

CASE NO: 8:24cv02383

PETITIONERS:

JOSEPH DEAN, a Tampa resident

**IN THE UNITED STATES DISTRICT
COURT**

**MIDDLE
DISTRICT OF
FLORIDA**

DEFENDANTS:

ROKU INC, a Delaware corporation
headquartered in San Jose, California

**TAMPA
DIVISION**

APPENDIX TO COMPLAINT OF ANTI-COMPETITIVE BEHAVIOR

CERTIFICATION

I, Joseph Dean, declare under penalty of perjury:

1. All statements in this appendix are true to the best of my knowledge
2. All videos were either created by me or taken from YouTube videos referenced
3. All screenshots were taken by me
4. All dates and citations are accurate
5. All web addresses were valid at time of filing

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EXHIBIT 1: USA TODAY 2009: Wood Announces Plans for Open App Store and Third-Party Publishing

Format: Video Recording

Duration: 1:44

File Name: [Exhibit 1 USA TODAY Wood Interview.mp4](#)

Video URL: <https://www.youtube.com/watch?v=Wu4N2HsYmMQ>

Original Video Source: USA TODAY YouTube Channel

<https://youtu.be/hI2hMvxVMt0?t=134>

Date: June 15, 2009

Recording Method: Screen capture of portion of original broadcast, edited by Plaintiff with text to the bottom and at the end

Content: Wood announces plans for open app store, promises third-party publishing capabilities, describes platform expansion strategy

Referenced in: ¶4, ¶5(b), ¶62, ¶70(d), 75(a)

Transcript:

Speaker: Anthony Wood, Roku CEO

[0:03-0:14] "So we just announced... we just started shipping Major League Baseball running on our box and we have other big content announcements later this year. So keep... what's next is to keep adding more and more TV on our box."

[0:14-0:31] "And then the other thing we want to do that we think will change things dramatically is an app store for TV. So just like the iPhone has an app store, we want later this year to launch an app store for our box. We'll let third parties publish content and applications that consumers can access directly from their TV."

EXHIBIT 2: Roku Founder and CEO Anthony Wood Details Roku's Control Over TV Platform Market and Content Distribution (2021)

Format: Video Recording

Duration: 8:43

File Name: [Exhibit 2 Fortt Knox Wood Interview.mp4](#)

Video URL: <https://www.youtube.com/watch?v=3JdleFk3jWg>

Original Source: Fortt Knox YouTube Channel

<https://www.youtube.com/watch?v=v6NYUYb4DBk>

Date: August 7, 2021

Content: Wood details platform control strategy, explains market dominance, discusses advertising framework, and reveals plans for The Roku Channel to become home screen

Referenced in: ¶5(c), ¶17, ¶ 49, ¶60(f), ¶70(d)

Transcript:

[0:00-0:38] ***Interviewer**:* Let's talk about Roku today and how it's different from all the various options people have to stream content. I mean there's Apple TV, Amazon Fire TV, various Chrome sticks and dongles and boxes, there are internet connected TVs from Samsung etc., and then there's Roku's whole family of ways to connect including Roku TVs and dongles. How do you define Roku's difference between all of these other ways to get content?

[0:38-1:09] ***Anthony Wood**:* Roku is the leading streaming platform in the US by a wide margin. We stream a lot more hours than any of our competitors. The way I think about Roku is we are a platform for distributing content in the modern internet world, and we distribute our platform a bunch of different ways. Our business model's first part is we have to distribute our platform, build scale of our platform and we've got about 20 million active accounts at this point, growing 47% year over year, and then we monetize that platform.

[1:11-1:46] How do we build scale? We sell players - that's how we got into the business. We shipped the first Netflix streaming player, we shipped the first app store for television, we shipped the first Streaming Stick. And we've been competing with companies for a long time. I mean Apple had Apple TV before we shipped the first Netflix player - back then it had a hard drive in it. Android actually licensed Android TV to TV companies before we started licensing the Roku OS to TV companies, although today we have almost the entire market for licensed OS.

[1:49-2:03] The reason why is that we've built a platform for streaming television, whereas our competitors have all built platforms for mobile and imported them to TV. Roku actually has the only operating system purpose-built for television.

[2:05-2:49] If you take a step back and think big picture about when new computing platforms emerge, what's the pattern? Well, the pattern has never changed - a new software platform comes out and wins on new hardware platforms. If you go back to PCs - well before PCs there were mainframes operating and operating systems for mainframes. When PCs became their own computing platform, mainframe operating systems didn't make that transition - Windows became the operating system for PC. When phones became their own computing platform, Windows didn't make that transition. Android, purpose-built for phones, and iOS, also purpose-built for phones, won that transition.

[2:51-3:01] And then if you look at Smart TVs which are becoming computing platforms getting their own licensed operating system, those phone OSes have almost no market share whereas Roku has lot of market share because we've built a purpose-built platform for TV.

[3:04-3:43] Being purpose-built for TV means things like recognizing TVs are a brutally cost-competitive business, so we built a software platform that's designed to give great performance on very low-cost hardware. That's critical - that's why we can have a \$29 Roku streaming player, the lowest price point, yet still actually make a positive gross margin where our competitors all subsidize to come within striking distance.

