDCP) |
| HDCP is the technology for protecting high-definition content against unauthorized copy or unreceptive between a source (computer, digital set top boxes, and so on) and the sink (panels, monitor, and TVs). The processor supports HDCP 1.4/2.3 for 4 k Premium content protection over wired displays (HDMI* and DisplayPort*). |
| <i>Id.</i> at 44 |
| Intel's "UHD" processor nomenclature also indicates support for HDCP 2.2: |
| Another change from 7 Gen to 8 Gen will be in the graphics. Intel is upgrading the nomenclature of the integrated graphics from HD 620 to UHD 620, indicating that the silicon is suited for 4K playback and processing. During our pre-briefing it was categorically stated several times that there was no change between the two, however we have since confirmed that the new chips will come with HDCP 2.2 support as standard for DP1.2a, removing the need for an external LSPCON for this feature. Other than this display controller change however, it appears that these new UHD iGPUs are architecturally the same as their HD predecessors. |
| https://www.anandtech.com/show/11738/intel-launches-8th-generation-cpus-starting-with-kaby-lake- refresh-for-15w-mobile. |
| HDCP 2.2 is implemented in Intel-based systems with Core-i series Processors within the Converged Security & Manageability Engine (CSME) also known as the Management Engine (ME). The CSME contains a processor (x86 core) which executes instructions including but not limited to the uKernel/OS, drivers, services, and applications for the CSME. |

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"49. A first device for controlling delivery of protected content to a second device, the first device comprising:"

Id. at 23.

One such application is "PAVP" which provides HDCP capabilities within the Intel processor.

- CSME applications are running at ring3
- CSME TCB ensure CSME applications are isolated from each others including their data kept in NVM

| AMT | | | | |
|------------------|------------------------|--------------------|------------|-------|
| IP Loading | DRMs | Hotham | WAPPS | |
| ICC | PTT (TPM) | DAL | RmtWake | |
| Services | | | | DIRAC |
| CB | | | | |
| Crypto Driver | Virtual File System | Process Manager | Bus Driver | |

Applications: AMT: Manageability including network stack IP loading: ISH, Audio, Camera PAVP: PlayReady, Widevine, HDCP Hotham: Debug mailbox with SW WAPPS: AMT 3rd party storage ICC: Integrated Clock Configuration (overclocking) PTT: TPM 2.0 implementation DAL: Dynamic Intel signed applications loading RmtWake: Support for concurrent Wake On LAN

Id.

Upon information and belief, the Dell Product is compliant with the High-bandwidth Digital Content Protection System Revision 2.2 ("HDCP 2.2") protocol. The Dell Product supports HDCP 2.2 for protecting content between devices.

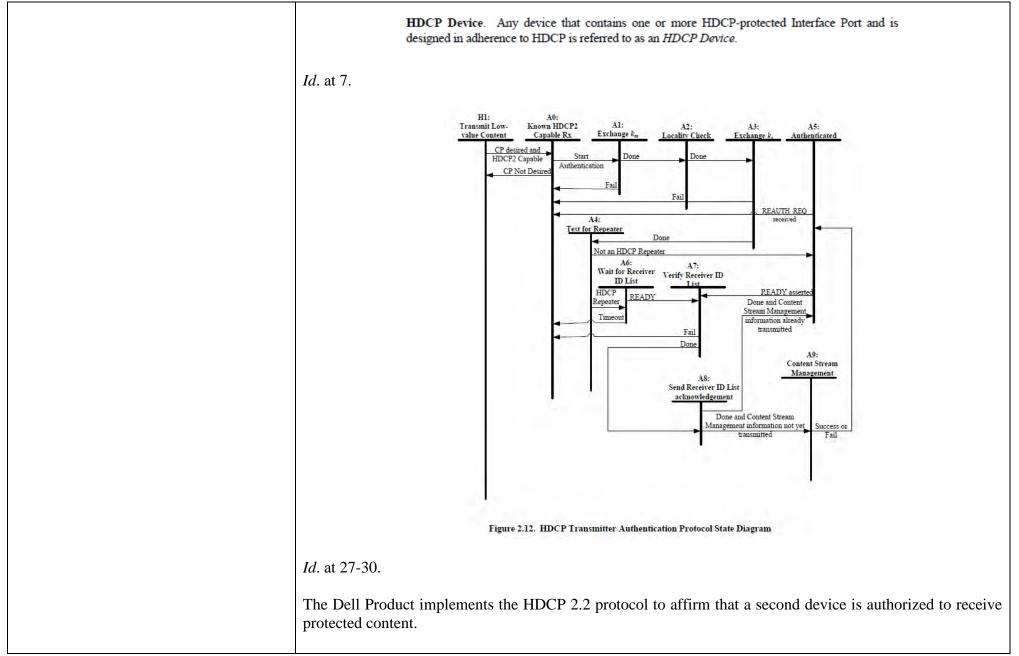
For the purpose of this specification, it is assumed that the Audiovisual content is transmitted over a HDMI based wired display link. In an HDCP System, two or more HDCP Devices are interconnected through an HDCP-protected Interface. The Audiovisual Content flows from the Upstream Content Control Function into the HDCP System at the most upstream HDCP Transmitter. From there the Audiovisual Content encrypted by the HDCP System, referred to as HDCP Content, flows through a tree-shaped topology of HDCP Receivers over HDCP-protected Interfaces. This specification describes a content protection mechanism for: (1) authentication of HDCP Receivers to their immediate upstream connection (i.e., an HDCP Transmitter), (2) revocation of HDCP Receivers that are determined by the Digital Content Protection, LLC, to be invalid, and (3) HDCP Encryption of Audiovisual Content over the HDCP-protected Interfaces between HDCP Transmitters and their downstream HDCP Receivers. HDCP Receivers may render the HDCP Content in audio and visual form for human consumption. HDCP Receivers may be HDCP Repeaters that serve as downstream HDCP Transmitters emitting the HDCP Content further downstream to one or more additional HDCP Receivers.

High-bandwidth Digital Content Protection System Mapping HDCP to HDMI Revision 2.2 13 February, 2013 ("HDMI HDCP 2.2") at 5.

| There are three elements of the content protection system. Each element plays a specific role in the system. First, there is the authentication protocol, through which the HDCP Transmitter verifies that a given HDCP Receiver is licensed to receive HDCP Content. The authentication protocol is implemented between the HDCP Transmitter and its corresponding downstream HDCP Receiver. With the legitimacy of the HDCP Receiver determined, encrypted HDCP Content is transmitted between the two devices based on shared secrets established during the authentication protocol. This prevents eavesdropping devices from utilizing the content. Finally, in the event that legitimate devices are compromised to permit unauthorized use of HDCP Content, renewability allows an HDCP Transmitter to identify such compromised devices and prevent the transmission of HDCP Content. This document contains chapters describing in detail the requirements of each of these elements. In addition, a chapter is devoted to describing the cipher structure that is used in the encryption of HDCP Content. |
|---|
| <i>Id.</i> at 9. |
| The Dell Product is an HDCP Device, and more specifically an HDCP 2.2-compliant Device, capable of functioning as an HDCP Transmitter and that implements required functionality of HDMI HDCP 2.2 including the functions required by the HDCP Transmitter State Diagram. |
| The state machines in this specification define the required behavior of HDCP Devices. The link- visible behavior of HDCP Devices implementing the specified state machines must be identical, even if implementations differ from the descriptions. The behavior of HDCP Devices implementing the specified state machines must also be identical from the perspective of an entity outside of the HDCP System. |
| Implementations must include all elements of the content protection system described herein, unless the element is specifically identified as informative or optional. Adopters must also ensure that implementations satisfy the robustness and compliance rules described in the technology license. |
| <i>Id.</i> at 5. |
| HDCP 2.2-compliant Device. An HDCP Device that is designed in adherence to HDCP 2.2 is referred to as an HDCP 2.2-compliant Device. |
| <i>Id.</i> at 6. |
| |

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"49. A first device for controlling delivery of protected content to a second device, the first device comprising:"



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"49. A first device for controlling delivery of protected content to a second device, the first device comprising:"

| 2.1 Overview The HDCP authentication protocol is an exchange between an HDCP Transmitter and an HDCP Receiver that affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. It is comprised of the following stages Authentication and Key Exchange (AKE) – The HDCP Receiver's public key certificate is verified by the HDCP Transmitter. A Master Key k_m is exchanged. Locality Check – The HDCP Transmitter enforces locality on the content by requiring that the Round Trip Time (RTT) between a pair of messages is not more than 20 ms. Session Key Exchange (SKE) – The HDCP Transmitter exchanges Session Key k_n with the HDCP Receiver. Authentication with Repeaters – The step is performed by the HDCP Transmitter only with HDCP Repeaters. In this step, the repeater assembles downstream topology information and forwards it to the upstream HDCP Transmitter. Successful completion of AKE and locality check stages affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Transmitter and HDCP Receiver that only Authorized Devices can access. | The HDCP authentication protocol is an exchange between | |
|---|--|---|
| Authentication with Repeaters – The step is performed by the HDCP Transmitter only with HDCP Repeaters. In this step, the repeater assembles downstream topology information and forwards it to the upstream HDCP Transmitter. Successful completion of AKE and locality check stages affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. At the end of the authentication protocol, a communication path is established between the HDCP Transmitter and HDCP Receiver that only Authorized Devices can access. | HDCP Content. It is comprised of the following stages Authentication and Key Exchange (AKE) – The H is verified by the HDCP Transmitter. A Master Kee Locality Check – The HDCP Transmitter enforce that the Round Trip Time (RTT) between a pair of the the Round Trip Time (RTT) between a pair o | HDCP Receiver's public key certificate tey k_m is exchanged. ces locality on the content by requiring of messages is not more than 20 ms. |
| <i>Id.</i> at 11. | the HDCP Receiver. Authentication with Repeaters – The step is perf with HDCP Repeaters. In this step, the repeatinformation and forwards it to the upstream HDCP Successful completion of AKE and locality check stages af HDCP Receiver is authorized to receive HDCP Content. At a communication path is established between the HDCP Tra- Authorized Devices can access. | formed by the HDCP Transmitter only eater assembles downstream topology P Transmitter. ffirms to the HDCP Transmitter that the At the end of the authentication protocol, |

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| | "a memory;" |
|-----------|---|
| a memory; | The Dell Product includes a memory. |
| | For example, the Intel Processor includes a 4MB cache and the Dell Product also includes a 4GB onboard LPDDR3 memory in addition to a 128GB solid state hard drive. |
| | Inspiron 13 5000 Laptop |
| | Configurations |
| | Processor More Info |
| | 10th Generation Intel® Core™ i3-10110U Processor (4MB Cache, up to 4.1 GHz) |
| | Operating System More Info |
| | Windows 10 Home in S mode 64-bit, English |
| | Graphics Card |
| | Intel UHD Graphics with shared graphics memory |
| | Memory |
| | 4GB, onboard, LPDDR3, 2133MHz |
| | Hard Drive More Info |
| | 128GB M.2 PCIe NVMe Solid State Drive |
| | Dell Inspiron 13 5000 Laptop, https://www.dell.com/en-us/member/shop/dell-laptops/inspiron-13-5000- |
| | laptop/spd/inspiron-13-5391-wifi-laptop/nn5391dopvh#features_section. |

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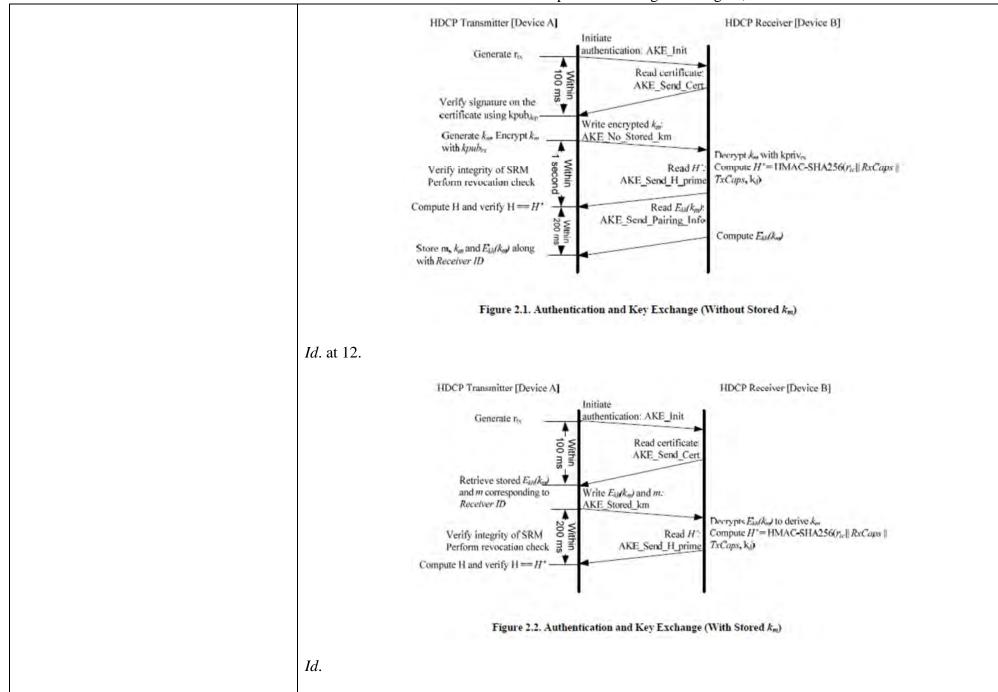
"a processor, the processor arranged to:"

| a processor, the processor arranged to. | | | | |
|---|---|--|--|--|
| a processor, the processor arranged to: | The Dell Product includes a processor. | | | |
| | For example, the Dell Product includes the Intel Processor integrated with the Intel GPU. | | | |
| | Inspiron 13 5000 Laptop | | | |
| | Configurations | | | |
| | Processor More Info | | | |
| | 10th Generation Intel® Core™ i3-10110U Processor (4MB Cache, up to 4.1 GHz) | | | |
| | Operating System More Info | | | |
| | Windows 10 Home in S mode 64-bit, English | | | |
| | Graphics Card | | | |
| | Intel UHD Graphics with shared graphics memory | | | |
| | Memory | | | |
| | 4GB, onboard, LPDDR3, 2133MHz | | | |
| | Hard Drive More Info | | | |
| | 128GB M.2 PCIe NVMe Solid State Drive | | | |
| | Dell Inspiron 13 5000 Laptop, <u>https://www.dell.com/en-us/member/shop/dell-laptops/inspiron-13-5000-laptop/spd/inspiron-13-5391-wifi-laptop/nn5391dopvh#features_section</u> ; <i>see also</i> NotebookCheck, Intel Core i3-10110U, <u>https://www.notebookcheck.net/Intel-Core-i3-10110U-Laptop-Processor-Comet-Lake-U.430588.0.html</u> . | | | |

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| | | | | e prior to sending a mist signal, |
|--|---|----------------------------|---------------------------------|--|
| receive a certificate from the second device prior to sending a first signal; | | and H | Key Excha | arranged to receive a certificate of the second device, <i>e.g.</i> , <i>cert_{rx}</i> , as pinge (AKE) stage of the HDCP 2.2 protocol and prior to sending a fine. |
| | and a cryptographic st The H Public | ignatu DCP R : Key C | eceiver is issuertificate issue | ed 1024-bit RSA public and private keys. The public key is stored in a ed by DCP LLC, denoted by <i>cert_{re}</i> . Table 2.1 gives the fields contained |
| | | | | are stored in big-endian format. |
| | Name | Size (bits) | Bit position | Function |
| | Receiver ID | 40 | 4175:4136 | Unique receiver identifier. It has the same format as an HDCP 1.x KSV i.e. it contains 20 ones and 20 zeroes |
| | Receiver Public Key | 1048 | 4135:3088 | Unique RSA public key of HDCP Receiver denoted by $kpub_{rx}$. The first 1024 bits is the big-endian representation of the modulus n and the trailing 24 bits is the big-endian representation of the public exponent e |
| | Reserved2 | 4 | 3087:3084 | Reserved for future definition. Must be 0x0 or 0x1. |
| | Reserved1 | 12 | 3083:3072 | Reserved for future definition. Must be 0x000 |
| | DCP LLC Signature | 3072 | 3071:0 | A cryptographic signature calculated over all preceding fields of the certificate. RSASSA-PKCS1-v1_5 is the signature scheme used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function |
| | | | Table | 2.1. Public Key Certificate of HDCP Receiver |
| | HDMI HDCP 2.2 at 1 | 1. | | |
| | | | | ch HDCP Receiver is issued a Public Key Certificate signed by DCP ver ID and RSA public key corresponding to the HDCP Receiver. |
| | <i>Id.</i> at 8. | | | |
| | | | | cate from the second device as part of the AKE stage, irrespective r Key k_m stored corresponding to the Receiver ID. |

