

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AKAMAI TECHNOLOGIES, INC.,
Petitioner,

v.

EQUIL IP HOLDINGS LLC,
Patent Owner.

IPR2023-00329
Patent 6,792,575 B1

Before RICHARD M. LEBOVITZ, ROBERT J. WEINSCHENK, and
SHARON FENICK, *Administrative Patent Judges*.

WEINSCHENK, *Administrative Patent Judge*.

DECISION
Granting Institution of *Inter Partes* Review
35 U.S.C. § 314

I. INTRODUCTION

A. *Background and Summary*

Akamai Technologies, Inc. (“Petitioner”) filed a Petition (Paper 2, “Pet.”) requesting an *inter partes* review of claims 1 and 9 (“the challenged claims”) of U.S. Patent No. 6,792,575 B1 (Ex. 1001, “the ’575 patent”). Equil IP Holdings LLC (“Patent Owner”) filed a Preliminary Response (Paper 8, “Prelim. Resp.”) to the Petition.

An *inter partes* review may not be instituted unless “the information presented in the petition . . . and any response . . . shows that there is a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged in the petition.” 35 U.S.C. § 314(a). Further, a decision to institute may not institute on fewer than all claims challenged in the petition. 37 C.F.R. § 42.108(a). Based on the arguments and evidence of record, Petitioner demonstrates a reasonable likelihood of prevailing in showing that at least one of the challenged claims of the ’575 patent is unpatentable. Accordingly, we institute an *inter partes* review as to the challenged claims of the ’575 patent on all the grounds of unpatentability in the Petition.

B. *Real Parties in Interest*

The parties identify themselves as the only real parties in interest. Pet. 3; Paper 4, 1.

C. *Related Matters*

The parties indicate that the ’575 patent is the subject of the following district court case: *Equil IP Holdings LLC v. Akamai Technologies, Inc.*, No. 1:22-cv-00677 (D. Del.). Pet. 3; Paper 4, 1.

D. The '575 Patent

The '575 patent relates to “an Internet server-based software system that provides delivery of automated graphics and other media to Web sites for access by an end user or consumer.” Ex. 1001, 1:8–12. The '575 patent states that, at the time, “[m]ost Web sites . . . [we]re primarily handmade” by “Web developers . . . produc[ing] each page on their Web site one by one.” *Id.* at 1:14, 1:28–30. According to the '575 patent, “[i]t would be advantageous to provide a system for automated processing and delivery of media (images, video, and sound) to a Web server whereby it eliminates the laborious post-production and conversion work that must be done before a media asset can be delivered on a Web server.” *Id.* at 4:52–56.

To achieve that asserted goal, the '575 patent discloses “an HTML document embedded with proprietary media tags” that “describe how . . . images are to be manipulated for the Web.” *Id.* at 6:57–59, 7:23–26. Specifically, an HTML document with proprietary tags is created and placed on a Web server. *Id.* at 8:18–20. When a user requests a Web page, the Web server, which is third-party software that delivers Web pages to a Web browser, passes the requested page to an HTML parser. *Id.* at 7:28–31, 8:20–22, Fig. 7. The HTML parser searches the HTML document for a proprietary tag, and then looks for the proprietary tag in a database. *Id.* at 8:22–26, Fig. 7. If the proprietary tag is *not* found in the database, a media creation subsystem uses the proprietary tag to generate a Web media and places the generated Web media in a media cache. *Id.* at 8:26–29, Fig. 7. The HTML parser then replaces the proprietary tag in the HTML document with a standard HTML tag that refers to the generated Web media. *Id.* at

8:29–35, Fig. 7. The Web server delivers the modified HTML document to the Web browser for the user to view. *Id.* at 8:35–37, Fig. 7.

E. Illustrative Claim

Of the challenged claims, claims 1 and 9 are independent. Claim 1 is reproduced below.

