

Viant Technology LLC (Petitioner)
v.
Intent IQ, LLC (Patent Owner)

Petitioner's Demonstratives

Case Nos. IPR2024-00421, -00422
U.S. Patent No. 7,861,260

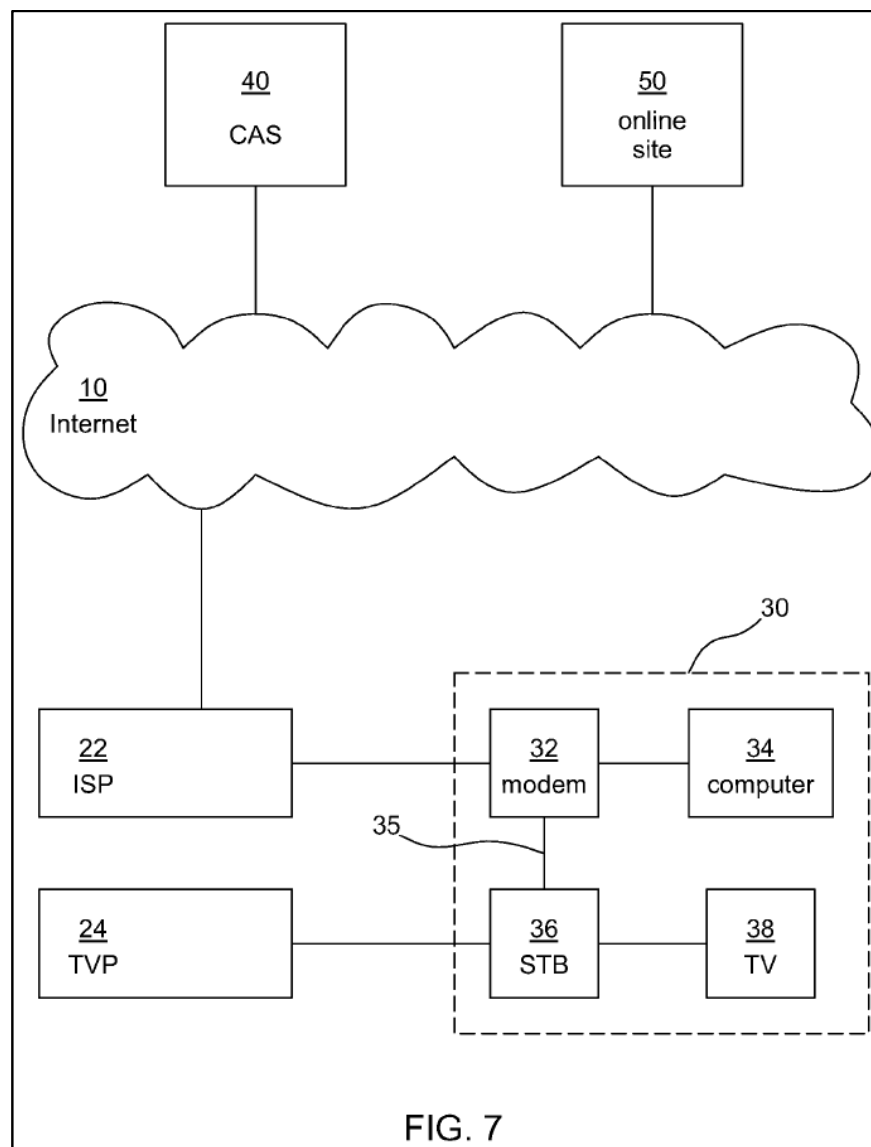
Before Hon. Nabeel U. Khan, Scott B. Howard, David Cotta
Administrative Patent Judges

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Background of '260 Patent

'260 Patent: Overview



scope of the present disclosure or appended claims. An online access IP address is assigned to modem 32 as described above. In cases where the user's STB 36 can also obtain online access via the same IP address as the user's online access (i.e., via modem 32), that common IP address comprises the electronic association that can be used to perform targeted television advertising without requiring PII. That case can occur by connecting STB 36 to the user's modem 32 via connection 35, in addition to connecting STB 36 to TVP 24. For example, STB 36 can be connected to a local area network (LAN) that shares device 32 for online access. In such an arrangement, network traffic is routed to a common IP address (i.e., the IP address of modem 32) for STB 36 and other devices connected to the LAN. The user can receive online access from any online service provider via any suitable modem 32 (for cable, DSL, wireless, satellite, or any

Ex. 1001, 12:52-67
Paper 2 (-00422 Pet.), 1

Television advertisement (TV ad)—a full screen video ad, a partial screen video ad, a banner ad, a text ad, an audio ad, or any other form of advertisement suitable for delivery to and visual or audible presentation by a television set.