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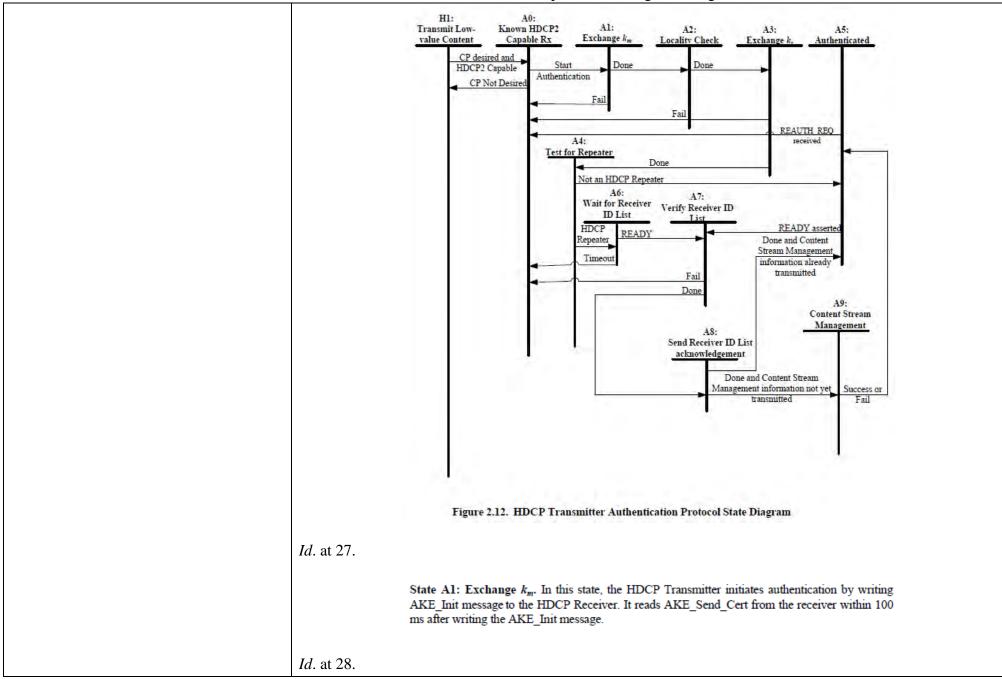


| | The Dell Product receives the certificate from the second | evice as part of the AKE_Send_Cert n | nessage. |
|-----|--|---|----------------|
| | Reads AKE_Send_Cert from the receiver contain (r_{rx}) and $RxCaps$. REPEATER bit in $RxCaps$ ind an HDCP Repeater. If REPEATER is set to on Repeater. If REPEATER is zero, the receive AKE_Send_Cert message must be available for from the time the transmitter finishes writing the HDCP Receiver. If the AKE_Send_Cert message read within 100 ms, the transmitter aborts the autility of the transmitter aborts t | cates whether the connected receiver is e, it indicates the receiver is an HDCP er is not an HDCP Repeater. The the transmitter to read within 100 ms e AKE_Init message parameters to the e is not available for the transmitter to | |
| i i | <i>Id.</i> at 13. | | |
| | The HDCP Receiver | | |
| | Makes available the AKE_Send_Cert message AKE_Init. The AKE_Send_Cert message m within 100 ms from the time the transmitte parameters to the HDCP Receiver. | ist be available for the transmitter to read | |
| | <i>Id</i> . at 14. | | |
| | 4.2.2 AKE_Send_Cert (Read) | | |
| | after writing the AKE_Init message i.e. after the | Send_Cert beginning with cert _{rx} within 100 ms last byte of <i>TxCaps</i> has been written. | |
| | Syntax | No. of Bytes | |
| | AKE_Send_Cert { msg_id (=3) cert _m [41750] r _m [630] RxCaps } | 1 522 8 3 | |
| | Table 4.3. AKE_Send_Cert For | nat | |
| | | | |
| | <i>Id</i> . at 57. | | |
| | The Dell Product receives the certificate from the second of signal, <i>e.g.</i> , r _n of the LC_Init message, as part of a Locality | • • • • | ending a first |

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| 2.3 | Locality Check Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r_n to the downstream receiver. The HDCP Transmitter Initiates locality check by writing the LC_Init message containing a 64-bit pseudo-random nonce r_n to the HDCP Receiver. |
|-------------------------|---|
| Id. at 16. See also: | |

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| | Transition A1:A2. The HDCP Transmitter implements locality check after successful completion of AKE and pairing. | | | |
|--|---|--|--|--|
| | State A2: Locality Check. In this state, the HDCP Transmitter implements the locality check as explained in Section 2.3 with the HDCP Receiver. | | | |
| | Id. | | | |

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"determine from the certificate if the second device is compliant;"

| determine from the certificate if the second device is compliant; | The processor of the Dell Product is arranged to determine from the certificate whether the second device is compliant. | | | | | | |
|---|---|------------------------------------|---|--|--|--|--|
| | Exchange (AKE) stag Receiver Public Key, The H Public | ge, wh and a DCP R Key Co | ether the s cryptogra eceiver is issuentificate issue | the certificate, <i>e.g.</i> , <i>cert_{rx}</i> , and as part of the Authentication and Ke second device is compliant. For example, $cert_{rx}$ includes a Receiver II phic signature. ed 1024-bit RSA public and private keys. The public key is stored in a ed by DCP LLC, denoted by $cert_{rx}$. Table 2.1 gives the fields contained are stored in big-endian format. | | | |
| | Name | Size (bits) | Bit position | Function | | | |
| | Receiver ID | 40 | 4175:4136 | Unique receiver identifier. It has the same format as an HDCP 1.x KSV i.e. it contains 20 ones and 20 zeroes | | | |
| | Receiver Public Key | 1048 | 4135:3088 | Unique RSA public key of HDCP Receiver denoted by <i>kpubre</i> . The first 1024 bits is the big-endian representation of the modulus n and the trailing 24 bits is the big-endian representation of the public exponent e | | | |
| | Reserved2 | 4 | 3087:3084 | Reserved for future definition. Must be 0x0 or 0x1. | | | |
| | Reserved1 | 12 | 3083:3072 | Reserved for future definition. Must be 0x000 | | | |
| | DCP LLC Signature | 3072 | 3071:0 | A cryptographic signature calculated over all preceding fields of the certificate. RSASSA-PKCS1-v1_5 is the signature scheme used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function | | | |
| | | | Table | 2.1. Public Key Certificate of HDCP Receiver | | | |
| | | rmine | | nple, whether the certificate conforms with the format established by the cerpted above) and indicates a valid signature. | | | |

"determine from the certificate if the second device is compliant;"

| determine nom the certificate if the second device is compnant, |
|---|
| Extracts Receiver ID from cert _{rx} |
| If the HDCP Transmitter does not have a 128-bit Master Key k_m stored corresponding to the <i>Receiver ID</i> (See Section 2.2.1) |
| Verifies the signature on the certificate using kpub_{dcp}. Failure of signature verification constitutes an authentication failure and the HDCP Transmitter aborts the authentication protocol. |
| • Generates a pseudo-random 128-bit Master Key k_m . Encrypts k_m with $kpub_{rx}$ ($E_{kpub}(km)$) and sends AKE_No_Stored_km message to the receiver containing the 1024-bit $E_{kpub}(km)$. RSAES-OAEP encryption scheme must be used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function. The mask generation function used is MGF1 which uses SHA-256 as its underlying hash function. |
| Verifies integrity of the System Renewability Message (SRM). It does this by checking the signature of the SRM using kpub_{dcp}. Failure of this integrity check constitutes an authentication failure and causes the HDCP Transmitter to abort authentication protocol. |
| The top-level HDCP Transmitter checks to see if the <i>Receiver ID</i> of the connected device is found in the revocation list. If the <i>Receiver ID</i> of the connected HDCP Device is found in the revocation list, authentication fails and the authentication protocol is aborted. SRM integrity check and revocation check are performed only by the top-level HDCP Transmitter. |
| <i>Id.</i> at 13. |
| A valid signature in the certificate indicates, for example, that the second device is compliant with the compliance rules of the HDCP specification. |
| 1.9 " Compliance Rules " means the technical requirements set out in Exhibit C, as such exhibit may be amended by Licensor from time to time in accordance with the terms of this Agreement. |
| HDCP License Agreement, March 6, 2017, at 2, <i>available at</i> <u>https://digital-cp.com/sites/default/files/HDCP%20License%20Agreement_March%206%2C%202017_FOR%20REVIEW%20ONLY.pdf</u> . |
| |

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"determine from the certificate if the second device is compliant;"

| EXHIBIT C COMPLIANCE RULES |
|--|
| Adopter agrees to comply with all terms and conditions of these Compliance Rules, which may be amended from time to time by Licensor in accordance with Section 5 of this Agreement. |
| <i>Id.</i> at Exhibit C. |
| See also: HI: A0: Transmit Low- Known HDCP2 Al: A2: A3: A5: value Content Canable Rx Exchange k Locality Check Exchange k Authenforded |
| value Content Capable Rs Exchange & Localin Check Exchange & Authenticated CP detred and HDCP2 Capable CP Not Denized Fail Atti- Text for Repeater Not an HDCP Repeater Atti- Text for Repeater Main for Receiver D I bits HDCP Repeater Timeout Fail Seed Receiver D List Timeout Fail Done and Content Stream Management Information already Tammited Done and Content Stream Management Tammited Tammited Tammited Content Stream Management Tammited Tammited Tammited Content Stream Management Tammited Tammit |
| Figure 2.12. HDCP Transmitter Authentication Protocol State Diagram |

"determine from the certificate if the second device is compliant:"

| determine from the certificate if the second device is compliant, |
|---|
| HDMI HDCP 2.2 at 27. |
| State A0: Rx Known to be HDCP 2 Capable. If state A0 is reached when content protection is desired by the Upstream Content Control Function, authentication must be started immediately by the transmitter if the receiver is HDCP 2 capable. A valid video screen is displayed to the user with encryption disabled during this time. |
| Transition A0:A1. The transmitter initiates the authentication protocol. |
| State A1: Exchange k_m . In this state, the HDCP Transmitter initiates authentication by writing AKE_Init message to the HDCP Receiver. It reads AKE_Send_Cert from the receiver within 100 ms after writing the AKE_Init message. |
| If the HDCP Transmitter does not have k_m stored corresponding to the <i>Receiver ID</i> , it generates $E_{kpub}(km)$ and sends $E_{kpub}(km)$ as part of the AKE_No_Stored_km message to the receiver after verification of signature on <i>cert_{rx}</i> . It performs integrity check on the SRM and checks to see whether the <i>Receiver ID</i> of the connected HDCP Device is in the revocation list. It computes H, reads AKE_Send_H_prime message from the receiver containing H' within one second after writing AKE_No_Stored_km to the receiver and compares H' against H. |
| If the HDCP Transmitter has k_m stored corresponding to the <i>Receiver ID</i> , it writes AKE_Stored_km message containing $E_{kh}(k_m)$ and <i>m</i> to the receiver, performs integrity check on the SRM and checks to see whether the <i>Receiver ID</i> of the connected HDCP Device is in the revocation list. It computes H, reads AKE_Send_H_prime message from the receiver containing H' within 200 ms after writing AKE_Stored_km to the receiver and compares H' against H. |
| <i>Id.</i> at 28. |

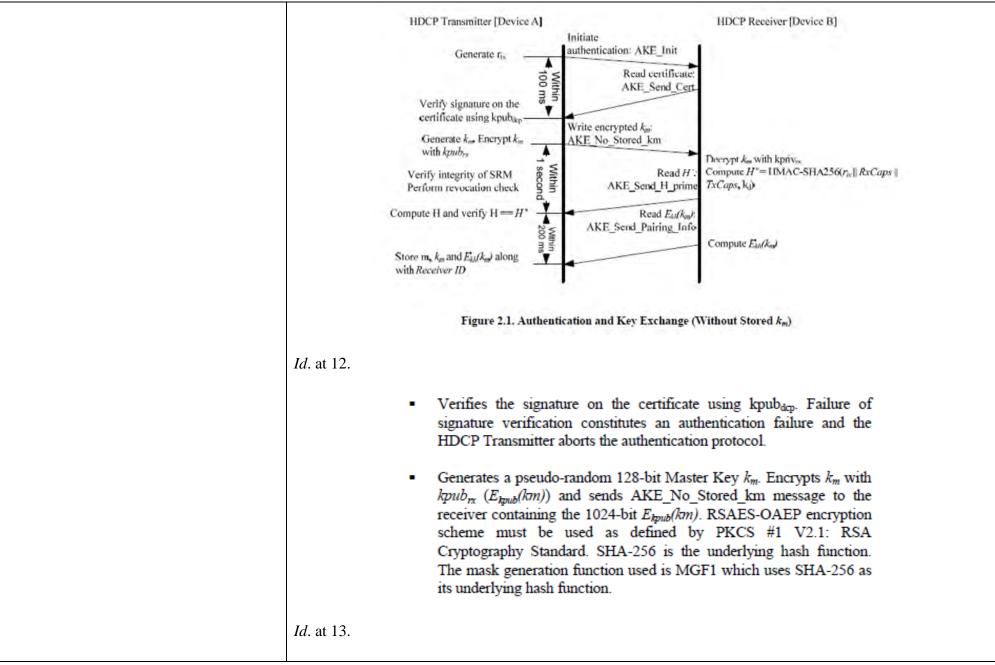
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| | Suid Secret et | mpris | ing a rain | dom number;" | | |
|--|---|---|------------|---|--|--|
| provide a secret to the second device viencryption by a public key of private/public key-pair of the second levice, if the second device is complian baid secret comprising a random number; | by a public key of a private/public key-pair of the second device, if the second device is compliant, said secre | | | | | |
| | Device Key Set . An HDCP Receiver has a Device Key Set, which consists of its corresponding Device Secret Keys along with the associated Public Key Certificate. | | | | | |
| | HDMI HDCP 2.2 at 6. | HDMI HDCP 2.2 at 6. | | | | |
| | Publ | The HDCP Receiver is issued 1024-bit RSA public and private keys. The public key is stored in a Public Key Certificate issued by DCP LLC, denoted by $cert_{rx}$. Table 2.1 gives the fields contained in the certificate. All values are stored in big-endian format. | | | | |
| | Name | Size | Bit | Function | | |
| | | (bits) | position | | | |
| | Receiver ID | 40 | 4175:4136 | Unique receiver identifier. It has the same format as an HDCP 1.x KSV i.e. it contains 20 ones and 20 zeroes | | |
| | Receiver Public Key | Receiver Public10484135:3088Unique RSA public key of HDCP Receiver denoted by kpubrx. The first 1024 bits is the big-endian representation of the modulus n and the trailing 24 bits | | | | |
| | Reserved2 | 4 | 3087:3084 | Reserved for future definition. Must be 0x0 or 0x1. | | |
| | Reserved1 | 12 | 3083:3072 | Reserved for future definition. Must be 0x000 | | |
| | DCP LLC 3072 3071:0 A cryptographic signature calculated over all preceding fields of the certificate. RSASSA-PKCS1-v1_5 is the signature scheme used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function | | | | | |
| | | Table 2.1. Public Key Certificate of HDCP Receiver | | | | |
| | The secret RSA private key is denoted by $kpriv_{rx}$. The computation time of RSA private key operation can be reduced by using the Chinese Remainder Theorem (CRT) technique. Therefore, it is recommended that HDCP Receivers use the CRT technique for private key computations. | | | | | |
| | <i>Id</i> . at 11. | <i>Id.</i> at 11. The Dell Product receives the public key of the second device, <i>e.g.</i> , kpub _{<i>rx</i>} , as part of the AKE_Send_Cert message. | | | | |
| | | | | | | |

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| sald secret comprising a random number; | |
|---|--|
| The HDCP Receiver | |
| AKE_Init. The AKE_Send_Cert message | sage for the transmitter to read in response to must be available for the transmitter to read aitter finishes writing the AKE_Init message |
| <i>Id.</i> at 14. | |
| Reads AKE_Send_Cert from the receiver conta (r_{rx}) and <i>RxCaps</i> . REPEATER bit in <i>RxCaps</i> is an HDCP Repeater. If REPEATER is set to Repeater. If REPEATER is zero, the rec AKE_Send_Cert message must be available if from the time the transmitter finishes writing HDCP Receiver. If the AKE_Send_Cert mess read within 100 ms, the transmitter aborts the a | ndicates whether the connected receiver is one, it indicates the receiver is an HDCP eiver is not an HDCP Repeater. The for the transmitter to read within 100 ms the AKE Init message parameters to the sage is not available for the transmitter to |
| <i>Id.</i> at 13. | |
| 4.2.2 AKE_Send_Cert (Read) The HDCP Transmitter attempts to read Al after writing the AKE_Init message i.e. after t | KE_Send_Cert beginning with $cert_{rx}$ within 100 ms the last byte of $TxCaps$ has been written. |
| Syntax | No. of Bytes |
| AKE_Send_Cert { msg_id (=3) cert _{rx} [41750] r _{rx} [630] RxCaps } | 1 522 8 3 |
| Table 4.3. AKE_Send_Cert F | ormat |
| <i>Id.</i> at 57. | |
| The Dell Product provides the secret, <i>e.g.</i> , k_m , to the sec public key, <i>e.g.</i> , kpub _{<i>rx</i>} , if the second device is complian Dell Product as part of the AKE_Send_Cert message. | · · · |

