

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DROPBOX, INC.
Petitioner

v.

MOTION OFFENSE, LLC
Patent Owner

IPR2024-00286
U.S. Patent No. 11,611,520

PETITIONER'S DEMONSTRATIVE EXHIBITS



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IPR2024-00286 & IPR2024-00287

U.S. Patent No. 11,611,520

Petitioner's Oral Argument – April 23, 2025



① Introduction

- a. IPR2024-00286 ("286 IPR") Overview
 - b. IPR2024-00287 ("287 IPR") Overview
-

② 286 IPR: Folder Sharing Claims

③ 287 IPR: File Request Claims



① Introduction

- a. IPR2024-00286 ("286 IPR") Overview
- b. IPR2024-00287 ("287 IPR") Overview

② 286 IPR: Folder Sharing Claims

③ 287 IPR: File Request Claims



286 IPR Challenges “Folder Sharing” Claims 17-21

Ground	Basis	Claims	References
1	§103	~~1-8~~ , 17-21	Houston and Garcia
2	§103	~~1-8~~ , 17-21	Houston, Garcia, and Manzano
3	§103	17-21	Houston, Garcia, and Wu
4	§103	17-21	Houston, Garcia, Manzano, and Wu

286 IPR, Paper 3 (Petition) at 6

¹ Patent Owner disclaimed claims 1-8 under 35 U.S.C. § 253. (EX2045.) Only challenged claims 17-21 remain.

286 IPR, Paper 10 (POPR) at 1 n.1



287 IPR Challenges “File Request” Claims 9-12, 14-16, and 22-24

Ground	Basis	Claims	References
1	§ 103	9, 10, 14, 15	Riepling
2	§ 103	11- ~~13~~ , 16, 22-24 <u>12</u>	Riepling and Manzano
3	§ 103	9, 10, 14, 15	Riepling and Meisels
4	§ 103	11- ~~13~~ , 16, 22-24 <u>12</u>	Riepling, Manzano, and Meisels
5	§ 103	11- ~~13~~ , 16, 22-24 <u>12</u>	Riepling, Manzano, and Garcia
6	§ 103	11- ~~13~~ , 16, 22-24 <u>12</u>	Riepling, Manzano, Meisels, and Garcia

287 IPR, Paper 4 (Petition) at 6

⁵ Claim 13 was statutorily disclaimed without any waiver with respect to any other claim.

287 IPR, Paper 36 (PO Sur-Reply) at 5 n.5



① Introduction

- a. IPR2024-00286 ("286 IPR") Overview
- b. IPR2024-00287 ("287 IPR") Overview

② 286 IPR: Folder Sharing Claims

③ 287 IPR: File Request Claims



286 IPR: Folder Sharing Claims Asserted Prior Art



Houston Discloses a System for Sharing Folders Among Users

(12) United States Patent Houston et al.

(10) Patent No.: US 8,825,597 B1
(45) Date of Patent: Sep. 2, 2014

- (54) NETWORK FOLDER SYNCHRONIZATION
- (75) Inventors: Drew Houston, San Francisco, CA
(US); Arash Ferdowsi, San Francisco, CA (US)
- (73) Assignee: Dropbox, Inc., San Francisco, CA (US)
- (*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 271 days.
- (21) Appl. No.: 12/856,581
- (22) Filed: Aug. 13, 2010

Related U.S. Application Data

- (60) Provisional application No. 61/233,773, filed on Aug. 13, 2009, provisional application No. 61/233,787, filed on Aug. 13, 2009.

- (51) Int. Cl.
G06F 17/00 (2006.01)
G06F 17/30 (2006.01)
H04L 29/08 (2006.01)

- (52) U.S. Cl.
CPC H04L 67/1095 (2013.01); G06F 17/30067 (2013.01); G06F 17/30174 (2013.01)
USPC 707/610; 707/624; 707/625

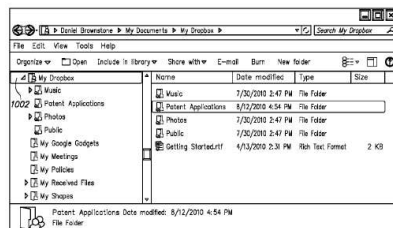
- (58) Field of Classification Search
None
See application file for complete search history.

References Cited

U.S. PATENT DOCUMENTS

- 6,865,599 B2 * 3/2005 Zhang 709/218
7,587,501 B2 * 9/2009 Stillion et al. 709/220
7,822,793 B2 * 10/2010 Rawat et al. 707/823

8 Claims, 9 Drawing Sheets



DROPBOX 1003

EX1003 (Houston)

1. Field of the Invention

The present invention relates generally to sharing of data over a network. In particular, the present invention is directed to synchronization of a folder and its contents shared between multiple clients.

EX1003 (Houston) at 1:15-17

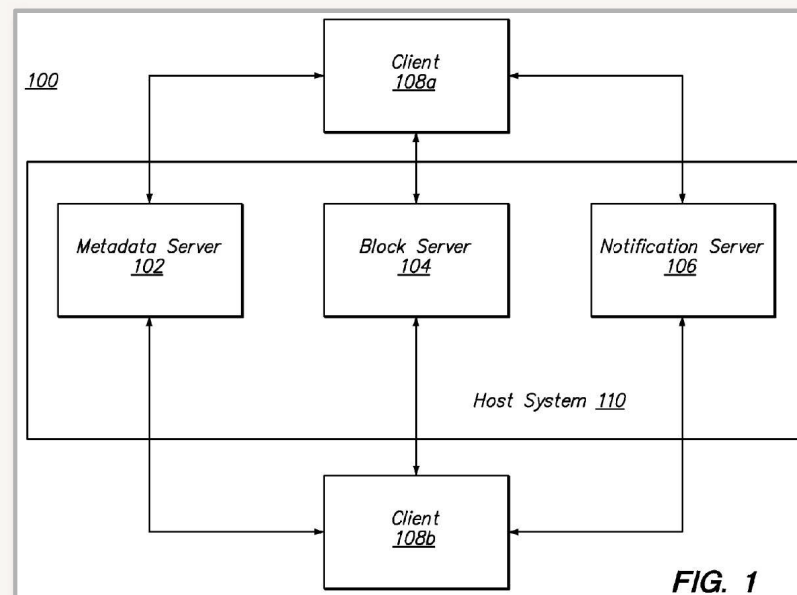


FIG. 1

EX1003 (Houston), Fig. 1

286 IPR, Paper 3 (Petition) at 15-16; EX1002 (Dr. Mowry Decl.) at ¶ 44



Houston Discloses User Interfaces for Collecting Information to Facilitate Sharing a Folder with a Collaborator

200

Share a Folder

Dropbox shared folders let you share or collaborate on a set of files. When someone joins a shared folder, the folder appears inside their Dropbox, and syncs to their computers automatically.

☒ I'd like to create and share a new folder

Patent Applications

☐ I'd like to create and share a new folder

Next Cancel

FIG. 2

300

Choose Folder to Share

My Dropbox

- A New Folder
- Music
- Patent Applications
- Photos
- Public

Next Cancel

FIG. 3

400

Share "Patent Applications" with others

Invite collaborators to this folder

drew@mycompany.com

(Optional) Send a personal message with your invitation

Hi Drew! Please use this shared folder so we can work on our patent applications together.

Share folder Cancel

FIG. 4

EX1003 (Houston), Figs. 2-4 (annotated)



Houston Discloses that the Collaborator Accepts an Invitation to Share the Folder

Assume now that the invited user has an existing namespace, “3:”. Assuming the user accepts the invitation to share the folder, metadata server 102 creates a link in the 3: namespace, such that “3:/Patent Applications” points to namespace 2:. Metadata server 102 also adds the invited

EX1003 (Houston) at 7:49-53



U.S. Patent No. 9,633,125 ("Garcia")

(12) **United States Patent**
Garcia et al.

(10) Patent No.: **US 9,633,125 B1**
(45) Date of Patent: **Apr. 25, 2017**



(54) **SYSTEM, METHOD, AND COMPUTER PROGRAM FOR ENABLING A USER TO SYNCHRONIZE, MANAGE, AND SHARE FOLDERS ACROSS A PLURALITY OF CLIENT DEVICES AND A SYNCHRONIZATION SERVER**

(75) Inventors: **Andrew Garcia**, San Francisco, CA (US); **Samir Bhupatral Mehta**, Menlo Park, CA (US); **Athena Anagnostopoulos**, San Mateo, CA (US); **Fuad Rashid**, Foster City, CA (US); **Laura Susan Fried Yeates**, Woodside, CA (US); **Alice Viola Pintos**, San Francisco, CA (US); **Jason Edward Short**, San Francisco, CA (US); **Elie Mathias Monge**, San Francisco, CA (US); **James David Wong**, San Jose, CA (US)

(73) Assignee: **Dropbox, Inc.**, San Francisco, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 17 days.

(21) Appl. No.: **13/571,564**

(22) Filed: **Aug. 10, 2012**

(51) Int. Cl. **G06F 17/30** (2006.01)

(52) U.S. Cl. **CPC** **G06F 17/30884** (2013.01)

(58) **Field of Classification Search**
USPC 715/738, 733, 734, 748, 751, 234, 762, 715/810, 839, 853, 854; 707/620, 999/01, 707/E17.005, E17.032; 709/248, 208

See application file for complete search history.

(56) **References Cited**
U.S. PATENT DOCUMENTS

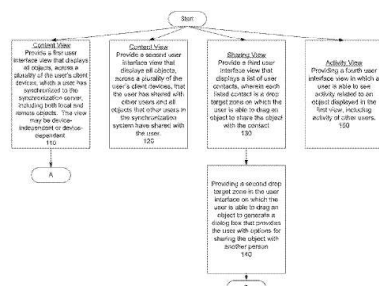
5,008,853 A * 4/1991 Bly G06F 17/30171 345C:1
5,862,346 A 1/1999 Kley et al.
6,348,932 B1 2/2002 Nishikawa et al.
6,407,750 B1 6/2002 Giocosa et al.
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6,636,888 B1 10/2003 Bookspan et al.
6,904,185 B1 6/2005 Wilkins et al.
7,039,723 B2 5/2006 Hu et al.
7,103,357 B2 9/2006 Kirani et al.
7,139,555 B2 11/2006 Apple
7,319,536 B1 1/2008 Wilkins et al.
7,321,919 B2 1/2008 Jacobs et al.
7,369,161 B2 5/2008 Easwar et al.
7,372,485 B1 5/2008 Bodnar et al.
7,441,180 B1 10/2008 Kaczmarek et al.

(Continued)
Primary Examiner — Linh K. Pham
Assistant Examiner — Wendy Nicholas
(74) Attorney, Agent, or Firm — Arent Fox LLP

(57) **ABSTRACT**

A system, method, and computer program are provided for enabling a user to synchronize, manage, and share files and folders across a plurality of client devices and a synchronization server. In a user interface, a first view displays all folders, which a user has synchronized to the synchronization server and a drop-target zone to which the user is able to drag a folder from the local device to synchronize the folder with the synchronization server. A second view displays all files and folders, which the user has shared with other users. A third view displays a list of user contacts, where each contact is a drop-target zone on which a user is able to drag a folder to share the folder with the contact. A fourth view is provided in which a user is able to see activity related to a folder displayed in the first view.

19 Claims, 26 Drawing Sheets

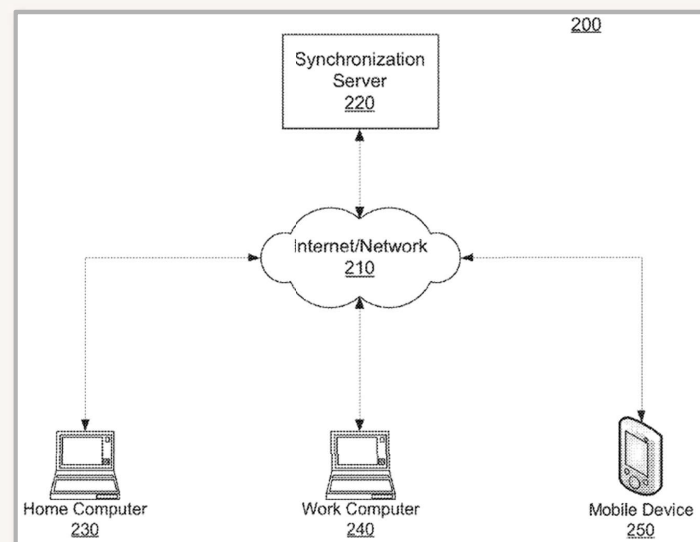


DROPBOX 1004

1. Field of the Invention

This invention relates generally to a synchronization system and, more particularly, to a system and method for enabling a user to synchronize, manage, and share folders across a plurality of client devices and a synchronization server.

EX1004 (Garcia) at 1:10-15



EX1004 (Garcia), Fig. 2

tops, laptops, and mobile devices connected to it. These client devices 230, 240, 250 may all belong to the same user or may belong to different users who have shared access to objects with one another. Client devices communicate with

EX1004 (Garcia) at 8:21-24

EX1004 (Garcia)

286 IPR, Paper 3 (Petition) at 26-27; EX1002 (Dr. Mowry Decl.) at 111 50, 85



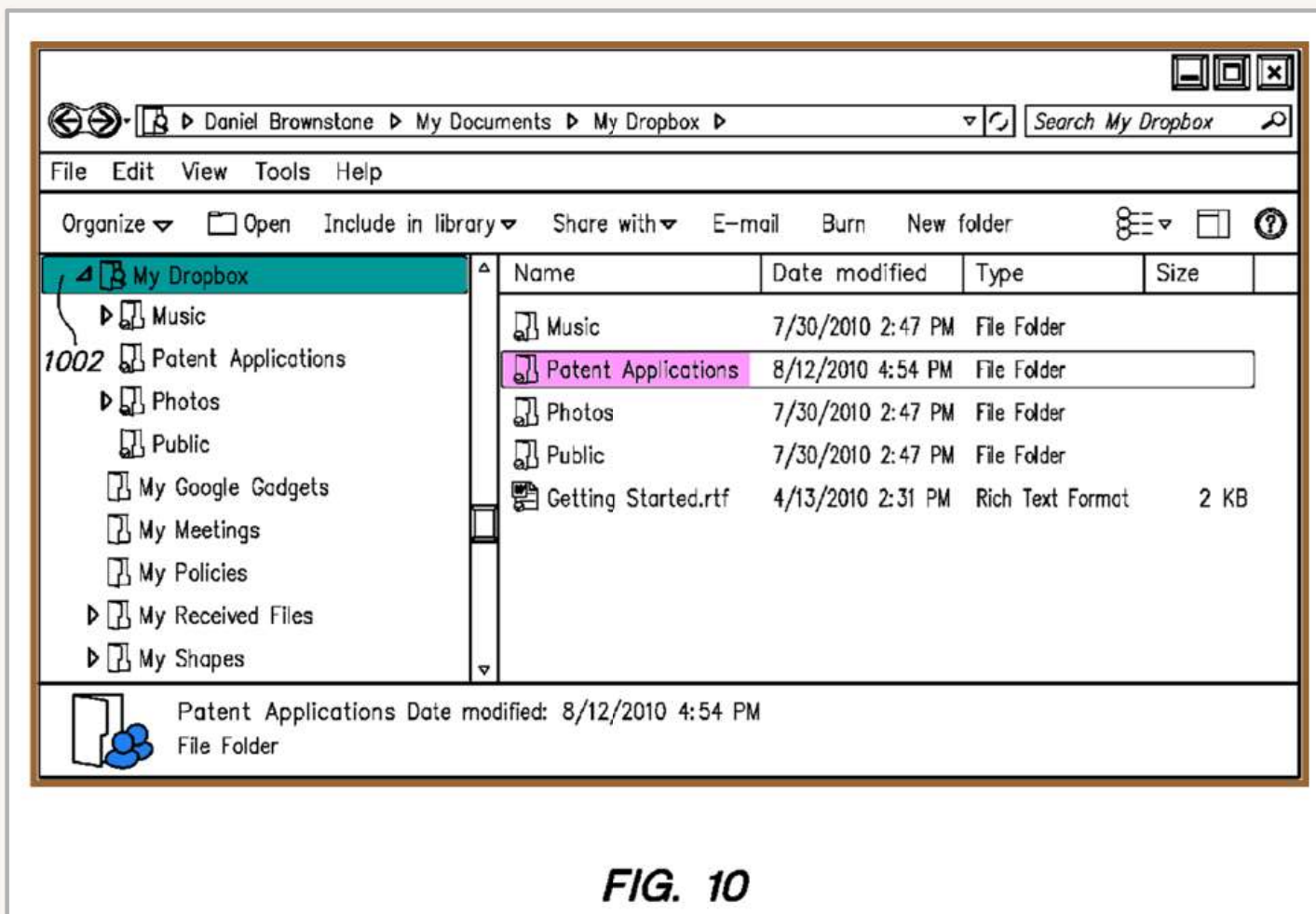
Garcia Teaches Sharing a Folder by Sending an Email with a Link to the Shared Folder

FIG. 9 illustrates the Web link tab 335. The Web link tab 335 includes a list of folders or files that have been shared as a link with other users. In this example, a list of files is shown, which is sorted by the date the link was enabled 905. The list may be sorted using other criteria as well. Each file has an icon 910, which indicates the number of times the file has been downloaded, and an icon 915, which places the link onto the clipboard to be copied into an email, text, or other transmittal. One benefit of sending links to folders or files to other users is it allows other users to access the folders or files without requiring the other user to create an account in the synchronization system.