1. A process for delivering an original media, comprising the steps of:
 - placing said original media in a network system;
 - creating an HTML document or browser language having proprietary media tags and placing said HTML document or browser language onto a Web server;
 - actuating a user request from a customer browser for a Web page by having said Web server pass said requested Web page to an HTML parser on said network system;
 - parsing said HTML document or browser language on said parser by looking for said proprietary media tags;
 - looking up said proprietary media tags in a media tags database on said network system;
 - if at least one media tag of said proprietary media tags is not found,
 - generating a Web media by using said at least one media tag;
 - placing said generated Web media in a media cache on said network system;
 - converting said at least one media tag to at least one standard HTML equivalent tag that refers to said media in said cache; and
 - storing said at least one media tag and said at least one standard HTML equivalent tag in said database;
 - modifying said HTML document or browser language by replacing said at least one media tag by said at least one standard HTML equivalent tag;

delivering said modified HTML document or browser language from said network system to said Web server; and

delivering said modified HTML document or browser language from said Web server to said customer browser for said customer to view.

Ex. 1001, 14:39–15:6.

F. Evidence

Petitioner submits the following evidence:

Evidence	Exhibit No.
Declaration of Vijay K. Madisetti (“Madisetti Declaration”)	1003
Lafer, US 6,192,382 B1, issued Feb. 20, 2001 (“Lafer”)	1004
Tso, US 6,421,733 B1, issued July 16, 2002 (“Tso”)	1005
Pei Cao, <i>Maintaining Strong Cache Consistency in the World Wide Web</i> , IEEE Transactions on Computers, Vol. 47, No. 4 (Apr. 1998) (“Cao”)	1006
Moore, US 6,310,601 B1, issued Oct. 30, 2001 (“Moore”)	1007

G. Asserted Grounds

Petitioner asserts that the challenged claims are unpatentable on the following grounds:

Claim(s) Challenged	35 U.S.C. §	Reference(s)/Basis
1	103	Lafer, Tso
9	103	Lafer, Tso, Cao
1	103	Lafer, Tso, Moore
9	103	Lafer, Tso, Cao, Moore

II. ANALYSIS

A. Level of Ordinary Skill in the Art

Petitioner argues that a person of ordinary skill in the art would have had “a bachelor’s degree in computer systems, computer science, or the equivalent thereof, and at least two years of experience with networked media delivery or related technology.” Pet. 14 (citing Ex. 1003 ¶¶ 42–44).

Petitioner’s description of the level of ordinary skill in the art is supported by the testimony of Petitioner’s declarant, Dr. Vijay Madiseti. Ex. 1003 ¶¶ 42–44. Patent Owner does not dispute Petitioner’s description at this stage of the proceeding. Prelim. Resp. 6. We adopt Petitioner’s description for purposes of this Decision.

B. Claim Construction

In an *inter partes* review proceeding, a patent claim is construed using the same standard used in a civil action under 35 U.S.C. § 282(b), including construing the claim in accordance with the ordinary and customary meaning of the claim as understood by one of ordinary skill in the art and the prosecution history pertaining to the patent. 37 C.F.R. § 42.100(b).

1. Conditional Steps

Claim 1 recites performing “generating,” “placing,” “converting,” and “storing” steps “if at least one media tag of said proprietary media tags is not found.” Ex. 1001, 14:54–64. Petitioner contends that the above portions of claim 1 recite conditional steps that “need not be performed.” Pet. 14–15. Claim 9 recites performing “creat[ing],” “storing,” “generating,” “placing,” and “return[ing]” steps “if said media tag entry does not exist in said media database” and performing certain other steps “if said media tag entry exists in said media database.” Ex. 1001, 16:53–18:5. Petitioner contends that the above portions of claim 9 recite “‘mutually exclusive conditional steps,’ and meeting any one of these sets of steps is sufficient to meet the claim.” Pet. 15. Patent Owner contends that Petitioner fails to show sufficiently that claims 1 and 9 recite conditional steps. Prelim. Resp. 6–9.

As discussed below, on this record, Petitioner shows sufficiently that the asserted prior art teaches the steps that Petitioner contends are

conditional. Thus, at this stage of the proceeding, we need not address Petitioner’s claim construction arguments in order to resolve the parties’ disputes about the asserted grounds of unpatentability. Nonetheless, Patent Owner may address Petitioner’s claim construction arguments in the Response after institution.

