

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner

v.

WILDSEED MOBILE LLC,
Patent Owner

Case IPR2023-00246
U.S. Patent No. 9,141,960

PATENT OWNER'S SUR-REPLY

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
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I. INTRODUCTION

The Board should reject Petitioner's reply arguments and find claims 1-25 of U.S. Patent No. 9,141,960 ("the '960 patent") patentable.

First, Petitioner argues for an incorrect claim construction of "*inferring*, by the server, based at least in part on the retrieved *plurality of media* or the retrieved information about said *plurality of media*, one or more entertainment preferences of a user of the portable media player device." Petitioner's construction does not require more than one media. The Board should reject Petitioner's construction, which contradicts the plain meaning of the claim language.

Additionally, Petitioner incorrectly argues that Sasaki's terminal-to-terminal and server-to-terminal embodiments are actually a single embodiment in order to salvage its arguments regarding the limitations that require the server to determine the location of the user of the portable media player device. However, these two embodiments are distinct and the Petition improperly relied on disclosures from both distinct embodiments without any explanation of why a POSITA would have been motivated to combine them. The Board should reject Petitioner's obviousness arguments based on this legally flawed combination of embodiments.

For these reasons, the Board should reject Petitioner's arguments and confirm that patentability of the challenged claims.

II. SASAKI DOES NOT DISCLOSE “INFERRING” ONE OR MORE ENTERTAINMENT PREFERENCES OF A USER.

Petitioner admits in its Reply that the Petition does not rely on Sasaki alone to teach “inferring” one or more entertainment preferences of a user. Reply, 3-4. Although the Institution Decision made a preliminary finding that Sasaki discloses “inferring” (DI, 17), Petitioner emphasized in Reply that it relies on the combination of Sasaki and Ellis for the “inferring” limitation. Reply, 4-5. As explained in Patent Owner’s Response, Sasaki does not disclose or suggest inferring a user’s entertainment preferences at all. POR, 21-25. Further, in its final written decision, the Board should not rely on an obviousness theory that is expressly *not* relied on by Petitioner, i.e., that Sasaki alone includes a teaching of inferring preferences. *Sirona Dental Sys. GmbH v. Institut Straumann AG*, 892 F.3d 1349, 1356 (Fed. Cir. 2018) (“It would thus not be proper for the Board to deviate from the grounds in the petition and raise its own obviousness theory.”); *see also Extractiontek Sales LLC v. Gene Pool Techs., Inc.*, IPR2022-00832, Paper 32 at 31-33 (P.T.A.B. Oct. 23, 2023) (declining to consider rationale not articulated in the Petition).

III. SASAKI IN COMBINATION WITH ELLIS DOES NOT TEACH INFERRING BASED ON A PLURALITY OF MEDIA OR INFORMATION ABOUT A PLURALITY OF MEDIA.

A. The claimed “*inferring*, by the server, based at least in part on the retrieved *plurality of media* or the retrieved information about said *plurality of media*, one or more entertainment preferences of a user of the portable media player device” requires the inference to be based on more than one media.

In its Reply, Petitioner argues that a construction of “inferring ... based at least in part on the retrieved plurality of media or the retrieved information about said plurality of media” that requires more than one media is not necessary because the combination of Sasaki and Ellis “discloses more than one media in multiple ways.” Reply, 7. Petitioner’s argument fails to establish that the construction is unnecessary. As discussed below in Section III.B, Petitioner’s prior art combination fails to render obvious this claim limitation under the proper construction which requires the inferring be based on more than one media or information about more than one media.

As explained in Patent Owner’s Response, based on the plain meaning of the limitation, a correct construction requires the “inferring” to be based on *more than one* media or information about *more than one* media. POR, 8.

Petitioner’s Reply refers to examples from the specification of inferring preferences based on a single type of media. Reply, 11-12. Unsurprisingly, Petitioner does not provide any legal basis for why express limitations in the

claims should be ignored in light of these examples in the specification. *Id.*; *see Phillips v. AWH Corp.*, 415 F.3d 1303, 1312 (Fed. Cir. 2005) (“It is a ‘bedrock principle’ of patent law that ‘the claims of a patent define the invention to which the patentee is entitled the right to exclude.’”).

B. Petitioner fails to carry its burden of establishing that the combination of Sasaki and Ellis renders obvious “inferring” based on “the retrieved plurality of media or the retrieved information about said plurality of media.”