EX1004 (Garcia) at 10:32-43



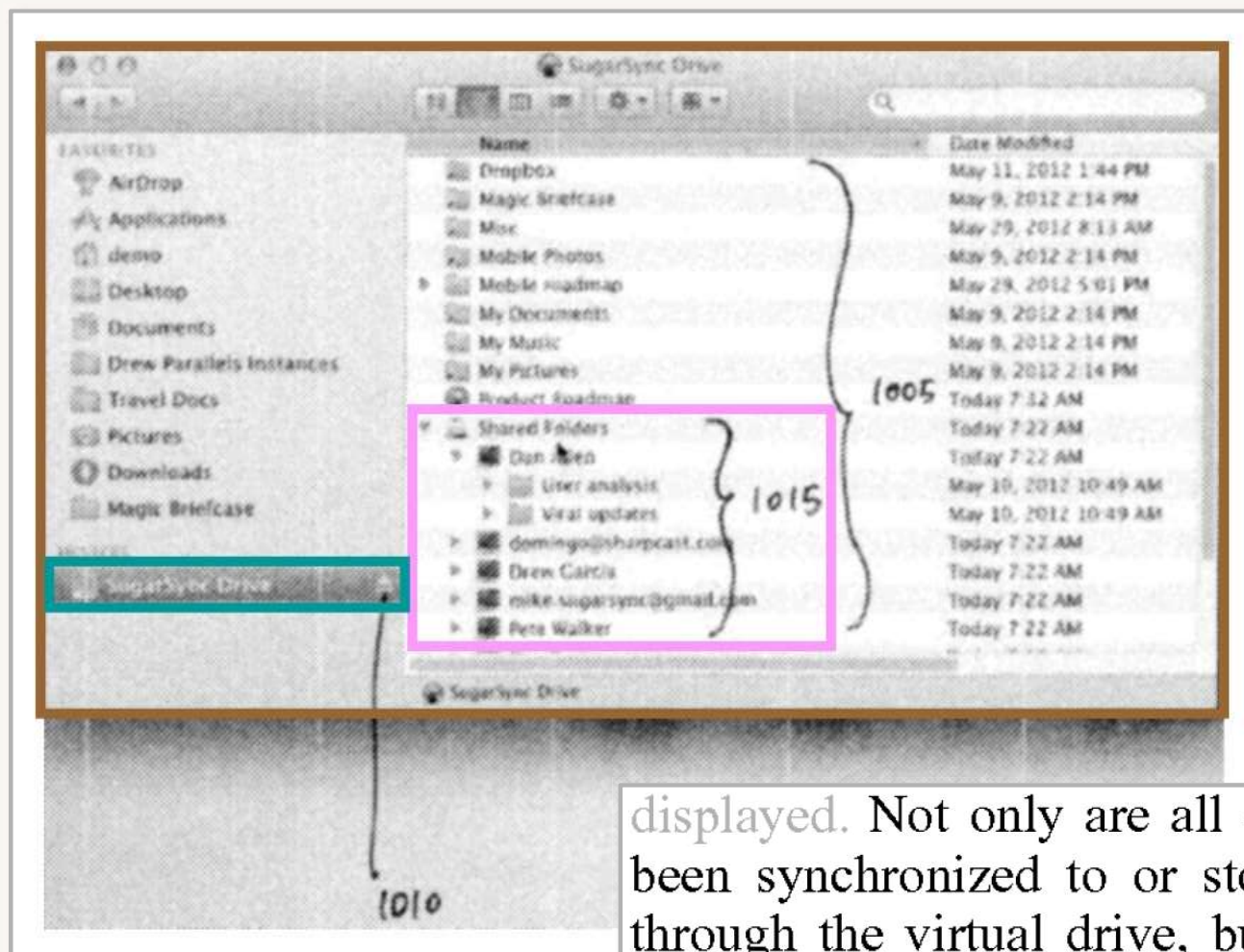
Houston Illustrates a Representation of a Shared Folder in a File Explorer Interface



EX1003 (Houston), Fig. 10 (annotated)



Like Houston, Garcia Illustrates Representations of Shared Folders in a File Explorer Interface



EX1004 (Garcia), Fig. 10 (excerpted and annotated)

displayed. Not only are all of the user's folders that have been synchronized to or stored on server **220** accessible through the virtual drive, but also all of the **folders 1015** shared with the user by other users.

EX1004 (Garcia) at 11:7-10

286 IPR, Paper 3 (Petition) at 38-39; EX1002 (Dr. Mowry Decl.) at ¶¶ 53-54, 103-104



Houston Discloses a Web Interface that Allows Access to Shared Folders

other users during the period the offline user was offline. In various embodiments, a web interface allows access to shared folders from any computer with network access.

EX1003 (Houston) at 2:10-12



Garcia Discloses Accessing Shared Folders Through a Web Interface



EX1004 (Garcia), Fig. 13 (excerpted and annotated)



286 IPR: Patent Owner's Arguments Fail

1	"Representation of the at Least One Folder" Need Not Be Construed
2	Houston Does Not Teach Away from Downloading Content in Shared Folder Upon User's Request
3	A POSITA Would Have Been Motivated to Combine Houston with Garcia's Email Message and Web Interface
4	Houston and Garcia Teach Dependent Claim 18's Additional Limitations
5	Secondary Considerations Do Not Support Finding of Non-Obviousness



1. “Representation of the at Least One Folder” Need Not Be Construed

Claim Elements 17[e]-[g]

receiving, from the second node and at at least one server,
a signal for causing creation of a first **representation of
the at least one folder**, in a location among one or more 40
folders, that is stored at the at least one server and that
is displayable via at least one web page;
causing, at the second node, receipt of the at least one web
page, that results in display, at the second node and via
the at least one web page, the first representation of the 45
at least one folder that is stored at the at least one
server; and
causing, at the second node, receipt of code for storage at
the second node and cooperation with a file explorer
interface of a client-based file explorer application, for 50
being utilized to:
cause creation of a second **representation of the at least
one folder**, in a location among one or more folders,
that is stored at the second node and that is display-
able via the file explorer interface of the client-based 55
file explorer application.

EX1001 ('520 Patent), claim 17 at 55:38-56

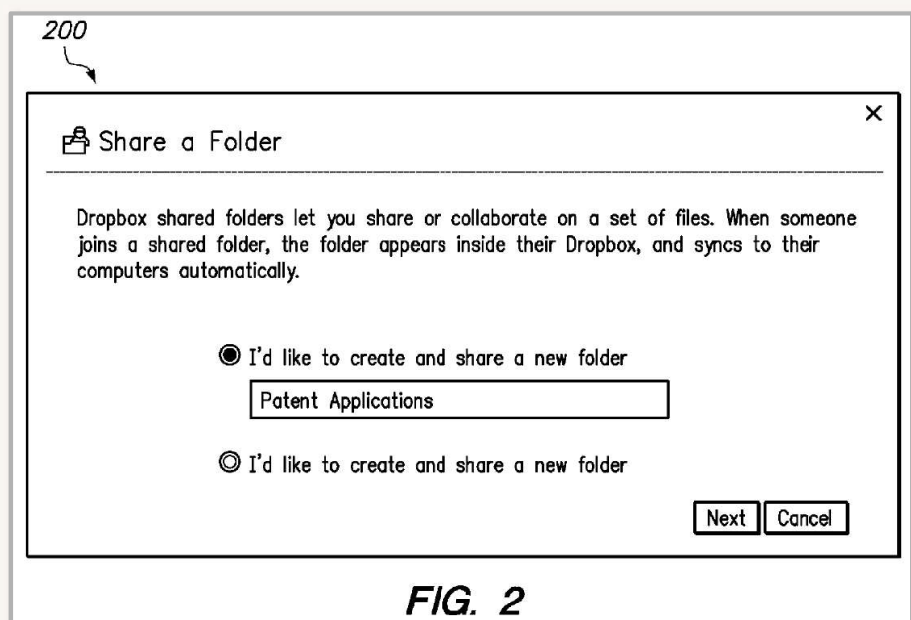
Term	PO's proposed construction	Petitioner's proposed construction
“representation of the at least one folder” (claims 17-21)	a folder that can be displayed at the user's node, but whose file contents are stored remotely and are not communicated to the user till the user initiates the communication	Plain and ordinary meaning

286 IPR, Paper 28 (Pet. Reply) at 1

286 IPR, Paper 28 (Pet. Reply) at 1-6; EX1002 (Dr. Mowry Decl.) at ¶ 20; EX1034 (Dr. Mowry Reply Decl.) at ¶¶ 3-17



2. Houston Does Not Teach Away From Storing Contents of Shared Folder Remotely Until User Initiates Communication



EX1003 (Houston), Fig. 2

Houston's Figure 2 . . . simply says that "*[w]hen someone joins a shared folder*, the folder appears inside their Dropbox, and syncs to their computers automatically." . . . Figure 2 does not indicate how the user "joins a shared folder," and does not preclude user action to initiate the download.

Paper 28 (Pet. Reply) at 10



3. A POSITA Would Have Been Motivated to Apply Garcia's Email and Web Interface Teachings to Houston's Folder Sharing System

Houston

Assume now that the invited user has an existing namespace, "3:". Assuming the user accepts the invitation to share the folder, metadata server 102 creates a link in the 3: namespace, such that "3:/Patent Applications" points to namespace 2:. Metadata server 102 also adds the invited

EX1003 (Houston) at 7:49-53

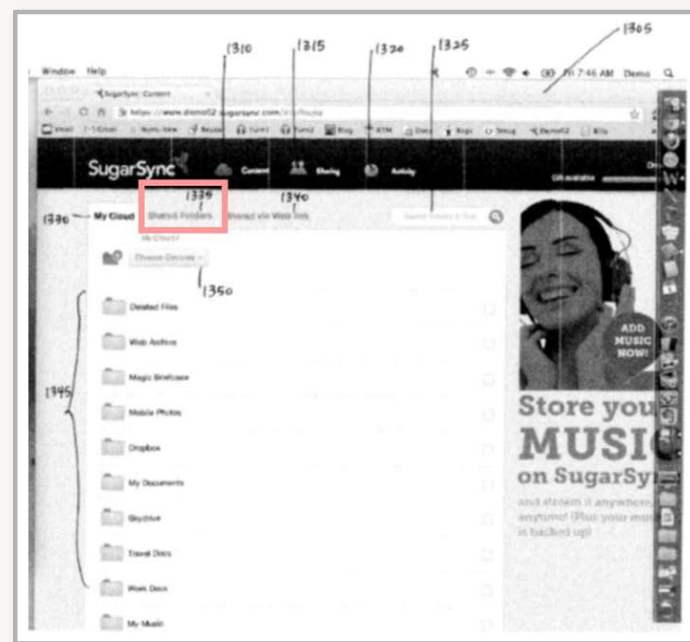
other users during the period the offline user was offline. In various embodiments, a web interface allows access to shared folders from any computer with network access.

EX1003 (Houston) at 2:10-12

Garcia

The list may be sorted using other criteria as well. Each file has an icon 910, which indicates the number of times the file has been downloaded, and an icon 915, which places the link onto the clipboard to be copied into an email, text, or other transmittal. One benefit of sending links to folders or files to

EX1004 (Garcia) at 10:32-43



EX1004 (Garcia), Fig. 13 (excerpted and annotated)



4. Garcia Teaches Dependent Claim 18's Email Interface

18. The method of claim 17, wherein the email and the file explorer interface are displayed via separate interfaces for permitting access to the at least one folder via multiple different interfaces based on a detection of an indication that the HTTP link has been selected.

EX1001 ('520 Patent) at 55:57-61

First, Petitioner explained that Garcia discloses the required email that “includes an Hypertext Transfer Protocol (HTTP) link.” Pet., 57, 60. A POSITA would have understood that such an email would necessarily have been displayed to the recipient via an interface, without which neither the email nor the HTTP link could be presented to the recipient for use. Further, Dr. Smith acknowledges that a “user interface” is “a means by which a user of a computer system interacts with that computer system.” EX1028, 44:6-9. Since Garcia teaches interacting with a computer using a link in the email, Garcia teaches using an email interface. See, e.g., EX1004, Fig. 12 (“Anyone with the link can view files.”). EX1034, ¶42.

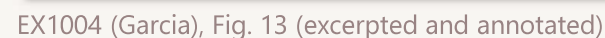
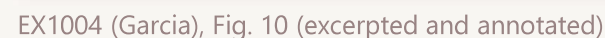
Paper 28 (Pet. Reply) at 18-19

286 IPR, Paper 3 (Petition) at 57, 60; Paper 28 (Pet. Reply) at 18-20; EX1002 (Dr. Mowry Decl.) at ¶¶ 148, 156; EX1034 (Dr. Mowry Reply Decl.) at ¶ 42.



EX1001 ('520 Patent) at 55:57-61

Paper 28 (Pet. Reply) at 19





5. Secondary Considerations Do Not Support Finding of Non-Obviousness

- Patent Owner does not, and cannot, meet its burden of showing a nexus exists between Dropbox's Smart Sync feature and claims 17-21 of the '520 patent.



① Introduction

- a. IPR2024-00286 ("286 IPR") Overview
 - b. IPR2024-00287 ("287 IPR") Overview
-

② 286 IPR: Folder Sharing

③ 287 IPR: File Request



287 IPR: File Request Claims Asserted Prior Art



U.S. Patent App. Pub. No. 2013/0046833 ("Riepling")



US 20130046833A1

(19) **United States**

(12) **Patent Application Publication**
Riepling et al.

(10) **Pub. No.:** US 2013/0046833 A1

(43) **Pub. Date:** Feb. 21, 2013

(54) **METHOD AND SYSTEM FOR SENDING A DIGITAL INVITATION REQUESTING A DATA UPLOAD**

(52) **U.S. CL.** 709/206

(57) **ABSTRACT**

(75) **Inventors:** Eric Casten Riepling, Soquel, CA (US);
Reza Brian Vaziri, Corona, CA (US)

(73) **Assignee:** SMITH MICRO SOFTWARE, INC.,
ALISO VIEJO (CA)

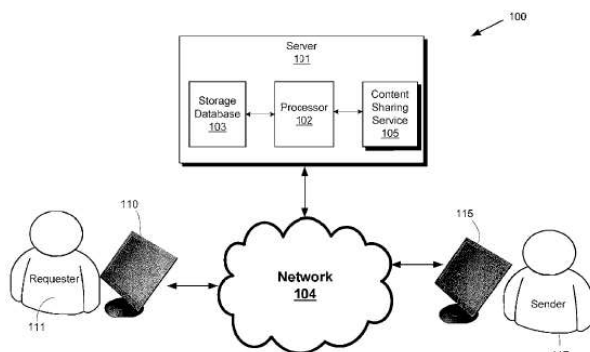
(21) **Appl. No.:** 13/211,146

(22) **Filed:** Aug. 16, 2011

Publication Classification

(51) **Int. Cl.**
G06F 15/16 (2006.01)

There is provided a method and system for sending, to a contact, a digital invitation requesting a data upload. There is provided a system comprising a server having a processor configured to receive the contact selected by a requester having a registered user account of a content sharing service, to transmit, to the contact, the digital invitation comprising a unique location identifier of the content sharing service, to receive a request to access the unique location identifier, to provide a file upload dialog associated with the registered user account and to receive a data upload in response to an uploading from the file upload dialog. Accordingly, an unregistered user of a content sharing service may upload a file to a registered user without registering a new account or obtaining the registered user login credentials.