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| said secret comprising a random number;" |
|---|
| Sends AKE_Stored_km message to the receiver with the 128-bit <i>E</i>_{kh}(k_m) and the 128-bit <i>m</i> corresponding to the <i>Receiver ID</i> of the HDCP Receiver |
| <i>Id.</i> at 14. |
| If AKE_No_Stored_km is received, the HDCP Receiver |
| • Decrypts k_m with kpriv _{rx} using RSAES-OAEP decryption scheme. |
| Performs key derivation as explained in Section 2.7 to generate 256-bit k_d. k_d = dkey₀ dkey₁, where dkey₀ and dkey₁ are derived keys generated when ctr = 0 and ctr = 1 respectively. dkey₀ and dkey₁ are in big-endian order. |
| Id. |
| For example, a valid signature in the certificate indicates that the second device is compliant with the compliance rules of the HDCP specification. |
| 1.9 " Compliance Rules " means the technical requirements set out in Exhibit C, as such exhibit may be amended by Licensor from time to time in accordance with the terms of this Agreement. |
| HDCP License Agreement, March 6, 2017, at 2. |
| EXHIBIT C COMPLIANCE RULES |
| Adopter agrees to comply with all terms and conditions of these Compliance Rules, which may be amended from time to time by Licensor in accordance with Section 5 of this Agreement. |
| <i>Id.</i> at Exhibit C. |
| k _m , the Master Key, is a secret and comprises a random number. |
| |

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| HDMI H | IDCP 2.2 | 2 at 8. | | | |
|---------------------|----------|--|---|--|--|
| | Value | Confidentiality Required [‡] ? | Integrity Required [±] ? | Value used by Core Functions? | Core Function |
| k _m | | Yes | Yes* | Yes | Handling of Master Key, during AKE (including Pairing) and Key Derivation, in plaintext form |
| ka | | Yes | Yes* | No | N/A |
| dkey ₀ . | dkey1 | Yes | Yes* | No | N/A |
| | | corresponding t | o the <i>Receive</i> es the signa | <i>er ID</i> (See Sec ature on the | certificate using kpubdep. Failure of |
| | | If the HDCP corresponding to Verific signate HDCP | o the <i>Receive</i> es the signa ure verificat ? Transmitter | er ID (See Sec ature on the tion constitute r aborts the aut | certificate using kpub _{dcp} . Failure of es an authentication failure and the thentication protocol. |
| | | If the HDCP corresponding to Verific signate HDCF Genera <i>kpub_{rx}</i> receive schem Crypto The m | to the <i>Receive</i> es the signature verificator of Transmitter ates a pseud $(E_{kpub}(km))$ er containing e must be ography Stat | er ID (See Sec ature on the tion constitute r aborts the aut o-random 128 and sends A g the 1024-bit e used as d ndard. SHA-2 ion function us | certificate using kpub _{dep} . Failure of es an authentication failure and the |

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| 2.13 Random Number Generation Random number generation is required both in the HDCP Transmitter logic and in the HDCP Receiver logic. Counter mode based deterministic random bit generator using AES-128 block cipher specified in NIST SP 800-90 is the recommended random number generator. The minimum entropy requirement for random values that are not used as secret key material (i.e. r_{α} , r_{α} , r_{n} , r_{n}) is 40 random bits out of 64-bits. This means that a reasonable level of variability or entropy is established if out of 1,000,000 random (r_{α} , r_{α} , r_{n} , r_{n} , or r_{n}) values collected after the first authentication attempt (i.e. after power-up cycles on the HDCP Transmitter or HDCP Receiver logic), the probability of there being any duplicates in this list of 1,000,000 random values is less than 50%. |
|--|
| For randomly generated secret key material (k_m, k_s) the minimum entropy requirement is 128-bits of entropy (i.e. the probability of there being any duplicates in the list of 2^64 secret values $(k_m \text{ or } k_s)$ collected after power-up and first authentication attempt on the HDCP Transmitter logic is less than 50%). |
| A list of possible entropy sources that may be used for generation of random values used as secret key material include |
| a true Random Number Generator or analog noise source, even if a poor (biased) one |
| a pseudo-random number generator (PRNG), seeded by a true RNG with the required entropy, where the state is stored in non-volatile memory after each use. The state must be kept secret. Flash memory or even disk is usable for this purpose as long as it is secure from tampering. |
| A list of possible entropy sources that may be used for generation of random values not used as secret key material include |
| timers, network statistics, error correction information, radio/cable television signals, disk seek times, etc. |
| a reliable (not manipulatable by the user) calendar and time-of-day clock. For example, some broadcast content sources may give reliable date and time information. |
| <i>Id.</i> at 45-46. |

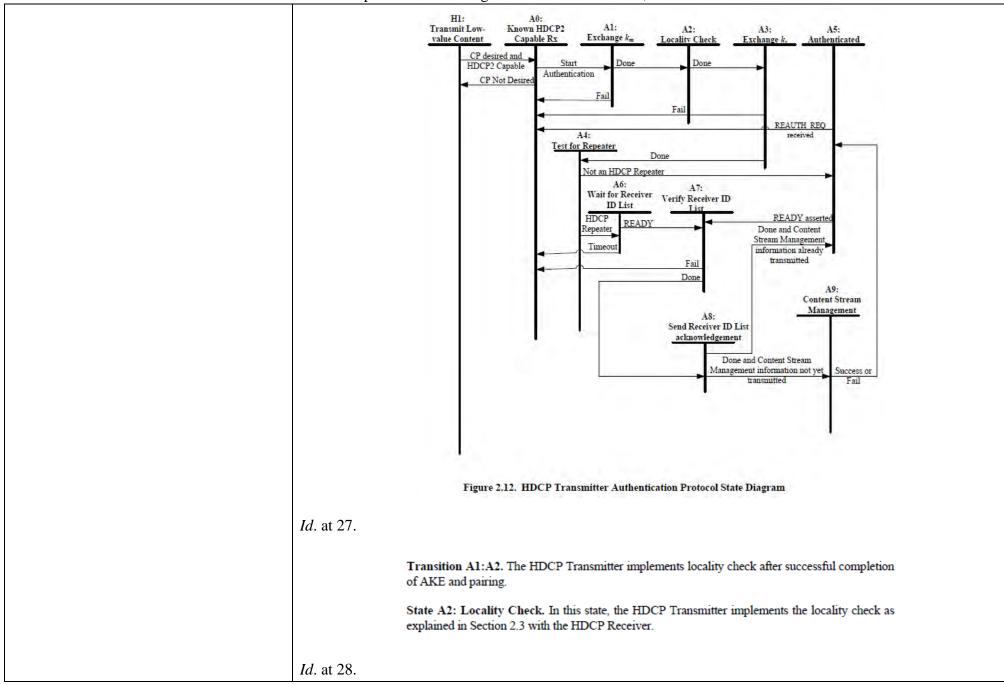
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"provide the first signal to the second device;"

| provide the first signal to the se device; | The processor of the Dell Product is arranged to provide the first signal, $e.g.$, r_n of the LC_Init message to the second device. |
|---|---|
| | 2.3 Locality Check Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r_n to the downstream receiver. The HDCP Transmitter Initiates locality check by writing the LC_Init message containing a 64-bit pseudo-random nonce r_n to the HDCP Receiver. |
| | HDMI HDCP 2.2 at 16. |
| | HDCP Transmitter [Device A] HDCP Receiver [Device B] |
| | Generate r_{h} Set watchdog timer Compute L = HMAC-SHA256(r_{m} , k_{d} XOR r_{m}) Verify L = L Figure 2.4. Locality Check between HDCP Transmitter and HDCP Receiver |
| | <i>Id.</i> at 17. |
| | See also: |

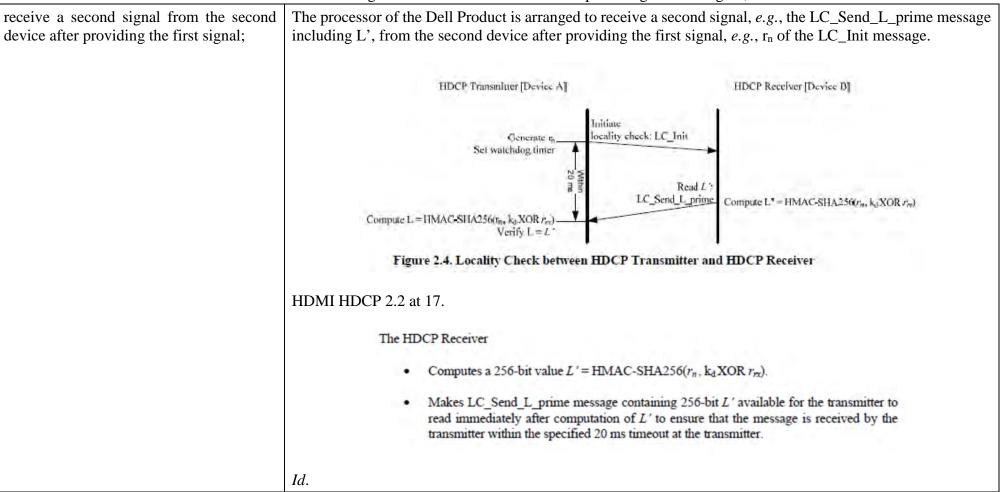
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24. Page 167 of 228 PageID #: 5099 U.S. Patent No. 9,436,809: Claim 49

"provide the first signal to the second device;"



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"receive a second signal from the second device after providing the first signal;"



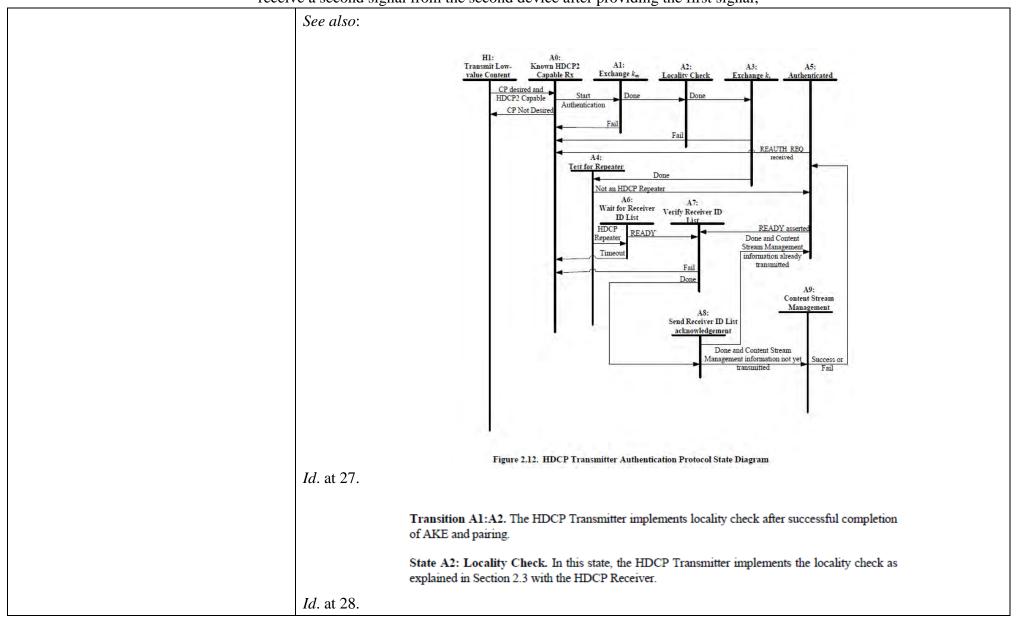
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"receive a second signal from the second device after providing the first signal;"

| | | 1 0 | U , | |
|--------------------|-----|---|--|--|
| | 2.3 | Locality Check | and the state of | |
| | | Locality check is performed after AKE and pairing | | ates locality check |
| | | by sending a 64-bit pseudo-random nonce r_n to the | downstream receiver. | |
| | | The HDCP Transmitter | | |
| | | Initiates locality check by writing the random nonce r_n to the HDCP Receiver. | LC_Init message containing | a 64-bit pseudo- |
| | | • Sets its watchdog timer to 20 ms. The L the transmitter within 20 ms from the t message parameters to the HDCP Rece expires before the last byte of the L transmitter. The transmitter then aborts th | ime the transmitter finishes we iver. Locality check fails if th C_Send_L_prime message is | riting the LC_Init e watchdog timer |
| | | Computes L = HMAC-SHA256(r_n, k_d over r_n and the key used for HMAC is significant 64-bits of k_d. | | |
| | | On reading LC_Send_L_prime message check fails if L is not equal to L'. | from the receiver, compares I | and L'. Locality |
| <i>Id</i> . at 16. | | | | |
| | | 4.2.7 LC_Init (Write) | | |
| | | Syntax | No. of Bytes | É la |
| | | LC_Init { | 1 8 | |
| | | Table 4.9. LC_Init Form | nat | ų. |
| | | | | |
| <i>Id.</i> at 59. | | | | |
| | | | | |
| | | 4.2.8 LC_Send_L_prime (Read) | | |
| | | The LC_Send L_prime message must be available the time the transmitter finishes writing the LC_Initiafter the last byte of r_n has been written. | | |
| | | Syntax | No. of Bytes | |
| 1 | | LC Send L prime{ | | |
| | | | | |
| | | msg_id (=10) L [2550] | 1 32 | |
| | | msg_id (=10) | 32 | |
| | | msg_id (=10) L [2550] | 32 | |
| Id. | | msg_id (=10) L [2550] | 32 | |

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"receive a second signal from the second device after providing the first signal;"



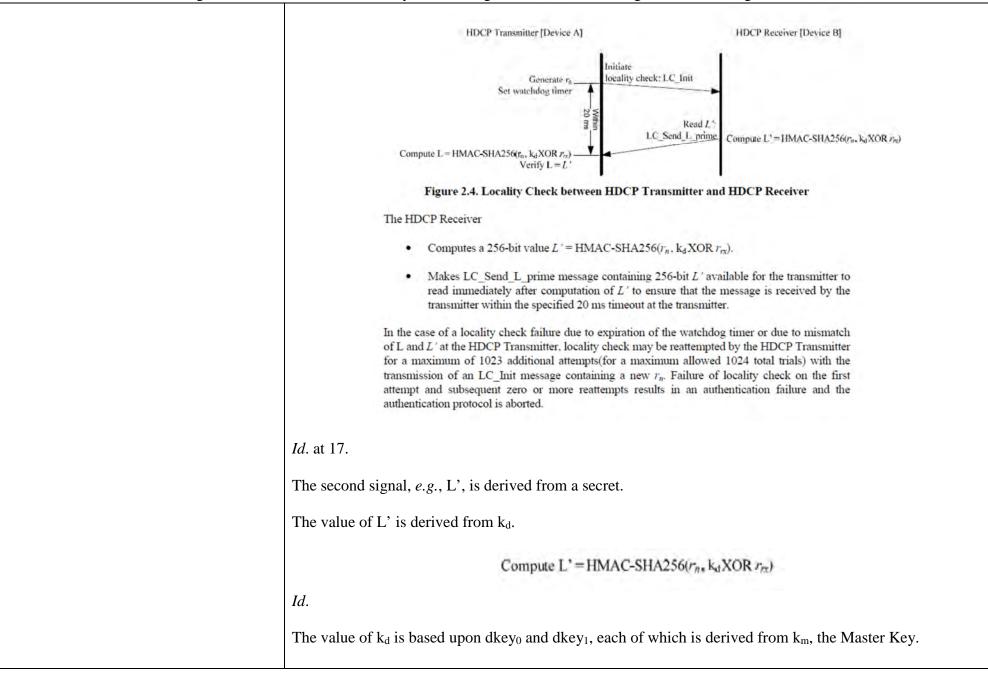
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24 Page 171 of 228 PageID #: 5103 U.S. Patent No. 9,436,809: Claim 49

| | d nom the secret by determining whether the second signal is the first signal modified based on the secret, |
|---|---|
| determine if the second signal is derived from the secret by determining whether the second signal is the first signal modified based on the secret; | The processor of the Dell Product is arranged to determine whether the second signal, <i>e.g.</i> , L', is derived from the secret, <i>e.g.</i> , k_m , by determining whether the second signal is the first signal, <i>e.g.</i> , r_n , modified based on the secret. |
| | The HDCP 2.2 Locality Check must be passed prior to session key exchange and establishment of a secure communications path for the Dell Product to provide protected content to the second device. |
| | The HDCP authentication protocol is an exchange between an HDCP Transmitter and an HDCP Receiver that affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. It is comprised of the following stages |
| | Authentication and Key Exchange (AKE) – The HDCP Receiver's public key certificate is verified by the HDCP Transmitter. A Master Key k_m is exchanged. |
| | Locality Check – The HDCP Transmitter enforces locality on the content by requiring that the Round Trip Time (RTT) between a pair of messages is not more than 20 ms. |
| | Session Key Exchange (SKE) – The HDCP Transmitter exchanges Session Key k_s with the HDCP Receiver. |
| | Authentication with Repeaters – The step is performed by the HDCP Transmitter only with HDCP Repeaters. In this step, the repeater assembles downstream topology information and forwards it to the upstream HDCP Transmitter. |
| | Successful completion of AKE and locality check stages affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. At the end of the authentication protocol, a communication path is established between the HDCP Transmitter and HDCP Receiver that only Authorized Devices can access. |
| | HDMI HDCP 2.2 at 11. |
| | The Locality Check requires the Dell Product (transmitter) to determine that L' received via the LC_Send_L_prime message is derived from the secret by matching L' to value L which is the first signal, <i>e.g.</i> , r_n , modified based on the secret (<i>e.g.</i> , L is computed based on r_n and k_d , which is based on dkey ₀ and dkey ₁ , each of which is based on the Master Key, k_m). |