Patent Owner’s Response explains why Sasaki and Ellis, in combination, fail to teach “inferring” based on a plurality of media or information about a plurality of media. POR, 27-29. Patent Owner explains that the Petition provides no explanation of how a POSITA would implement Ellis’s method, which determines preferences based only on what a user has listened to, in Sasaki’s system to arrive at the claimed invention, which requires inferring preferences based on a plurality of media or information about a plurality of media. *Id.*, 28. Furthermore, the Petition’s reliance on Sasaki’s ¶74 for the disclosure of collecting a user’s preference information is inapt. *Id.* Sasaki’s ¶74 describes a terminal device collecting preference information of a user to determine what content the user “desires to recommend,” not content recommendations the user may want to receive. EX1004, ¶74; POR, 28.

Additionally, the Petition insufficiently explains the combination of Sasaki and Ellis and therefore fails to carry the burden of establishing obviousness. POR,

28-29. Dr. Houh’s declaration suffers from the same weakness. Instead, with respect to this limitation, the Petition and Dr. Houh’s declaration separately discuss the teachings of Sasaki and Ellis. EX1003, ¶¶84-90. The only discussion of the actual combination of Sasaki and Ellis for this claim element are conclusory statements that list teachings of both references in a single sentence with no explanation of how they fit together. *See id.*, ¶90.

Petitioner’s Reply incorrectly argues that Patent Owner’s Response did not address Sasaki and Ellis in combination, alleging that Patent Owner has “waived its ability to argue about the combination of Sasaki and Ellis.” Reply, 4. Patent Owner’s Response, however, extensively explained how the combination of Sasaki and Ellis fails to render obvious “inferring” based on the “plurality of media” or “information about said plurality of media” and that the Petition failed to meet its burden of establishing why this limitation would have been obvious. *See, e.g.*, POR, 37-40.

In its Reply, Petitioner recasts its obviousness argument in an attempt to shore up the flawed analysis in the Petition. Reply, 8-9. First, Petitioner asserts that Ellis’s techniques are used to monitor songs and commercials that the user listens to on Sasaki’s portable device, and, based on what the user listens to, automatically determines the user’s preferences using Sasaki’s server, citing Dr. Houh’s ¶90. Reply, 9 (citing EX1003, ¶90). But Dr. Houh’s declaration does not provide this

level of detail or specify that, in the combination, it is Sasaki's server that determines the user's preferences. Petitioner's new Reply argument is not supported by the cited evidence.

Petitioner now argues that "Ellis's techniques are applied, using Sasaki's server, to the audio data or image data stored and played on Sasaki's terminal device." Reply, 9 (citing EX1003, ¶¶88-90). Again, Petitioner did not make this argument in the Petition. Further still, this argument is not supported by the cited declaration testimony. None of paragraphs 88-90 in Dr. Houh's declaration even mentions Sasaki's terminal device. *See* EX1003, ¶¶88-90. In paragraphs 88-89, Dr. Houh separately recites disclosures of Sasaki and disclosures of Ellis. There is no discussion of combining the references. In paragraph 90, Dr. Houh, in conclusory fashion, recites a list of teachings of Sasaki and Ellis but provides no explanation about how they work together:

Thus, Sasaki's server that stores user preferences about multiple types of content accessed by a user of a portable media player device in view of Ellis's technique of automatically determining a user's preferences about types of content, songs, commercials, shows, and other content, where the automatic determination is based on monitoring a portable media player device user's usage information renders obvious [this claim limitation].

EX1003, ¶90.

Petitioner's Reply points out that Patent Owner's Response applies the phrase "plurality of media content types," which appears in two instances on a single page, instead of "plurality of media." Reply, 10; POR, 26. This is clearly a typo, as Patent Owner's Response uses the term "plurality of media" in the claim construction section and all the argument sections except for the standalone discussion of Ellis on page 26. *See* POR, 1, 5-6, 8-9, 11, 19-21, 25, 27-29.

Petitioner's Reply also attempts to rebut the argument in Patent Owner's Response that Petitioner provides no explanation of how a POSITA would implement Ellis's method of determining preferences based only on what a user has listened to in Sasaki's system to arrive at the claimed invention, which requires inferring preferences based on the plurality of media. Reply, 12-13. In doing so, Petitioner makes the following statements about the combination of Sasaki and Ellis that are absent from the Petition:

Using Ellis's techniques for monitoring and automatically determining (inferring) the user's preferences, Sasaki's server can monitor the audio data and image data played on the terminal device and automatically determine (infer[]) the user's preferences.

Reply, 12.

Ellis describes monitoring content (e.g., Ellis's songs and/or commercials and Sasaki's audio data and image data) and automatically determining (inferring) the user's preferences therefrom.