C. Obviousness of Claim 1 over Lafer and Tso

Petitioner argues that claim 1 would have been obvious over Lafer and Tso. Pet. 16–61. For the reasons discussed below, Petitioner demonstrates a reasonable likelihood of prevailing in showing that claim 1 would have been obvious over Lafer and Tso.

1. Claim 1

Claim 1 recites “[a] process for delivering an original media.” Ex. 1001, 14:39–40. Petitioner presents evidence that Lafer teaches “‘distributing personalized HTML pages’ containing ‘content’ ‘map[ped]’ with underlying ‘content data.’” Pet. 25–26 (citing Ex. 1004, 2:15–33, 3:23–42, 4:55–61). Petitioner also presents evidence that Tso teaches “‘caching ‘original’ versions of content, including ‘image’ and ‘video’ content for ‘transmission’ to users.” *Id.* at 26–28 (citing Ex. 1005, 3:41–54, 4:1–5). Patent Owner does not dispute that the Lafer and Tso combination teaches the preamble of claim 1. On this record, Petitioner shows sufficiently that the Lafer and Tso combination teaches the preamble of claim 1.¹

¹ Because Petitioner presents sufficient evidence that the prior art teaches the recitations in the preamble of claim 1, at this stage of the proceeding, we need not decide whether the preamble is limiting.

Claim 1 recites “placing said original media in a network system.” Ex. 1001, 14:41. Petitioner presents evidence that Lafer teaches storing “‘data’ for ‘content’ on webpages . . . in a ‘Content DB’ . . . on a server-side back-end system.” Pet. 28–30 (citing Ex. 1004, 2:65–3:3, 3:23–43, 4:65–5:2, Fig. 1). Petitioner also presents evidence that Tso teaches “original media . . . cached in ‘[s]erver-side cache memory 30’ on a server connected to the ‘Internet.’” *Id.* at 30–31 (citing Ex. 1005, 3:41–54, 4:1–5). Patent Owner does not dispute that the Lafer and Tso combination teaches this limitation of claim 1. On this record, Petitioner shows sufficiently that the Lafer and Tso combination teaches this limitation of claim 1.

Claim 1 recites “creating an HTML document or browser language having proprietary media tags and placing said HTML document or browser language onto a Web server.” Ex. 1001, 14:42–44. Petitioner presents evidence that Lafer teaches using “a ‘page formation mapping process’ to create, and then store in the [Web] server’s ‘storage medium,’ ‘tag-extended HTML files’” that “are ‘selectively augmented with’ ‘specialized tags.’” Pet. 31–33 (citing Ex. 1004, 2:20–25, 2:65–3:22, 4:10–22, 4:65–5:2). Patent Owner does not dispute that the Lafer and Tso combination teaches this limitation of claim 1. On this record, Petitioner shows sufficiently that the Lafer and Tso combination teaches this limitation of claim 1.

Claim 1 recites “actuating a user request from a customer browser for a Web page by having said Web server pass said requested Web page to an HTML parser on said network system.” Ex. 1001, 14:45–48. Petitioner presents evidence that Lafer teaches “issu[ing] a request to the Web server,” and “obtain[ing] [the] ‘requested information’ by . . . pass[ing] a tag-extended HTML file to the network system” where “‘the tag-extended

HTML file’ is ‘parsed until . . . a particular tag . . . is encountered.’”

Pet. 34–37 (citing Ex. 1004, 1:15–18, 2:65–3:22, 3:62–67). Patent Owner does not dispute that the Lafer and Tso combination teaches this limitation of claim 1. On this record, Petitioner shows sufficiently that the Lafer and Tso combination teaches this limitation of claim 1.

Claim 1 recites “parsing said HTML document or browser language on said parser by looking for said proprietary media tags.” Ex. 1001, 14:50–51. Petitioner presents evidence that Lafer teaches parsing “the tag-extended [HTML] file . . . until either a particular tag . . . or the end-of-file is encountered.” Pet. 37–40 (citing Ex. 1004, 1:54–58, 3:62–67, 4:11–13). Patent Owner does not dispute that the Lafer and Tso combination teaches this limitation of claim 1. On this record, Petitioner shows sufficiently that the Lafer and Tso combination teaches this limitation of claim 1.