DROPBOX 1107

(22) **Filed:** Aug. 16, 2011

(43) **Pub. Date:** Feb. 21, 2013

EX1107 (Riepling) at Cover

DETAILED DESCRIPTION OF THE INVENTION

[0018] The present application is directed to a method and system for sending, to a contact, a digital invitation requesting a data upload. The following description contains specific

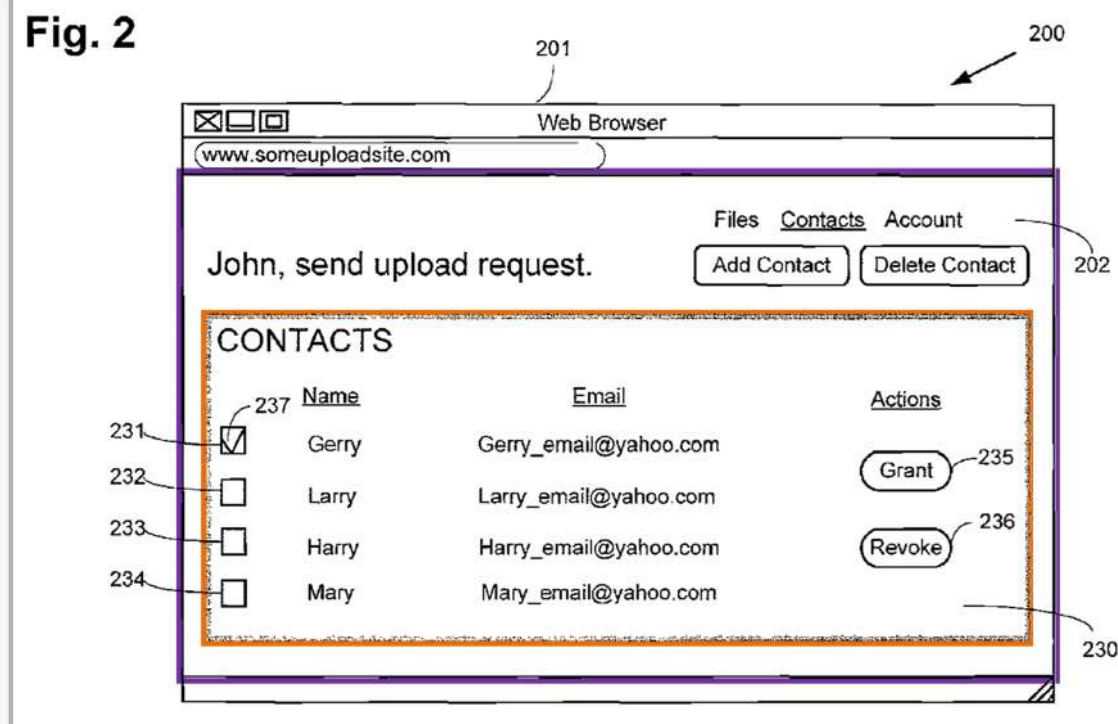
EX1107 (Riepling) at ¶ 18

EX1107 (Riepling)

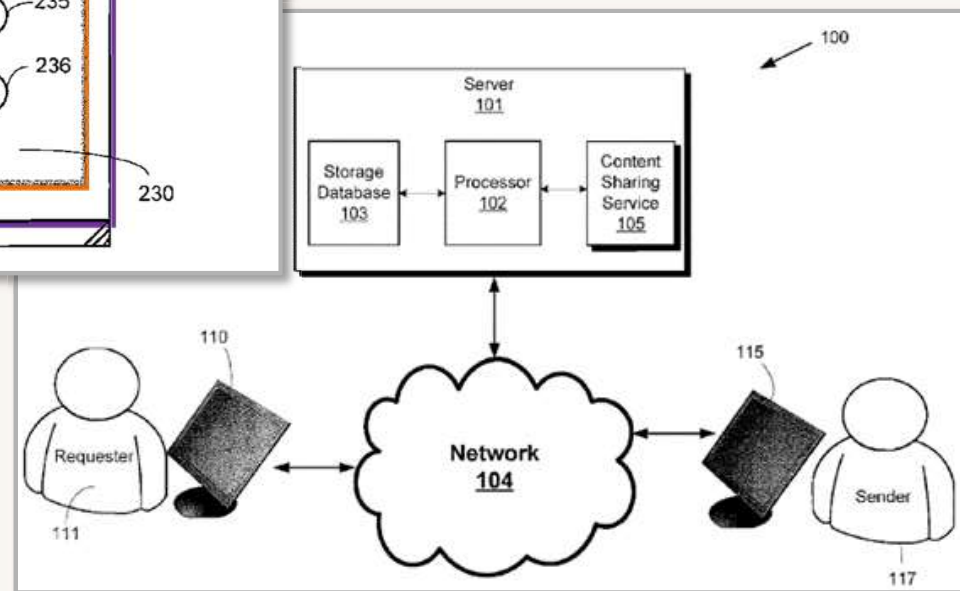
287 IPR, Paper 4 (Petition) at 14-15; EX1102 (Dr. Mowry Decl.) at ¶ 46



Riepling Discloses an Interface for a Requester to Provide Information About a Sender (of Requested File)



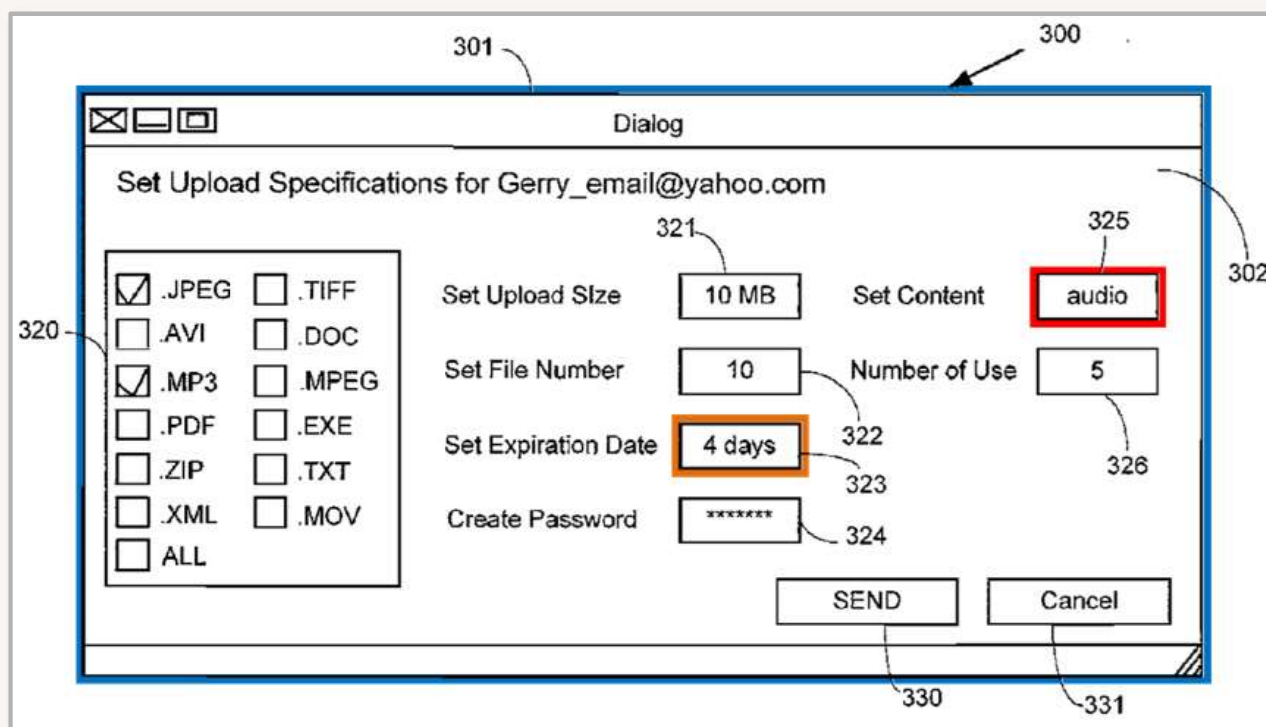
EX1107 (Riepling), Fig. 2 (annotated)



EX1107 (Riepling), Fig. 1



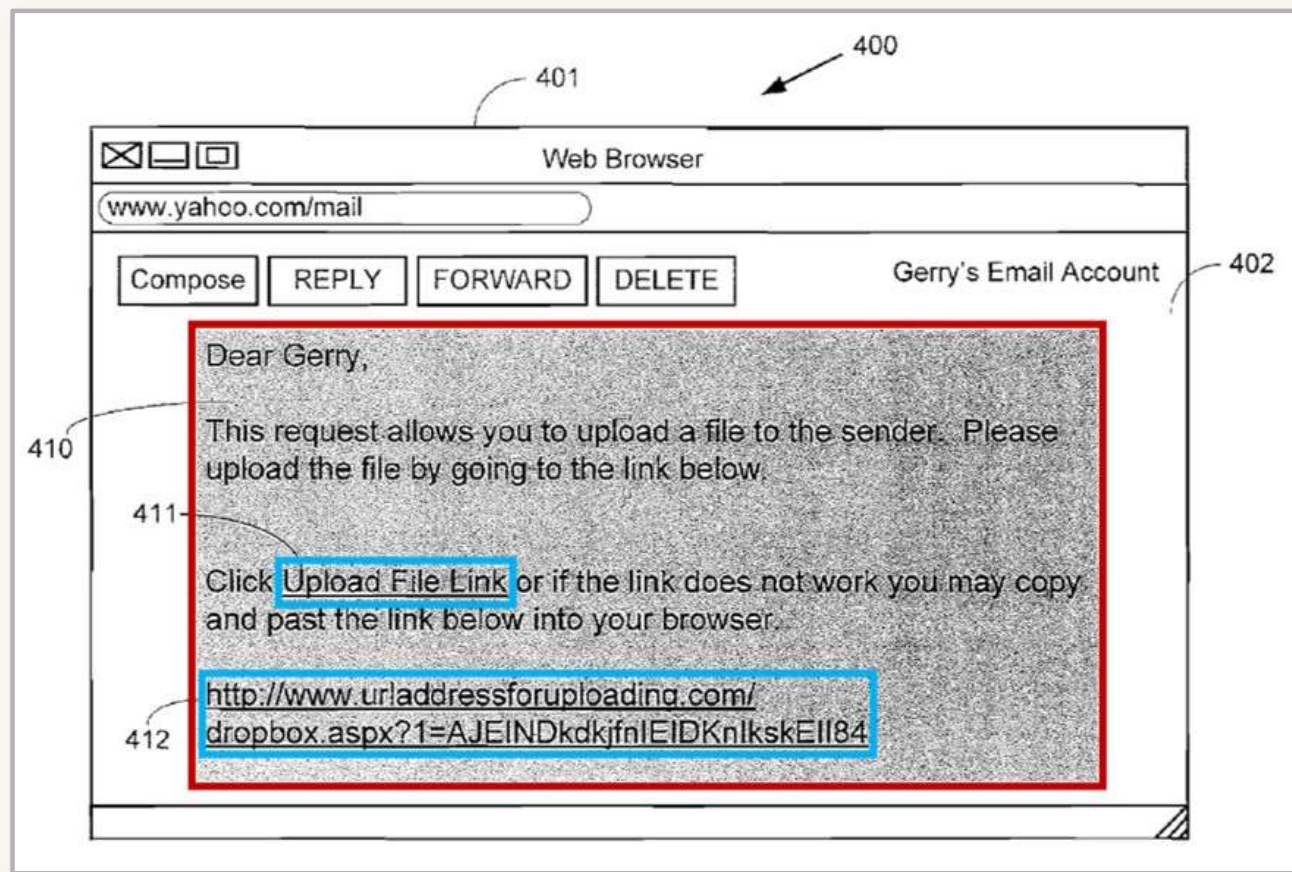
Riepling Discloses an Interface for the Requester to Provide File Description and Date or Time, and Send a Digital Invitation



EX1107 (Riepling), Fig. 3 (annotated)



Riepling Discloses the Digital Invitation Sent to the Sender with Links to Allow Upload of Requested File



EX1107 (Riepling), Fig. 4 (annotated)



Including a File Description and Date or Time in the Digital Invitation Would Have Been Obvious

[0034] Send button 330 may be used to send a digital invitation restricted by the one or more upload parameters specified in upload parameter dialog 301. Content sharing service

EX1107 (Riepling) at ¶ 34



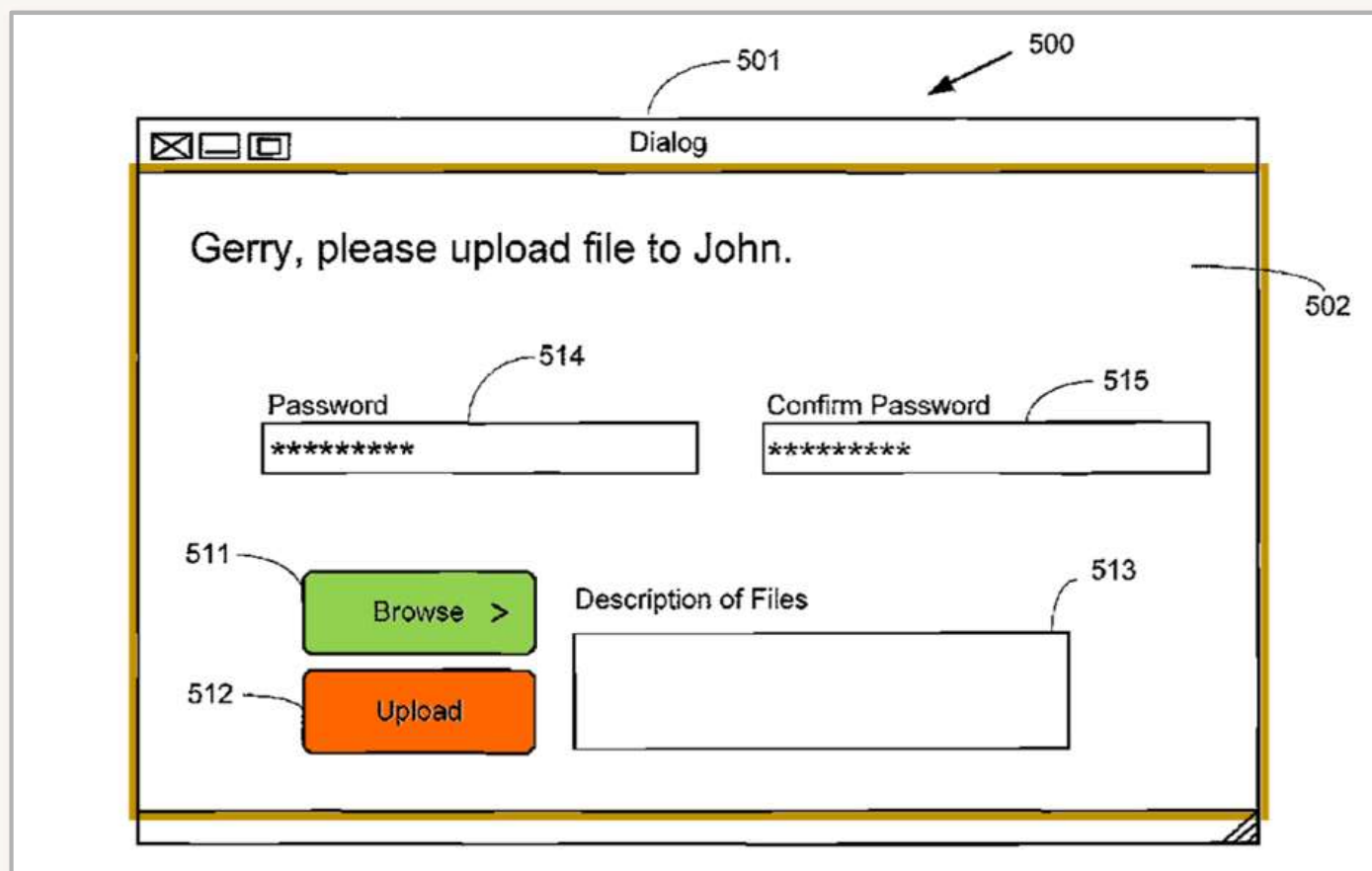
**Dropbox's Expert
Dr. Mowry**

PST”). A POSITA would have found it an obvious design choice to include these pieces of information in the digital invitation in order to inform the sender 117 of the kind of file the requester 111 is requesting and by when the requester 111 would like to receive the file.

EX1102 (Dr. Mowry Decl.) at ¶ 96



Riepling Discloses an Interface to Allow the Sender to Upload Requested File



EX1107 (Riepling), Fig. 5 (annotated)



Riepling Discloses Sending a Notification Message that Alerts the Requester of File Upload and Allows Download

[0045] In an embodiment of the invention as shown in FIG. 5, content sharing service 105, using processor 102, may notify one or more user accounts within content sharing service 105 in response to receiving a data upload in the registered user account. As explained earlier, a data upload may occur when upload button 512 may be used to upload one or more selected data files. In an embodiment of the invention, one or more user accounts may receive an alert message or any other type of notification message alerting the other accounts of the data upload. The owner of the registered user account may specify which other user accounts are to receive the notifications automatically or manually. The notification messages may permit the downloading of the uploaded data through the one or more user accounts.