Id., 12-13.

These statements are not supported by Dr. Houh's testimony. As discussed above, paragraphs 84-90 of Dr. Houh's declaration merely list teachings of Sasaki and Ellis and conclude that they render this limitation obvious. They do not provide the explanations of the combination of Sasaki and Ellis quoted above.

For at least these reasons, the Petition failed to show that the combination of Sasaki and Ellis teaches inferring a user's preferences based on each of the recited media content types, as recited in each independent claim.

IV. SASAKI AND ELLIS IN COMBINATION DO NOT TEACH THE "CURRENT LOCATION" LIMITATIONS.

A. Claims 1 and 21: Sasaki and Ellis do not render obvious "accessing, by the server, one or more sources of information about venues or events proximal to a current location of the user."

Claim 1, similar to claim 21, recites "accessing, by the server, one or more sources of information about venues or events proximal to a current location of the user."

The Petition relies on Sasaki's alleged teaching of a portable device transmitting location information to a server in combination with Ellis's alleged teaching of the portable ERS device using location information to access

information about events and facilities local to the user. Pet., 33-35. Patent

Owner's Response explains that Sasaki does not, in fact, disclose a portable device transmitting its location to a server and that Ellis does not disclose a *server* using location information to access information about events and facilities near the user. POR, 37-39; EX2007, ¶¶146-158.

In its Reply, Petitioner reiterates obviousness arguments about Ellis from the Petition, including Ellis's disclosure of the portable ERS using GPS to determine the user's location and downloading information about local events and facilities. Reply, 13 (citing EX1005, ¶¶225, 233-234, 236). Petitioner's Reply, however, fails to address Ellis's lack of disclosure of *a server* accessing information about events and facilities near the user. Reply, 14.

B. Claims 6, 11, and 16: Sasaki and Ellis do not render obvious “providing to a server, by a portable media player device, a current location of the portable media player device.”

Claim 11, similar to claims 6 and 16, recites “providing to a server, by a portable media player device, a current location of the portable media player device.”

For this element, the Petition relies on disclosure related to Sasaki's terminal-to-terminal embodiment, which discloses a portable terminal device transmitting its location to another portable terminal device along with content recommendation information. Pet., 41-42 (discussing claim 6, which is cited for

claims 11 and 16); EX1004, ¶¶68-69, 80-81. Patent Owner's Response explains that the Petition incorrectly asserted that Sasaki's paragraphs 69 and 81 disclosed a portable terminal device transmitting its location to a server. POR, 34-37. Patent Owner's Response further explains that paragraphs 51-82 of Sasaki describe an example where two terminal devices communicate *with each other* as part of the terminal-to-terminal embodiment; there is no discussion of the server of the second embodiment in this example. POR, 35-36.

In its Reply, Petitioner admits that “determining and transmitting the location of the terminal to another device is described in relation to the embodiment in which both devices are terminals (terminal-to-terminal embodiment).” Reply, 15. However, Petitioner now argues, for the first time, that the “server-to-terminal embodiment *is* the terminal-to-terminal embodiment.” Reply, 16 (emphasis in original). For alleged support, Petitioner cites a passage in Sasaki that states that the portable terminal device in the server-to-terminal embodiment “is similar in configuration” and “has similar functions” to the portable terminal device in the terminal-to-terminal embodiment. *Id.*, 15-16 (quoting EX1004, ¶¶112-113). Petitioner also now argues that the portable terminal device in the server-to-terminal embodiment retains the GPS technology. *Id.*, 16.

Petitioner’s argument that the server-to-terminal embodiment is the terminal-to-terminal embodiment, in addition to being untimely raised for the first time in reply, is incorrect. Sasaki clearly distinguishes between the two embodiments, even including separate headings for the two embodiments. EX1004, between ¶28 and ¶29 (“1. First Embodiment (Transmission and Reception of Content Recommendation Information by Two Terminal Devices)”; between ¶111 and ¶112 (“2. Second Embodiment (Reception of Content Recommendation Information from a Service Spot)”).