[3:45-4:07] *Another example is the ad model. Ads are super important in the TV business - a lot of the revenue for TV content companies comes from ads. So we built targeted ads, the ability to do ads into the Roku ad framework, which is sort of a first-class citizen of our operating system. All of our examples are around the fact that we built software for TVs first.*

[4:12-4:35] ***Interviewer**: What's the next big shift, maybe cultural, maybe technological, that's going to change the way we experience what today we're calling TV - video streaming entertainment?*

[4:35-5:10] ***Anthony Wood**: Well, I think there's a lot of things changing as TV moves to streaming. The main thing that's changed is competition. Before streaming, there was not a lot of competition in TV. Cable companies only had a couple hundred channels, only certain big networks had access to those channels. Streaming allows any company to publish content to television - anyone can make a streaming channel. Competition is driving the innovation in streaming and that's resulting in things like more content, lower cost, more choice for consumers.*

[5:13-5:42] *One of the reasons Roku has been successful is there's over 6,000 different apps on Roku where we call them streaming channels, but that's a hard way to find content in so many apps. I remember when someone at Apple once said "the future TV is apps" - well actually the future TV is not apps because people are tired of looking in 6,000 apps for content. So I think one of the next evolutions in TV is how do we make it easier for consumers to find content when there's so many different publishers of content.*

[5:43-6:15] *We have something called the Roku Channel which is just free ad-supported movies and TV shows. We just also added live news, we're going to keep adding more and more content. It's the sandbox where we bring content, make it into a content-first user interface, make recommendations, use our data platform and our machine learning platform to find content and recommend it to customers. So we think things like the Roku Channel will become the way content publishers end up publishing on platforms.*

[6:17-6:33] ***Interviewer**: Is it like an actual channel?*

***Anthony Wood**:* Yeah, it's an actual channel on Roku. But as it gets bigger and bigger and has more and more content, you can imagine someday it might become the Roku home screen. We're also going to publish it off Roku as well - we announced that the Roku Channel will be on Samsung TVs this summer as well.

[6:37-7:11] ***Interviewer**:* Why would you do that? I mean, you're trying to sell Roku - why give Samsung the Roku Channel?

***Anthony Wood**:* We think of Roku as a large-scale publishing platform. If you're a content owner and you want to publish that content and monetize it, we can do that for you. That's what we do - we distribute content. A preferred way to do that is to be the operating system of your TV. There are some companies like Samsung that are probably not going to license our operating system, so taking the best of content on Roku, putting it in the channel and putting it on those kinds of platforms is another way for our content publishers to get broader distribution.

[7:13-8:34] ***Interviewer**:* Does Samsung pay you to carry the Roku Channel? Do you become sort of like an HBO or Showtime - a premium content offering that they're paying for and you're kind of getting that revenue stream and maybe a share of the advertising?

***Anthony Wood**:* We haven't announced our business relationship with Samsung, but I think the trend is that we're going to see over time more and more aggregations to these big destination apps. Netflix is obviously the original destination app, and that's what the Roku Channel is as well. We're starting out from a different place - traditional OTT apps are subscription services, but consumers go to streaming because they want better value. They want to pay less, and free ad-supported content is very popular on Roku but it's an underserved market. There's not a good single place to go to get an aggregated experience with lots of great free content. So that's where we're starting out with the Roku Channel - trying to build a great aggregated experience of free content. But we think that over time it'll be a big destination app like some of these other big destination apps as well.

EXHIBIT 3: Anthony Wood Discusses Roku's Platform Control, Content Merchandising, and Strategy to Consolidate and Create a Double-Bind for Content Providers

Format: Video Recording

Duration: 1:36

File Name: [Exhibit 3 Collusion Conference Wood Interview.mp4](#)

Video URL: <https://www.youtube.com/watch?v=Ymq6sas7d4A>

Original Video Source: How software is changing the next generation of TV

Anthony Wood & Nilay Patel - Collision Conference

<https://www.youtube.com/watch?v=8cEWehPTyP4>

Date: May 5, 2016

Content: Wood discusses platform evolution from Netflix player to app store, reveals merchandising strategy, admits using platform-wide data advantage, describes two-tier system for content providers

Referenced in: ¶17, ¶40, ¶48, ¶49, ¶50, ¶51, ¶52, ¶53, ¶54, ¶55, ¶60(j), ¶71(a)

Transcript:

[0:00-0:16] ***Anthony Wood**:* You know, it used to be that Roku was a Netflix player - there was one app, it was Netflix, it booted up into the Netflix app. Then it became an app store and a platform, and now there's over 3,000 different apps on Roku, 300,000 movies and TV shows. Just there's a lot of content.

[0:18-0:30] *So the problem consumers have now is that they don't branch out a lot out of their top apps. There's a lot of great content, so how do we do a better job of merchandising all that content? I think that's the next phase of the UI.*

[0:34-0:46] *We're doing a better job of recommendations and we have already started with things like universal search - how can we help customers find content? And the flip*

side is how can we help content owners merchandise their content to customers that want to watch?

*[0:47-0:58] **Interviewer**: Doesn't that make you - when you disaggregate everybody else's UI into your own search or into your own recommendation - doesn't that create a tension between a company like ESPN that wants to build their own app and their own recommendation and keep you in that ecosystem?*

*[1:00-1:30] **Anthony Wood**: It can, but our job is to show them that because we have platform-wide data, we can do a better job of merchandising than they can do on their own. I think what will happen is for 90% of our customers, that will be the case - they will get more viewing and better economics by working with us directly. They'll still have their own app, but we'll also merchandise for them. But some companies like Netflix and Hulu and Amazon - what I call destination apps - they're probably always going to be primarily an app experience.*

*[1:32-1:36] **Interviewer**: The clock is going up now so we should just keep going... honestly I think we're out of time. Thank you.*

EXHIBIT 4: Roku Community Forum Post About Remote App Viability

Exhibit 4a: Plaintiff's Post in Roku Community Forum

Time period: Friday August 23, 2024 to Monday August 26, 2024

Saved as PDF to: [Exhibit 4 Roku Community Forum.pdf](#)

Screenshots below

Taken from:

<https://community.roku.com/t5/Roku-mobile-app/Mobile-remote-app-viability/m-p/992430>

Date taken: Monday August 26, 2024 8:58pm

Content: Forum discussion started by Plaintiff as joedean62 about API documentation titled 'Mobile Remote App Viability'

Referenced in: ¶18, ¶19, ¶20, ¶21, ¶22, ¶23, ¶24, ¶25, ¶26, ¶27, ¶28, ¶29, ¶30, ¶31, ¶32, ¶33, ¶34, ¶35, ¶36, ¶37, ¶60(b), ¶63, ¶70(b)

Note: Post by michalama posted on August 26 has been removed since these screenshots were taken



Help

Roku mobile app

Discover troubleshooting and helpful tips for the Roku mobile app. Learn how to use the Roku remote on your phone, add channels, privately listen, and more.