EX1107 (Riepling) at ¶ 45



U.S. Patent App. Pub. No. 2012/0278404 ("Meisels")



US 20120278404A1

(19) United States

(12) Patent Application Publication (10) Pub. No.: US 2012/0278404 A1
Meisels et al. (43) Pub. Date: Nov. 1, 2012

(54) UPLOAD OF ATTACHMENT AND INSERTION
OF LINK INTO ELECTRONIC MESSAGES

Publication Classification

(51) Int. Cl. G06F 15/16 (2006.01)
(52) U.S. Cl. 709/206

(57) ABSTRACT

An option is presented with an electronic message to automatically upload and permission an attachment to the electronic message. A single click may be received to upload the attachment to a shared location (e.g. network share, online service, and the like). Permissions may be automatically set for the message recipients of the electronic message. For example, a default set of permissions and/or custom permissions may be set for each of the recipients listed on the To/Cc/Bcc lines. A link to the shared location may also be automatically inserted into the electronic message along with or in place of the attachment.

(75) Inventors: Joshua Adam Meisels, Seattle, WA (US); Daniel Paul Costenaro, Bellevue, WA (US); Jedidiah Brown, Seattle, WA (US)

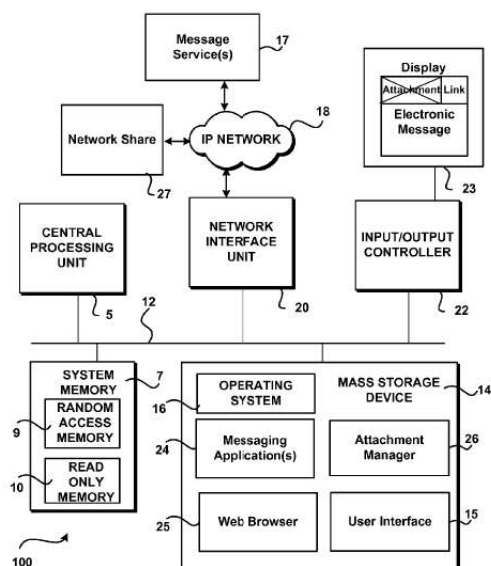
(73) Assignee: MICROSOFT CORPORATION, Redmond, WA (US)

(21) Appl. No.: 13/096,880

(22) Filed: Apr. 28, 2011

(54) UPLOAD OF ATTACHMENT AND INSERTION OF LINK INTO ELECTRONIC MESSAGES

EX1108 (Meisels), Title



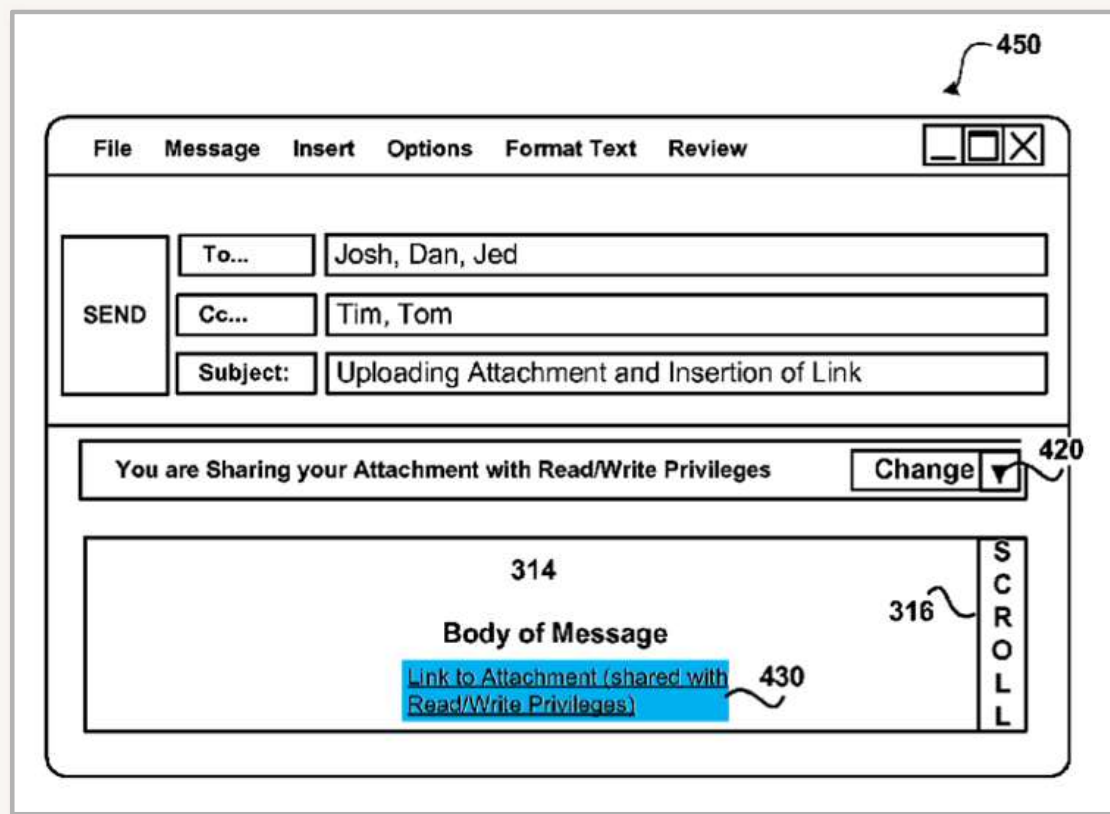
DROPBOX 1108

EX1108 (Meisels)

287 IPR, Paper 4 (Petition) at 66; EX1102 (Dr. Mowry Decl.) at ¶¶ 56, 193



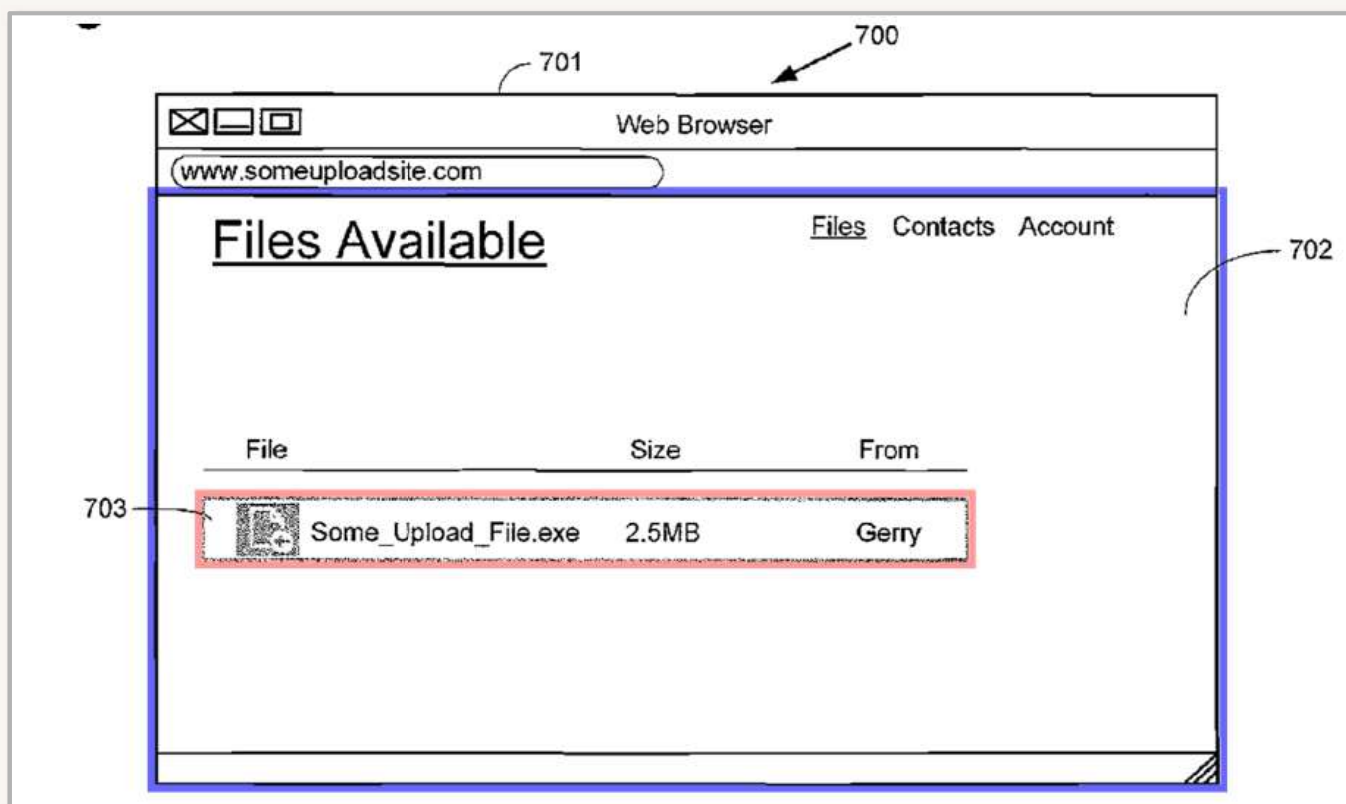
Meisels Discloses Sending an Email with a Link to a File Instead of Attaching the File



EX1108 (Meisels), Fig. 4 (excerpted and annotated)



Riepling Discloses an Interface that Allows the Requester to Access the Uploaded File



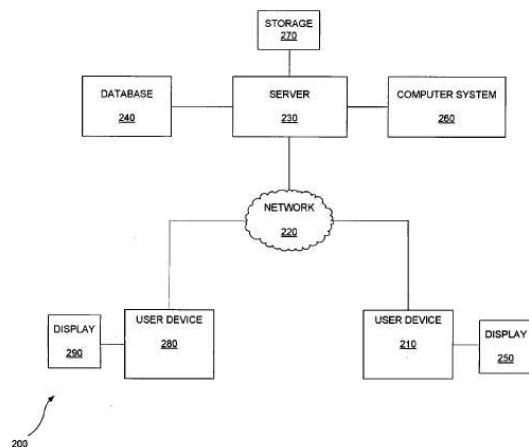
EX1107 (Riepling), Fig. 7 (annotated)



U.S. Patent App. Pub. No. 2010/0005138 ("Manzano")

(19) **United States**
(12) **Patent Application Publication** (10) **Pub. No.:** US 2010/0005138 A1
Manzano (43) **Pub. Date:** Jan. 7, 2010

(54) **ELECTRONIC FILE SHARING** Publication Classification
(75) **Inventor:** Michael R. Manzano, Seattle, WA (US) (51) **Int. Cl.** G06F 15/16 (2006.01)
Correspondence Address: (52) **U.S. Cl.** 709/203; 709/219
BLACK LOWE & GRAHAM, PLLC
701 FIFTH AVENUE, SUITE 4800
SEATTLE, WA 98104 (US)
(73) **Assignee:** Topia Technology, Tacoma, WA (US) (57) **ABSTRACT**
(21) **Appl. No.:** 12/427,540
(22) **Filed:** Apr. 21, 2009
Related U.S. Application Data
(60) Provisional application No. 61/046,725, filed on Apr. 21, 2008.



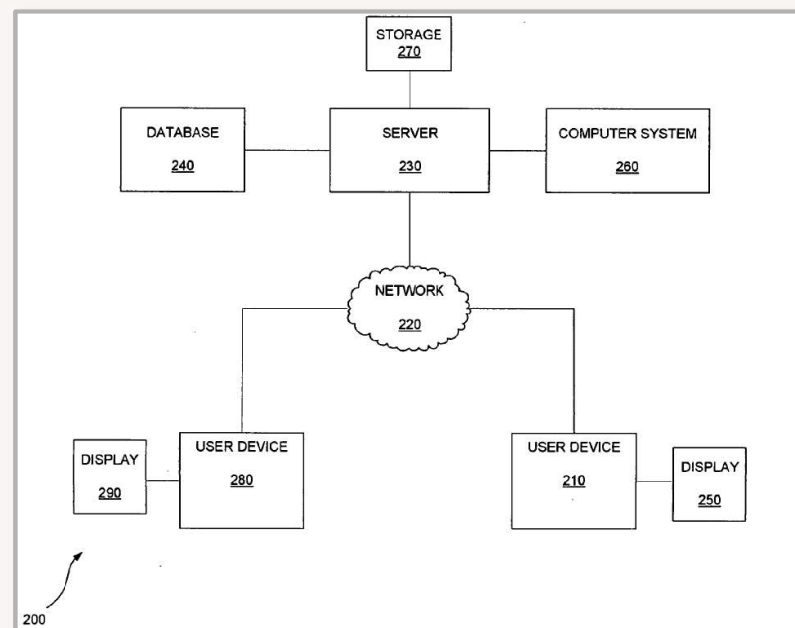
DROPBOX 1105

EX1105 (Manzano)

FIELD OF THE INVENTION

[0002] This invention relates generally to computer-implemented processes and, more specifically, to sharing of electronic files among electronic devices.

EX1105 (Manzano) at ¶ 2

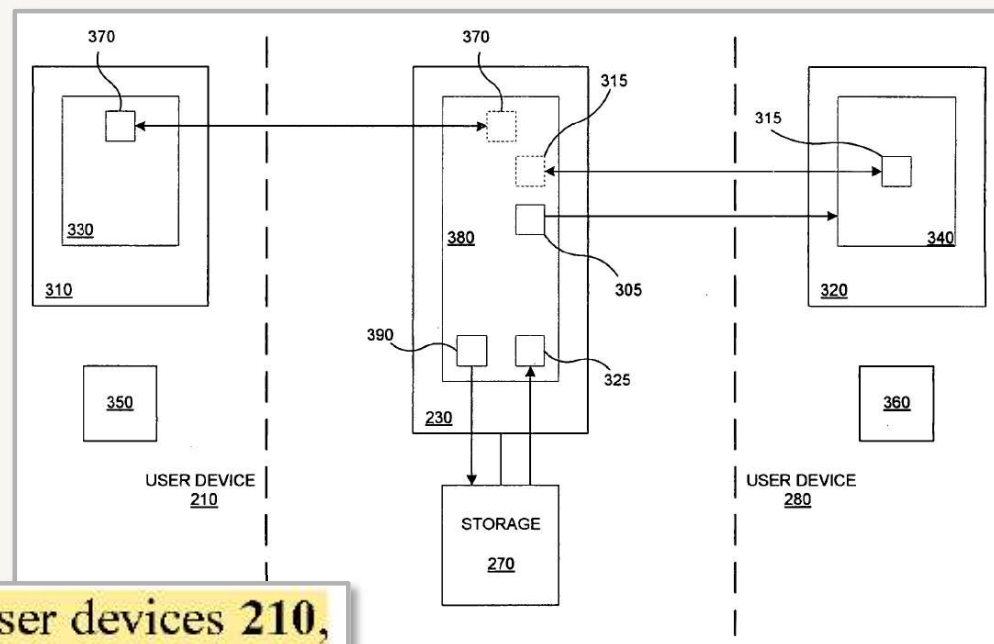


EX1105 (Manzano), Fig. 2

287 IPR, Paper 4 (Petition) at 49-50; EX1102 (Dr. Mowry Decl.) at ¶¶ 52, 149



Manzano Discloses a Client-Based File Explorer Application that Allows Access to a Shared File



EX1105 (Manzano), Fig. 3

installation thereon. Once installed on the user devices 210, 280, the file-transfer application provides file-transfer clients 310, 320 executable by the user devices 210, 280, respectively. Each of the file-transfer clients 310, 320 includes a

EX1105 (Manzano) at ¶ 32

to carry out. Also included in the file-transfer application are user interfaces 350, 360 that are displayable on the displays 250, 290, respectively. In an embodiment, the interfaces 350, 360 correspond to respective electronic folders or windows into which files may be placed.