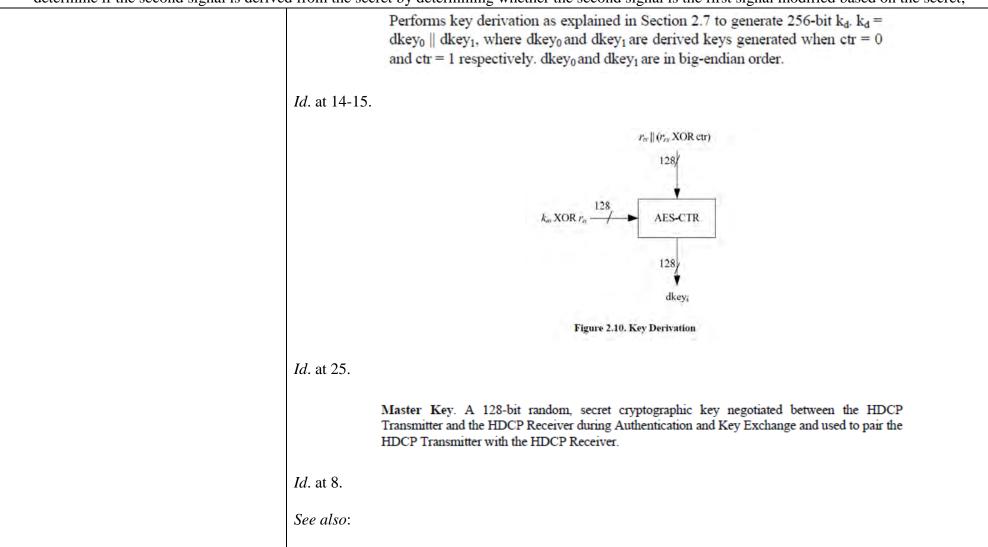
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24 Page 172 of 228 PageID #: 5104 U.S. Patent No. 9,436,809: Claim 49

| | 2.3 Locality Check Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r_n to the downstream receiver. The HDCP Transmitter Initiates locality check by writing the LC_Init message containing a 64-bit pseudo- random nonce r_n to the HDCP Receiver. Sets its watchdog timer to 20 ms. The LC_Send_L_prime message must be received by the transmitter within 20 ms from the time the transmitter finishes writing the LC_Init message parameters to the HDCP Receiver. Locality check fails if the watchdog timer expires before the last byte of the LC_Send_L_prime message is received by the transmitter. The transmitter then aborts the authentication protocol. Computes L = HMAC-SHA256(r_n, k_d XOR r_n) where HMAC-SHA256 is computed over r_n and the key used for HMAC is k_d XOR r_n, where r_n is XORed with the least- significant 64-bits of k_d. On reading LC_Send_L_prime message from the receiver, compares L and L'. Locality check fails if L is not equal to L'. |
|----|--|
| Id | at 16. |

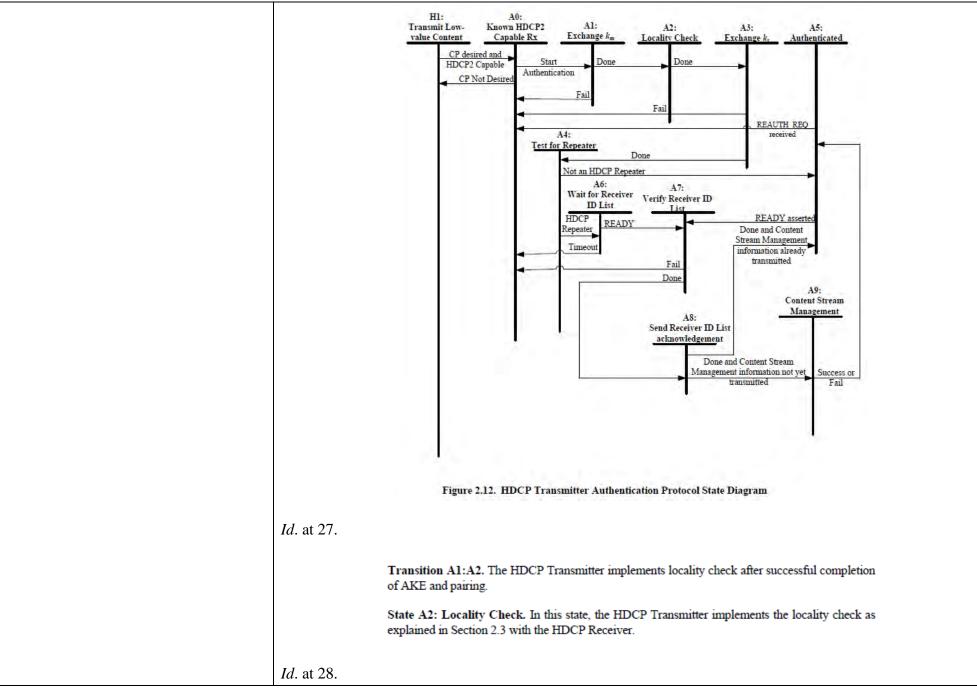
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 173 of 228 PageID #: 5105 U.S. Patent No. 9,436,809: Claim 49



Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24. Page 174 of 228 PageID #: 5106 U.S. Patent No. 9,436,809: Claim 49



Case 1:20-cv-01243-CFC Document 92 Filed 09/23/24 Page 175 of 228 PageID #: 5107 U.S. Patent No. 9,436,809: Claim 49



Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 176 of 228 PageID #: 5108 U.S. Patent No. 9,436,809: Claim 49

"determine whether a time difference between providing the first signal and receiving the second signal is less than a predetermined time; and"

| determine whether a time difference between providing the first signal and receiving the second signal is less than a predetermined time; and | The processor of the Dell Product is arranged to determine whether a time difference between providing the first signal, <i>e.g.</i>, the LC_Init message including r_n, and receiving the second signal, <i>e.g.</i>, the LC_Send_L_prime message including L', is less than a predetermined time. The Locality Check requires the Dell Product to determine that the time between the providing of the LC_Init message and receiving L' via the LC_Send_L_prime message is less than a predetermined time of 20 ms. 2.3 Locality Check Locality Check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r_n to the downstream receiver. The HDCP Transmitter Initiates locality check by writing the LC_Init message containing a 64-bit pseudo-random nonce r_n to the HDCP Receiver. Sets its watchdog timer to 20 ms. The LC_Send_L_prime message must be received by the transmitter within 20 ms from the time the transmitter finishes writing the LC_Init message parameters to the HDCP Receiver. Locality check fails if the watchdog timer expires before the last byte of the LC_Send_L_prime message is received by the transmitter. The transmitter then aborts the authentication protocol. Computes L = HMAC-SHA256(r_n, k₄ XOR r_n) where HMAC-SHA256 is computed over r_n and the key used for HMAC is k₄ XOR r_n) where r_n is XORed with the least-significant 64-bits of k₄. On reading LC_Send_L_prime message from the receiver, compares L and L'. Locality |
|--|--|
| | On reading LC_Send_L_prime message from the receiver, compares L and L'. Locality check fails if L is not equal to L'. Id. at 16. |

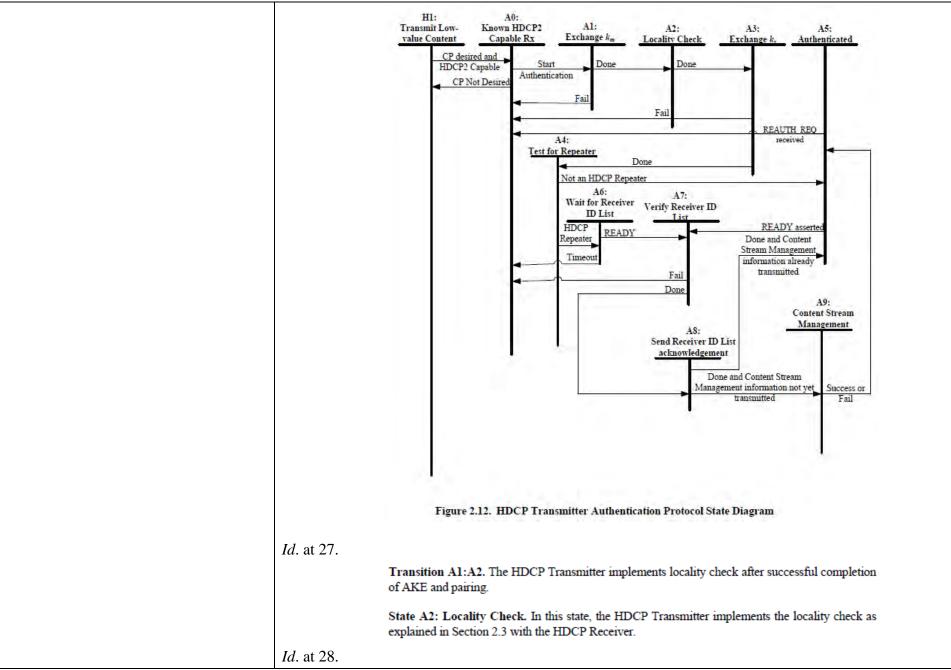
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 177 of 228 PageID #: 5109 U.S. Patent No. 9,436,809: Claim 49

"determine whether a time difference between providing the first signal and receiving the second signal is less than a predetermined time; and"

| HDCP Transmitter [Device A] | HDCP Receiver [Device B] |
|--|---|
| Compute L = HMAC-SHA256(r_n , k _d XOR r_{r_0}) | Read L': LC_Send L_prime Compute L'=HMAC-SHA256(r _n , k ₀ XOR r _n) |
| Verify $L = L'$ | |
| Figure 2.4. Locality Check between HDCP | Transmitter and HDCP Receiver |
| The HDCP Receiver | |
| Computes a 256-bit value L' = HMAC-SHA | $256(r_n, \mathbf{k}_d \mathbf{XOR} \ r_m).$ |
| Makes LC_Send_L_prime message containing read immediately after computation of L' to transmitter within the specified 20 ms timeout | o ensure that the message is received by the |
| In the case of a locality check failure due to expiration of L and L' at the HDCP Transmitter, locality check n for a maximum of 1023 additional attempts(for a maximum transmission of an LC_Init message containing a ne attempt and subsequent zero or more reattempts r authentication protocol is aborted. | have be reattempted by the HDCP Transmitter naximum allowed 1024 total trials) with the ew r_n . Failure of locality check on the first |
| <i>Id.</i> at 17. | |
| See also: | |

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"determine whether a time difference between providing the first signal and receiving the second signal is less than a predetermined time; and"



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"allow the protected content to be provided to the second device at least when the second signal is determined to be derived from the secret and the time difference is less than the predetermined time."

| | difference is less than the predetermined time. |
|---|---|
| allow the protected content to be provided to the second device at least when the second signal is determined to be derived from the secret and the time difference is less than the predetermined time | The processor of the Dell Product is arranged to allow the protected content to be provided to the second device at least when the second signal, <i>e.g.</i> , L', is determined to be derived from the secret and the time difference is less than the predetermined time. |
| 0 | difference is less than the predetermined time. The HDCP 2.2 Locality Check must be passed prior to session key exchange and establishment of a secure communications path for the Dell Product to provide protected content to the second device. The HDCP authentication protocol is an exchange between an HDCP Transmitter and an HDCP Receiver that affirms to the HDCP transmitter that the HDCP Receiver's public key certificate is verified by the HDCP Transmitter. A Master Key k_n is exchanged. Locality Check – The HDCP Transmitter and rescales is verified by the HDCP Transmitter enforces locality on the content by requiring that the Round Trip Time (RTT) between a pair of messages is not more than 20 ms. Session Key Exchange (SKE) – The HDCP Transmitter exchanges Session Key k_n with the HDCP Receiver. Authentication with Repeaters – The step is performed by the HDCP Transmitter only with HDCP Receiver. Authentication of AKE and locality check stages affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. At the end of the authentication protocol, a communication path is established between the HDCP Transmitter and HDCP Receiver that only Authorized Devices can access. HDMI HDCP 2.2 at 11. The Dell Product allows the protected content to be provided to the second device at least when, as part of the Locality Check: the L' received via the LC_Send_L_prime message is determined to be derived from the secret (as determined by matching L' to value L which is derived from the secret (e.g., L is computed based on ke, which is based on the Qcy and dkey, each of which is based on the Master Key, k_m)); and the time difference between the providing of the LC_Init message and receiving L' via the LC_Send_L_prime message |
| | |

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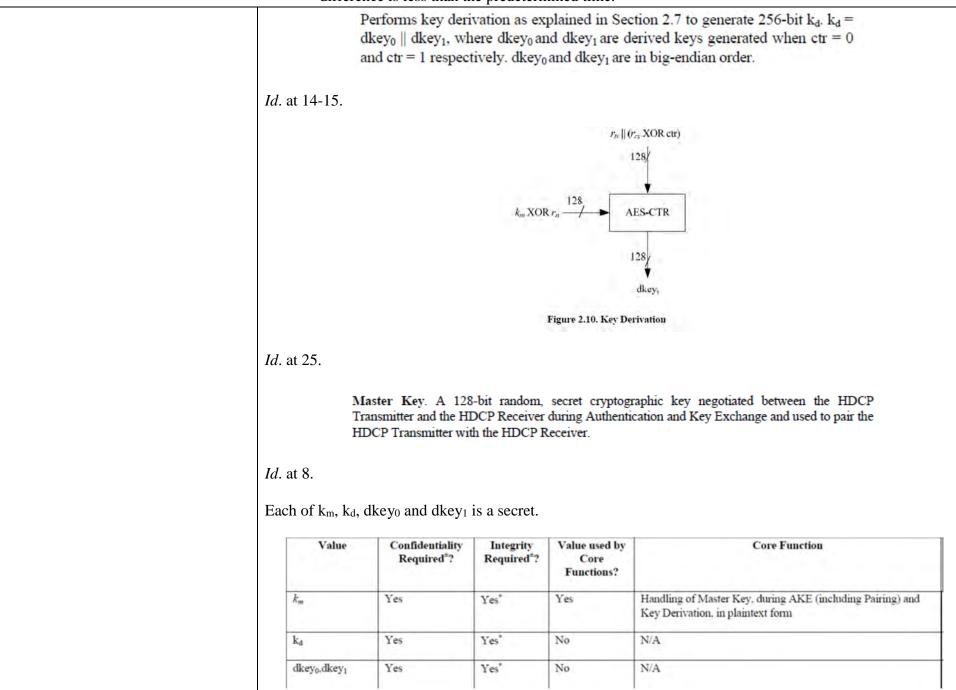
"allow the protected content to be provided to the second device at least when the second signal is determined to be derived from the secret and the time difference is less than the predetermined time."

| 2.3 | Locality Check Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r _n to the downstream receiver. |
|--------------------|--|
| | The HDCP Transmitter Initiates locality check by writing the LC_Init message containing a 64-bit pseudo-random nonce r_n to the HDCP Receiver. |
| | • Sets its watchdog timer to 20 ms. The LC_Send_L_prime message must be received by the transmitter within 20 ms from the time the transmitter finishes writing the LC_Init message parameters to the HDCP Receiver. Locality check fails if the watchdog timer expires before the last byte of the LC_Send_L_prime message is received by the transmitter. The transmitter then aborts the authentication protocol. |
| | Computes L = HMAC-SHA256(r_n, k_d XOR r_{ix}) where HMAC-SHA256 is computed over r_n and the key used for HMAC is k_d XOR r_{ix}, where r_{ix} is XORed with the least- significant 64-bits of k_d. |
| | On reading LC_Send_L_prime message from the receiver, compares L and L'. Locality check fails if L is not equal to L'. |
| <i>Id</i> . at 16. | |

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| HDCP Transmitter [Device A] | HDCP Receiver [Device B] |
|---|---|
| Generate r_n Set watchdog timer Compute L = HMAC-SHA256(r_n , k_i XOR r_p) | Read L^{+} Send L prime Compute L'=HMAC-SHA256(r_n , k_d XOR r_m) |
| Verify $L = L'$ | |
| Figure 2.4. Locality Check between HDCP Tra | ansmitter and HDCP Receiver |
| The HDCP Receiver | |
| Computes a 256-bit value L' = HMAC-SHA256 | $(r_n, \mathbf{k_d} \mathbf{XOR} \; r_{rx}).$ |
| Makes LC_Send_L_prime message containing 2 read immediately after computation of L' to ens transmitter within the specified 20 ms timeout at | sure that the message is received by the |
| In the case of a locality check failure due to expiration of of L and L' at the HDCP Transmitter, locality check may be for a maximum of 1023 additional attempts (for a maxim transmission of an LC_Init message containing a new r attempt and subsequent zero or more reattempts result authentication protocol is aborted. | be reattempted by the HDCP Transmitter num allowed 1024 total trials) with the r_n . Failure of locality check on the first |
| <i>Id.</i> at 17. | |
| The second signal, <i>e.g.</i> , L', is derived from a secret. | |
| The value of L' is derived from k_d . | |
| Compute L'=HMAC-SHA | $\lambda 256(r_n, k_d XOR r_{cx})$ |
| Id. | |
| The value of k_d is based upon dkey ₀ and dkey ₁ , each of w | which is derived from k_m , the Master Key. |