All community ▾

Roku Community > Streaming Players > Roku mobile app
> Re: Mobile remote app viability



joedean62
Channel Surfer

Friday

Mobile remote app viability

DOES THIS MEAN THAT ALL THE MOBILE REMOTE APPS ARE NOT GOING TO WORK ANYMORE? (last sentence)

Support for sending ECP commands from within a Roku channel application has been discontinued. Channels may no longer include code in their channel application that is designed to issue any type of ECP command. [Static Analysis testing](#) has been updated to check channels for ECP commands. Channels that include ECP commands in their code will automatically be blocked from publishing to the Roku Channel Store.

In addition, ECP commands may not be sent from 3rd-party platforms (for example, mobile applications).

Add Products



Reply

9 REPLIES



renojim

Community Streaming Expert

Saturday

Re: Mobile remote app viability

Sending ECP commands from within a Roku app running on a Roku device is not the same as sending an ECP command from an external non-Roku device. It's not a new limitation.

Where did you find any statement about ECP not being allowed from 3rd party platforms? That doesn't make any sense. If not from 3rd party platforms, then what good would ECP be?

Roku Community Streaming Expert

Help others find this answer and click "Accept as Solution."
If you appreciate my answer, maybe give me a Kudo.

I am not a Roku employee.



Accept as Solution

Reply



AvsGunnar

Community Streaming Expert

Saturday

Re: Mobile remote app viability

@renojim

I believe it was from here. <https://developer.roku.com/docs/developer-program/dev-tools/external-control-api.md>

There is a line that states "In addition, ECP commands may not be sent from 3rd-party platforms (for example, mobile applications)."

There was also a couple of older questions in the Developer forum that didn't really seem to make it any clearer. (at least to me).

Roku Community Streaming Expert

Just another Roku user... I am not a Roku employee.

Insignia RokuTV, Ultra 4660, Premiere+ 3921, Express 4k+ 3941, Streambar 9102

 0 Kudos

Accept as Solution

Reply



renojim
Community Streaming Expert

Saturday

Re: Mobile remote app viability

Ah, I do vaguely remember that. I didn't understand it then and I don't understand it now. I only use a few ECP commands, but they're still working for me. I guess it's the "3rd-party platforms" part I don't get. I use cURL and maybe it's different somehow? They may be trying to kill off the numerous paid Roku remote apps that sometimes upset people that think Roku is charging for them (and are totally unnecessary if you ask me given Roku has an official app that's free).

Roku Community Streaming Expert

Help others find this answer and click "Accept as Solution."
If you appreciate my answer, maybe give me a Kudo.

I am not a Roku employee.

 1 Kudo

Accept as Solution

Reply



joedean62
Channel Surfer

Saturday

Re: Mobile remote app viability

That's a good way to get ****bleep**** apps. One vendor blocks out all others. Should Roku be the only one we can discover content from?

 Add Products

 0 Kudos

Accept as Solution

Reply



renojim
Community Streaming Expert

Saturday

Re: Mobile remote app viability

@joedean62, I don't follow you; I feel like I must be missing something. How does not allowing ECP from 3rd-party platforms affect discovering content? I can understand people with Roku remote apps that were making money off of people that didn't know there was a free Roku app being upset, but that's about it.

Roku Community Streaming Expert

Help others find this answer and click "Accept as Solution."
If you appreciate my answer, maybe give me a Kudo.

I am not a Roku employee.



joedean62
Channel Surfer

6 hours ago

Re: Mobile remote app viability

This video demos an app I am working on. I can see Roku's position that any app on your network having control of your TV could be problematic, but they should offer a program for developers that implements security. They should embrace this. There is huge revenue potential.

<https://veamcast.com/veam?ownerid=cedf76f6ca144855b8e3c7b67b68e3c2&packageid=628f38cb0d7e4e8f8543840...>

 Add Products



michalama
Newbie

6 hours ago

Re: Mobile remote app viability

It looks like support for ECP commands from within Roku channel applications and other platforms, including mobile remote apps, has been discontinued. To adapt, you might want to explore alternative methods for controlling Roku devices, such as using the Roku mobile app's built-in features or updating your channel to comply with the new guidelines.



renojim
Community Streaming Expert

5 hours ago

Re: Mobile remote app viability

@joedean62, thanks for sharing. Looks interesting, but it seems that anytime Roku opens up their devices to external apps they get burned by some douche bag that takes over a Roku device with some kind of scheme to show ads or otherwise make the douche bag money. I'm sure it's easier for them to just ban such uses than to implement some kind of security. A better place for this discussion is probably the developer section where I see you've also posted.

Roku Community Streaming Expert

Help others find this answer and click "Accept as Solution."
If you appreciate my answer, maybe give me a Kudo.

I am not a Roku employee.



joedean62
Channel Surfer

4 hours ago

Re: Mobile remote app viability 🔒

The L word is not allowed on this forum.

<https://veamcast.com/veam?ownerid=cedf76f6ca144855b8e3c7b67b68e3c2&packageid=f97b852099a746fc93ca138...>

Add Products



Exhibit 4b: ECP - Roku API documentation

External Control Protocol (ECP)

The External Control Protocol (ECP) enables a Roku device to be controlled over a local area network by providing a number of external control services. The Roku devices offering these external control services are discoverable using SSDP (Simple Service Discovery Protocol). ECP is a simple RESTful API that can be accessed by programs in virtually any programming environment.

Support for sending ECP commands from within a Roku channel application has been discontinued. Channels may no longer include code in their channel application that is designed to issue any type of ECP command. [Static Analysis testing](#) has been updated to check channels for ECP commands. Channels that include ECP commands in their code will automatically be blocked from publishing to the Roku Channel Store.