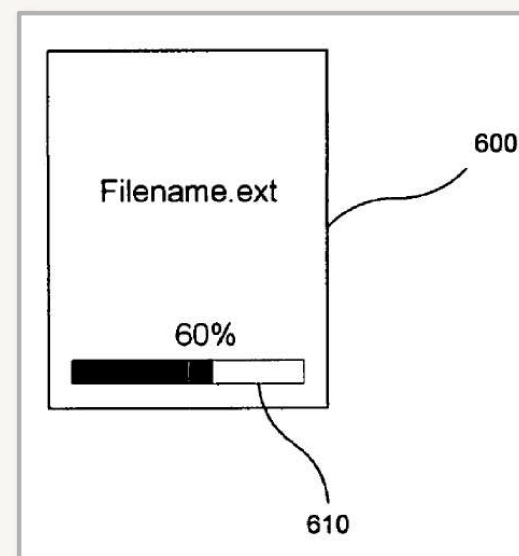
Manzano Discloses Downloading Shared File Upon User's Request

[0050] In an embodiment, file icons, such as the icon 600, in a workspace displayed on display device 290 can visually indicate whether a corresponding file (such as a file, the transfer of which may be as is discussed herein with reference to FIG. 3) has been downloaded to or is otherwise stored on (i.e., is local to), or has otherwise been made available (e.g., sent or in transit) to the user device 280. For example, if the

EX1105 (Manzano) at ¶ 50

[0051] In such a situation, and in an embodiment, a user may right-click or otherwise indicate the icon 600, and from a resultant pop-up contextual menu (not shown), for example, that appears on the display 290, make a selection from the menu to request receipt or download of the associated file, at which time the icon 600 will become unghosted or will oth-

EX1105 (Manzano) at ¶ 51



EX1105 (Manzano), Fig. 6

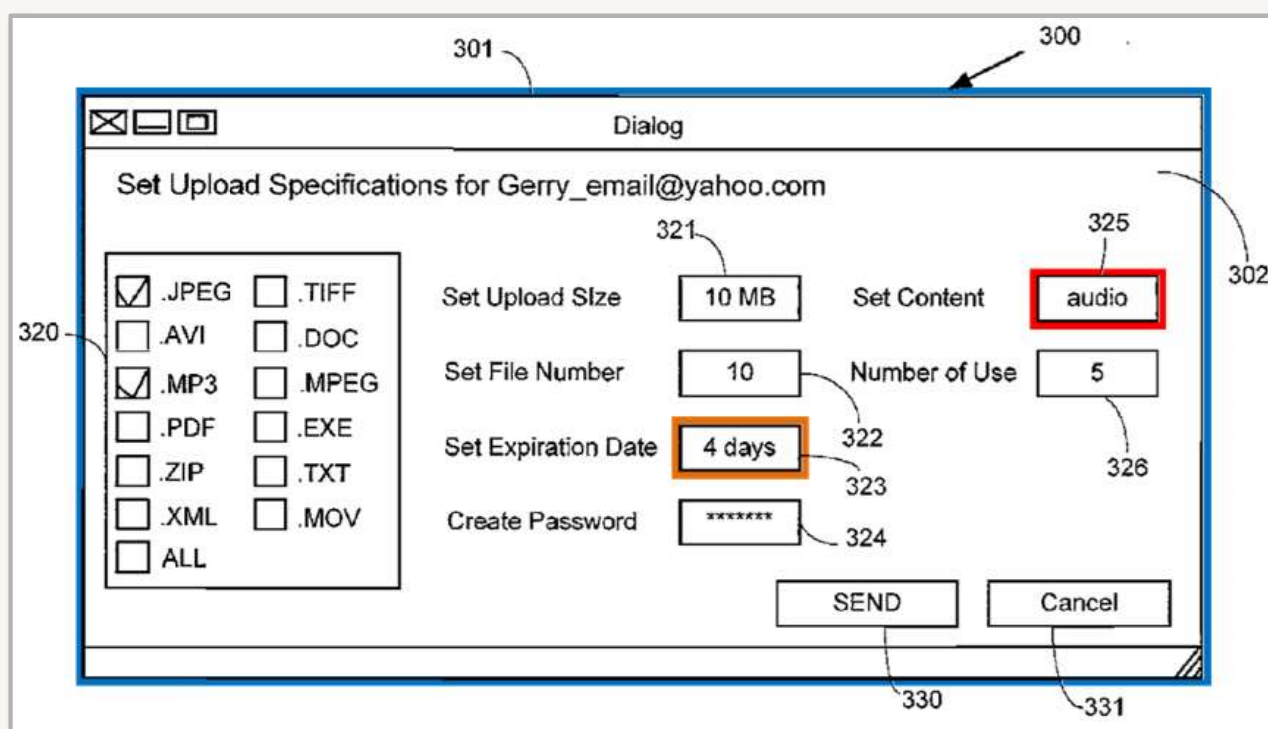


287 IPR: Patent Owner's Arguments Fail

1	Riepling Teaches a User Interface Element for a Requester to Describe the Requested File via a Textbox (Element 9[b])
2	It Would Have Been Obvious to Include File Description and Date or Time in Riepling's Digital Invitation as Claimed in Element 9[g]
3	A POSITA Would Have Found it Obvious, When Implementing Riepling's Notification Message, to Insert a Link in an Email as Disclosed in Meisels (Element 9[l])
4	It Was Obvious for Riepling's Notification Message to Include an Email Message
5	A POSITA Would Have Been Motivated to Combine Manzano with Riepling—Both of Which Disclose a User Sharing a File with Another User



1. Riepling Teaches a User Interface Element for a Requester to Describe the Requested File via a Textbox (Element 9[b])



EX1107 (Riepling), Fig. 3 (annotated)



2. It Would Have Been Obvious to Include File Description and Date or Time in Riepling's Digital Invitation as Claimed in Element 9[g]



Dropbox's Expert
Dr. Mowry

Q. So in Figure 3, there's different fields that are shown. But the information that is collected, that's not all included in the message that is sent to another user requesting a file, right?

A. **So you're asking whether Figure 3 is showing this, the Riepling patent. It's obvious that this information would be communicated to the person that the invitation is sent to. Otherwise, you would be surprising them in an unpleasant way, when they attempt to upload the wrong thing.**

EX2015 (Dr. Mowry Depo. Tr.) at 238:12-25 (objection omitted)

[0034] Send button 330 may be used to send a digital invitation restricted by the one or more upload parameters specified in upload parameter dialog 301. Content sharing service

EX1107 (Riepling) at ¶ 34

287 IPR, Paper 4 (Petition) at 30-31; Paper 27 (Pet. Reply) at 12-18; EX1102 (Dr. Mowry Decl.) at ¶¶ 95-96



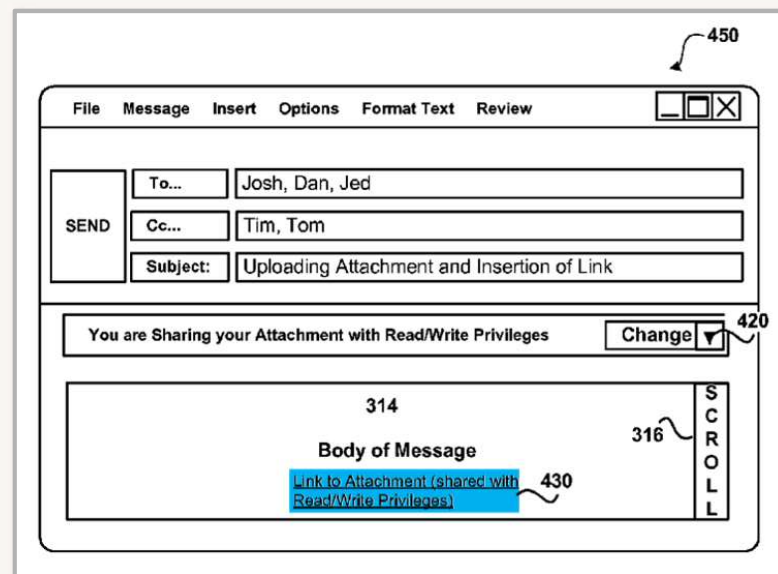
3. A POSITA Would Have Found it Obvious, When Implementing Riepling's Notification Message, to Insert a Link in an Email as Disclosed in Meisels (Element 9[I])

Riepling

the notifications automatically or manually. The notification messages may permit the downloading of the uploaded data through the one or more user accounts.

EX1107 (Riepling) at ¶ 45

Meisels



EX1108 (Meisels), Fig. 4 (excerpted and annotated)

attachment to the electronic message. A single click may be received to upload the attachment to a shared location (e.g. network share, online service, and the like). Permissions may

ents listed on the To:/Cc:/Bcc: lines. A link to the shared location may also be automatically inserted into the electronic message along with or in place of the attachment.

EX1108 (Meisels) at ¶ 3



4. It Was Obvious for Riepling's Notification Message to Include an Email Message



**Dropbox's Expert
Dr. Mowry**

“may be a textual email message.” Exhibit 1107, ¶ 36. Riepling further discloses that “one or more user accounts may receive an alert message or any other type of notification message alerting the other accounts of the data upload.” *Id.*, ¶ 45. A POSITA would have understood that notification messages would have included email messages as was conventional, just like Riepling’s **digital invitation 410**. See Exhibit 1106, ¶ 4 (“E-mail is so popular mainly because it includes the advantages of providing a quick, convenient and boundaryless transmission . . .”).

EX1102 (Dr. Mowry Decl.) at ¶ 138

used by companies, households and individuals. E-mail is so popular mainly because it includes the advantages of providing a quick, convenient and boundaryless transmission, and the transmitted content may include multimedia information and a huge quantity of data that can be transmitted at the same time. These advantages make E-mail an indis-

EX1106 (Wu) at ¶ 4

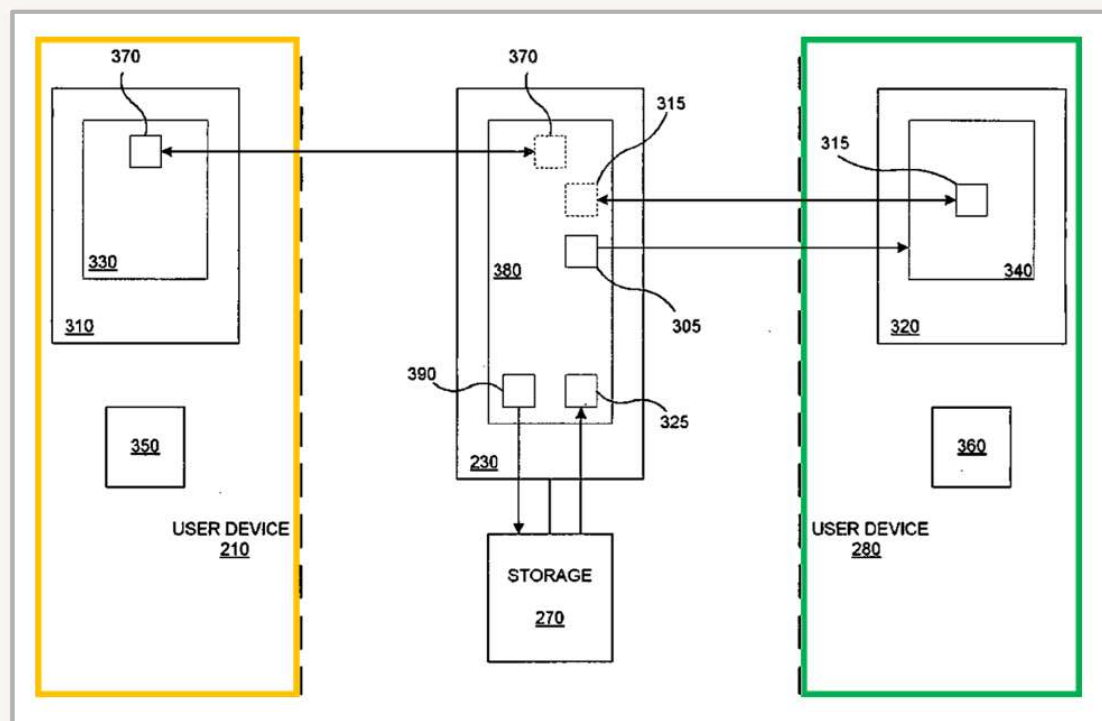
287 IPR, Paper 4 (Petition) at 47; Paper 27 (Pet. Reply) at 20-21



5. A POSITA Would Have Been Motivated to Combine Manzano with Riepling—Both of Which Disclose a User Sharing a File with Another User

[0033] To initiate sharing of a file with a user of the user device 280, the user of the user device 210 may place a file into the folder corresponding to the interface 350 and with which the user device 280 has been associated as a recipient.

EX1105 (Manzano) at ¶ 33



EX1105 (Manzano), Fig. 3 (annotated)



BACKUP SLIDES



The '520 Patent



The '520 Patent

(12) United States Patent Morris

(10) Patent No.: US 11,611,520 B1
(45) Date of Patent: *Mar. 21, 2023

(54) METHODS, SYSTEMS, AND COMPUTER PROGRAM PRODUCTS FOR PROCESSING A DATA OBJECT IDENTIFICATION REQUEST IN A COMMUNICATION

(58) Field of Classification Search
CPC H04L 51/08; H04L 51/18; H04L 51/32; H04L 51/22; H04L 51/34; H04L 67/06; (Continued)

(71) Applicant: MOTION OFFENSE, LLC, Longview, TX (US)

(56) References Cited
U.S. PATENT DOCUMENTS

(72) Inventor: Robert Paul Morris, Madison, GA (US)

5,572,643 A 11/1996 Judson
5,948,061 A 9/1999 Merriam et al. (Continued)

(73) Assignee: MOTION OFFENSE, LLC, Longview, TX (US)

FOREIGN PATENT DOCUMENTS

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.
This patent is subject to a terminal disclaimer.

AU 2002239940 A1 7/2002
KR 1020050061361 A 6/2005 (Continued)

OTHER PUBLICATIONS

(21) Appl. No.: 17/187,621

Pro Softnet Corp., IBackup for Windows-User Manual, dated Jan. 18, 2005.

(22) Filed: Feb. 26, 2021

(Continued)

Related U.S. Application Data

(63) Continuation of application No. 16/803,980, filed on Feb. 27, 2020, now Pat. No. 11,044,215, which is a (Continued)

Primary Examiner—Jungwon Chang
(74) Attorney, Agent, or Firm—Patrick E. Caldwell, Esq.; The Caldwell Firm, LLC

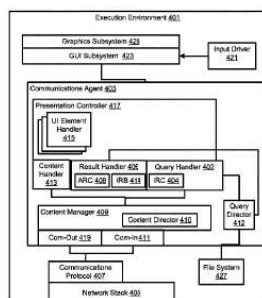
(57) ABSTRACT

(51) Int. Cl.
H04L 12/58 (2006.01)
H04L 51/08 (2022.01)
(Continued)

Methods, systems, and apparatuses are provided that are configured to: display, at a first node, at least one first interface with a first user interface element and a second user interface element; display, at the first node, at least one second interface; generate a first message; display, at the second node, at least one third interface; generate a second message that does not include a file attachment with the second message; display, at the first node, at least one fourth interface with a reference to at least one file; and allow access, at the first node, to the at least one file.

(52) U.S. CL.
CPC H04L 51/08 (2013.01); G06F 3/0482 (2013.01); G06F 9/451 (2018.02); G06F 16/168 (2019.01); (Continued)

24 Claims, 15 Drawing Sheets



DROPBOX 1001

(54) METHODS, SYSTEMS, AND COMPUTER PROGRAM PRODUCTS FOR PROCESSING A DATA OBJECT IDENTIFICATION REQUEST IN A COMMUNICATION

(57) ABSTRACT

Methods, systems, and apparatuses are provided that are configured to: display, at a first node, at least one first interface with a first user interface element and a second user interface element; display, at the first node, at least one second interface; generate a first message; display, at the second node, at least one third interface; generate a second message that does not include a file attachment with the second message; display, at the first node, at least one fourth interface with a reference to at least one file; and allow access, at the first node, to the at least one file.

EX1001 ('520 Patent); see also EX1101

286 IPR, Paper 3 (Petition) at 9
287 IPR, Paper 4 (Petition) at 10



286 IPR



286 IPR – Folder Sharing Claims 17-21



Independent Claim 17

17. A method, comprising:

causing, at a first node, display of:

- a first user interface element, for collecting information associated with at least one folder,
- a second user interface element, for collecting at least one object associated with at least one email address, the at least one object associated with at least one email address being the at least one email address or an alias associated with the at least one email address, and
- a third user interface element, for detecting an indication of a selection thereof to cause an initiation of a sharing of the at least one folder;

causing generation of at least one email, based on the information associated with the at least one folder, the at least one object associated with the at least one email address, and the detection of the indication of the selection of the third user interface element to cause the initiation of the sharing of the at least one folder, where the at least one email:
identifies the information associated with the at least one folder,
includes an Hypertext Transfer Protocol (HTTP) link, does not include a file attachment, for permitting avoidance of at least one file from being communicated to and stored at the second node until an initiation of the communication of the at least one file by a user of the second node is detected and the communication commences via at least one server that stores the at least one file,
is at least partially pre-written, and
is automatically caused to be received without requiring user involvement after the detection of the indication of the selection of the third user interface element to cause the initiation of the sharing of the at least one folder;

receiving, from the second node and at at least one server, a signal for causing creation of a first representation of the at least one folder, in a location among one or more folders, that is stored at the at least one server and that is displayable via at least one web page;
causing, at the second node, receipt of the at least one web page, that results in display, at the second node and via the at least one web page, the first representation of the at least one folder that is stored at the at least one server; and
causing, at the second node, receipt of code for storage at the second node and cooperation with a file explorer interface of a client-based file explorer application, for being utilized to:
cause creation of a second representation of the at least one folder, in a location among one or more folders, that is stored at the second node and that is displayable via the file explorer interface of the client-based file explorer application.