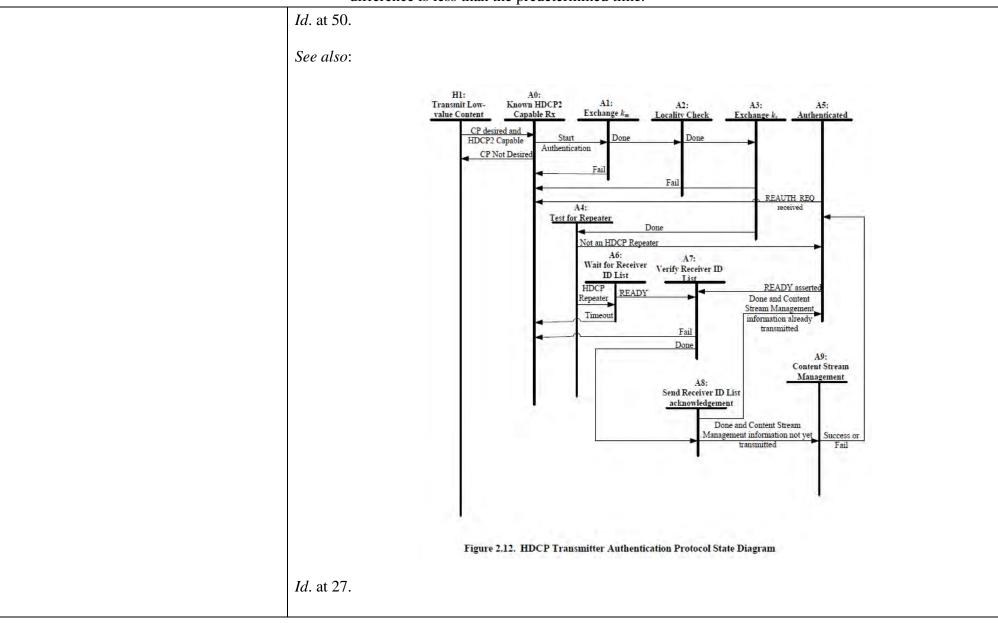
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 182 of 228 PageID #: 5114 U.S. Patent No. 9,436,809: Claim 49



Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24. Page 183 of 228 PageID #: 5115 U.S. Patent No. 9,436,809: Claim 49

| | | nge and providing of the protected conten nd Locality Check. | t to the second device |
|----------------------------------|--|---|---|
| 2.4 | HDCP Receiver is authorized to by the HDCP Transmitter after encrypted Session Key to the HI and beginning the transmission of the transmission of the encrypted encrypted with the Session Key | and locality check stages affirms to HDCP Transmit receive HDCP Content. Session Key Exchange (SKE) er a successful locality check. The HDCP Transm DCP Receiver at least 200 ms before enabling HDCP of HDCP Content. HDCP Encryption may be enabled 2 I Session Key to the HDCP Receiver and at no time pri- y k_s starts to flow between the HDCP Transmitter a 1st be enabled only after successful completion of AK | is initiated itter sends Encryption 00 ms after or. Content and HDCP |
| <i>Id</i> . at 17. 3.1 | output of the T.M.D.S. Decoder (| he input to the T.M.D.S. Encoder and decryption is ap (Figure 3-1). HDCP Encryption consists of a bit-wise e h a pseudo-random data stream produced by the HDCF | xclusive-or |
| 24-bit Da <u>ta</u> | Bitwise XOR | HDCP Receiver HDCP Cipher 24-bit Pseudo- Random Data T.M.D.S. Link Pseudo- Random Data | 24-bit Data |

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| | | Transition A1:A2. The HDCP Transmitter implements locality check after successful completion of AKE and pairing. | | |
|--|----------------------|---|--|--|
| | | State A2: Locality Check. In this state, the HDCP Transmitter implements the locality check as explained in Section 2.3 with the HDCP Receiver. | | |
| | <i>Id</i> . at 28. | | | |
| | | Transition A2:A3. The HDCP Transmitter implements SKE after successful completion of locality check. | | |
| | | State A3: Exchange k_3 . The HDCP Transmitter sends encrypted Session Key, $E_{dkey}(k_3)$, and r_{iv} to the HDCP Receiver as part of the SKE_Send_Eks message. It may enable HDCP Encryption 200 | | |
| | | ms after sending encrypted Session Key. HDCP Encryption must be enabled only after successful completion of AKE, locality check and SKE stages. | | |
| | | Transition A3:A4. This transition occurs after completion of SKE. | | |
| | <i>Id.</i> at 28-29. | | | |

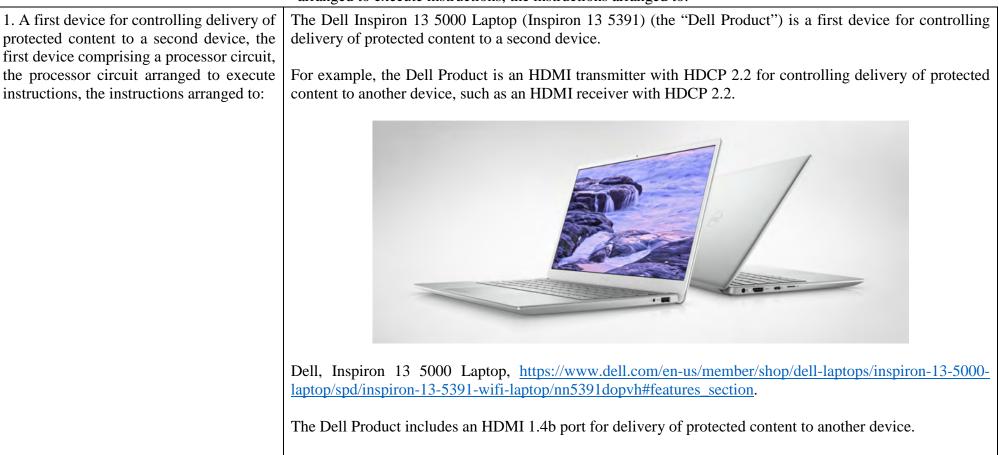
Case 1:20-cv-01243-CFC Document 92 Filed 09/23/24 Page 186 of 228 PageID #: 5118

EXHIBIT D

U.S. Patent No. 10,091,186 Dell Product Containing Intel Product HDMI with HDCP 2.2

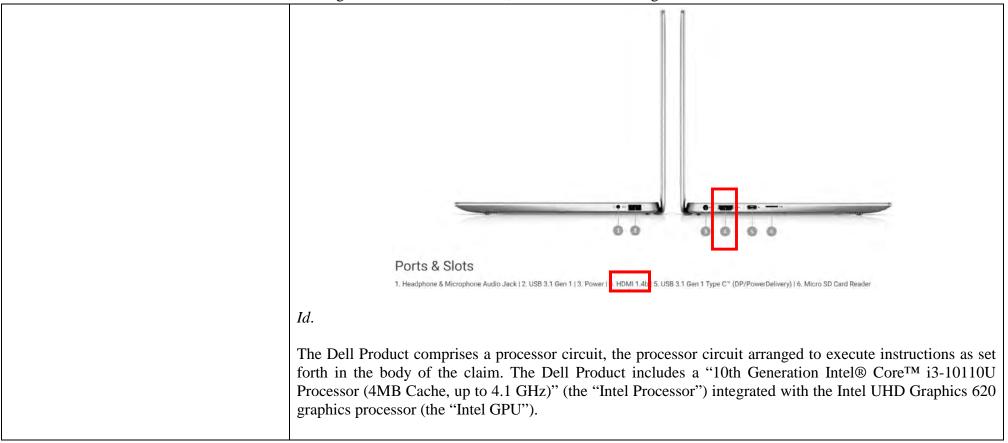
| Case 1:20-cv-01243-CFC Document 92 File | d 09/23/24 Page 188 of 228 PageID #: 5120 |
|---|--|
| | Processor More Info 10th Generation Intel® Core [™] i3-10110U Processor (4MB Cache, up to 4.1 GHz) |
| Dell Inspiron 13 5000 Laptop (Inspiron 13 5391) ("Dell Product") | Intel video processing system and components thereof including 10th Generation Intel Core i3-10110U Processor, main board hardware, integrated operating system, middleware, application program, video processing, and/or digital rights management ("DRM") software that runs on the Dell Product ("Intel Product") |

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"1. A first device for controlling delivery of protected content to a second device, the first device comprising a processor circuit, the processor circuit arranged to execute instructions, the instructions arranged to:"



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| | Inspiron 13 5000 Laptop | |
|-----------|--|--|
| | Configurations | |
| | Processor More Info | |
| | 10th Generation Intel® Core™ i3-10110U Processor (4MB Cache, up to 4.1 GHz) | |
| | Operating System More Info | |
| | Windows 10 Home in S mode 64-bit, English | |
| | Graphics Card | |
| | Intel UHD Graphics with shared graphics memory | |
| | Memory | |
| | 4GB, onboard, LPDDR3, 2133MHz | |
| | Hard Drive More Info | |
| | 128GB M.2 PCIe NVMe Solid State Drive | |
| | <i>Id.</i> ; <i>see also</i> NotebookCheck, Intel Core i3-10110U, <u>https://www.notebookcheck.net/Intel-Core-i3-10110U-</u> | |
| | Laptop-Processor-Comet-Lake-U.430588.0.html. | |
| The Intel | Processor supports HDCP 2.2 via HDMI 1.4. | |
| | | |

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| | Торіс | HDCP Revision | Maximum Resolution | HDR ¹ | HDCP Solution ² | BPC ³ | Comments |
|--------|----------|------------------|-----------------------|------------------|-------------------------------|---------------------|-------------------------------------|
| | | HDCP1.4 | 4K@60 | No | iHDCP | 10 bit | Legacy Integrated for HDCP1.4 |
| | DP | HDCP2.2 | 4K@60 | Yes | iHDCP | 10 bit | New Integrated for HDCP2.2 |
| | | HDCP1.4 | 4K@30 | No | iHDCP | 8 bit | Legacy Integrated for HDCP1.4 |
| | | HDCP2.2 | 4K@30 | No | LSPCON | 8 bit | LSPCON HDCP2.2 required |
| | HDMI 1.4 | HDCP2.2 | 4K@30 | No | iHDCP4 | 8 bit | New Integrated for HDCP2.2 |
| | HDMI 2.0 | HDCP2.2 | 4K@60 | No | LSPCON | 12 bit (YUV 420) | LSPCON HDCP2.2 required |
| | HDMI2.0a | HDCP2.2 | 4K@60 | Yes | LSPCON | 12 bit (YUV 420) | LSPCON HDCP2.2 required |
| Intel, | How | to | | enable | Hig | rh | Dynamic |

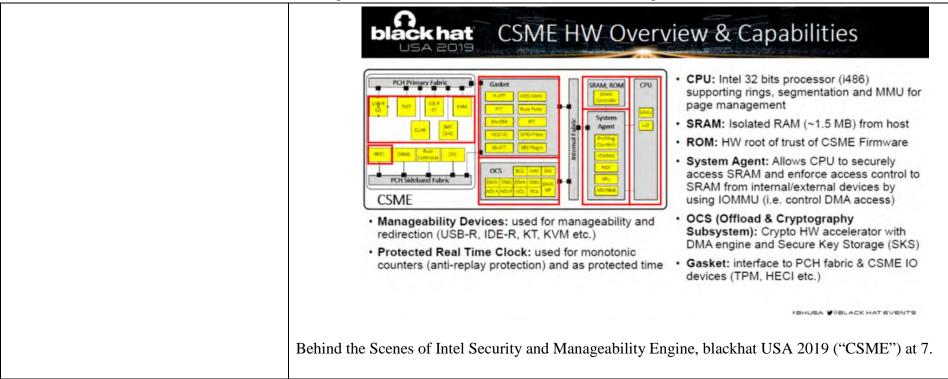
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 193 of 228 PageID #: 5125 U.S. Patent No. 10,091,186: Claim 1

| e | |
|------------|---|
| | Supported Technologies |
| | Intel[®] Virtualization Technology (Intel[®] VT) |
| | Intel[®] Active Management Technology 11.0 (Intel[®] AMT 11.0) |
| | Intel[®] Trusted Execution Technology (Intel[®] TXT) |
| | Intel[®] Streaming SIMD Extensions 4.2 (Intel[®] SSE4.2) |
| | Intel[®] Hyper-Threading Technology (Intel[®] HT Technology) |
| | • Intel [®] 64 Architecture |
| | Execute Disable Bit |
| | Intel [®] Turbo Boost Technology 2.0 |
| | Intel[®] Advanced Vector Extensions 2 (Intel[®] AVX2) Intel[®] Advanced Encryption Standard New Instructions (Intel[®] AES-NI) |
| | PCLMULQDQ (Perform Carry-Less Multiplication Quad word) Instruction |
| | Intel[®] Transactional Synchronization Extensions (Intel[®] TSX-NI) |
| | PAIR – Power Aware Interrupt Routing |
| | SMEP – Supervisor Mode Execution Protection |
| | Intel [®] Boot Guard |
| | Intel[®] Software Guard Extensions (Intel[®] SGX) |
| | Intel[®] Memory Protection Extensions (Intel[®] MPX) |
| | GMM Scoring Accelerator |
| | Intel [®] Processor Trace |
| | High Definition Content Protection (HDCP) 2.2 |
| | |
| - | eneration Intel Core Processors, Datasheet, Volume 1 or 2 (Jul. 2020, rev. 5), <i>available at</i> <u>intel.com/v1/dl/getContent/615211</u> , at 11-12. |
| source and | e technology for protecting high-definition content against unauthorized copy between a the sink The [Intel] [P]rocessor supports HDCP 1.4/2.3 for 4 k Premium content protection splays (HDMI* and DisplayPort*)." |
| | |

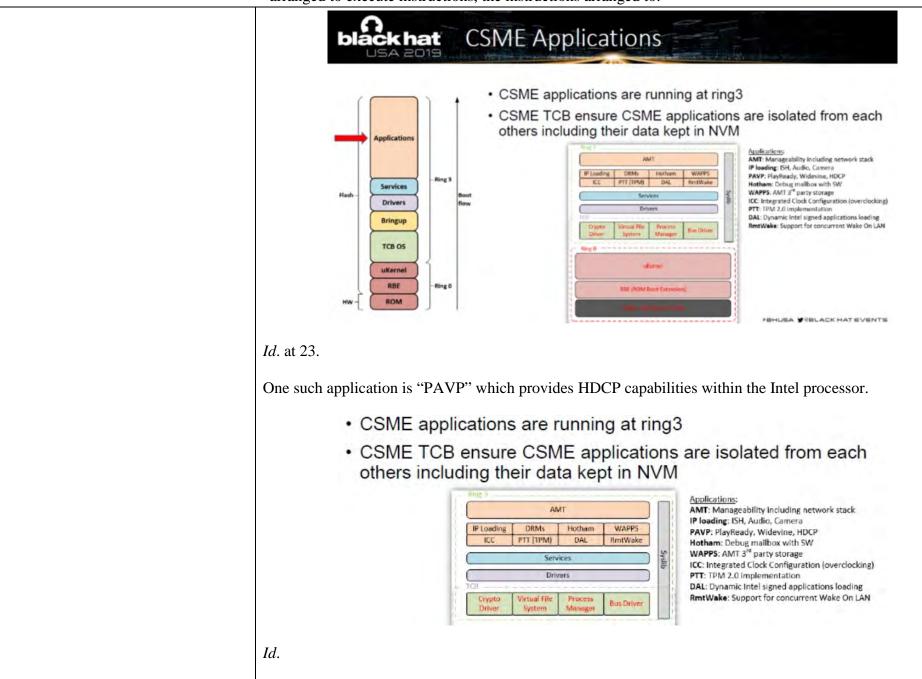
Case 1:20-cv-01243-CFC Document 92, Filed 09/23/24, Page 194 of 228 PageID #: 5126 U.S. Patent No. 10,091,186: Claim 1

| arranged to execute instructions, the instructions arranged to. |
|--|
| High-bandwidth Digital Content Protection (HDCP) |
| HDCP is the technology for protecting high-definition content against unauthorized copy or unreceptive between a source (computer, digital set top boxes, and so on) and the sink (panels, monitor, and TVs). The processor supports HDCP 1.4/2.3 for 4 k Premium content protection over wired displays (HDMI* and DisplayPort*). |
| <i>Id.</i> at 44 |
| Intel's "UHD" processor nomenclature also indicates support for HDCP 2.2: |
| Another change from 7 Gen to 8 Gen will be in the graphics. Intel is upgrading the nomenclature of the integrated graphics from HD 620 to UHD 620, indicating that the silicon is suited for 4K playback and processing. During our pre-briefing it was categorically stated several times that there was no change between the two, however we have since confirmed that the new chips will come with HDCP 2.2 support as standard for DP1.2a, removing the need for an external LSPCON for this feature. Other than this display controller change however, it appears that these new UHD iGPUs are architecturally the same as their HD predecessors. |
| https://www.anandtech.com/show/11738/intel-launches-8th-generation-cpus-starting-with-kaby-lake- refresh-for-15w-mobile. |
| HDCP 2.2 is implemented in Intel-based systems with Core-i series Processors within the Converged Security & Manageability Engine (CSME) also known as the Management Engine (ME). The CSME contains a processor (x86 core) which executes instructions including but not limited to the uKernel/OS, drivers, services, and applications for the CSME. |