Ex. 1001, 6:37-40
Paper 2 (-00422 Pet.), 27

'260 Patent: Challenged Indep. Claim 1

1. A method implemented using a programmed hardware computer system, the method comprising:
 - (a) for each of a multitude of users, with the computer system, electronically associating an online access IP address of the user and a set-top box IP address of that user based on a common IP address, wherein network traffic is routed via the common IP address to both an online user interface device and a set-top box of that user; and
 - (b) using user profile information derived from online activity from a first online user interface device via a first one of the online access IP addresses of the multitude of users, with the computer system automatically causing a first television advertisement to be directed to a set-top box for presentation via that set-top box, selectively, wherein the set-top box is indicated by the set-top box IP address associated with the first online access IP address.

'260 Patent: Issues Raised by PO

- **Issues Raised**

- Motivation to combine Baig and Costa
- Obviousness of dependent claims 121 and 146

- **Undisputed**

- Prior art disclosure of limitations of claims 1-120, 122-145, and 147-152
- Motivation to combine with Zwicky, Banga690, Cox, Han, Leigh, Wing, Jaye, Howcroft, Smith, Middeljans, Koningstein, Banga633
- Whether there would have been a reasonable expectation of success with respect to any combinations

First Issues

Combinability of Baig and Costa

Baig+Costa: Devices connected to “hotspot” access point

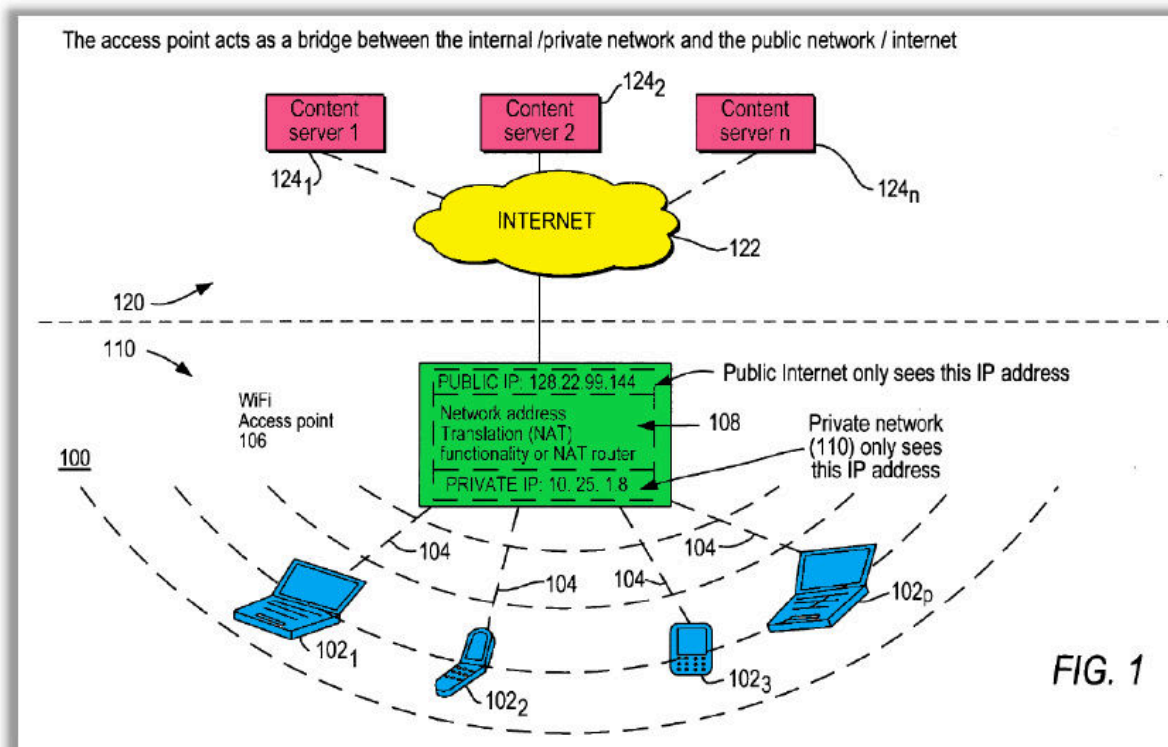


FIG. 1

Paper 2 (-00422 Pet.), 8

Ex. 1007, Fig. 1 (annotated)

[0047] Accordingly, an access point 106 at a WiFi hotspot 110 conceals internal IP addresses from the public internet 122, and the only IP address visible to the public network 120 is the unique IP address of the access point 106. Thus, only a single, unique IP address (belonging to the access point) will represent an entire group of mobile devices to the public network(s), and the access point 106 acts as an interpreter between the two networks. That is, the access

Ex. 1007 (Baig), [0047];
Paper 2 (Petition), 21

Baig+Costa: Grouping and advertising based on common IP

point at a wireless hotspot. A vicinity-based community service is a service provided by the VCSP which discovers (i.e., identifies) and connects wireless users within physical vicinity of each other at a WiFi hotspot. Once a “vicinity-based community” at a physical location (i.e., a hotspot) is created, the users can potentially interact physically or non-physically with each other. The VSCP identifies a group of users at a wireless hotspot based upon their common public IP address and interconnects them, thereby creating a vicinity-based user group. The VSCP may also request the street address or the venue name of the hotspot from the end user in order to correlate the vicinity-based group to a specific geographical location.