Dependent Claim 18

18. The method of claim **17**, wherein the email and the file explorer interface are displayed via separate interfaces for permitting access to the at least one folder via multiple different interfaces based on a detection of an indication that 60 the HTTP link has been selected.



Dependent Claim 19

19. The method of claim **17**, wherein the file explorer interface of the client-based file explorer application is displayed via an interface that does not include a web page displayed via a web browser.

65



Dependent Claim 20

20. The method of claim **17**, wherein the file explorer interface is part of an operating system of the second node.



Dependent Claim 21

21. The method of claim **17**, wherein at least one of:
the first user interface element, the second user interface element, and the third user interface element are caused by sending a first communication;
the receipt of the at least one web page is caused by sending a second communication; or
the receipt of the code is caused by sending a third communication.



286 IPR Other Asserted Prior Art



U.S. Patent App. Pub. No. 2007/0011246 ("Wu")

(19) United States

(12) Patent Application Publication (10) Pub. No.: US 2007/0011246 A1
Wu (43) Pub. Date: Jan. 11, 2007

(54) SYSTEM AND METHOD OF PRODUCING E-MAIL

(76) Inventor: Chao-Hung Wu, Hsintien City (TW)

Correspondence Address:
ROSENBERG, KLEIN & LEE
3458 ELLICOTT CENTER DRIVE-SUITE 101
ELLICOTT CITY, MD 21043 (US)

(21) Appl. No.: 11/172,842

(22) Filed: Jul. 5, 2005

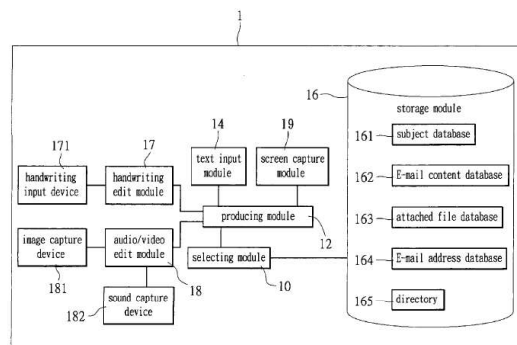
Publication Classification

(51) Int. Cl. G06F 15/16 (2006.01)

(52) U.S. CL. 709/206

(57) ABSTRACT

A system and method of producing E-mail reduce the time consumed for producing E-mail. The system of producing E-mail has a storage module, a selecting module, a producing module and a text input module. The selecting module selects data stored in the storage module, the storage module stores the subject and content required for the E-mail respectively in databases, and the producing module controls the selecting module to select a predetermined subject template and a predetermined content template to produce an E-mail. The text input module allows users to input textual information, and the producing module integrates the textual information input by the text input module into the E-mail.



DROPBOX 1006

(57)

ABSTRACT

A system and method of producing E-mail reduce the time consumed for producing E-mail. The system of producing E-mail has a storage module, a selecting module, a producing module and a text input module. The selecting module selects data stored in the storage module, the storage module stores the subject and content required for the E-mail respectively in databases, and the producing module controls the selecting module to select a predetermined subject template and a predetermined content template to produce an E-mail. The text input module allows users to input textual information, and the producing module integrates the textual information input by the text input module into the E-mail.

EX1006 (Wu) at Abstract

EX1006 (Wu)

286 IPR, Paper 3 (Petition) at 73-74; EX1002 (Dr. Mowry Decl.) at ¶¶ 60, 180



286 IPR Claim Construction



Intrinsic Evidence Does Not Support Patent Owner's Proposed Claim Construction



**Dropbox's Expert
Dr. Mowry**

8. Dr. Smith seems to agree with me that claims are to be given their plain and ordinary meaning, as a person of ordinary skill in the art would have understood at the time of the invention, and considering the language of the claims, specification, and prosecution history. Exhibit 2051, ¶17; Exhibit 1002, ¶20. But Dr. Smith proposes a construction for “representation of the at least one folder” that is (1) contrary to the express text in the patent, as well as plain and ordinary meaning; (2) improperly imports limitations into the claim; and (3) misreads the specification. See Exhibit 2051 ¶¶73-88.

EX1034 (Dr. Mowry Reply Decl.) at ¶ 8



Dr. Smith Agrees that A Folder is a Container for Files, Symbolized on Screen by a Graphical Image (Icon) of a File Folder



**PO's Expert
Dr. Smith**

- Q. Would you agree that a folder in the Mac OS and 32-bit versions of Windows, and other operating systems, is a container for programs and files in graphical user interfaces, symbolized on the screen by a graphical image (icon) of a file folder?
- A. Yes, I would agree that in the Mac OS, 32-bit versions of Windows, and other operating systems, a container for programs and files and graphical user interfaces, symbolized on the screen by a graphical image (icon) of a file folder.**

EX1028 (Dr. Smith Depo. Tr.) at 40:8-19



Patent Owner's Proposed Claim Construction Improperly Imports Permissive Language from Claim Element 17[d]

Claim Element 17[d]

does not include a file attachment, for permitting avoid- 25
ance of at least one file from being communicated to
and stored at the second node until an initiation of the
communication of the at least one file by a user of the
second node is detected and the communication
commences via at least one server that stores the at 30
least one file,

EX1001 ('520 Patent), claim 17 at 55:25-31



PO's Expert
Dr. Smith

Q. [I]f somebody said that your construction meant that it was required that the file contents are not communicated to the user until the user initiates the communication, would that be correct?

A. **I haven't studied, at length, the issue of the transfer being required or not. I think that would require further analysis...**

EX1028 (Dr. Smith Depo. Tr.) at 67:15-68:2



Disclaimed Claim 1 Highlights Patent Owner's Erroneous Claim Construction

Claim Element 1[h]

based on the receipt of the indication of the at least one folder, the indicia associated with the at least one email address, and the indication to share the at least one folder via the at least one network; cause, utilizing code configured to be stored on a storage at the second node and further configured to cooperate with a file explorer interface, creation of a representation of the at least one folder in a location among one or more folders on the file explorer interface, where the storage at the second node does not store the at least one file when the creation of the representation of the at least one folder is caused;

EX1001 ('520 Patent), claim 1 at 49:38-49

Claim Elements 17[h]-[g]

includes an Hypertext Transfer Protocol (HTTP) link, does not include a file attachment, for permitting avoidance of at least one file from being communicated to and stored at the second node until an initiation of the communication of the at least one file by a user of the second node is detected and the communication commences via at least one server that stores the at least one file, is at least partially pre-written, and is automatically caused to be received without requiring user involvement after the detection of the indication of the selection of the third user interface element to cause the initiation of the sharing of the at least one folder; receiving, from the second node and at at least one server, a signal for causing creation of a first representation of the at least one folder, in a location among one or more folders, that is stored at the at least one server and that is displayable via at least one web page; causing, at the second node, receipt of the at least one web page, that results in display, at the second node and via the at least one web page, the first representation of the at least one folder that is stored at the at least one server; and

EX1001 ('520 Patent), claim 17 at 55:24-47



Disclaimed Claim 1 Versus Claim 17

Claim Element 1[h]

based on the receipt of the indication of the at least one folder, the indicia associated with the at least one email address, and the indication to share the at least one folder via the at least one network; cause, utilizing code configured to be stored on a storage at the second node and further configured to cooperate with a file explorer interface, creation of a representation of the at least one folder in a location among one or more folders on the file explorer interface, where the storage at the second node does not store the at least one file when the creation of the representation of the at least one folder is caused;

EX1001 ('520 Patent), claim 1 at 49:38-49

Claim Elements 17[e]-[g]

receiving, from the second node and at at least one server, a signal for causing creation of a first representation of the at least one folder, in a location among one or more folders, that is stored at the at least one server and that is displayable via at least one web page; causing, at the second node, receipt of the at least one web page, that results in display, at the second node and via the at least one web page, the first representation of the at least one folder that is stored at the at least one server; and causing, at the second node, receipt of code for storage at the second node and cooperation with a file explorer interface of a client-based file explorer application, for being utilized to: cause creation of a second representation of the at least one folder, in a location among one or more folders, that is stored at the second node and that is displayable via the file explorer interface of the client-based file explorer application.

EX1001 ('520 Patent), claim 17 at 55:38-56



Garcia Discloses Downloading a File in a Shared Folder Upon User's Request

client (step 2020). In one embodiment, when a user double clicks on a file or item in a remote folder in the virtual drive, the server downloads its copy of the file/item to the local synchronization software client (i.e., the client currently being used by the user). The user can then edit the file/item

EX1004 (Garcia) at 5:35-39



Dr. Mowry Explained the Benefits of Downloading File in Shared Folder Upon User's Request, as Taught by Garcia



**Dropbox's Expert
Dr. Mowry**

106. As I discussed above in Section IX.A.1.h.iii, a POSITA would have been motivated to modify Houston's system based on and informed by Garcia's teachings. A POSITA would have been further motivated to modify Houston's system such that, when an icon for a shared folder is created in Houston's Figure 10 interface at an invited user's client, the client does not store a file in the shared folder, as taught by Garcia. This would have provided the added benefit of allowing the invited user to have more control over what is downloaded from the shared folder and when, rather than letting the system download any file in the shared folder automatically onto the invited user's client from the host system 110. For instance, whether and when the invited user downloads a file in the shared folder would depend on whether the user's device has sufficient storage space or whether the file looks secure to the user or passes security checks. A POSITA would have implemented this modification using basic computer programming principles to modify Houston's host system to include Garcia's teachings and would have had a reasonable expectation of success. See Sections IX.A.1.h.iii and IX.A.1.h.iv.

EX1002 (Dr. Mowry Decl.) at ¶ 106

286 IPR, Paper 3 (Petition) at 40-41; Paper 28 (Pet. Reply) at 14-15



Dr. Smith Is in Agreement with Dr. Mowry About Benefits of Downloading Contents in Shared Folder Upon User's Request



**PO's Expert
Dr. Smith**

Q. Is it your testimony that a person might see a representation of the at least one folder and decide not to download the folder because they don't want or need to see the contents of the folder?

A. My answer is that I see folders that I don't necessarily want to open or potentially download.

Q. And why is that?

A. I might know that that folder is 5 gigabytes in size, and I don't have enough bandwidth to perform that download, for example.

Q. So you might have a concern about the bandwidth of your Internet connection for downloading; is that correct?

A. That would be one example.

Q. What would another example be?

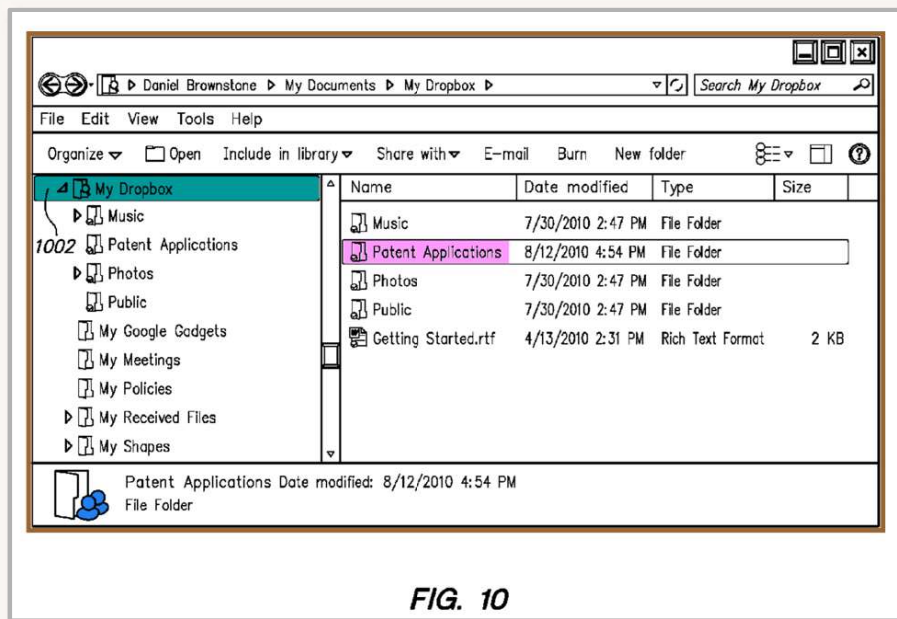
A. That I have two folders and I would like to see one but not the other.

EX1028 (Dr. Smith Depo. Tr.) at 69:9-70:5



A POSITA Would Have Been Motivated to Apply Garcia's Downloading Upon User's Request to Houston's Folder Sharing System

Houston



EX1003 (Houston), Fig. 10 (annotated)

Garcia

client (step 2020). In one embodiment, when a user double clicks on a file or item in a remote folder in the virtual drive, the server downloads its copy of the file/item to the local synchronization software client (i.e., the client currently being used by the user). The user can then edit the file/item

EX1004 (Garcia) at 5:35-39

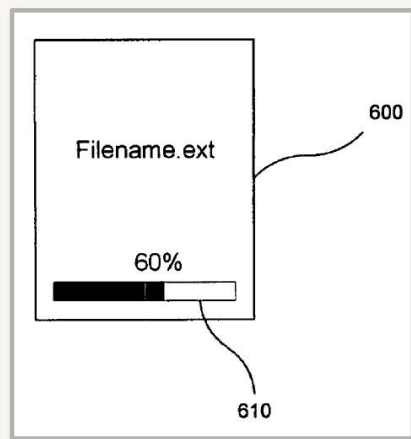


286 IPR – Grounds 2 and 4

A POSITA Would Have Been Motivated to Combine Manzano with Houston and Garcia



A POSITA Would Have Been Motivated to Combine Manzano's Downloading of a Shared File in a Folder Upon User's Request with the Houston-Garcia System



EX1005 (Manzano), Fig. 6

[0051] In such a situation, and in an embodiment, a user may right-click or otherwise indicate the icon 600, and from a resultant pop-up contextual menu (not shown), for example, that appears on the display 290, make a selection from the menu to request receipt or download of the associated file, at which time the icon 600 will become unhosted or will oth-

EX1005 (Manzano) at ¶ 51



**Dropbox's Expert
Dr. Mowry**

“[A] POSITA would have recognized the benefit of not storing a file in a shared folder at a second node until the user at the second node requests the file be downloaded. For instance, such a feature would have allowed the recipient of the shared folder to have more control over what to download from the shared folder and when, rather than letting the system download any file in the shared folder automatically onto the recipient's device.”

EX1002 (Dr. Mowry Decl.) at ¶ 176

286 IPR, Paper 3 (Petition) at 64-73; EX1002 (Dr. Mowry Decl.) at ¶¶ 58-59, 166-177



U.S. Provisional Application No. 61/233,787



U.S. Provisional Application No. 61/233,787

- Patent Owner copied ¶¶ 8-14 and Figure 1 of Provisional Application No. 61/233,787 (the "'787 provisional") into its Sur-Reply.

286 IPR, Paper 36 (Sur-Reply) at 9-12

- With respect to Houston's other provisional, Petitioner explained how "[n]othing in the provisional teaches away from a system like Garcia that allows a user to control when the initial download of a file in a newly shared folder occurs."

286 IPR, Paper 28 (Pet. Reply) at 11-12, n.5; EX1034 (Dr. Mowry Reply Decl.) at ¶ 25, n.5

- The same applies to the improperly incorporated aspects of the '787 provisional.