Claim 1 recites “looking up said proprietary media tags in a media tags database on said network system.” Ex. 1001, 14:52–53. Petitioner presents evidence that Lafer teaches checking “for the ‘specialized tag[]’ . . . in a ‘tag cache’ on the network system.” Pet. 40–42 (citing Ex. 1004, 1:54–58, 3:23–42, 4:32–35). Patent Owner does not dispute that the Lafer and Tso combination teaches this limitation of claim 1. On this record, Petitioner shows sufficiently that the Lafer and Tso combination teaches this limitation of claim 1.

Claim 1 recites “if at least one media tag of said proprietary media tags is not found, generating a Web media by using said at least one media tag” and “placing said generated Web media in a media cache on said network system.” Ex. 1001, 14:54–59. Petitioner presents evidence that Lafer teaches “when a special tag in the tag-extended HTML file ‘does not

exist in the tag cache,’ the tag is used to ‘construct[]’ a ‘tag-content pair’ linking a ‘tag’ to an ‘HTML fragment’” that “references a piece of ‘content data’ stored in the ‘Content DB.’” Pet. 42 (citing Ex. 1004, 3:22–30, 3:32–39, 4:13–31, 4:46–54, Fig. 1). Petitioner also presents evidence that Lafer “leaves it to a POSITA to implement populating” the Content DB, and Tso “teaches how to implement Lafer’s ‘Content DB,’” namely, by transcoding (i.e., generating) content and storing both the original and transcoded versions in the Content DB cache. *Id.* at 23–24, 44–45, 48 (citing Ex. 1003 ¶¶ 74, 105; Ex. 1004, 3:32–43; Ex. 1005, 3:48–4:5, 7:15–8:9, 10:24–49, 14:1–7, 14:37–46) (emphasis omitted).

Patent Owner argues that Petitioner does not show sufficiently that the Lafer and Tso combination teaches generating Web media by using at least on media tag. Prelim. Resp. 17–20. Specifically, Patent Owner contends that Lafer teaches generating “a tag-content pair,” not generating “Web media.” *Id.* at 19. According to Patent Owner, “[i]n Lafer, it is not necessary to fetch and generate new content because Lafer is directed to the web server itself, which already includes the content in its databases.” *Id.* (citing Ex. 1004, 20:50–55, 3:41–43). Patent Owner also argues that Petitioner “fails to explain why a POSITA would have changed Lafer’s system and method to generate Web media . . . , as opposed to generating a tag-content pair.” *Id.*

On this record, Patent Owner’s argument is unavailing. First, the evidence of record does not indicate that it is unnecessary for Lafer to generate content. Lafer teaches generally that its Content DB includes content (Ex. 1004, 3:41–43), but Lafer does not teach specifically how the Content DB is populated with content (Ex. 1003 ¶ 74; Ex. 1004, 3:32–43).

And, as discussed in more detail below, a person of ordinary skill in the art would have had reason to populate Lafer's Content DB using Tso's technique for generating content. *See* Section II.C.2. Second, contrary to Patent Owner's argument, Petitioner does not propose changing Lafer's system to generate content instead of a tag-content pair. Lafer teaches generating a tag-content pair based on content from the Content DB, and Petitioner just proposes using Tso's technique to populate the Content DB with the necessary content. Pet. 23–24; Ex. 1003 ¶ 74; Ex. 1004, 4:46–48 (“[A] tag-content pair is constructed from information in the object cache or databases.”).

Claim 1 recites “if at least one media tag of said proprietary media tags is not found, . . . converting said at least one media tag to at least one standard HTML equivalent tag that refers to said media in said cache; and storing said at least one media tag and said at least one standard HTML equivalent tag in said database.” Ex. 1001, 14:60–64. Petitioner presents evidence that Lafer teaches replacing the “specialized tags” with “content information in the form of HTML fragments” and storing the HTML fragments in the database. Pet. 51–54 (citing Ex. 1004, 1:54–58, 3:23–43, 4:11–13, 4:46–54, Fig. 1). Patent Owner does not dispute that the Lafer and Tso combination teaches this limitation of claim 1. On this record, Petitioner shows sufficiently that the Lafer and Tso combination teaches this limitation of claim 1.