Ex. 1007 (Baig), [0038];
Paper 2 (-00422 Pet.), 9-10

[0061] The vicinity-based user network (i.e., the mesh-network of vicinity-based hotspots **110**) increases the VCSP services that are available to the users at the hotspots. For example, the location based barter service provides the users with the ability to barter products in their local vicinity-based hotspot community, as well as with users in the entire vicinity based online community (i.e., mesh network). Similarly, vicinity-based advertising provides the ability to advertise to an audience at a particular WiFi hotspot based upon the profile (e.g., age or gender) of the user (among other profile information), as well as advertise to other vicinity-based hotspots in the mesh network of the VCSP **202**.

Ex. 1007 (Baig), [0061];
Paper 2 (-00422 Pet.), 15

Baig+Costa: VCSP Provides Access to “Variety of Services”

[0040] Once the end-users at a particular access point log into the website of the VCSP, they are able to view other members of the VCSP who have also logged in from the same access point associated with a particular wireless hotspot. The VCSP can offer a variety of services to the logged-in end users, all of whom now form the vicinity-based community at the wireless access point.

Ex. 1007 (Baig), [0040];
Paper 2 (-00422 Pet.), 9-10

[0053] The at least one server 224 further includes programs and data for hosting a website of the VCSP 202. For example, the server 224 provides web pages for user access to information, as well as interactive and non-interactive services. The server 224 is also capable of storing information that is entered on the web pages or uploaded by the users, among other functions and services, as discussed below in further detail with respect to FIGS. 4-23.

Ex. 1007 (Baig), [0053];
Paper 2 (-00422 Pet.), 9-10

Baig+Costa: Variety of venues for hotspot access point

[0037] The present invention provides a method and apparatus that takes advantage of new trends in the consumer technology area. One trend is the rising popularity and availability of wireless technologies such as WiFi technology particularly in public settings in metropolitan locations. Public deployment of WiFi networks have skyrocketed in parks, cafes, bookstores, airports and college campuses. There are proposals being considered to roll-out city-wide WiFi service in various large metropolitan cities. Another

Ex. 1007 (Baig), [0037]
Paper 22 (-00421 Reply), 5

Baig-Costa-Zwicky and/or Baig-Costa-Banga690 teaches [1B]. As discussed above and further below, in both combinations, a content server provides targeted advertising and other shared services to devices at a public hotspot (*e.g.*, coffee shop). Specifically, the content server uses user profile information derived from

Paper 2 (-00421 Pet.), 24

Baig+Costa: Set-top Box Connected to Access Point

[0036] The UPnP network 104 (or similar networking technology) allows devices to exchange data in a local environment 110. The local environment 110 typically includes a home or office, although it will be appreciated that other environments may provide UPnP connectivity, including automobiles, airplanes, boats, public wireless hotspots, etc. The UPnP network 104 may couple consumer electronics devices 112, including televisions 114, audio systems 116, computers 118, telephones 120 (e.g., analog phones, digital phones, cordless phones, SIP phones), digital media centers 122 (e.g., set-top boxes, MP3 jukeboxes, personal video recorders, media hubs), printers 124, cameras 126, and other devices, represented by generic UPnP device 128.

[0037] The consumer electronic devices 112 may be coupled to the UPnP network 104 in any manner known in the art. The UPnP network 104 may employ connectivity using any media or format known or later developed. For example, the UPnP network 104 may utilize any combination of wired and wireless networking technologies, such as Ethernet, 802.11 Wi-Fi, X10, powerline networking, infrared, etc. Generally, UPnP networks utilize TCP/IP and other Web technologies to enable proximity networking for transfer of control data and content among networked devices.

Ex. 1011 (Costa), [0036]-[0037]
Paper 2 (-00421 Pet.), 10-11

Baig+Costa: Displaying webpages on set-top boxes

[0073] In the case where the SSO subscriber accesses a web page, content, or an IP-based service from any end user device including personal computer (PC), IPTV set top box (STB), cell phone, etc. an event record detailing what the SSO subscriber accessed from their end user device is created. The TASS 101 receives an event detail record 402 containing data from the profiling process.

Ex. 1016 (Howcroft), [0073];
Paper 2 (-00421 Pet.), 11-12

1002, ¶¶162-163; Ex. 1007, ¶¶[0043], [0049]; Ex. 1011, ¶¶[0007], [0037]. And, it was well-known to provide web-pages (including advertisements) on a STB. *See, e.g.,* Ex. 1016, ¶¶[0073], [0093], [0032]; Ex. 1002, ¶163. A POSA would be motivated to include Costa's STB because it beneficially allows customers at a public establishment to watch television or other information on an associated display. Ex. 1002, ¶160. Baig shares music, video games, and advertisements at

Paper 2 (-00421 Pet.), 11-12

Baig+Costa: Provision of Multimedia Information and Data

hotspot. The VCSP can offer a variety of services to the logged-in end users, all of whom now form the vicinity-based community at the wireless access point.