287 IPR



287 IPR – File Request Claims 9-12, 14-15, and 22-24



Independent Claim 9

9. An apparatus, comprising:
at least one non-transitory memory storing instructions;
and
one or more processors in communication with the at least
one non-transitory memory, wherein the one or more 25
processors execute the instructions to:
cause, at a first node, display of a first interface with a
first user interface element and a second user inter-
face element, the first interface for use in creating a
file request requesting at least one file; 30
receive, from the first node via at least one network, a
file description via the first user interface element
that includes a textbox, utilizing the first interface,
the file description describing the at least one file in
connection with the file request; 35
receive, from the first node via the at least one network,
an indication of at least one of a date or a time via the
second user interface element, utilizing the first
interface;
cause, at the first node, display of a second interface 40
with a third user interface element and a fourth user
interface element, the second interface for use in
causing the file request to be sent;
receive, from the first node via the at least one network,
indicia associated with at least one email address via 45
the third user interface element, utilizing the second
interface, the at least one email address for being
used to send the file request;
receive, from the first node via the at least one network,
an indication of a selection of the fourth user inter- 50
face element, utilizing the second interface, where
the receipt of the indication of the selection of the
fourth user interface element indicates that the file
request is to be caused to be sent;

in response to the receipt of the indication of the 55
selection of the fourth user interface element and
based on the file description, the indication of the at
least one of the date or the time, and the indicia
associated with the at least one email address; gen-
erate a first message addressed to the at least one 60
email address and including the file request, the first
message indicating the at least one of the date or the
time on which the file request is based, and further
including a fifth user interface element and at least
one sentence including the file description describing 65
the at least one file in connection with the file
request;
send, to a second node via the at least one network, the
first message;



Independent Claim 9 (cont'd)

5 receive, from the second node via the at least one network, an indication of a selection of the fifth user interface element of the first message, where the receipt of the indication of the selection of the fifth user interface element indicates that the at least one file is to be uploaded in response to the file request;
10 in response to the receipt of the indication of the selection of the fifth user interface element, cause, at the second node, display of a third interface with a sixth user interface element and a seventh user interface element, the third interface for use in uploading the at least one file in response to the file request;
15 receive, from the second node via the at least one network, an indication of a selection of the seventh user interface element, utilizing the third interface;

20 in response to the receipt of the indication of the selection of the seventh user interface element, generate a second message that includes an eighth user interface element, and that does not include a file attachment with the second message, the second message indicating that the file request has been responded to;
25 send, to the first node via the at least one network, the second message;

30 receive, from the first node via the at least one network, an indication of a selection of the eighth user interface element of the second message;
in response to the receipt of the indication of the selection of the eighth user interface element of the second message, cause, at the first node, display of at least one fourth interface with a reference to the at least one file for allowing access to the at least one file at the first node.
35



Dependent Claim 10

10. The apparatus of claim 9, wherein the apparatus is configured such that the at least one of the date or the time of the indication of the at least one of the date or the time is a criterion, and the indication of the at least one file is received based on whether the criterion is met.



Dependent Claim 11

11. The apparatus of claim 9, wherein the apparatus is configured such that, in response to the receipt of the indication of the selection of the seventh user interface element, a creation of a representation of the at least one file is caused, at the first node, in a location among one or more folders on a file explorer interface that is not a web page and utilizes a client-based file explorer application, such that the at least one file is accessible via both the second message and the file explorer interface.



Dependent Claim 12

12. The apparatus of claim 11, wherein the apparatus is configured such that the second message is sent without including the at least one file as an attachment of the second message, and a storage at the first node does not store the at least one file when the creation of the representation of the at least one file is caused, both for avoiding the at least one file from having to be communicated to and stored at the first node until the at least one file is requested by a user at the first node using the representation or the reference.



Independent Claim 14

14. An apparatus, comprising:
at least one non-transitory memory storing instructions;
and
one or more processors in communication with the at least
one non-transitory memory, wherein the one or more 35
processors execute the instructions to:
display, at a first node, of a first user interface element,
a second user interface element, and a third user
interface element, the first user interface element, the
second user interface element, and the third user 40
interface element for use in creating a file request
requesting one or more desired files;
receive, from the first node via at least one network,
text associated with one or more desired files via the
first user interface element that includes a textbox, 45
the text describing the one or more desired files in
connection with the file request;
receive, from the first node via the at least one network,
an object associated with at least one email address
via the second user interface element, the at least one 50
email address for being used to send the file request;

based on the text associated with the one or more
desired files and the object associated with the at
least one email address; generate a first message
addressed to the at least one email address and 55
including the file request, the first message including
a fourth user interface element and the text associ-
ated with the one or more desired files describing the
one or more desired files in connection with the file
request; 60
send, to a second node via the at least one network, the
first message;



Independent Claim 14 (cont'd)

receive, from the second node via the at least one network, a message associated with a selection of the fourth user interface element of the first message for indicating that at least one file is to be uploaded in response to the file request; 65

in response to the receipt of the message associated with the selection of the fourth user interface element, send a first communication over the at least one network that results in display, at the second node, of a fifth user interface element for use in uploading the at least one file in response to the file request; 5

receive, from the second node via the at least one network, a message associated with a selection at least one file for being used to upload the at least one file in response to the file request; 10

receive, from the second node via the at least one network, a message associated with a selection of the fifth user interface element; 15

in response to the receipt of the message associated with the selection of the fifth user interface element, generate a second message that includes a sixth user interface element, and that does not include a file attachment with the second message, the second message indicating that the file request has been responded to; 15 20

send, to the first node via the at least one network, the second message;

receive, from the first node via the at least one network, a message associated with a selection of the sixth user interface element of the second message; 25

in response to the receipt of the message associated with the selection of the sixth user interface element of the second message, send a second communication over the at least one network that results in display, at the first node, of a reference to the at least one file; and 30

allow access, at the first node, to the at least one file via the reference. 35



Dependent Claim 15

15. The apparatus of claim **14**, wherein the apparatus is configured such that:

- the first message and the second message are email messages;
- the object includes the at least one email address or an alias associated with the at least one email address;
- the second message is at least partially pre-written and is automatically generated without user involvement after the receipt of the message associated with the selection of the fifth user interface element; and
- the message associated with the at least one file is conditionally received based on whether a date-related criterion or a time-related criterion is met.



Dependent Claim 16

16. The apparatus of claim **15**, wherein the apparatus is configured such that, in response to the receipt of the indication of the selection of the fifth user interface element, a creation of a representation of the at least one file is caused, at the first node, in a location among one or more folders on a file explorer interface that is not a web page and is displayed utilizing a client-based file explorer application, such that the at least one file is accessible via both the second message and the file explorer interface, wherein the apparatus is further configured such that the second message is sent without including the at least one file as an attachment of the second message, and a storage at the first node does not store the at least one file when the creation of the representation of the at least one file is caused, both for avoiding the at least one file from having to be communicated to and stored at the first node until the at least one file is requested by a user at the first node using the representation or the reference.



Independent Claim 22

22. A method, comprising:

causing, at a first node, display of:

a first user interface element that includes a textbox, for collecting a file request description for at least one file,

a second user interface element, for enabling collection of an indication of at least one of a date or a time,

a third user interface element, for collecting at least one object associated with at least one email address, the at least one object associated with at least one email address being the at least one email address or an alias associated with the at least one email address, and

a fourth user interface element, for detecting an indication of a selection thereof to cause an initiation of a request for the at least one file;

causing generation of a first email, based on the file request description for the at least one file, the at least one object associated with the at least one email address, and the detection of the indication of the selection of the fourth user interface element to cause the initiation of the request for the at least one file, where the first email includes:

at least one sentence including the file request description for the at least one file, and

a fifth user interface element for detecting an indication of a selection thereof;



Independent Claim 22 (cont'd)

based on the detection of the indication of the selection of the fifth user interface element of the first email, causing, at the second node, display of:

a sixth user interface element, for collecting an indication of at least one file, and
a seventh user interface element, for detecting an indication of a selection thereof;

receiving, from the second node and at at least one server, a signal for causing creation of a first representation of the at least one file, in a location among one or more folders, that is stored at the at least one server and that is displayable via at least one web page;

causing generation of a second email, based on the detection of the indication of the selection of the seventh user interface element, where the second email: includes an eighth user interface element for detecting an indication of a selection thereof,
does not include a file attachment, for permitting avoidance of the at least one file from being communicated to and stored at the first node via the second email,
is at least partially pre-written, and
is automatically caused to be received without requiring further user involvement after the detection of the indication of the selection of the seventh user interface element;

causing, at the first node, receipt of the at least one web page, that results in display, at the first node and via the at least one web page, of a file structure that permits access to the first representation of the at least one file that is stored at the at least one server;
causing, at the first node, receipt of code for storage at the first node and cooperation with a file explorer interface of a client-based file explorer application, for being utilized to:

based on the detection of the indication of the selection of the seventh user interface element, cause creation of a second representation of the at least one file, in a location among one or more folders, that is stored at the first node and that is displayable via the file explorer interface of the client-based file explorer application.



Dependent Claim 23

23. The method of claim **22**, wherein, at a time of sending, to the at least one server, of the signal, one or more representations for the one or more folders that is stored at the at least one server already exist in the location among the one or more folders that is stored at the first node.



Dependent Claim 24

24. The method claim **22**, wherein the access to the at least one file is allowed at the first node based on whether a date-related criterion or a time-related criterion is met in connection with a receipt of the at least one file.



287 IPR Other Asserted Prior Art



U.S. Patent No. 9,633,125 ("Garcia")

(12) United States Patent Garcia et al.



(10) Patent No.: US 9,633,125 B1
(45) Date of Patent: Apr. 25, 2017

(54) SYSTEM, METHOD, AND COMPUTER PROGRAM FOR ENABLING A USER TO SYNCHRONIZE, MANAGE, AND SHARE FOLDERS ACROSS A PLURALITY OF CLIENT DEVICES AND A SYNCHRONIZATION SERVER

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(73) Assignee: Dropbox, Inc., San Francisco, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 17 days.

(21) Appl. No.: 13/571,564

(22) Filed: Aug. 10, 2012

(51) Int. Cl. G06F 17/30 (2006.01)

(52) U.S. Cl. CPC

(58) Field of Classification Search CPC

USPC: 715/738, 733, 734, 748, 751, 234, 762, 715/810, 839, 853, 854; 707/620, 999.01, 707/E17.005, E17.032; 709/248, 203

See application file for complete search history.

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(Continued)

Primary Examiner — Linh K. Pham

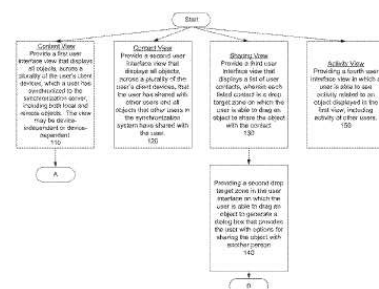
Assistant Examiner — Wendy Nicholas

(74) Attorney, Agent, or Firm — Arent Fox LLP

(57) ABSTRACT

A system, method, and computer program are provided for enabling a user to synchronize, manage, and share files and folders across a plurality of client devices and a synchronization server. In a user interface, a first view displays all folders, which a user has synchronized to the synchronization server and a drop-target zone to which the user is able to drag a folder from the local device to synchronize the folder with the synchronization server. A second view displays all files and folders, which the user has shared with other users. A third view displays a list of user contacts, where each contact is a drop-target zone on which a user is able to drag a folder to share the folder with the contact. A fourth view is provided in which a user is able to see activity related to a folder displayed in the first view.

19 Claims, 26 Drawing Sheets

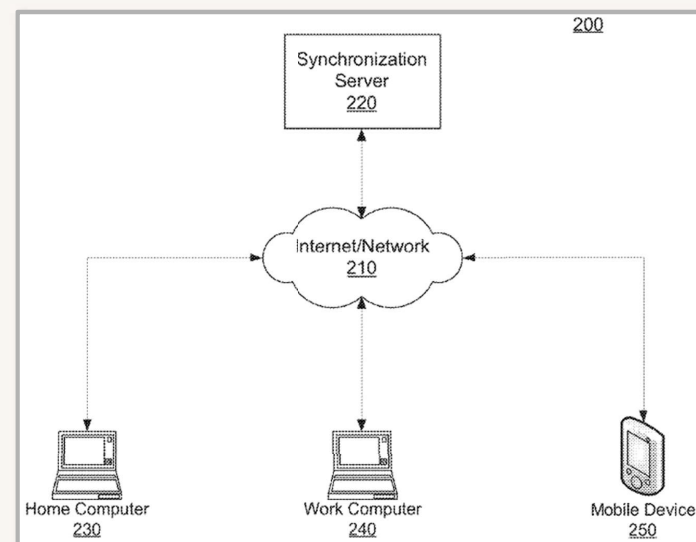


DROPBOX 1104

1. Field of the Invention

This invention relates generally to a synchronization system and, more particularly, to a system and method for enabling a user to synchronize, manage, and share folders across a plurality of client devices and a synchronization server.

EX1104 (Garcia) at 1:10-15



EX1104 (Garcia), Fig. 2

tops, laptops, and mobile devices connected to it. These client devices 230, 240, 250 may all belong to the same user or may belong to different users who have shared access to objects with one another. Client devices communicate with

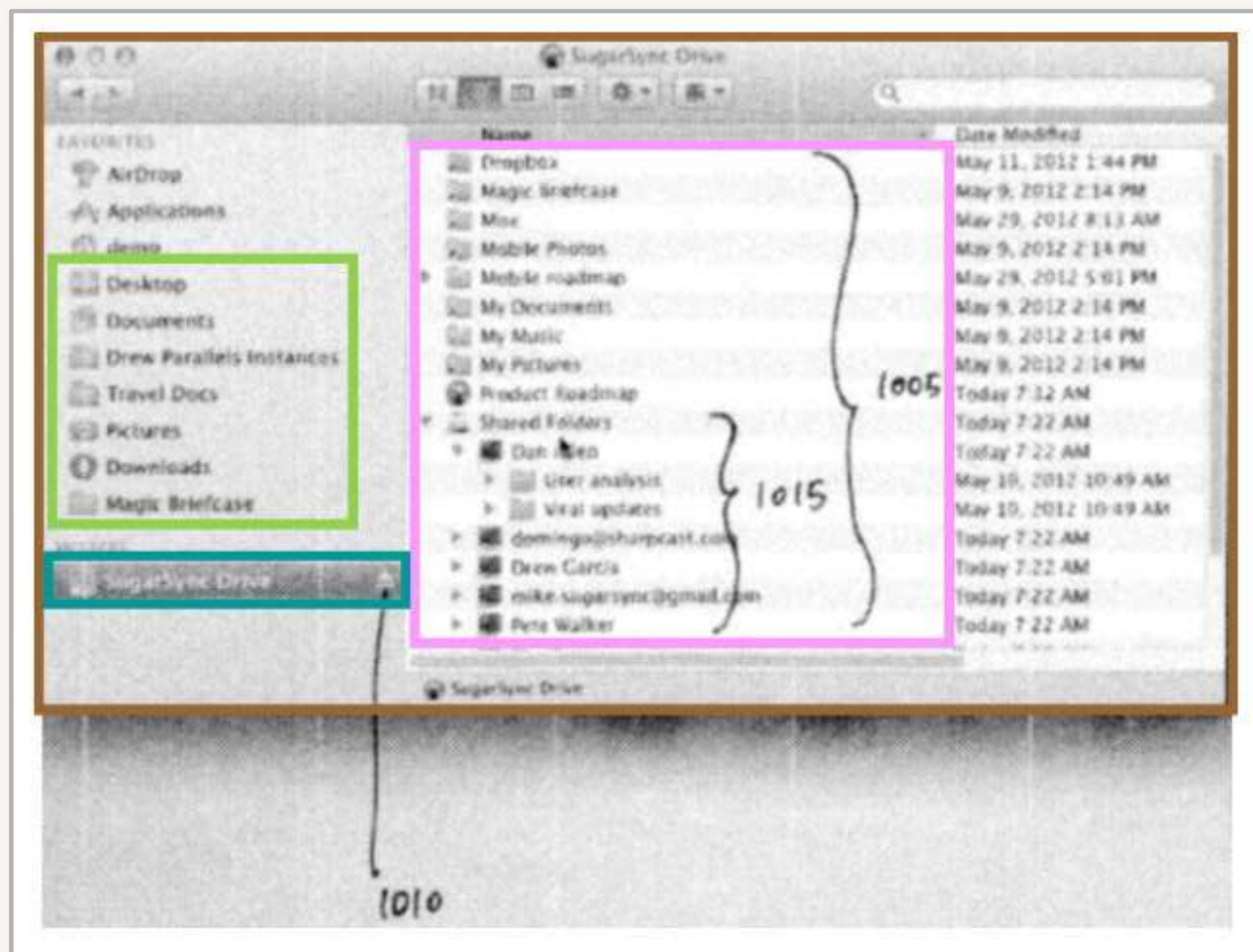
EX1104 (Garcia) at 8:21-24

EX1104 (Garcia)