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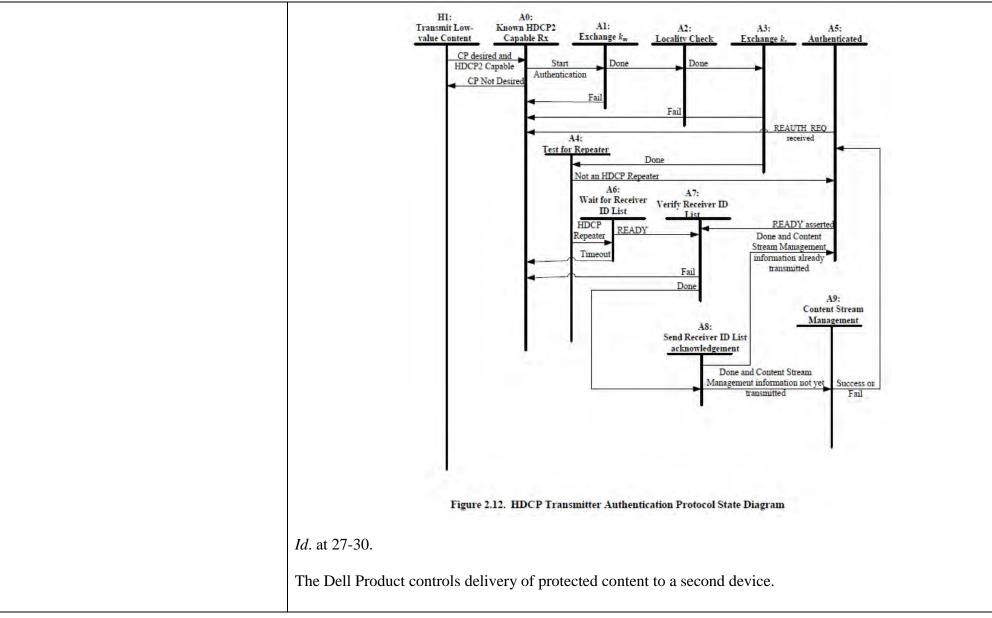
| arranged to execute instructions, the instructions arranged to:" |
|---|
| Upon information and belief, the Dell Product is compliant with the High-bandwidth Digital Content Protection System Revision 2.2 ("HDCP 2.2") protocol. The Dell Product supports HDCP 2.2 for protecting content between devices. |
| For the purpose of this specification, it is assumed that the Audiovisual content is transmitted over a HDMI based wired display link. In an HDCP System, two or more HDCP Devices are interconnected through an HDCP-protected Interface. The Audiovisual Content flows from the Upstream Content Control Function into the HDCP System at the most upstream HDCP Transmitter. From there the Audiovisual Content encrypted by the HDCP System, referred to as HDCP Content, flows through a tree-shaped topology of HDCP Receivers over HDCP-protected Interfaces. This specification describes a content protection mechanism for: (1) authentication of HDCP Receivers to their immediate upstream connection (i.e., an HDCP Transmitter), (2) revocation of HDCP Receivers that are determined by the Digital Content Protection, LLC, to be invalid, and (3) HDCP Encryption of Audiovisual Content over the HDCP-protected Interfaces between HDCP Transmitters and their downstream HDCP Receivers. HDCP Receivers may render the HDCP Content in audio and visual form for human consumption. HDCP Receivers may be HDCP Repeaters that serve as downstream HDCP Transmitters emitting the HDCP Content further downstream to one or more additional HDCP Receivers. High-bandwidth Digital Content Protection System Mapping HDCP to HDMI Revision 2.2 13 February, 2013 ("HDMI HDCP 2.2") at 5. |
| There are three elements of the content protection system. Each element plays a specific role in the system. First, there is the authentication protocol, through which the HDCP Transmitter verifies that a given HDCP Receiver is licensed to receive HDCP Content. The authentication protocol is implemented between the HDCP Transmitter and its corresponding downstream HDCP Receiver. With the legitimacy of the HDCP Receiver determined, encrypted HDCP Content is transmitted between the two devices based on shared secrets established during the authentication protocol. This prevents eavesdropping devices from utilizing the content. Finally, in the event that legitimate devices are compromised to permit unauthorized use of HDCP Content, renewability allows an HDCP Transmitter to identify such compromised devices and prevent the transmission of HDCP Content. This document contains chapters describing in detail the requirements of each of these elements. In addition, a chapter is devoted to describing the cipher structure that is used in the encryption of HDCP Content. |
| <i>Id.</i> at 9. |

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| "1. A first device for controlling delivery of protected content to a second device, the first device comprising a processor circuit, the processor circuit |
|---|
| arranged to execute instructions, the instructions arranged to:" |

| \mathcal{C} |
|--|
| The Dell Product is an HDCP Device, and more specifically an HDCP 2.2-compliant Device, capable of functioning as an HDCP Transmitter and that implements required functionality of HDMI HDCP 2.2 including the functions required by the HDCP Transmitter State Diagram. |
| The state machines in this specification define the required behavior of HDCP Devices. The link- visible behavior of HDCP Devices implementing the specified state machines must be identical, even if implementations differ from the descriptions. The behavior of HDCP Devices implementing the specified state machines must also be identical from the perspective of an entity outside of the HDCP System. |
| Implementations must include all elements of the content protection system described herein, unless the element is specifically identified as informative or optional. Adopters must also ensure that implementations satisfy the robustness and compliance rules described in the technology license. |
| <i>Id.</i> at 5. |
| HDCP 2.2-compliant Device. An HDCP Device that is designed in adherence to HDCP 2.2 is referred to as an HDCP 2.2-compliant Device. Id. at 6. |
| HDCP Device . Any device that contains one or more HDCP-protected Interface Port and is designed in adherence to HDCP is referred to as an <i>HDCP Device</i> . |
| <i>Id.</i> at 7. |

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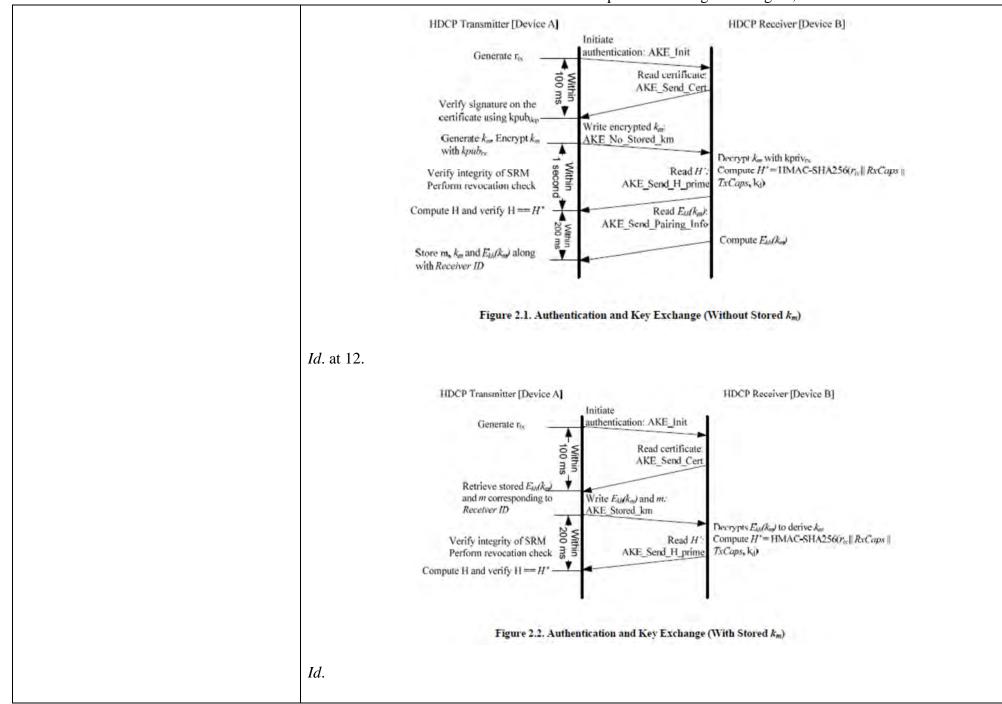
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| 2.1 | Overview The HDCP authentication protocol is an exchange between an HDCP Transmitter and an HDCP Receiver that affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. It is comprised of the following stages Authentication and Key Exchange (AKE) – The HDCP Receiver's public key certificate is verified by the HDCP Transmitter. A Master Key k_m is exchanged. |
|--------------------|--|
| | Locality Check – The HDCP Transmitter enforces locality on the content by requiring that the Round Trip Time (RTT) between a pair of messages is not more than 20 ms. Session Key Exchange (SKE) – The HDCP Transmitter exchanges Session Key k₅ with the HDCP Receiver. |
| | Authentication with Repeaters – The step is performed by the HDCP Transmitter only with HDCP Repeaters. In this step, the repeater assembles downstream topology information and forwards it to the upstream HDCP Transmitter. |
| | Successful completion of AKE and locality check stages affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. At the end of the authentication protocol, a communication path is established between the HDCP Transmitter and HDCP Receiver that only Authorized Devices can access. |
| <i>Id</i> . at 11. | |

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| receive a second device certificate from the second device prior to sending a first signal; | second device (recei | ver) a | s part of t | are arranged to receive a second device certificate, <i>e.g.</i> , <i>cert_{rx}</i> , from the the Authentication and Key Exchange (AKE) stage of the HDCP 2.2 ignal, <i>e.g.</i> , the LC_Init message including r_n . | | |
|---|--|--------------|-----------------------|---|--|--|
| | The certificate, $cert_{rx}$, includes a Receiver ID for the second device, Receiver Public Key for the second device, and a cryptographic signature, amongst other information. The HDCP Receiver is issued 1024-bit RSA public and private keys. The public key is stored in a Public Key Certificate issued by DCP LLC, denoted by $cert_{rx}$. Table 2.1 gives the fields contained | | | | | |
| | Name | | | | | |
| | Receiver ID | (bits) 40 | position 4175:4136 | Unique receiver identifier. It has the same format as an HDCP 1.x KSV i.e. it contains 20 ones and 20 zeroes | | |
| | Receiver Public Key | 1048 | 4135:3088 | Unique RSA public key of HDCP Receiver denoted by $kpub_{rx}$. The first 1024 bits is the big-endian representation of the modulus n and the trailing 24 bits is the big-endian representation of the public exponent e | | |
| | Reserved2 | 4 | 3087:3084 | Reserved for future definition. Must be 0x0 or 0x1. | | |
| | Reserved1 | 12 | 3083:3072 | Reserved for future definition. Must be 0x000 | | |
| | DCP LLC Signature | 3072 | 3071:0 | A cryptographic signature calculated over all preceding fields of the certificate. RSASSA-PKCS1-v1_5 is the signature scheme used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function | | |
| | Table 2.1. Public Key Certificate of HDCP Receiver | | | | | |
| | HDMI HDCP 2.2 at 11. Public Key Certificate. Each HDCP Receiver is issued a Public Key Certificate signed by DCP LLC, and contains the Receiver ID and RSA public key corresponding to the HDCP Receiver. | | | | | |
| | <i>Id.</i> at 8. | | | | | |
| | | | | cate from the second device as part of the AKE stage, irrespective of r Key k_m stored corresponding to the Receiver ID. | | |

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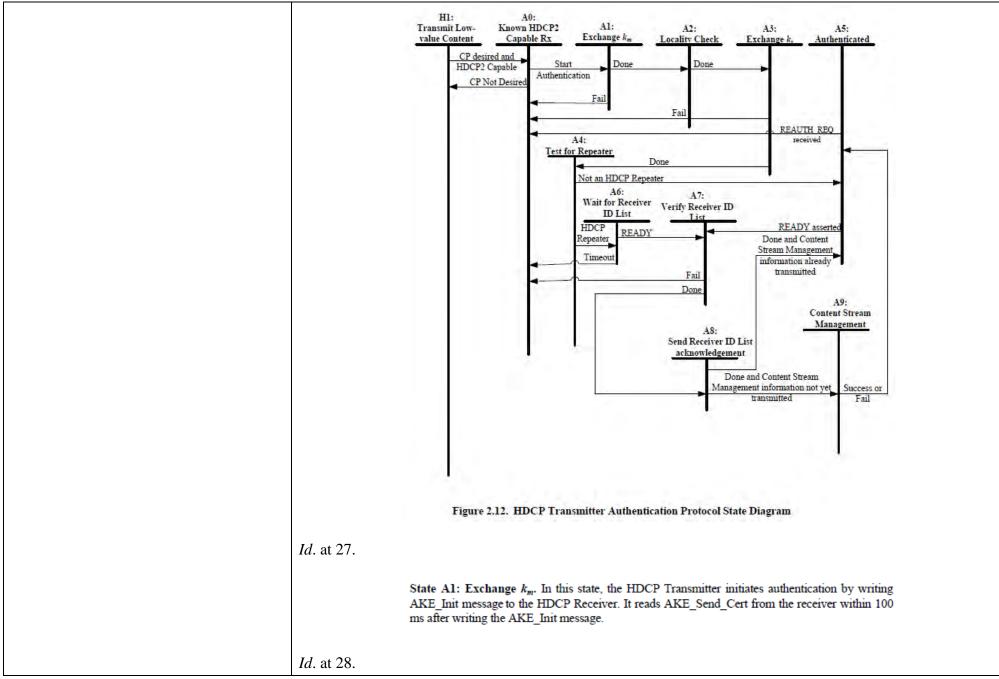


| econd device certificate from the second device prior to sending a | i llist signal, | | | |
|--|---|--|--|--|
| The Dell Product receives the certificate from the second device as part of the AKE_Send_Cert message. | | | | |
| Reads AKE_Send_Cert from the receiver containing <i>cert</i> (r_{rx}) and <i>RxCaps</i> . REPEATER bit in <i>RxCaps</i> indicates an HDCP Repeater. If REPEATER is set to one, it in Repeater. If REPEATER is zero, the receiver is AKE_Send_Cert message must be available for the tr from the time the transmitter finishes writing the AKE HDCP Receiver. If the AKE_Send_Cert message is not read within 100 ms, the transmitter aborts the authentical set of the transmitter aborts the authentical set. | whether the connected receiver is dicates the receiver is an HDCP not an HDCP Repeater. The ansmitter to read within 100 ms E_Init message parameters to the ot available for the transmitter to | | | |
| <i>Id</i> . at 13. | | | | |
| The HDCP Receiver | | | | |
| Makes available the AKE_Send_Cert message for the AKE_Init. The AKE_Send_Cert message must be within 100 ms from the time the transmitter finis parameters to the HDCP Receiver. | available for the transmitter to read | | | |
| Id. at 14. | | | | |
| 4.2.2 AKE_Send_Cert (Read) The HDCP Transmitter attempts to read AKE_Send_Cert beginning with cert _{rx} within 100 ms after writing the AKE_Init message i.e. after the last byte of TxCaps has been written. | | | | |
| Syntax | No. of Bytes | | | |
| AKE_Send_Cert { | 1 522 8 3 | | | |
| Table 4.3. AKE_Send_Cert Format | | | | |
| <i>Id</i> . at 57. | | | | |
| The Dell Product receives the certificate from the second device signal, <i>e.g.</i> , the LC_Init message including r _n , as part of a Local | • • • • | | | |

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| 2.3 | Locality Check Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r_n to the downstream receiver. The HDCP Transmitter Initiates locality check by writing the LC_Init message containing a 64-bit pseudo-random nonce r_n to the HDCP Receiver. |
|--------------------|---|
| <i>Id</i> . at 16. | |
| See also: | |

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| Transition A1:A2. The HDCP Transmitter implements locality check after successful completion | | |
|---|--|--|
| of AKE and pairing. | | |
| State A2: Locality Check. In this state, the HDCP Transmitter implements the locality check as explained in Section 2.3 with the HDCP Receiver. | | |
| Id. | | |