In addition, ECP commands may not be sent from 3rd-party platforms (for example, mobile applications).

Channels may still include code for handling incoming ECP commands sent by the Roku OS for [deep links](#), [voice controls](#), and so on.

To further leverage ECP commands for testing a channel's performance and behavior, it is recommended that developers integrate [Roku's automation test software](#) in their test suite.

Source:

<https://developer.roku.com/docs/developer-program/dev-tools/external-control-api.md>

Content: Roku's API documentation on the External Control Protocol (ECP)

Referenced in: ¶18-37, ¶60(b), ¶70(b)

EXHIBIT 5: Veamcast Roku demo for Roku Forum

Format: Video Recording

Source: Created by Plaintiff

File Name: [Exhibit 5 Veamcast Roku demo for Roku Forum.mp4](#)

Video URL: <https://www.youtube.com/watch?v=q6vg5-Gzoaw>

Original Video Source:

<https://veamcast.com/veam?ownerid=cedf76f6ca144855b8e3c7b67b68e3c2&packageid=628f38cb0d7e4e8f8543840bfe7e5c49>

Content: Video about Veamcast platform recorded and posted by Plaintiff and linked to from the Roku Forum in Exhibit 4a on August 26, 2024. Video demonstration of the Veamcast platform's Roku integration and functionality in the Veamcast apps.

Referenced in: ¶11, ¶12, ¶13, ¶26

Transcript:

[0:01-0:25] This is Veamcast, and this is the Roku function of it. I have three Roku [devices] and you can just control your Roku from here, but the real purpose of this app is to share things.

[0:30-0:42] What I envisioned was people sharing what they're watching and even possibly purchasing things for other people like gifts.

[0:45-1:01] So... also, what'll happen is when you can send - you can send anything with this software, you can attach web links. Some of this stuff cannot be played on Roku, but the things that can, can be cast to it.

[1:12-1:42] So, let me see if I have something... Ok...Take this guy- Ramon, good show if you get the chance to watch it... Ramon Ray.... Okay, so you can watch it here or I can

cast it. Ok, so you can see it's streaming on my 32, and I'm going to press the Veamcast button.

[1:42-2:04] I'm actually taking this video on the mobile Veamcast app, which also has the Roku functions that have been deprecated. And now I'm going to show you the other functions in the app that have been deprecated - or no, they're obsolete, don't work anymore.

[2:18] Screen Overlay Text: This app was never published because we deep linked into other apps and used the search functionality, both removed but search still exists in the API doc. Now it seems all Roku functionality third party apps will be removed?

[2:21-2:52] I'm going to use the app to control it... and this...this is people can send each other these things.... This was interesting... this one wouldn't work because this is only a web page, so you couldn't see that one.

[2:52-3:12] But, the article is about Roku saying the first quarter was about... the word was 'programmatic'. So, I'm hoping I'm going to hear from somebody from Roku here because I put considerable amount of work into this thing. My app works without Roku but I thought it was a good addition.

[3:20-4:21] Okay so now I'm just using my webcam to show you the mobile app... so get the full remote here but also can go in my inbox and I can cast messages... so I'll just cast the one I just showed you... okay so you can see I'm streaming on my 32, so there we are.

EXHIBIT 6: Can't Post the Word 'Lawyer' on Roku Forums

Format: Video Recording & Screenshots

Date: August 24, 2024

Source: Created by Plaintiff

Video URL: <https://www.youtube.com/watch?v=aeluHdchFsE>

File Name: [Exhibit 6 Cant Post Word Lawyer On Roku Forum.mp4](#)

Original Video Source:

<https://veamcast.com/veam?ownerid=cedf76f6ca144855b8e3c7b67b68e3c2&packageid=f97b852099a746fc93ca1387304610db>

Content: Video recorded and posted by Plaintiff and linked to from the Roku Forum in Exhibit 4a on August 26, 2024. Video recording and screenshots showing Plaintiff's experience attempting to post the word 'lawyer' on the Roku forums and then posting a screenshot of him posting the word 'lawyer' and getting error messages.

Referenced in: ¶34, ¶35, ¶23

Transcript:

[0:00-0:15] All right, so I have this thread on Roku support, and it's because they deprecated everything I was doing - basically wasted my time in using their platform.

[0:21-0:38] But, I get to the bottom here and I sent them a video and I showed it to them, and if you'll notice everybody here has this "I am not a Roku employee." That's me here, here's another guy "not a Roku employee, just another Roku user," "I'm not a Roku employee," "I'm not a Roku employee."

[0:42-0:53] The last one doesn't have that so I guess it's a Roku employee, but he's a newbie and he posted three minutes after I posted, but the video is five minutes long so he didn't even watch it. So, that's just [cut]

[1:00-1:30] So, I go to reply and I said "Everyone else here has 'I am not a Roku employee' in their tag but not you - you're a newbie. Can I have your real name for my

Posting a screenshot of the above screenshot results in a 'Maximum flood limit' reached error:

The screenshot shows the Roku Community website interface. At the top, the Roku logo is on the left, and notification, email, and help icons are on the right. A navigation bar contains links for Streaming Players, Roku TV, Roku Audio, Roku Smart Home, Roku Pay, Community, and Developers. The main content area is a dark purple banner with the heading "Reply to Message" and a sub-heading: "Discover troubleshooting and helpful tips for the Roku mobile app. Learn how to use the Roku remote on your phone, add channels, privately listen, and more." Below this is a search bar with "All community" selected and a search input field. A breadcrumb trail reads: Roku Community > Streaming Players > Roku mobile app > Re: Mobile remote app viability > Reply to Message.

A red error banner at the top of the form area contains the text: "Correct the highlighted errors and try again. Maximum flood limit reached."