287 IPR, Paper 4 (Petition) at 72; EX1102 (Dr. Mowry Decl.) at ¶ 57



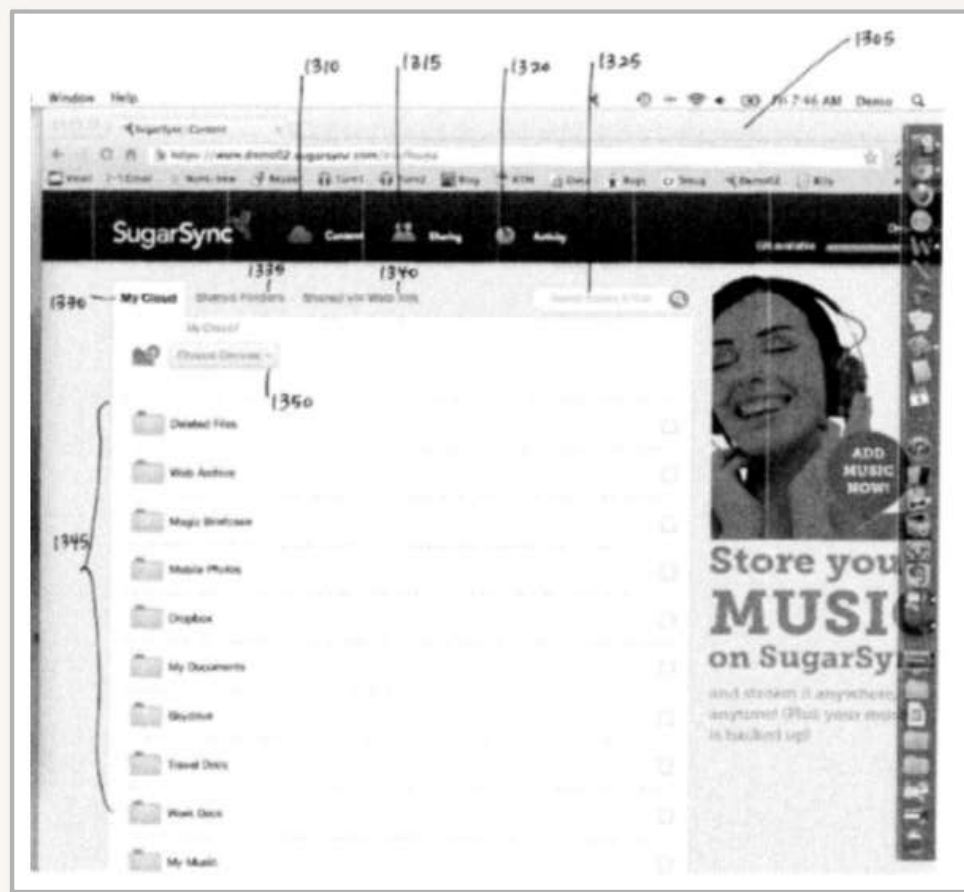
Garcia Discloses a File Explorer Interface that Allows Access to Shared Content Among One or More Folders



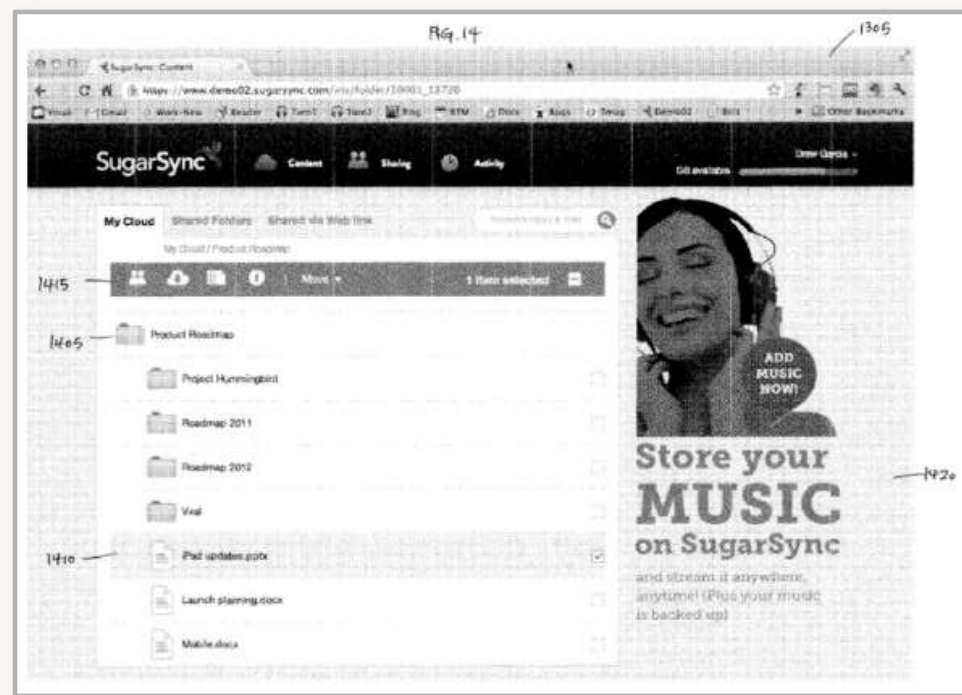
EX1104 (Garcia), Fig. 10 (excerpted and annotated)



Garcia Discloses Web Interfaces that Allow Access to Shared Content Among One or More Folders



EX1104 (Garcia), Fig. 13 (excerpted)



EX1104 (Garcia), Fig. 14



Riepling Is Prior Art



Riepling Is Prior Art



Case Law: *Lynk Labs Inc. v. Samsung Electronics Co.*

“§§ 311(b) and 102(e)(1) permit IPR challenges based upon published patent applications, and such published patent applications can be deemed prior art in IPRs as of their filing date.”

Lynk Labs Inc. v. Samsung Electronics Co., No. 2023-2346, 2025 WL 85559, at **8 (Fed. Cir. Jan. 14, 2025)



The '520 Patent Is Not Entitled to a September 2012 Priority Date



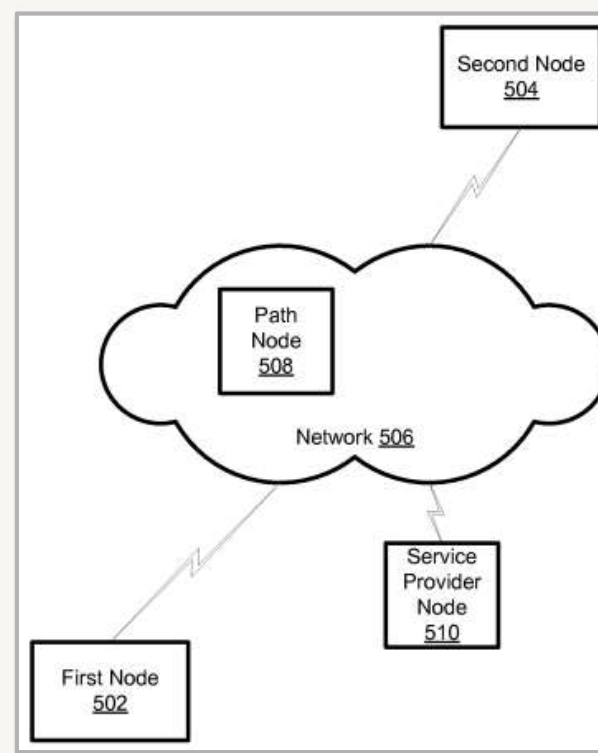
“Web Service Provider Node”—Described in Original Application—Does Not Generate Messages or Emails



**Dropbox’s Expert
Dr. Mowry**

service provider node. The web service provider node may include a query handler component that may operate to receive the data object information identified in the message from the browser.”). The web service provider node and the query handler component do not generate messages.

EX1127 (Dr. Mowry Reply Decl.) at ¶ 49



EX2004 ('906 Application), Fig. 5

287 IPR, Paper 27 (Pet. Reply) at 7-8



Patent Owner Misquotes Dr. Mowry's Deposition Transcript

what that means without additional context.” (EX2015, 99:23-102:23.) He eventually conceded that “presumably, it provides a service.” (*Id.* 104:19-25; *see*

Paper 36 (PO Sur-Reply) at 5



**PO's Counsel
Mr. Dahlgren**

19 Q. Sure. So what would a person of
20 ordinary skill in the art understand the "web
21 service provider node" to be?
22 And I think you had said that it
23 would depend on context.
24 And I said, Well, presumably, it
25 provides a service.

EX2015 (Dr. Mowry Depo. Tr.) at 104:19-25



**Dropbox's Expert
Dr. Mowry**

2 As I said in paragraph -- I mean, in
3 paragraph 49 of my Exhibit 7, I am discussing --
4 and in other parts of it -- I am discussing the
5 fact that the patent owner appears to contend
6 that an external messaging node is encompassed
7 in the limitations of the challenge claim, and
8 the web service provider node and the query
9 handler component do not generate messages.

EX2015 (Dr. Mowry Depo. Tr.) at 126:2-9

287 IPR, Paper 27 (Pet. Reply) at 7-8; EX1127 (Dr. Mowry Reply Decl.) at ¶ 49



Patent Owner Mischaracterizes Dr. Mowry's Deposition Testimony

Dr. Mowry did not have any opinion as to whether other paragraphs of the specification, including, for example, '520 patent 22:21-31 (i.e., EX2002 [0373] and EX2004 [0102]), disproved the presence of an external server. (EX2015, 116:17-117:15, 123:9-124:4.) Importantly, Dr. Mowry was unable to offer any actual

Paper 36 (PO Sur-Reply) at 8

9 Q. In the '520 Patent when the
10 discussion in Figure 5, when it refers to the
11 service provider -- I'm sorry -- the "web
12 service provider node," would that be understood
13 to encompass a server?
14 MR. ESRAM: Objection to form.
15 A. What it means is what's described
16 later during that brief part, very brief part of
17 column 27, where it discusses the phrase,
18 "web" -- where is that -- "web service provider
19 node," and it says that what this does is it
20 responds to queries from the browser.
21 So as I stated in paragraph 49 of
22 Exhibit 7, that does not -- is not consistent
23 with generating a first message by an external
24 messaging node.

EX2015 (Dr. Mowry Depo. Tr.) at 123:9-24

287 IPR, Paper 27 (Pet. Reply) at 7-8; EX1127 (Dr. Mowry Reply Decl.) at ¶ 49



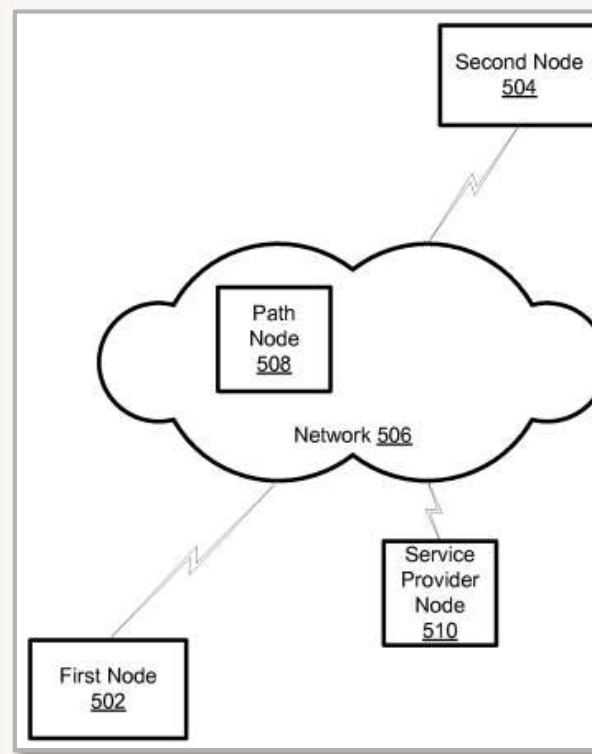
“Path Node”—Described in Original Application—Also Does Not Generate Messages or Emails



**Dropbox’s Expert
Dr. Mowry**

indicated, path node 508 illustrates such a node.” *Id.*, ¶ 114. A path node does not generate messages. And, as I discussed above in the content of paragraph 124, web service provider nodes likewise do not generate messages. Accordingly, Figure 5

EX1127 (Dr. Mowry Reply Decl.) at ¶ 56

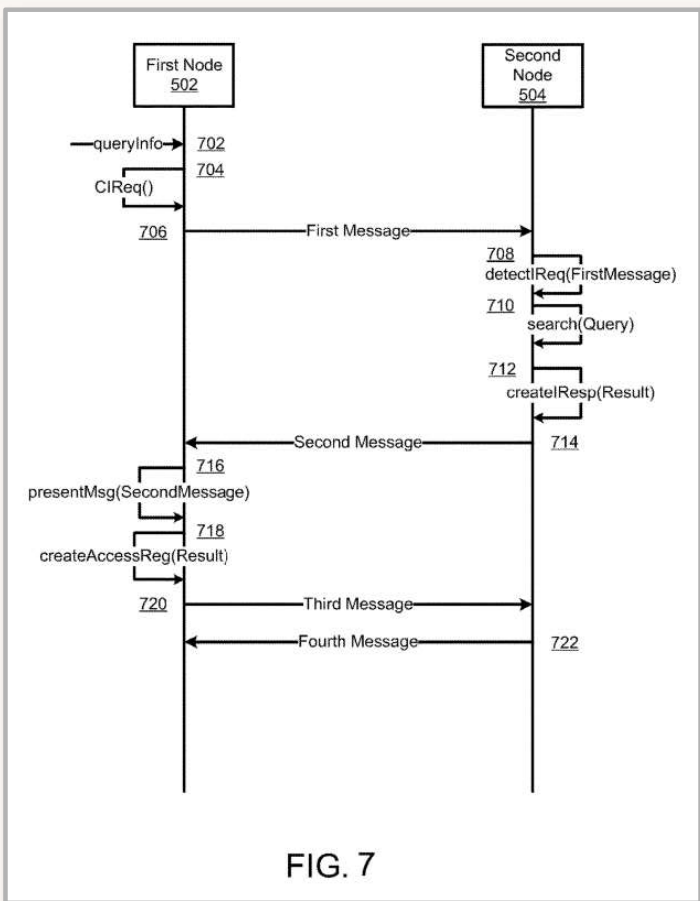


EX2004 ('906 Application), Fig. 5

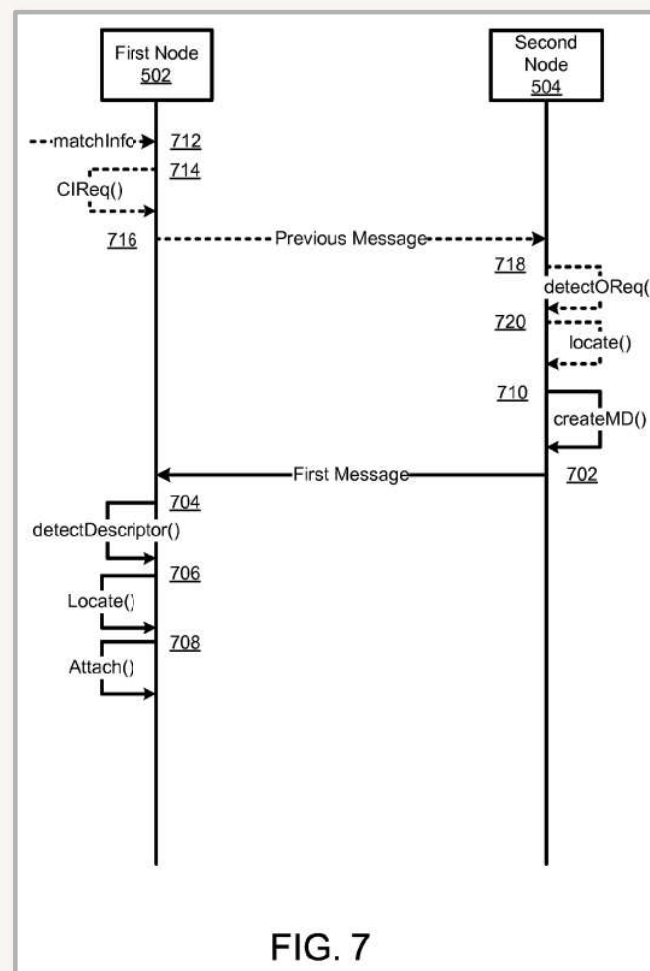
287 IPR, Paper 27 (Pet. Reply) at 7-8



Original Applications Disclose Messages Generated at a First Node and a Second Node



EX2004 ('906 Application), Fig. 7



EX2002 ('635 Application), Fig. 7



Patent Owner Mischaracterizes Dr. Mowry's Deposition Testimony

by a web server and that “a data object identification request,” “a data object identification response, an access request, and a response to an access request” “may be generated, detected and/or otherwise processed according to a schema,” (EX2004, ¶186), which Dr. Mowry stated included a date, (EX2015, 134:22-135:7),

Paper 36 (PO Sur-Reply) at 7-8



Dropbox's Expert
Dr. Mowry

Q. [] What is your understanding of the term "schema" in column 44 of the '520 Patent??

A. It's a term from the field of databases. It represents a special, a specific pattern that's used to create – construct something. For example, like a date has a particular kind of format. That's just one random example, but a schema generally -- it's a term from databases.

EX2015 (Dr. Mowry Depo. Tr.) at 134:22-135:7

Respectfully,

Date: April 16, 2025

/Trishan Efram/

Trishan Efram
Registration No. 74,075
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that, on April 16, 2025, I caused a true and correct copy of the foregoing materials:

- Petitioner's Demonstrative Exhibits

to be served via electronic mail by consent on counsel of record at:

andrew@agordonlawfirm.com

asherman@devlinlawfirm.com

ddahlgren@devlinlawfirm.com

dlflitparas@devlinlawfirm.com

Respectfully,

/Trishan Efram/

Trishan Efram

Registration No. 74,075