Ex. 1007 (Baig), [0040];
Paper 2 (-00421 Pet.), 9-10

work 120 via an access point 106. The public network 120 includes, for example, content servers 124₁, through 124_p (collectively content servers 124) that store and/or host information (e.g., multimedia information and data), illustratively, from websites, and are communicably linked together to form the public internet 122.

Ex. 1007 (Baig), [0042];
Paper 2 (-00421 Pet.), 6. 26

[0079] The illustrative web page 700 allows the user to select various services that are available exclusively through the VCSP website. The webpage 700 includes a main window 702 having a plurality of tabbed headers 704 that are labeled with a description of the available services by the VCSP 202. For example, in one embodiment, the tab headers 704 include tabs for a chat room (e.g., “Chat”) 706, “Buy/Sell or barter” 708, “Share” 710, “Blog Spot” 712, “Location Forum” 714 and “Lost & Found” 716. The number and types of services described herein is not to be considered as being limiting.

Ex. 1007 (Baig), [0079];
Paper 2 (-00421 Pet.), 10

Baig+Costa: VCSP Example Service Provides Games

[0107] Referring now to FIG. 23, in another embodiment, the VCSP can provide on-line gaming to the vicinity-based community members. The VCSP can store numerous video games on their servers to form a library of games for selection by the end-users. The end users can then challenge one or more other members in the vicinity-based community to a game. The vicinity-based community of players is

Ex. 1007 (Baig), [0107];
Paper 2 (-00421 Pet.), 12

display. Ex. 1002, ¶160. Baig shares music, video games, and advertisements at hotspots, and a POSA would have realized a STB would beneficially provide that content for display via a television or other display. Ex. 1007, ¶¶[0054], [0062], [0090], [0094]-[0095], [0103], [0107]-[0108]; Ex. 1002, ¶¶160, 163.

Paper 2 (-00421 Pet.), 12

Second Issue

Dependent Claims 121 and 146

Dependent Claims 121 and 146

121. The method of claim **34** wherein the revenue amount is received from an advertiser that has contracted to display a TV ad to persons who have characteristics contained in the user profile information.

146. The method of claim **42** wherein the revenue amount is received from an advertiser that has contracted to display a TV ad to an audience of an Internet site.

Baig+Costa: Contracting for Ad Display

Television advertisement (TV ad)—a full screen video ad, a partial screen video ad, a banner ad, a text ad, an audio ad, or any other form of advertisement suitable for delivery to and visual or audible presentation by a television set.

Ex. 1001, 6:37-40; Paper 2 (-00422 Pet.), 27, 50

wireless hotspots using vicinity-based networks The vicinity-based service permits advertisers to target particular geographical locations. Advantageously, the advertisers can target the audience of a particular hotspot according to the profile, e.g., age/gender etc. of the users and/or a particular time of the day. As users register online on the VCSP website, profile information about our users, such as age, gender, occupation, interests and the like are requested during the registration process and securely stored by the VCSP 202. Advertisers can selectively choose to advertise to users at a particular address, city, state or zip code. Similarly advertisers can target the traffic patterns at a particular geographic location according to the time of the day.

Ex. 1007 (Baig), [0093]

[0102] In one embodiment, multiple advertisers can bid against each other to have their advertisements displayed at a particular location and time of day, or based on some other end-user profile.

Ex. 1007 (Baig), [0102]

[0104] Through the VCSP, the advertisers can select individual hotspots or hotspots in a particular city or particular zip code. The advertisers can view the traffic patterns, for example, the age/gender distribution for particular geographical locations, and then select the time during which they want their advertisements to appear to users. An advertiser can then log on to the VCSP website and bid against other advertisers for rights. The winner of the bidding contest receives exclusive rights to advertise on the VCSP website for the selected hotspot at a particular time of day, for example, between 6-8 pm to female end-users who are 18-25 years old at a particular geographical location.

Ex. 1007 (Baig), [0104]

Baig+Costa: Ad Displayed on TV

Television advertisement (TV ad)—a full screen video ad, a partial screen video ad, a banner ad, a text ad, an audio ad, or any other form of advertisement suitable for delivery to and visual or audible presentation by a television set.