Claim 1 recites “modifying said HTML document or browser language by replacing said at least one media tag by said at least one standard HTML equivalent tag.” Ex. 1001, 14:65–67. Petitioner presents evidence that Lafer teaches “substituting one or more predetermined HTML

fragments,’ . . . ‘for each particular tag’ ‘embedded in a requested HTML file’ to ‘construct[] . . . personalized HTML pages.” Pet. 54–56 (citing Ex. 1004, 4:8–13). Patent Owner does not dispute that the Lafer and Tso combination teaches this limitation of claim 1. On this record, Petitioner shows sufficiently that the Lafer and Tso combination teaches this limitation of claim 1.

Claim 1 recites “delivering said modified HTML document or browser language from said network system to said Web server.” Ex. 1001, 15:1–3. Petitioner presents evidence that Lafer teaches “return[ing] the processed ‘page’ to the web server . . . after ‘end-of-file is encountered’ and the ‘page is placed in the page cache.’” Pet. 57–59 (citing Ex. 1004, 3:62–4:5). Patent Owner does not dispute that the Lafer and Tso combination teaches this limitation of claim 1. On this record, Petitioner shows sufficiently that the Lafer and Tso combination teaches this limitation of claim 1.

Claim 1 recites “delivering said modified HTML document or browser language from said Web server to said customer browser for said customer to view.” Ex. 1001, 15:4–6. Petitioner presents evidence that Lafer teaches ““distribut[ing] the constructed HTML files to the user’ via ‘front-end logic.’” Pet. 59–61 (citing Ex. 1004, 2:32–33, 2:62–67, 3:62–4:5). Patent Owner does not dispute that the Lafer and Tso combination teaches this limitation of claim 1. On this record, Petitioner shows sufficiently that the Lafer and Tso combination teaches this limitation of claim 1.

2. *Reason to Combine*

Petitioner argues that a person of ordinary skill in the art as of the claimed priority date of the '575 patent would have had reason to combine the cited teachings of Lafer and Tso. Pet. 20–25 (citing Ex. 1003 ¶¶ 67–75). Petitioner presents evidence that “[a] POSITA would have been motivated to modify Lafer with the[] teachings from Tso by implementing a system in which . . . original media objects are retrieved and transcoded, and the original and transcoded versions are stored in [Lafer’s] ‘Content DB.’” *Id.* at 21–22 (citing Ex. 1003 ¶ 71) (emphases omitted). More specifically, Petitioner presents evidence that Lafer “leaves it to a POSITA to implement populating” its Content DB, and Tso “teaches how to implement Lafer’s ‘Content DB’ by storing both the transcoded version of content data . . . and the original content data.” *Id.* at 23–24 (citing Ex. 1003 ¶ 74; Ex. 1004, 3:32–43; Ex. 1005, 3:48–4:5, 14:37–46) (emphasis omitted). Petitioner also presents evidence that “applying Tso’s teaching of caching original media content in a server-side cache would further improve the efficiency of Lafer’s cache teachings, allowing content to be delivered to users more quickly.” *Id.* at 23 (citing Ex. 1003 ¶ 73; Ex. 1005, 4:1–5) (emphases omitted).

Patent Owner responds that Petitioner does not show sufficiently that a person of ordinary skill in the art would have had reason to combine the cited teachings of Lafer and Tso. Prelim. Resp. 14–17. Patent Owner argues that “Petitioner overlooks a fundamental difference between Lafer and Tso that would have discouraged a POSITA from making th[e] proposed combination.” *Id.* at 15. According to Patent Owner, “Lafer criticizes the practices of ‘caching of the information stored in a database accessed by a

server based on classification or categorization’ as inefficient, . . . and thus teaching caching tag-content pairs and HTML fragments (or HTML code) that reference content or media in a separate database.” *Id.* at 15–16 (citing Ex. 1004, 1:27–35, 3:23–43). Patent Owner contends that, as a result, “Petitioner’s proposed combination is contrary to Lafer’s express teachings and would fundamentally change Lafer’s principle of operation.” *Id.* at 16.