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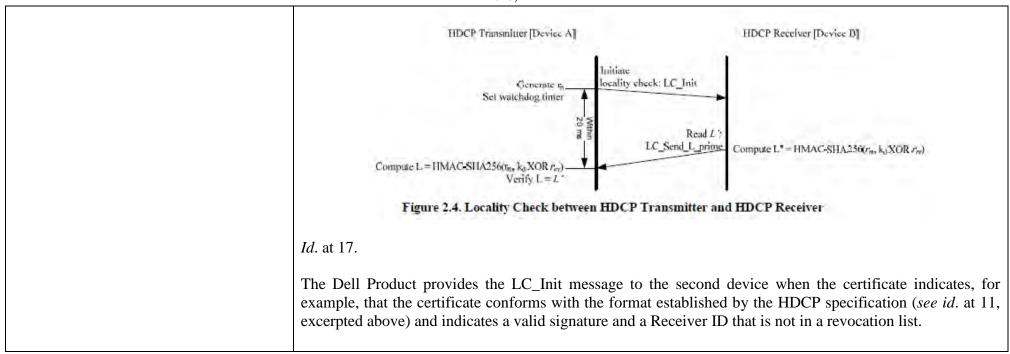
"provide the first signal to the second device when the second device certificate indicates that the second device is compliant with at least one compliance

| | | | rule;" | |
|---|--|---------------------------------|--|--|
| provide the first signal to the second device when the second device certificate indicates that the second device is compliant with at least one compliance rule; | r_n , to the second device when the second device certificate indicates that the second device is compliant with at least one compliance rule. | | | |
| | Name | Size (bits) | Bit position | Function |
| | Receiver ID | 40 | 4175:4136 | Unique receiver identifier. It has the same format as an HDCP 1.x KSV i.e. it contains 20 ones and 20 zeroes |
| | Receiver Public Key | 1048 | 4135:3088 | Unique RSA public key of HDCP Receiver denoted by $kpub_{rx}$. The first 1024 bits is the big-endian representation of the modulus n and the trailing 24 bits is the big-endian representation of the public exponent e |
| | Reserved2 | 4 | 3087:3084 | Reserved for future definition. Must be 0x0 or 0x1. |
| | Reserved1 | 12 | 3083:3072 | Reserved for future definition. Must be 0x000 |
| | DCP LLC Signature | 3072 | 3071:0 | A cryptographic signature calculated over all preceding fields of the certificate. RSASSA-PKCS1-v1_5 is the signature scheme used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function |
| | Table 2.1. Public Key Certificate of HDCP Receiver | | | |
| | HDMI HDCP 2.2 at 2.3 Loca | ality Cl Locality by send | y check is perf ling a 64-bit p OCP Transmitt Initiates loc | formed after AKE and pairing. The HDCP Transmitter initiates locality check seudo-random nonce r_n to the downstream receiver. ter the transmitter that the LC_Init message containing a 64-bit pseudo-ce r_n to the HDCP Receiver. |
| | <i>Id.</i> at 16. | | | |

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"provide the first signal to the second device when the second device certificate indicates that the second device is compliant with at least one compliance

rule;"



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"provide the first signal to the second device when the second device certificate indicates that the second device is compliant with at least one compliance

| | rule;" |
|----------|--|
| | Extracts Receiver ID from cert _{rx} |
| | • If the HDCP Transmitter does not have a 128-bit Master Key k_m stored corresponding to the <i>Receiver ID</i> (See Section 2.2.1) |
| | Verifies the signature on the certificate using kpub_{dcp}. Failure of signature verification constitutes an authentication failure and the HDCP Transmitter aborts the authentication protocol. |
| | Generates a pseudo-random 128-bit Master Key k_m. Encrypts k_m with kpub_{rx} (E_{kpub}(km)) and sends AKE_No_Stored km message to the receiver containing the 1024-bit E_{kpub}(km). RSAES-OAEP encryption scheme must be used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function. The mask generation function used is MGF1 which uses SHA-256 as its underlying hash function. Verifies integrity of the System Renewability Message (SRM). It does this by checking the signature of the SRM using kpub_{dxp}. Failure of this integrity check constitutes an authentication failure and causes the HDCP Transmitter to abort authentication protocol. The top-level HDCP Transmitter checks to see if the <i>Receiver ID</i> of the connected device is found in the revocation list. If the <i>Receiver ID</i> of the connected HDCP Device is found in the revocation list, authentication fails and the authentication protocol is aborted. SRM integrity check and revocation check are performed only by the top-level HDCP Transmitter. |
| | |
| | <i>Id</i> . at 13. |
| | A valid signature in the certificate indicates, for example, that the second device is compliant with compliance rules of the HDCP specification. |
| | 1.9 " Compliance Rules " means the technical requirements set out in Exhibit C, as such exhibit may be amended by Licensor from time to time in accordance with the terms of this Agreement. |
| <u>c</u> | HDCP License Agreement, March 6, 2017, at 2, <i>available at</i> <u>https://digital-cp.com/sites/default/files/HDCP%20License%20Agreement_March%206%2C%202017_FOR%20REVIEW%20ONLY.pdf</u> . |

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"provide the first signal to the second device when the second device certificate indicates that the second device is compliant with at least one compliance

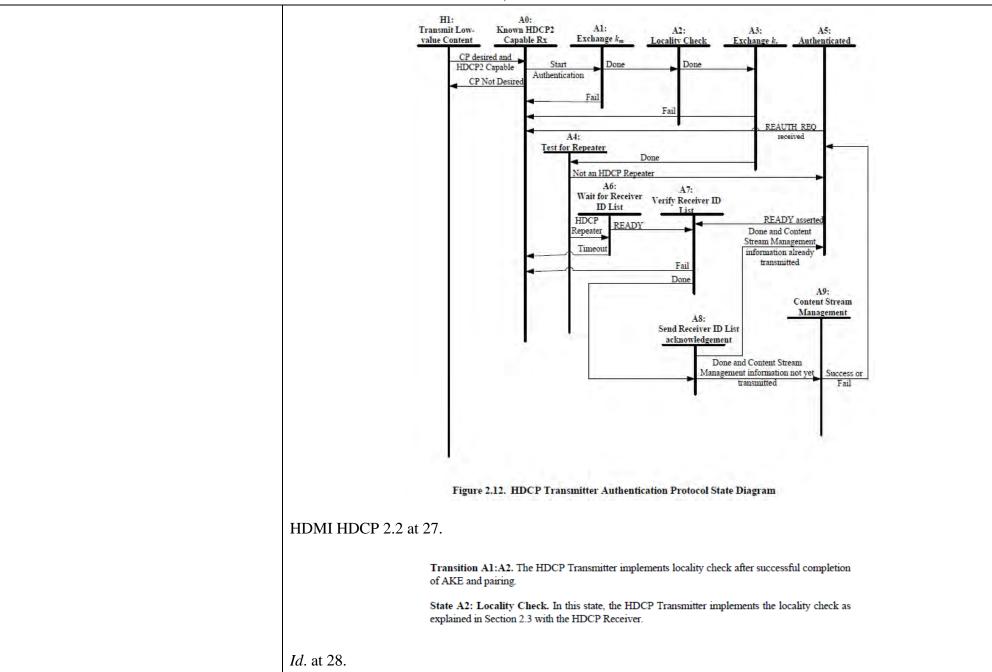
rule;"

| EXHIBIT C COMPLIANCE RULES Adopter agrees to comply with all terms and conditions of these Compliance Rules, which may be amended from time to time by Licensor in accordance with Section 5 of this Agreement. |
|--|
| Id. at Exhibit C. See also: |

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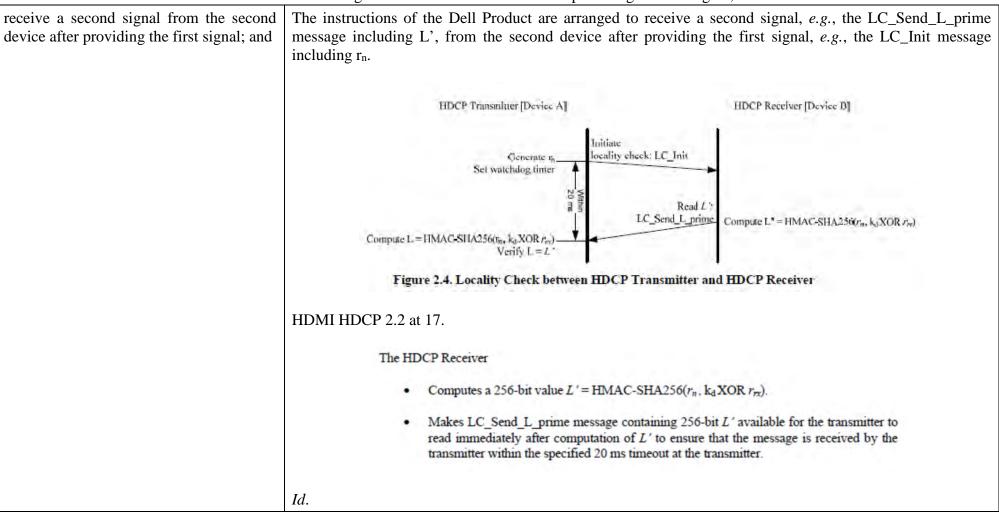
"provide the first signal to the second device when the second device certificate indicates that the second device is compliant with at least one compliance

rule;"



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"receive a second signal from the second device after providing the first signal; and"



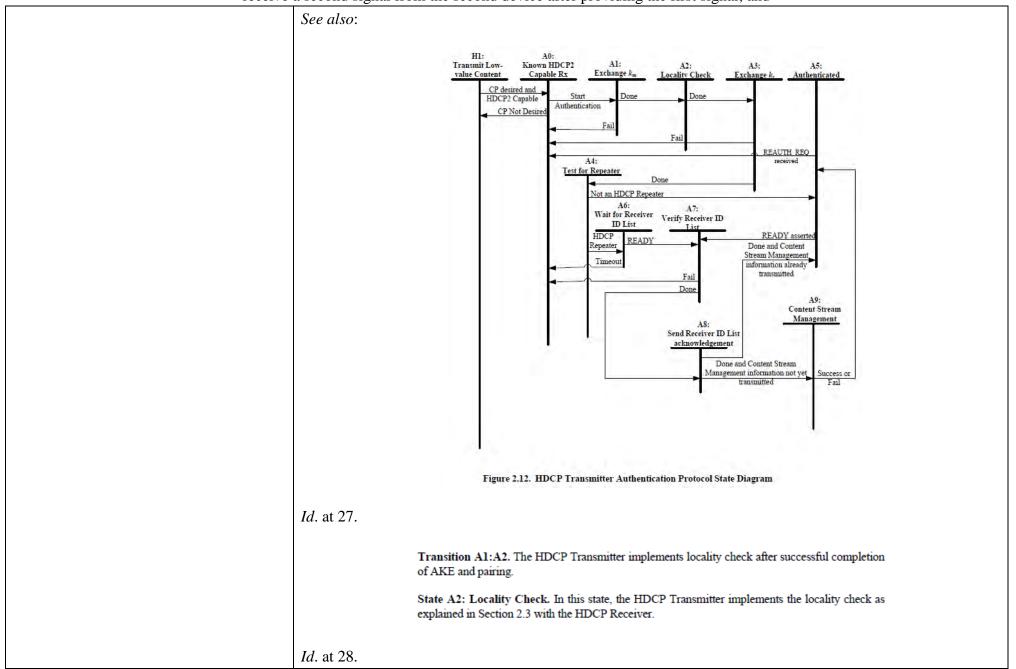
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"receive a second signal from the second device after providing the first signal; and"

| 2.3 | Locality Check | |
|--------------------|---|--|
| | Locality check is performed after AKE and pairing. The by sending a 64-bit pseudo-random nonce r_n to the down | |
| | The HDCP Transmitter | |
| | Initiates locality check by writing the LC_1 random nonce r_n to the HDCP Receiver. | init message containing a 64-bit pseudo- |
| | Sets its watchdog timer to 20 ms. The LC_Set the transmitter within 20 ms from the time the message parameters to the HDCP Receiver. expires before the last byte of the LC_Set transmitter. The transmitter then aborts the auti- | he transmitter finishes writing the LC_Init Locality check fails if the watchdog timer nd_L_prime message is received by the |
| | Computes L = HMAC-SHA256(r_n, k_d XOR over r_n and the key used for HMAC is k_d XO significant 64-bits of k_d. | |
| | On reading LC_Send_L_prime message from check fails if L is not equal to L'. | the receiver, compares L and L $$. Locality |
| <i>Id</i> . at 16. | | |
| | 4.2.7 LC_Init (Write) | |
| | Syntax | No. of Bytes |
| | LC_Init { | 1 8 |
| | Table 4.9. LC_Init Format | |
| | | |
| <i>Id.</i> at 59. | | |
| | 4.2.8 LC_Send_L_prime (Read) | |
| | The LC_Send_L_prime message must be available for t the time the transmitter finishes writing the LC_Init mess after the last byte of r_n has been written. | |
| | Syntax | No. of Bytes |
| | LC_Send_L_prime { | 1 32 |
| | Table 4.10. LC_Send_L_prime Format | |
| | | |
| Id. | | |
| | | |

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"receive a second signal from the second device after providing the first signal; and"



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"provide the protected content to the second device when the second signal is derived from a secret and a time between the providing of the first signal and the receiving of the second signal is less than a predetermined time,"

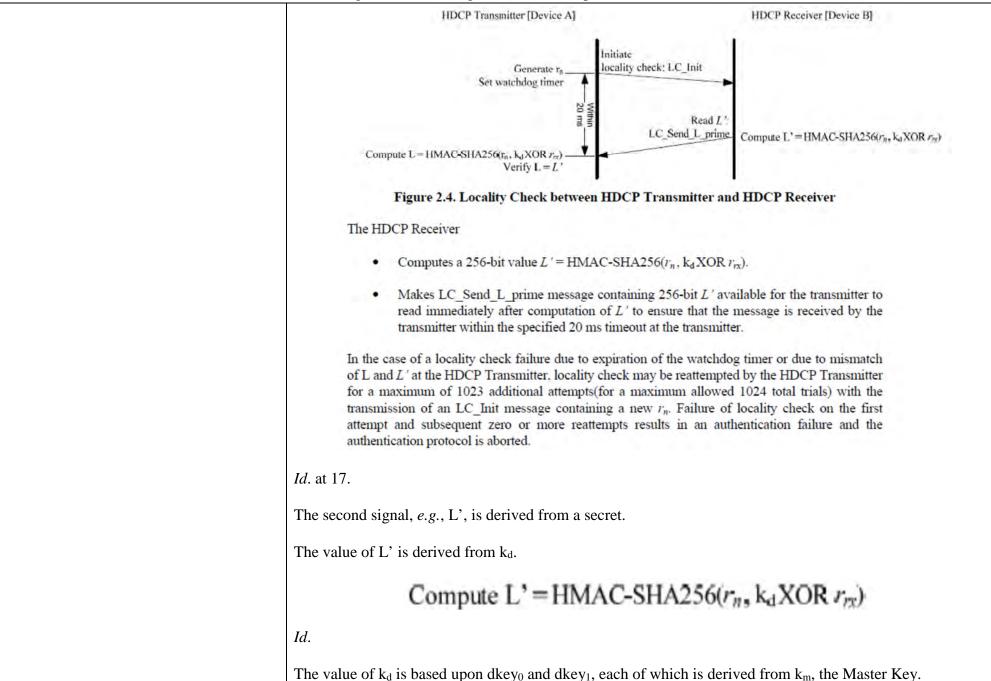
| the receiving of the second signal is less than a predetermined time, | | | |
|--|--|--|--|
| provide the protected content to the second device when the second signal is derived from a secret and a time between the providing of the first signal and the receiving of the second signal is less than a predetermined time, | The instructions of the Dell Product are arranged to provide the protected content to the second device when the second signal, <i>e.g.</i> , L', is derived from a secret and a time between the providing of the first signal, <i>e.g.</i> , the LC_Init message including r _n , and the receiving of the second signal is less than a predetermined time. The HDCP 2.2 Locality Check must be passed prior to session key exchange and establishment of a secure communications path for the Dell Product to provide protected content to the second device. | | |
| | The HDCP authentication protocol is an exchange between an HDCP Transmitter and an HDCP Receiver that affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. It is comprised of the following stages | | |
| | Authentication and Key Exchange (AKE) – The HDCP Receiver's public key certificate is verified by the HDCP Transmitter. A Master Key k_m is exchanged. | | |
| | Locality Check – The HDCP Transmitter enforces locality on the content by requiring that the Round Trip Time (RTT) between a pair of messages is not more than 20 ms. | | |
| | Session Key Exchange (SKE) – The HDCP Transmitter exchanges Session Key k_s with the HDCP Receiver. | | |
| | Authentication with Repeaters – The step is performed by the HDCP Transmitter only with HDCP Repeaters. In this step, the repeater assembles downstream topology information and forwards it to the upstream HDCP Transmitter. | | |
| | Successful completion of AKE and locality check stages affirms to the HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. At the end of the authentication protocol, a communication path is established between the HDCP Transmitter and HDCP Receiver that only Authorized Devices can access. | | |
| | HDMI HDCP 2.2 at 11. | | |
| | The Dell Product provides protected content to the second device when, as part of the Locality Check: the L' received via the LC_Send_L_prime message is derived from a secret (as determined by matching L' to value L which is derived from the secret (<i>e.g.</i> , L is computed based on k_d , which is based on dkey ₀ and dkey ₁ , each of which is based on the Master Key, k_m); and a time between the providing of the LC_Init message and receiving L' via the LC_Send_L_prime message is less than a predetermined time of 20 ms. | | |