Additionally, although Sasaki states that the portable terminal device has “similar functions” in both embodiments, the differences in the functions and operation of the portable terminal device in the two embodiments are highly material to Petitioner’s prior art combination. EX1004, ¶113. In each variation of the terminal-to-terminal embodiment, terminal devices transmit content recommendation information directly to each other. *Id.*, ¶¶59, 84, 100, 103. Sasaki teaches that recommendation information sent by one terminal device to another can include the “place of transmission.” *Id.*, ¶¶69, 71, 80, 81, FIG. 3B. The only disclosure in Sasaki of the portable terminal device using GPS or other location technology is to determine the “place of transmission” that is sent along with recommendation information to another terminal device. *Id.*, ¶¶68-71. In contrast, in the server-to-terminal embodiment, terminal devices communicate directly with

a server, not with each other. *Id.*, ¶117. Unlike in the terminal-to-terminal embodiment, the terminal device in the server-to-terminal embodiment does not communicate content recommendations or “place of transmission” to the server. *Id.*, ¶¶112-130. Rather, the terminal device in the server-to-terminal embodiment is receiving recommendations from the server. *Id.*, ¶115. Therefore, neither of Sasaki’s embodiments teaches a portable terminal device transmitting its location to a server.

Because of the material differences between the two embodiments, Sasaki’s server-to-terminal embodiment *is not* the terminal-to-terminal embodiment and, therefore, Sasaki does not teach a portable terminal device that transmits its location information to a server, as each of claim 6, 11, and 16 requires. The combination with Ellis does not remedy these deficiencies of Sasaki, as Petitioner does not rely on Ellis for providing user location information to a server. Pet., 41-42.

C. Patent Owner has not mis-interpreted Sasaki and Ellis.

Petitioner’s Reply argues that Sasaki’s server-to-terminal embodiment and terminal-to-terminal embodiment are not wholly distinct. Reply, 16-17. As discussed in Section IV.B, and in Patent Owner’s Response, Sasaki’s terminal-to-terminal and server-to-terminal embodiments are, in fact, distinct embodiments. POR, 30-34. Because the Petition fails to even attempt to explain why a POSITA

would have been motivated to combine the two embodiments of Sasaki, the Petition fails to establish that Sasaki and Ellis in combination render obvious a portable device that transmits location information to a server.

Petitioner's Reply also argues that Patent Owner's arguments relating to the Institution Decision's statement that "Sasaki's server at least implicitly determines the location of the user's portable media device" are irrelevant to claim 11. Reply, 17. Petitioner is incorrect. First, as Petitioner admits, "claim 11 recites that the *server* receives the location from the *portable media player device*." *Id.* (emphasis in original). This is exactly what Patent Owner argues is missing from Sasaki. *See* POR, 36-37. Further, although the specific language quoted from the Institution Decision in Patent Owner's arguments was directed to claim 1, the Board analyzed only claim 1 at institution, and instituted review of all challenged claims of the '960 patent, including claim 11. DI, 2, 33-34. Thus, arguments directed to the Board's preliminary findings as to the scope and content of the prior art are indeed relevant to all of the instituted claims.

Petitioner also contends that Patent Owner's Response fails to address the Petition's argument that "Sasaki's server in communication with a portable media player device that directly transmits location information in view of Ellis's technique of using the user's geographic location to access information about events and facilities that are local to the user render obvious [] limitation [1.3]"

(“accessing, by the server, one or more sources of information about venues or events proximal to a current location of the user”). Reply, 18 (citing Pet., 35; EX1003, ¶¶91-96). However, Patent Owner’s Response explains at length that Sasaki does not disclose a server in communication with a portable media player device that transmits location information, either directly or indirectly. POR, 30-34. Patent Owner’s Response also explains why the combination of Sasaki and Ellis fails to teach a server that determines the location of the user. *Id.*, 37-39. Therefore, the Petition fails to establish that Sasaki and Ellis in combination render obvious “accessing, by the server, one or more sources of information about venues or events proximal to a current location of the user.”

For at least these reasons, Petitioner has not shown that the combination of Sasaki and Ellis teaches the “current location” limitations, as recited in each independent claim.

V. PETITIONER FAILS TO ESTABLISH A MOTIVATION TO COMBINE SASAKI AND ELLIS.

Petitioner’s Reply fails to rebut Patent Owner’s arguments explaining why a POSITA would *not* have been motivated to combine Sasaki and Ellis.

Petitioner first contends that Patent Owner’s argument that Ellis relates to radio content and Sasaki relates to non-radio content is inaccurate. Reply, 20. But, it is undisputed that Sasaki does not mention radio content at all. Meanwhile, Ellis expressly states that it relates to radio:

This invention relates to radio systems and methods. In particular this invention relates to enhanced radio reception and processing features, utilizing multiple radio receivers, digital storage of radio content, independent control of radio reception and playback, listener profiles, and two-way communication features.

EX1005, ¶2.