On this record, Patent Owner’s argument is unavailing. The portion of Lafer cited by Patent Owner does not criticize the process of caching content in a database. Rather, Lafer states that “caching of the information stored in a database . . . based on classification or characterization of content” does “not improve efficiency of distributing *personalized or customized* Web pages” because “any *specialized information* . . . would still need to be retrieved from the database each time the page [is] distributed.” Ex. 1004, 1:27–39 (emphases added). In other words, Lafer indicates that caching content in a database does not address the need to improve distribution efficiency for *personalized* Web pages. *Id.* at 1:39–41 (emphasis added). According to Patent Owner, Lafer accomplishes that by “caching tag-content pairs and HTML fragments.” Prelim. Resp. 17. Nonetheless, Lafer still needs to retrieve content from a database. Ex. 1004, 3:41–43 (“The data for these objects are maintained in respective databases.”); *id.* at 4:46–48 (“[A] tag-content pair is constructed from information in the object cache or databases.”). And the evidence of record indicates that adding Tso’s process of caching content in a database to Lafer’s Content DB would have further improved Lafer’s efficiency by reducing the processing load needed to retrieve content from the Content DB. Ex. 1003 ¶ 73; Ex. 1005, 4:1–5.

3. *Summary*

For the foregoing reasons, Petitioner demonstrates a reasonable likelihood of prevailing in showing that claim 1 would have been obvious over Lafer and Tso.

D. Obviousness of Claim 9 over Lafer, Tso, and Cao

Petitioner argues that claim 9 would have been obvious over Lafer, Tso, and Cao. Pet. 62–84. Petitioner identifies evidence indicating that the Lafer, Tso, and Cao combination teaches the limitations of claim 9, and that a person of ordinary skill in the art would have had reason to combine these references. *Id.* Patent Owner contends that Petitioner does not show sufficiently that the Lafer, Tso, and Cao combination teaches creating media using the media tag, as recited in claim 9. Prelim. Resp. 17–20. Patent Owner relies on the same argument discussed above for the “generating” limitation of claim 1. *Id.* For the same reasons discussed above, on this record, Patent Owner’s argument is unavailing.

For the foregoing reasons, Petitioner demonstrates a reasonable likelihood of prevailing in showing that claim 9 would have been obvious over Lafer, Tso, and Cao.

E. Obviousness of Claim 1 over Lafer, Tso, and Moore

Petitioner argues that claim 1 would have been obvious over Lafer, Tso, and Moore. Pet. 84–86. Petitioner identifies evidence indicating that the Lafer, Tso, and Moore combination teaches the limitations of claim 1, and that a person of ordinary skill in the art would have had reason to combine these references. *Id.* Other than the arguments discussed above, Patent Owner does not raise any additional arguments relating to this asserted ground. On this record, Petitioner demonstrates a reasonable

likelihood of prevailing in showing that claim 1 would have been obvious over Lafer, Tso, and Moore.

F. Obviousness of Claim 9 over Lafer, Tso, Cao, and Moore

Petitioner argues that claim 9 would have been obvious over Lafer, Tso, Cao, and Moore. Pet. 84–86. Petitioner identifies evidence indicating that the Lafer, Tso, Cao, and Moore combination teaches the limitations of claim 9, and that a person of ordinary skill in the art would have had reason to combine these references. *Id.* Other than the arguments discussed above, Patent Owner does not raise any additional arguments relating to this asserted ground. On this record, Petitioner demonstrates a reasonable likelihood of prevailing in showing that claim 9 would have been obvious over Lafer, Tso, Cao, and Moore.

III. CONCLUSION

Petitioner demonstrates a reasonable likelihood of prevailing in showing the unpatentability of at least one of the challenged claims of the '575 patent. At this stage of the proceeding, we have not made a final determination with respect to the patentability of any of the challenged claims.

IV. ORDER

It is hereby

ORDERED that, pursuant to 35 U.S.C. § 314(a), an *inter partes* review of claims 1 and 9 of the '575 patent is instituted with respect to all grounds of unpatentability set forth in the Petition; and

FURTHER ORDERED that, pursuant to 35 U.S.C. § 314(c) and 37 C.F.R. § 42.4(b), *inter partes* review of the '575 patent shall commence

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on the entry date of this Order, and notice is hereby given of the institution
of a trial.

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