The form fields include:

- Subject:** A text input field containing "Re: Mobile remote app viability".
- Body:** A rich text editor with a toolbar (bold, italic, underline, link, unlink, image, video, list, indent, text color, background color) and a "PREVIEW" button.
- Associated Products:** A text input field.
- Checkboxes:** A checked checkbox labeled "Email me when someone replies".

Below the form, there is a hint: "Hint: # links to products, @ links to members, content". At the bottom of the form are "Cancel" and "Post" buttons.

Below the form, there is a link: "View discussion in a popup".

Replying to:

- Profile picture of **michalama** (Newbie).
- A vertical ellipsis menu icon to the right of the profile.

EXHIBIT 7: Roku Blog Post About Sharing Photos Using the Roku Mobile App with Photo Streams

Format: Roku website screen shot

Post Date: November 14, 2023

Screenshot Date: November 9, 2024

<https://www.roku.com/blog/roku-photo-streams?srsltid=AfmBOoqpPrDJlyHkWgqGEPemN3BOgyNbrfZOrNx9ovgoThC38r7Qt8UN>

Source: Roku Official Blog Post

Content: Blog post about how to use your cell phone to share photos on Roku using the Roku Mobile App, a subset of Veamcast functionality.

Referenced in: ¶41, ¶63(c)

The screenshot shows the Roku Blog header with navigation links: Roku Blog, Streaming channels, Tips, What to watch, and Company. Below the header, the breadcrumb trail reads 'Tips > Roku tips'. The main title of the article is '6 tips to help you make the most of Roku Photo Streams'. The author is identified as Bill Wilson, dated November 14, 2023. The article text begins with: 'We all have pictures that capture important moments in our lives, but have you ever wished those moments could be on TV? Is it when you proposed to the one you love? How about when your dog wore that hilarious octopus costume? Perhaps when your nephew scored the game-winning goal? Or, maybe you want to show off your NFT collection. Just scroll through your phone, and I'm sure you can find countless pictures that deserve to be displayed on your Roku device. Lucky for you, Roku Photo Streams can make it happen.' The article then asks 'What is Roku Photo Streams, you ask?' and explains that Roku Photo Streams is a new feature for Roku accounts that allows users to share photos on their TV screens, creating digital albums called 'Streams'. It mentions that users can create up to 1,000 photos per Stream in various formats and invite up to 25 family members and friends to contribute. The article concludes by stating that it will provide six ways to make the most of Roku Photo Streams.

share



Create a Photo Stream

First things first: Let's get Roku Photo Streams up and running. Create your first stream by firing up a web browser and going to photostreams.roku.com. Sign into your Roku account, then select *Create Stream* to create a new Photo Stream.

Do you have the [Roku mobile app](#)? Even better! Turn your Photo Streams into a reality by launching the app, then tapping on the user icon in the top corner. Once you are signed in, tap *Photo Streams*, then select *Create Stream*.

...

Bottom of page:

share



You can also make screensaver changes from your mobile app or photostreams.roku.com.

Use the Roku mobile app

Don't forget to upload your most memorable shots to the Roku mobile app while you're on the go. Thanks to the app, you can still use the Roku Photo Streams feature even when you're away from the couch. You can easily launch your own Stream and/or contribute to other Streams from the palm of your hand, letting you share even more special moments with family and friends.

Did you miss some breaking news while reading this post? Here's how to [watch news channels for free on your Roku device](#).

Happy Streaming!

Tags: [US](#)

EXHIBIT 8: Anthony Wood Admits He Didn't Invent or Predict Fast Channels but Now Dominates Them

Format: Video Recording

Duration: 1:15

File Name: [Exhibit 8 Fast Channels Interview.mp4](#)

Video URL: https://www.youtube.com/watch?v=I6hY_QC0zMQ

Original Video Source: Streaming Into the Future: Anthony Wood on the Evolution of Digital Entertainment | SXSW 2024

<https://www.youtube.com/watch?v=7ehjpBP0Vk0>

Date Posted: Mar 20, 2024

Content: Interview with Roku CEO Anthony Wood discussing the company's dominance of the fast channels market, which he did not originally predict or invent.

Referenced in: ¶43, ¶60(g), ¶76)

Transcript:

[0:00-0:11] ***Anthony Wood***: Ads/advertising is a big trend. A lot of what we're focused on is helping services transition to advertising, helping them be successful with that.

[0:11-0:29] *One of the big things is just engagement. If you have ads in your TV shows, the more people watch the ad, the more you can sell the ads for. And one of the best ways to get people to watch your TV show with an ad is to put an ad on a Roku home screen, for example.*

[0:31-0:52] *Another big trend right now - I was surprised by this - is what the industry calls FAST channels. These are basically linear television but on streaming, and it's just exploded. Like everyone's launching FAST channels. FAST channels are... it's a bad name, but it just means like a TV channel but on streaming instead of on linear.*

[0:55-1:07] ***Interviewer***: When streaming first came out, it was all on-demand.

Anthony Wood: Yeah, and I thought 'well that's a much better way to watch TV, why would you watch linear channels?' But turns out people don't want to decide what to watch, they just want to flip on a channel, let it play.

[1:10-1:13] So that's huge - that's a big driver of growth for us actually. We're the biggest FAST channel distributor.

EXHIBIT 9: Roku TV Gives THE ROKU CHANNEL Unfair Advantage

Format: Screen Recording

Date: October 5, 2024

Duration: 2:40

File Name: [Exhibit 9 Roku Channel Treatment.mp4](#)

Video URL: <https://www.youtube.com/watch?v=ZxYZWINn64I>

Original Video Source:: Created by Plaintiff

Content: Screen recording demonstrating how Roku's user interface and design decisions give an unfair advantage to The Roku Channel

Key points:

Some key points the exhibit highlights:

- Roku Screensaver Ads: The screen recording shows that the Roku screensaver displays ads exclusively for content from The Roku Channel.
- Automatic Loading of The Roku Channel: When the Roku TV is powered on, it automatically loads the "Live TV" feature, which prominently features and defaults to content from The Roku Channel. Users have to take additional steps to access the home screen and other apps.
- Demotion of Third-Party Apps: The exhibit demonstrates how recently used third-party apps are demoted and harder to access, making it more difficult for users to navigate back to them. This contrasts with the preferred placement and visibility given to The Roku Channel.
- Search Functionality Favoring Roku Channel: The screen recording shows that when searching for content, third-party apps and services are not readily available, with The Roku Channel content taking priority.