Ex. 1001, 6:37-40; Paper 2 (-00422 Pet.), 27, 50

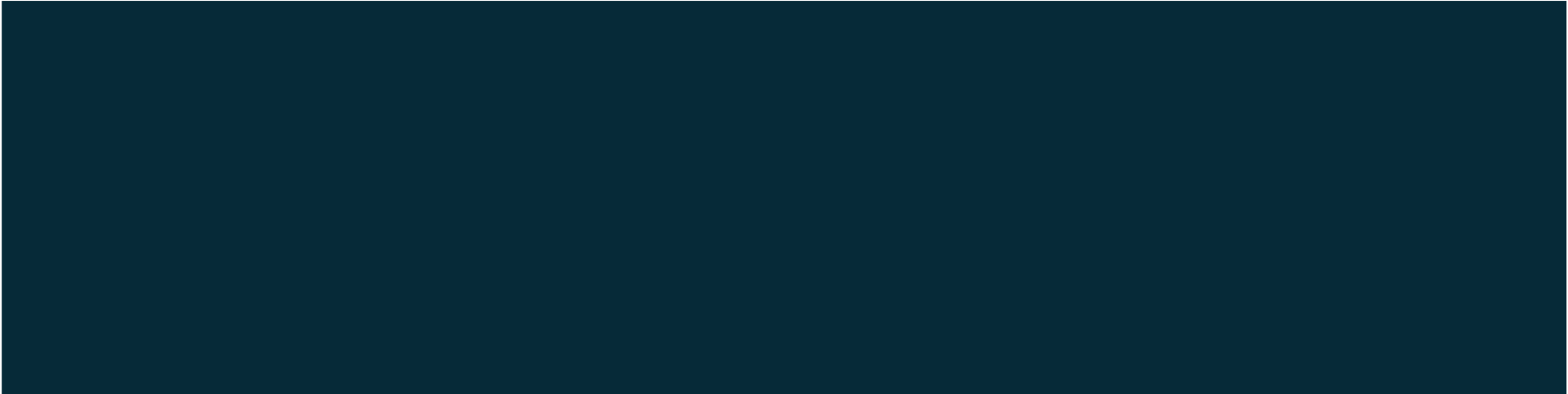
[0036] The UPnP network 104 (or similar networking technology) allows devices to exchange data in a local environment 110. The local environment 110 typically includes a home or office, although it will be appreciated that other environments may provide UPnP connectivity, including automobiles, airplanes, boats, public wireless hotspots, etc. The UPnP network 104 may couple consumer electronics devices 112, including televisions 114, audio systems 116, computers 118, telephones 120 (e.g., analog phones, digital phones, cordless phones, SIP phones), digital media centers 122 (e.g., set-top boxes, MP3 jukeboxes, personal video recorders, media hubs), printers 124, cameras 126, and other devices, represented by generic UPnP device 128.

Ex. 1011 (Costa), [0036]
Paper 2 (-00422 Pet.), 10-11

[0073] In the case where the SSO subscriber accesses a web page, content, or an IP-based service from any end user device including personal computer (PC), IPTV set top box (STB), cell phone, etc. an event record detailing what the SSO subscriber accessed from their end user device is created. The TASS 101 receives an event detail record 402 containing data from the profiling process.