Therefore, it is accurate to describe Sasaki as relating to non-radio content and Ellis as relating to radio content. EX2007, ¶¶133-134. Petitioner points to Sasaki's "music" as support that it overlaps with Ellis's "songs," Reply, 19, but Sasaki expressly discloses that its "music" is in the form of "CD music," EX1004, ¶74, and not radio as in Ellis.

Petitioner also argues that it is irrelevant that the portable devices of Sasaki and Ellis receive different types of content in different manners resulting in technical barriers to combining them. Reply, 21-22. These technological barriers are not irrelevant, however, because they establish that Ellis's portable ERS and Sasaki's portable terminal device are sufficiently distinct that a POSITA would not have been motivated to incorporate Ellis's techniques into Sasaki. EX2007, ¶¶116-127; POR, 39-40. Additionally, Petitioner's reliance on an announcement of the iPhone to argue about technical feasibility of combining the devices of Sasaki and Ellis should be disregarded. Reply, 22-23. Petitioner provides no testimonial evidence to support this argument. Further, although the iPhone was purportedly

announced in January 2007, Petitioner provides no evidence of the actual iPhone launch date to prove it was launched prior to the June 22, 2007 filing of the provisional application. EX1001, (60).

Petitioner argues that Ellis’s description of the differences between radio and television content is irrelevant to the combination of Sasaki and Ellis because Sasaki is not limited to television content. Reply, 23-24. However, this discussion in Ellis does apply to the combination of Ellis with Sasaki insofar as Sasaki relates to video content, even if it is not traditional television. Ellis’s discussion of television content encompasses digital video like that described in Sasaki. For example, Ellis discusses U.S. Pat. No. 6,327,418, titled “Method and apparatus implementing random access and time-based functions on a continuous stream of formatted *digital data*,” which Ellis describes as having “been optimized for the needs of the television viewer.” EX1005, ¶5. Thus, Ellis’s distinction of audio and video content consumption teaches away from combining Sasaki and Ellis. EX2007, ¶¶134-137.

For at least these reasons, Petitioner has not established a motivation to combine Sasaki and Ellis.

VI. SIGNIFICANT PORTIONS OF DR. HOUH’S OPINIONS MERELY REPEAT THE PETITION.

As explained in Patent Owner’s Response, significant portions of Dr. Houh’s declaration merely repeat the language of the Petition and, therefore, the

Board should not credit his opinions. POR, 43-45. Petitioner argues in its Reply that Dr. Houh cites the prior art references in his declaration and, therefore, his opinions should be given their full weight. Reply, 24-25. The Reply, however, fails to address Patent Owner's argument that key portions of Dr. Houh's declaration provide no support beyond that found in the Petition.

For example, Dr. Houh's opinions as to why a POSITA would have allegedly combined and reasonably expected success in combining Sasaki with Ellis and Sasaki-Ellis with Jacobi repeat, without additional support, the conclusory arguments in the Petition. *Compare* Pet., 24-29, with EX1003, ¶¶59-66. That Dr. Houh cites the prior art references themselves does not mitigate this shortcoming when Dr. Houh's citations are the same as those found in the Petition itself. *Id.*

Additionally, Dr. Houh repeats the language of the Petition in his analysis of specific claim limitations. For example, with respect to claim limitation [1.2], Dr. Houh's declaration repeats almost the identical language from the Petition, with the exception that Dr. Houh's declaration merely adds block quotes from the references. *Compare*, Pet., 31-33, with EX1003, ¶¶84-90. Dr. Houh similarly repeats the language from the Petition for limitations [1.3] (*compare*, Pet., 33-35, with EX1003, ¶¶91-96) and [6.0] (*compare*, Pet., 41-42, with EX1003, ¶¶114-117).

VII. CONCLUSION

Petitioner failed to rebut the arguments in Patent Owner's Response. As such, Patent Owner respectfully requests that the Board confirm the patentability of the challenged claims of the '960 patent.

Respectfully submitted,

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CERTIFICATE OF WORD COUNT (37 C.F.R. § 42.24(d))

1. This Patent Owner's Sur-Reply complies with the type-volume limitation of 5,600 words, comprising 3,717 words, excluding the parts exempted by 37 C.F.R. § 42.24(c).
2. This Patent Owner's Sur-Reply complies with the general format requirements of 37 C.F.R. § 42.6(a) and has been prepared using Microsoft® Word 2016 in 14-point Times New Roman font.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **PATENT OWNER'S SUR-REPLY** was served electronically via e-mail on January 11, 2024, in its entirety on the following counsel of record for Petitioner:

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