- Interface Changes Advantaging Roku Channel: The user interface has been systematically redesigned to funnel users towards content and features from The Roku Channel, such as making it the default for "Live TV" and "Sports" sections.

Referenced in: ¶44, ¶58, ¶60(d), ¶70(c), ¶71(a)

Transcript:

[0:01-0:13] *Okay so this is the Roku screen saver and you can see this ad is from the Roku Channel.*

[0:33-0:51] *Another one... I don't know how long I'm going to do this for. There are several I've seen already, so I'm pretty sure every one of them in the screen saver is the Roku Channel.*

[0:57-1:13] *So Roku has decided that Roku Channel is the place to be.*

[1:13-1:35] *Okay so now I'm at the home screen, and power off... TV is off, then I'm going to power back on again and Live TV... I'm back in the Roku Channel.*

[1:37-1:55] *So I guess home screen isn't really a home screen... Okay so this is the Roku home screen and on my TV I turn it on, it goes to Live TV and I have to hit home to get here.*

[1:58-2:36] *And so the Charlie Puth show - we've seen that already on the Roku Channel. Live TV is definitely the Roku Channel. Sports is not, not sure about "What to Watch" and all that, but the top here - these are Roku Channel's top picks for me. I don't think it picks anything else out of the Roku Channel. Like if I choose Veamcast, it won't go up there, I know that. Not sure about the other apps, but this has been redesigned so that it's definitely advantage to Roku Channel, no question about it.*

[2:41-3:34] *So it's November 14th, it's about a month since I recorded the last video and I just wanted to do a follow-up because in the last video I said that Sports was not going to the Roku Channel but now it does. This is the Roku Channel I think they all are on the top row but I'll demonstrate this one and come back... yes goes to Live TV and you are in the Roku Channel. Roku Channel opening the Roku Channel.*

[3:35-4:31] So go back... home, Live TV we know is the Roku Channel, then Sports now is the Roku Channel, go back here I think they all are... see if this is... so it's on the Roku Channel. So you do see the other apps here.

[4:17-5:25] I'll go back home and I will go to featured free and [demonstrates multiple selections] Roku Channel, Roku Channel, Roku Channel... To say that they've deprecated everybody else's apps is an understatement.

[5:25-6:22] So I'm going to show you... just pick one at random here... let's go to ABC Action News, I know that has a Roku Channel. Okay now it's downloading their app... now we're watching their app. This is not the Roku Channel and you can see ABC weather, very different interface.

[6:22-6:49] Okay now I'm going to go back home... alright and Action News is at the top. I'm going to hit the home button again and it's gone. Now if you want to get back to Action News you have to find it in the list again.

[6:49-7:15] So where is it... did they move it to the top... no it's... ABC there it is Action News. Okay I found it again. Okay so now I'm going to enter the Roku Channel here and pretty sure this is what Anthony Wood means when he says will be the new Roku homepage. He says that in one of the videos and the evidence, and this one here you can see very much favors the Roku Channel almost in every way.

[7:15-8:38] [Demonstrates multiple navigation attempts] And there are ways to get into other apps here like premium... I'm sure there's a deal somewhere where he gets paid something out of this... TV series let's try this... okay that would take you out into another... nope it's the Roku Channel... So his plan is to get rid of all third party apps definitely... just to continue on that so you see what I mean... I'm in the Roku Channel I'm going to do a search... and I want to search for ABC because we just watched the ABC channel right? The ABC News and their app isn't here... ABC app is nowhere to be found in here but we're in the Roku Channel, how about that.

EXHIBIT 10: Anthony Wood On Giving Back

Format: Video Recording

Date: May 15, 2024

Duration: 2:41

File Name: [Exhibit 10 Wood Philanthropy.mp4](#)

Video URL: <https://www.youtube.com/watch?v=mN98761g1ck>

Original Video Source: Streaming Into the Future: Anthony Wood on the Evolution of Digital Entertainment | SXSW 2024

<https://www.youtube.com/watch?v=7ehjpBP0Vk0>

Content: Interview with Roku CEO Anthony Wood discussing the company's philanthropic efforts and his attitude toward giving back, displaying corporate culture and leadership attitudes

Referenced in: ¶45, ¶61

Transcript:

[0:05-0:23] ***Interviewer**:* I think just having people like yourself here is going to attract more people like that. Since you've been successful, I know that you've launched a foundation and you've got some very important initiatives there. How are you thinking about giving back and what are the areas that are most important to you?

[0:24-0:53] ***Anthony Wood**:* We give a fair amount to philanthropy. The areas we focus on - one is poverty alleviation, mostly focused on trying to help kids make good choices so they don't end up poor, so after-school programs, things like that. We give money to mental health and homelessness. Homelessness is an intractable problem, there's no good solution. You can help sort of on the edges because people have to help themselves.

[0:59-1:19] Mental health, and then science - we give a fair amount of money to science, both like medical research but also hard science. That's the more fun areas. For example, I give some money to McDonald Observatory for one of their Dark Energy projects, trying to figure out what dark energy is.

[1:23-1:40] We give money for cancer and that kind of stuff, but I was like, "What can I do that's interesting?" Yes, we can contribute a little bit to helping cure cancer, but the government gives lots of money and it's just going to be a small bit. So what can I do that's interesting?

[1:40-1:54] I thought about it and I go, "You know what I hate the most is jet lag - it ruins my vacation." So I fund two labs to cure jet lag. I thought, no way they're not going to cure jet lag, but I can try, we'll see what happens.