Ex. 1016 (Howcroft), [0073];
Paper 2 (-00422 Pet.), 11-12

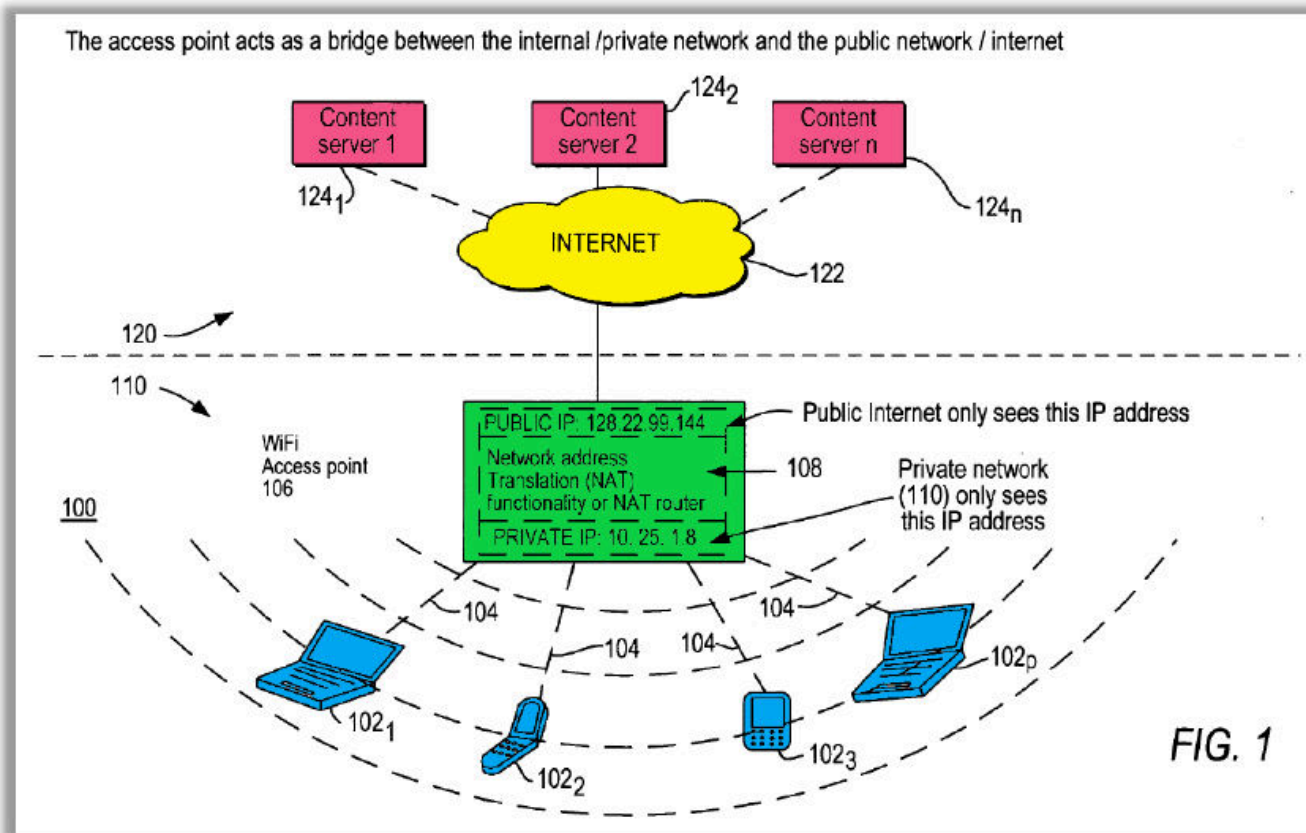
Appendix



Element [1pre]

[1pre]

1. A method implemented using a programmed hardware computer system, the method comprising:



Ex. 1007, Fig. 1 (annotated)

Element [1pre]

[1pre]

1. A method implemented using a programmed hardware computer system, the method comprising:

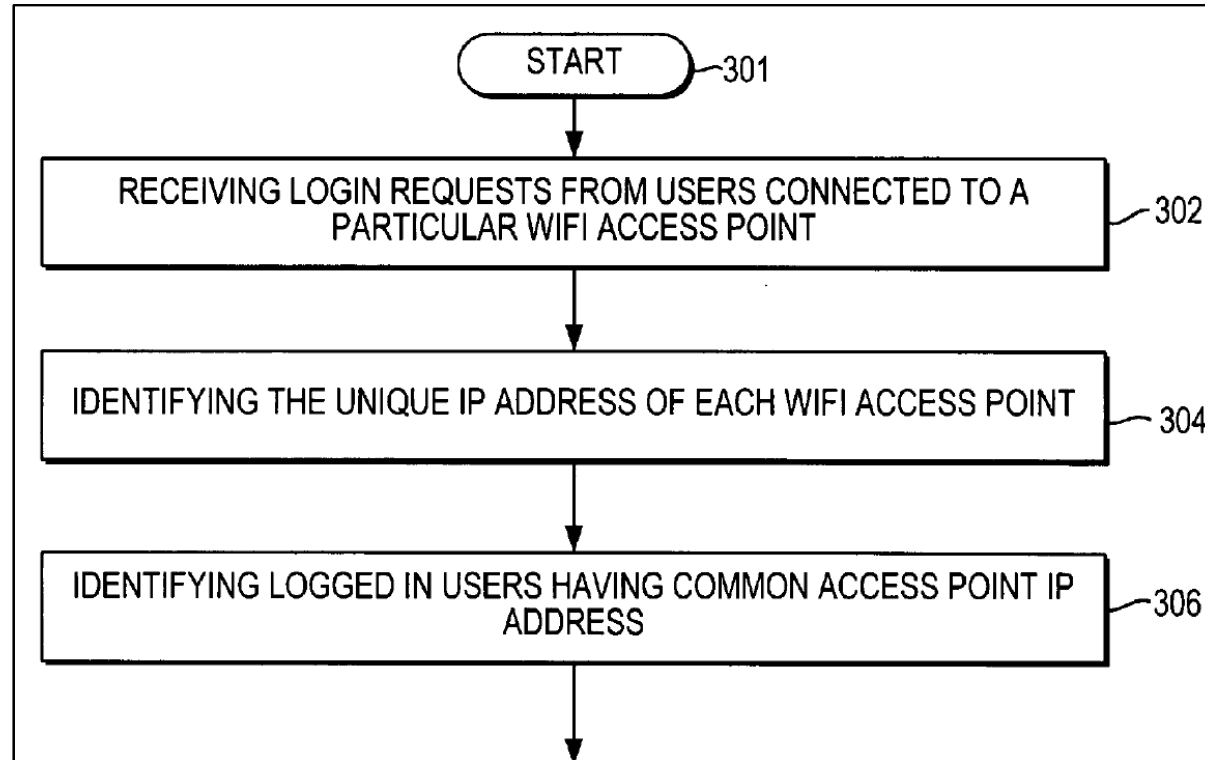
[0052] The network **200** of FIG. **2** further includes a vicinity-based community service provider (VCSP) **202** having at least one content server **224** coupled to the Internet **122** in a conventional manner. The server **224** includes at least one processor, memory and support circuitry for running programs that, for example, identify users that are originating from a particular access point **106** and then groups those users having a common IP address to the same hotspot **110**. Accordingly, since each hotspot **110** has a

Ex. 1007 (Baig), [0052]

Paper 2 (-00422 Pet.), 7-8

Element [1A]

- | | |
|------|--|
| [1A] | (a) for each of a multitude of users, with the computer system, electronically associating an online access IP address of the user and a set-top box IP address of that user based on a common IP address, wherein network traffic is routed via the common IP address to both an online user interface device and a set-top box of that user; and |
|------|--|