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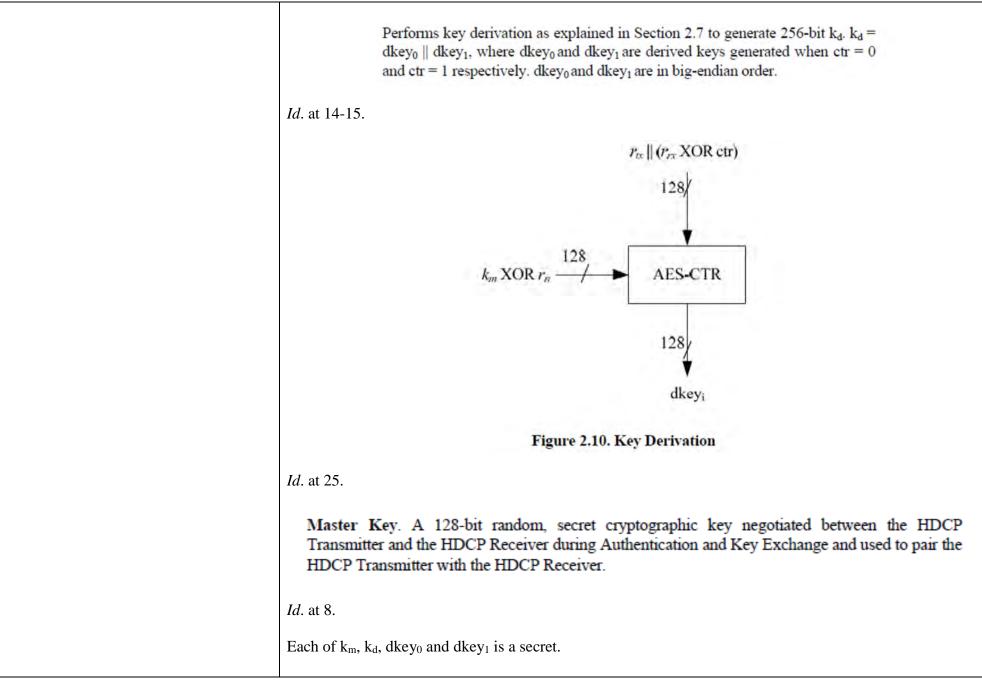
"provide the protected content to the second device when the second signal is derived from a secret and a time between the providing of the first signal and the receiving of the second signal is less than a predetermined time,"

| | 2.3 Locality Check Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r_n to the downstream receiver. The HDCP Transmitter Initiates locality check by writing the LC_Init message containing a 64-bit pseudo-random nonce r_n to the HDCP Receiver. Sets its watchdog timer to 20 ms. The LC_Send_L_prime message must be received by the transmitter within 20 ms from the time the transmitter finishes writing the LC_Init message parameters to the HDCP Receiver. Locality check fails if the watchdog timer expires before the last byte of the LC_Send_L_prime message is received by the transmitter. The transmitter then aborts the authentication protocol. Computes L = HMAC-SHA256(r_n, k_d XOR r_n) where HMAC-SHA256 is computed over r_n and the key used for HMAC is k_dXOR r_n, where r_n is XORed with the least- |
|----|---|
| Ια | |

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| | Value | Confidentiality Required [±] ? | Integrity Required [±] ? | Value used by Core Functions? | Core Function |
|-------|--------------------------------------|--|--|-------------------------------------|---|
| | k _m | Yes | Yes* | Yes | Handling of Master Key, during AKE (including Pairing) and Key Derivation, in plaintext form |
| | k _d | Yes | Yes" | No | N/A |
| | dkey ₀ ,dkey ₁ | Yes | Yes* | No | N/A |
| The | | | • | • • | to the second device irrespective of whether the Dell nd device. |
| | | HDCP Transmitter [Generate Verify signature o certificate using k Generate k _m Encr with kpub _{re} Verify integrity of SI Perform revocation c ompute H and verify H Store m, k _m and E _{kh} (k _m) a with Receiver ID | The Mithin an the public M and M | AKE_Send_ Read AKE_Send_Pairi | tificate: nd Cerr Decrypt k_m with kpriv Read H': Compute H'= IIMAC-SHA256(r_{lx} $RxCaps$ H_prime $TxCaps$, k _d) Eu(k_m): |
| Id. a | ıt 12. | | | | |

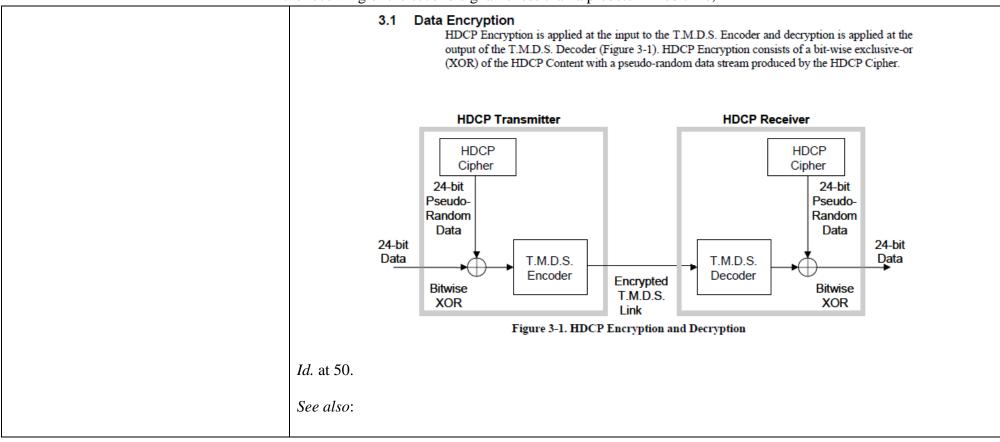
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| to recerving of the second signal is less than a predetermined time, |
|---|
| Generates a pseudo-random 128-bit Master Key k_m. Encrypts k_m with kpub_{rx} (E_{kpub}(km)) and sends AKE_No_Stored_km message to the receiver containing the 1024-bit E_{kpub}(km). RSAES-OAEP encryption scheme must be used as defined by PKCS #1 V2.1: RSA Cryptography Standard. SHA-256 is the underlying hash function. The mask generation function used is MGF1 which uses SHA-256 as its underlying hash function. |
| <i>Id.</i> at 13. |
| If AKE_No_Stored_km is received, the HDCP Receiver |
| • Decrypts k_m with kpriv _{rx} using RSAES-OAEP decryption scheme. |
| Performs key derivation as explained in Section 2.7 to generate 256-bit k_d. k_d = dkey₀ dkey₁, where dkey₀ and dkey₁ are derived keys generated when ctr = 0 and ctr = 1 respectively. dkey₀ and dkey₁ are in big-endian order. |
| <i>Id.</i> at 14. |
| HDCP Transmitter [Device A] HDCP Receiver [Device B] |
| Generate r_{i_k} Retrieve stored $E_{4a}(k_w)$ and <i>m</i> corresponding to <i>Receiver ID</i> Verify integrity of SRM Perform revocation check Compute H and verify $H = H^*$ |
| Figure 2.2. Authentication and Key Exchange (With Stored k_m) |

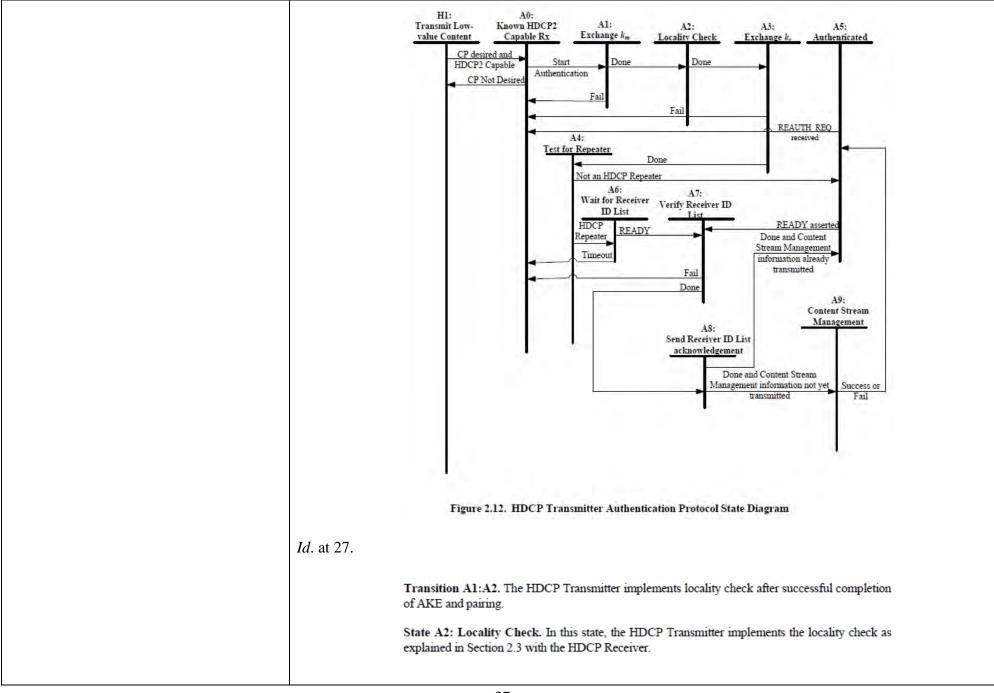
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| Id. at 12. Sends AKE_Stored_km message to the receiver with the 128-bit <i>E_{kh}(k_m)</i> and the 128-bit <i>m</i> corresponding to the <i>Receiver ID</i> of the HDCP Receiver |
|---|
| <i>Id.</i> at 14. |
| If AKE_Stored_km is received, the HDCP Receiver |
| • Computes 128-bit $k_h = SHA-256(kpriv_{rx})[127:0]$ |
| • Decrypts $E_{kh}(k_m)$ using AES with the received <i>m</i> as input and k_h as key in to the AES module as illustrated in Figure 2.3 to derive k_m . |
| Performs key derivation as explained in Section 2.7 to generate 256-bit k_d. k_d = dkey₀ dkey₁, where dkey₀ and dkey₁ are derived keys generated when ctr = 0 and ctr = 1 respectively. dkey₀ and dkey₁ are in big-endian order. |
| <i>Id.</i> at 15. |
| The Dell Product proceeds to session key exchange and providing of the protected content to the second device after successful completion of the AKE stage and Locality Check. |
| 2.4 Session Key Exchange Successful completion of AKE and locality check stages affirms to HDCP Transmitter that the HDCP Receiver is authorized to receive HDCP Content. Session Key Exchange (SKE) is initiated by the HDCP Transmitter after a successful locality check. The HDCP Transmitter sends encrypted Session Key to the HDCP Receiver at least 200 ms before enabling HDCP Encryption and beginning the transmission of HDCP Content. HDCP Encryption may be enabled 200 ms after the transmission of the encrypted Session Key to the HDCP Receiver and at no time prior. Content encrypted with the Session Key k_3 starts to flow between the HDCP Transmitter and HDCP Receiver. HDCP Encryption must be enabled only after successful completion of AKE, locality check and SKE stages. |
| <i>Id.</i> at 17. |

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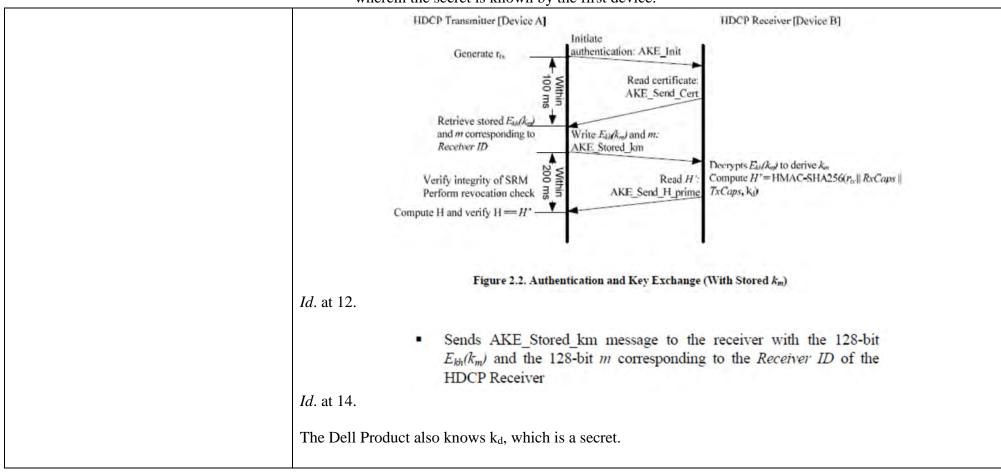
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| <i>Id.</i> at 28. | |
|-----------------------|--|
| | Transition A2:A3. The HDCP Transmitter implements SKE after successful completion of locality check. |
| | State A3: Exchange k_s . The HDCP Transmitter sends encrypted Session Key, $E_{dkq}(k_s)$, and r_{iv} to the HDCP Receiver as part of the SKE_Send_Eks message. It may enable HDCP Encryption 200 |
| | ms after sending encrypted Session Key. HDCP Encryption must be enabled only after successful completion of AKE, locality check and SKE stages. |
| | Transition A3:A4. This transition occurs after completion of SKE. |
| <i>Id</i> . at 28-29. | |

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| wherein the secret is known by the first | The secret is known by the first device. For example, the Dell Product generates and/or stores the Master Key, |
|--|---|
| device. | k_m , a secret, and thus knows k_m . |
| | |
| | HDCP Transmitter [Device A] HDCP Receiver [Device B] |
| | Initiate |
| | Generate r _{to} authentication: AKE_Init |
| | ē ≤ Read certificate: |
| | VerdAv signature on the Read certificate: |
| | certificate using kpuba |
| | Generate k_m Encrypt k_m AKE No_Stored km |
| | with kpubra |
| | Verify integrity of SRM $\begin{subarray}{c} \end{subarray}$ $\bedin{subarray}{c} \end{subarray}$ $\bedin{subarray}{c} \end{subarray}$ $\bedin{subarray}{c} \end{subarray}$ $\bedin{subarray}{c} \end{subarray}$ <th< td=""></th<> |
| | Verify integrity of SRM $\begin{subarray}{c} \begin{subarray}{c} subaray$ |
| | Compute H and verify $H = H^*$ Read $E_{M}(k_m)$: |
| | 8 ≦ AKE_Send_Pairing_Info |
| | 2 Compute Elin Kay |
| | Store $m_k k_m$ and $E_{kl}(k_m)$ along with Receiver ID |
| | |
| | |
| | Figure 2.1. Authentication and Key Exchange (Without Stored k_m) |
| | |
| | HDMI HDCP 2.2 at 12. |
| | |
| | • Generates a pseudo-random 128-bit Master Key k_m . Encrypts k_m with |
| | $kpub_{rx}$ ($E_{kpub}(kn)$) and sends AKE No Stored km message to the |
| | receiver containing the 1024-bit $E_{kpub}(km)$. RSAES-OAEP encryption |
| | scheme must be used as defined by PKCS #1 V2.1: RSA |
| | Cryptography Standard. SHA-256 is the underlying hash function. |
| | The mask generation function used is MGF1 which uses SHA-256 as |
| | its underlying hash function. |
| | |
| | |
| | <i>Id.</i> at 13. |
| | |

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| | 2.3 Locality Check Locality check is performed after AKE and pairing. The HDCP Transmitter initiates locality check by sending a 64-bit pseudo-random nonce r _n to the downstream receiver. |
|-------------------|--|
| | The HDCP Transmitter |
| | Initiates locality check by writing the LC_Init message containing a 64-bit pseudo- random nonce r_n to the HDCP Receiver. |
| | Sets its watchdog timer to 20 ms. The LC_Send_L_prime message must be received by the transmitter within 20 ms from the time the transmitter finishes writing the LC_Init message parameters to the HDCP Receiver. Locality check fails if the watchdog timer expires before the last byte of the LC_Send_L_prime message is received by the transmitter. The transmitter then aborts the authentication protocol. |
| | • Computes L = HMAC-SHA256 $(r_n, k_d \text{ XOR } r_{rx})$ where HMAC-SHA256 is computed over r_n and the key used for HMAC is $k_d \text{ XOR } r_{rx}$, where r_{rx} is XORed with the least-significant 64-bits of k_d . |
| | On reading LC_Send_L_prime message from the receiver, compares L and L'. Locality check fails if L is not equal to L'. |
| <i>Id</i> . at 16 | 5. |
| | HDCP Transmitter [Device A] HDCP Receiver [Device B] |
| | Generate rn Set watchdog timer |
| | Compute L = HMAC-SHA256(r_n , k_d XOR r_n) Verify L = L? |
| | Figure 2.4. Locality Check between HDCP Transmitter and HDCP Receiver |
| <i>Id</i> . at 17 | 1. |

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| Value | Confidentiality Required [‡] ? | Integrity Required [±] ? | Value used by Core Functions? | Core Function |
|-----------------------|--|--------------------------------------|-------------------------------------|---|
| k _m | Yes | Yes* | Yes | Handling of Master Key, during AKE (including Pairing) and Key Derivation, in plaintext form |
| k _d | Yes | Yes" | No | N/A |
| dkey0,dkey1 | Yes | Yes* | No | N/A |
| Id. at 67 (abridged). | | | | |