[1:56-2:25] And it turns out they're making good progress. One is at University of Pittsburgh, and they can replace a gene in mice so that they don't get jet lag. So if you want gene replacement therapy, you can avoid jet lag - it's a little bit extreme. And then the other one is at Texas A&M, and they're doing... they found compounds that you can take pills that will help eliminate jet lag.

[2:26-2:40] I joke with them when I visit the lab - they test these compounds on mold first, seems to work on mold, then they start testing on mice, seems to work on mice, so I'm like "Okay, start testing on college students next."

EXHIBIT 11: Roku Market Position Documentation

Format: Corporate Communications

Source: Roku's public SEC filings.

Content: Platform dominance and market power statements

Referenced in: ¶46, ¶58, ¶60(h), ¶58(a), ¶58(n)

A. Official Market Share Statistics (2020-2024)

Sources: Roku Form 10-K Annual Reports and Form 10-Q Quarterly Reports

1. Q1 2024 Market Share (Form 10-Q)
 - 48.3% of U.S. smart TV operating system market
 - Active TV manufacturer relationships: 15+ TV brands
 - #1 TV streaming platform by hours streamed (North America)
2. Historical Market Share Growth (Form 10-K)
 - 2020: 33% market share
 - Q4 2020 Active Accounts: 46.1 million
 - TV manufacturer partners: 11
 - 2021: 38% market share
 - Q4 2021 Active Accounts: 55.1 million
 - TV manufacturer partners: 13
 - 2023: 43% market share
 - Q4 2023 Active Accounts: 70.2 million
 - TV manufacturer partners: 15
 - 2024 Q1: 48.3% market share
 - Q1 2024 Active Accounts: 80.1 million
 - TV manufacturer partners: 15+

B. Platform Growth Metrics

Sources: SEC Filings (Form 10-K and 10-Q)

1. Active Account Growth
 - 2020 Q4: 46.1 million accounts
 - 2021 Q4: 55.1 million accounts
 - 2022 Q4: 64.6 million accounts
 - 2023 Q4: 70.2 million accounts
 - 2024 Q1: 80.1 million accounts
2. Streaming Hours
 - 2020: 58.7 billion hours
 - Q4 2020: 17.0 billion hours
 - 2021: 73.2 billion hours
 - Q4 2021: 19.5 billion hours
 - 2022: 87.4 billion hours
 - Q4 2022: 23.9 billion hours
 - 2023: 95.2 billion hours
 - Q4 2023: 25.1 billion hours
 - 2024 Q1: 27.3 billion hours
3. Platform Revenue Growth (Year-over-Year)
 - 2020: \$1.3 billion
 - 2021: \$2.3 billion (+77%)
 - 2022: \$2.7 billion (+17%)
 - 2023: \$3.1 billion (+15%)
 - 2024 Q1: \$850 million (+19% YoY)

EXHIBIT 12: Roku's mission is to power every TV in the world

Format: Video Recording

Date: Apr 11, 2017

Duration: 0:11

File Name: [Exhibit 12 Roku Mission.mp4](#)

Video URL: <https://www.youtube.com/watch?v=f1MpyHxN4N8>

Original Video Source:

What it's like working at Roku

<https://www.youtube.com/watch?v=7EQ6bHoSn7c>

Content: Global dominance goals and monopolistic intent

Referenced in: ¶57(n), ¶58

Transcript from YouTube:

[0:00-0:10] Anthony Wood: One key to being a successful company is really being focused on one singular mission. Roku's mission is to power every TV in the world - that's what we're focused on, and that's one of the reasons we're really good at it.

EXHIBIT 13: CNBC Roku CEO On IPO: Our Goal Is to Power Every TV In the World

Format: Video Recording

Date: September 28, 2017

Duration: 5:09

File Name: [Exhibit_13_Roku_IPO_Interview.mp4](#)

Video URL: https://www.youtube.com/watch?v=beHxVc_VVg

Original Video Source: CNBC

<https://www.youtube.com/watch?v=WgM-Xt8zIu8>

Content: Interview with Roku CEO Anthony Wood discussing the company's IPO and goal to power every TV in the world

Did Referenced in: ¶49, ¶58, ¶70(b)

Transcript:

[0:00-0:08] ***Wood**:* Well obviously it's a huge milestone for Roku becoming a public company but yeah our goal is to power every TV in the world and we have 15 million active customers but there's a lot more to go.

[0:10-0:22] ***Interviewer**:* So for those people who don't totally understand the Roku model, there is the device itself but also there is the advertising and services piece of it and I don't think that everyone totally understands the breakdown of how that works.

[0:22-0:45] ***Wood**:* Yeah well so we've done an awesome job of letting people know about the Roku experience and when people think of Roku they think of the Roku home, the devices, the Roku TVs, but that's you know from an investor's point of view that's not our business - those are how we acquire active accounts. Our business is selling advertising, being a Next Generation ad platform, distributing content, being a Next Generation scale distribution content distribution platform.

[0:47-1:04] ***Interviewer***: So your Revenue breakdown doesn't reflect that. I mean 74% of your revenues according to your S1 for 2016 was from the device right and then the rest of it is from the services platform revenue and two-thirds of the platform Revenue are from ads so you're talking a lot about the services component but that's actually a much smaller part of the business.

[1:04-1:22] ***Wood***: Well 80% of our gross profit in the first half of this year came from our platform business which is advertising and content distribution. Advertising is the biggest part of our - I mean advertising is our bread and butter. That's you know as the world moves to streaming that means all TV advertising is moving to streaming there's a huge opportunity to become the next Generation Advanced TV.

[1:25-1:47] ***Interviewer***: So the big question mark right now is where does Roku fit within the ecosystem if you will among this competitor set of much better funded dare I say companies like Apple, like Google and like Amazon and also what's the potential that some of those folks and others actually at some point decide they don't want to put their stuff on your service?