Ex. 1007 (Baig), FIG. 3

Element [1A]

[1A]	(a) for each of a multitude of users, with the computer system, electronically associating an online access IP address of the user and a set-top box IP address of that user based on a common IP address, wherein network traffic is routed via the common IP address to both an online user interface device and a set-top box of that user; and
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By identifying all devices sharing the AP's IP address, Baig's server electronically associates IP addresses of the devices used at the hotspot. Ex. 1007, ¶[0056], Fig. 3 (Step 306). These devices include Costa's STB, which has the same IP address (claimed "set-top box IP address") as devices 102 and the AP (claimed "online access IP address"). Ex. 1002, ¶201. Accordingly, Baig's content server

Paper 2 (-00442 Pet.), 13

Element [1A]: Breadth of “user”

[1A]	(a) for each of a multitude of users, with the computer system, electronically associating an online access IP address of the user and a set-top box IP address of that user based on a common IP address, wherein network traffic is routed via the common IP address to both an online user interface device and a set-top box of that user; and
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In the following disclosure and appended claims, the term “user” shall be construed as one or more persons receiving online access or television service at a delivery end-point within a household, office, business, or other site or establishment served by an online access provider or television service provider. Thus, delivery of a television ad to “the user” based on access of an online site by “the user” might involve a single person, or one person might access the online site while the corresponding television ad might be delivered to another person in the household, office, business, or other site or establishment. The delivery end-point may be one television

Ex. 1001 (260 Patent), 8:31-41

Paper 2 (-00442 Pet.), 8-16

Element [1A]: Breadth of “user”

[1A]	(a) for each of a multitude of users, with the computer system, electronically associating an online access IP address of the user and a set-top box IP address of that user based on a common IP address, wherein network traffic is routed via the common IP address to both an online user interface device and a set-top box of that user; and
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establishment. The delivery end-point may be one television set or multiple sets of a given user; likewise, online access may involve one or more computers or other online interface devices of a given user. In some instances, a business having multiple physical locations may be served by separate online or television services, but in other instances, a business may have an internal LAN or WAN that extends service provided to multiple physical locations. Also, some computers and televisions are portable, and can access the service provided from remote locations. Accordingly, the term “user” is intended to refer to that person or those persons who receive the provided services and does not require a fixed or single location in such instances.

Ex. 1001 (260 Patent), 8:41-53

Element [1A]

[1A]	(a) for each of a multitude of users, with the computer system, electronically associating an online access IP address of the user and a set-top box IP address of that user based on a common IP address, wherein network traffic is routed via the common IP address to both an online user interface device and a set-top box of that user; and
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[0121] The VCSP website of the present invention enables users at each WiFi hotspot to connect to other users connected to that hotspot. In this manner, the website enables the creation of “hotspot centric” communities. The VCSP website allows users to chat, buy and sell goods and/or services, and post messages.

[0122] Users logged into a particular hotspot can also access communities at other hotspots. In one embodiment, any “external” user accessing a particular hotspot is labeled as an outsider. That is, the location centric communities ensure that visiting hotspot users are distinguished from local hotspot users.

Ex. 1007 (Baig), [0121]-[0122]

Element [1B]

[1B]

(b) using user profile information derived from online activity from a first online user interface device via a first one of the online access IP addresses of the multitude of users, with the computer system automatically causing a first television advertisement to be directed to a set-top box for presentation via that set-top box, selectively, wherein the set-top box is indicated by the set-top box IP address associated with the first online access IP address.

Element [1B]: Breadth of “profile information”

Profiles or partial profiles provided by a profile provider to a CAS can contain any quantity of profile information, such as, in one example, just an online access IP address used by a person at the time his profile was collected and the identity of the profile provider. The IP address can be provided by the profile provider itself or might be obtained by the CAS when a user engages in any online activity or provides an item of demographic information and is redirected by a profile provider to the CAS. In another example, a profile can be more extensive and can include demographic or behavioral information, such as an extensive browsing history, shipping or purchase histories, content viewed, and other information concerning the user’s characteristics or the user’s activities.

Ex. 1001 (260 Patent), 5:46-58

Paper 2 (-00442 Pet.), 24-28

Element [1B]: Targeting hot-spot using “profile information”

wireless hotspots using vicinity-based networks The vicinity-based service permits advertisers to target particular geographical locations. Advantageously, the advertisers can target the audience of a particular hotspot according to the profile, e.g., age/gender etc. of the users and/or a particular time of the day. As users register online on the VCSP website, profile information about our users, such as age, gender, occupation, interests and the like are requested during the registration process and securely stored by the VCSP 202. Advertisers can selectively choose to advertise to users at a particular address, city, state or zip code. Similarly advertisers can target the traffic patterns at a particular geographic location according to the time of the day.