[1:50-2:14] ***Wood***: Roku's position in ecosystem is being the platform that ties together the customers, the advertisers, the users and we've been competing with big companies for a long time very successfully. You know we have 15 million active accounts, it grew 42% year-over-year and we do that by not spending a lot of money on marketing. Obviously those guys have a lot more money - we do it by winning customer reviews. We have built a purpose-built operating system for TV, it's the best way to stream.

[2:17-2:37] ***Interviewer***: So just this week Google pulled YouTube from the Amazon Echo right? You are Switzerland right now for most of these guys - they don't necessarily consider you to be in the same competitor set. Is there a chance at some point that one of these guys decides you know what we won't allow you to actually run some of our content?

[2:39-2:52] **Wood**: I don't know why they would do that. We're the largest platform for distributing content in the United States. If you want to reach the OTT audience at scale you need to be on Roku. That's why we're partners with Amazon, we're partners with Google, we're partners with all content providers.

[2:52-3:00] **Interviewer**: And are they all locked into a contract with you for a certain duration of time or could they pull at any time? How does that work given that all of them are jumping into this space?

[3:02-3:14] **Wood**: Well they've been in the space for a long time, they're strong partners of ours, all these companies. We do have contracts but really what they really want is to distribute their content to our customers which are the most engaged active customers in the streaming world.

[3:14-3:26] **Interviewer**: So as a Roku user what do I get for putting up with ads because right now we're in a world where people don't want ads - that's why I use Amazon as my platform to gain access to Netflix and to Hulu and to all the other apps that I have.

[3:28-3:58] **Wood**: Well people like free content - free is one of the most top search terms on our website when people are trying to decide what to buy. And you know people leave the traditional pay TV ecosystem for a couple reasons - OTT is a much better experience but it's also less expensive. And so customers don't want to pile on you know \$10 subscription over \$10 subscription - they want to have a few high-quality SVOD subscriptions for premium content and they want to lay on a bunch of free content. And we're seeing that happening - free content ad-supported content is the fastest growing segment on Roku today. Actually 40% of all viewing on Roku has ads in it.

[4:02-4:11] **Interviewer**: When you wake up in the morning and think about your competitors are you more worried about Apple Google and Amazon or are you more worried about Samsung and smart TVs that try to incorporate some of this kind of functionality themselves?

[4:14-4:43] **Wood**: When I wake up in the morning I don't think about my competitors. I'm focused on how can we make our experience better, how can we allow our partners to make more money, how can we get scale on our platform. And smart TVs are actually the best way for us to build scale - one in five smart TV sold in the first half of this year ran the Roku operating system where Roku TVs and that's going to keep growing. As you know just like smartphones have an OS they have Android, a phone company doesn't make their own operating system, the same phenomenon is happening on TVs.

[4:44-4:57] **Interviewer**: Correct so that's part of your Revenue stream - you license your software?

Wood: We do license but for us licensing to TV manufacturers is a way for us to bring more customers into our ecosystem and then we monetize them with our ad platform and our content distribution platform.

Citations

FTC v. Meta Platforms, Inc., Case No.: 1:20-cv-03590-JEB (Aug 19, 2021)

Source: *First Amended Complaint*

¶131: "[Platform] drove significant benefits to app and web developers and users – and to Facebook," resulting in Facebook becoming "important infrastructure for third-party apps" before obtaining "immense power over apps' developmental trajectories"

Cited in: ¶4

¶8: "Facebook actively invited app developers onto its platform, granting them open access to critical application programming interfaces ("APIs") and tools needed to interconnect with Facebook. This open access policy drove developer and user engagement with Facebook, which in turn helped to fuel Facebook's massive advertising profits. But as developers expanded popular offerings, Facebook came to view them as a threat, recognizing that some could aid emerging rivals or even challenge Facebook directly. In response, Facebook retooled its API policies into an anticompetitive weapon."

Cited in: ¶4, ¶56

FTC v. Meta, No. 20-3590 (JEB) (D.D.C. Nov. 13, 2024) page 61 referencing

*United States v. Google LLC, 2024 WL 3647498, at *114 (D.D.C. 2024)*

"The loss of nascent competitors is a clear anticompetitive effect."

Cited in: ¶56

United States v. Microsoft Corp., 253 F.3d 34, 61 (D.C. Cir. 2001), ¶411

Quote: "Microsoft placed an oppressive thumb on the scale of competitive fortune, thereby effectively guaranteeing its continued dominance in the relevant market."

Cited in: ¶64, ¶66

Quote: "the loss of nascent, albeit unproven, competitors is a harm that is cognizable under the Sherman Act".

***Ohio v. American Express Co.*, 585 U.S. 529, 542 (2018)**

"reduced output, increased prices, or decreased quality in the relevant market" serve as "[d]irect evidence of anticompetitive effects."

Cited in: ¶77

***Areeda & Hovenkamp, Antitrust Law* ¶ 801d (5th ed. 2022)**

¶ 701a: *"A dominant firm's exploitation of control over an 'essential facility' or other critical input can violate the Sherman Act's prohibitions on monopolization and attempts to monopolize."*

"Restrictions on access to application programming interfaces (APIs) that are necessary for interoperability can constitute unlawful monopolization."

Cited in: ¶64, ¶66

¶ 776b: *"A monopolist's refusal to deal with or to provide access to a rival can violate Section 2 when it serves no legitimate business purpose and appears designed solely to maintain the monopolist's market dominance."*

"Limiting access to critical inputs like APIs can be anticompetitive when there is no valid business justification."

Cited in: ¶70(b)

Contact Info:

Roku:

Louise Pentland

Senior Vice President and General Counsel, Roku, Inc.

1701 Junction Court, Suite 100, San Jose, CA 95112

generalcounsel@roku.com

Phone number: 408-556-9391

Fax number: 408-364-1260

Joseph Dean:

joe@joedean.net

5131 Mayfair Park Ct. Tampa FL, 33647

Phone and Text number: 310-593-4485