Ex. 1007 (Baig), [0093]

Element [1B]: Targeting all devices at a given hot-spot

[0101] For example, the wireless access provider (e.g., STARBUCKS) can advertise to the vicinity based community (e.g., special coupons for coffee), thus making sure that it can advertise to potential customers within walking distance or even sitting wireless access provider (i.e., hotspot host). Alternatively, advertisers that are not associated with the wireless access provider and/or the VCSP can send or post advertisements to the end-users in the vicinity-based community based on the end-user's profiles. The method **2200** then proceeds to step **2299** where the method ends.

[0102] In one embodiment, multiple advertisers can bid against each other to have their advertisements displayed at a particular location and time of day, or based on some other end-user profile.

Ex. 1007 (Baig), [0101]-[0102]

Paper 2 (-00442 Pet.), 24-28

Element [1B]: Targeting all devices at a given hot-spot

236. As I explained in detail above, a POSA would have been motivated to include a set-top box, such as that disclosed by Costa, in the devices at Baig's access point 106. Therefore, a POSA would have understood that one of the devices receiving the targeted advertisements would have been a set-top box, so that the targeted advertisements could be displayed on a television along with other television content. In some examples, a POSA would have been motivated to select the set-top box over other user devices connected to the access point, in order to broaden the reach of the advertised content to a higher number of persons at a particular location. For example, rather than selectively targeting advertisements to

Ex. 1002 (Lett Decl.), [236]

Obviousness of Displaying Baig's Website

Rebuttal to:

"Petitioner does not seriously defend the obviousness of displaying Baig's website on a TV at a public hotspot" -00422 Sur-reply, 4.

[0073] In the case where the SSO subscriber accesses a web page, content, or an IP-based service from any end user device including personal computer (PC), IPTV set top box (STB), cell phone, etc. an event record detailing what the SSO subscriber accessed from their end user device is created. The TASS 101 receives an event detail record 402 containing data from the profiling process.

Ex. 1016 (Howcroft), [0073];
Paper 2 (-00422 Pet.), 11-12

1002, ¶¶162-163; Ex. 1007, ¶¶[0043], [0049]; Ex. 1011, ¶¶[0007], [0037]. And, it was well-known to provide web-pages (including advertisements) on a STB. *See, e.g.,* Ex. 1016, ¶¶[0073], [0093], [0032]; Ex. 1002, ¶163. A POSA would be motivated to include Costa's STB because it beneficially allows customers at a public establishment to watch television or other information on an associated display. Ex. 1002, ¶160. Baig shares music, video games, and advertisements at

Paper 2 (-00422 Pet.), 11-12

Obviousness of Displaying Baig's Website

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to:**

"Petitioner does not seriously defend the obviousness of displaying Baig's website on a TV at a public hotspot" -00422 Sur-reply, 4.

C. The Petition sufficiently demonstrates the obviousness and motivation for a television to display web content

Paper 23 (-00422 Reply), 15-17

Ex. 2001, ¶ 45. A POSA would understand that televisions are commonly used to provide services other than "television service[s]" and there is no reason that this would not be the case in the proposed combinations. For example, a POSA would have understood that at the time of the invention, the television would be used to display websites (Ex. 1002, ¶¶ 156-165, 235-237; Ex. 1064), display information such as weather, stocks, etc. (Ex. 1065), display videos received from security cameras (Ex. 1066), purchase goods and/or services (Ex. 1067), retail advertising (Ex. 1068), and/or the like. And within the context of the teachings in the Baig-

Ex. 1063, ¶31

Paper 23 (-00422 Reply), 15-17

A “TV ad” is any form of advertisement “suitable for delivery to and...presentation by” a television set

Rebuttal to:

“[I]n Petitioner’s proposed combination of Baig with Costa, TV ads are displayed incidentally to any contract to display an ad on Baig’s website. The contract is not for a “TV ad,” it is for an ad on Baig’s website.” -00422 Sur-reply, 19.

Television advertisement (TV ad)—a full screen video ad, a partial screen video ad, a banner ad, a text ad, an audio ad, or any other form of advertisement suitable for delivery to and visual or audible presentation by a television set.

Ex. 1001, 6:37-40; Paper 2 (-00422 Pet.), 27, 50

item or is claiming a found item. Targeted advertising at wireless hotspots using vicinity-based networks The vicinity-based service permits advertisers to target particular geographical locations. Advantageously, the advertisers can target the audience of a particular hotspot according to the profile, e.g., age/gender etc. of the users and/or a particular time of the day. As users register online on the VCSP website, profile information about our users, such as age, gender, occupation, interests and the like are requested during the registration process and securely stored by the VCSP 202. Advertisers can selectively choose to advertise to users at a particular address, city, state or zip code. Similarly advertisers can target the traffic patterns at a particular geographic location according to the time of the day.

Ex. 1007 (Baig), [0093], Paper 2 (-00422 Pet.), 9-10

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Ex. 1001, 6:37-40; Paper 2 (-00422 Pet.), 27, 50

[0103], [0107]-[0108], Fig. 9. Accordingly, Costa’s technique would have improved Baig’s similar wireless hotspot system by providing access to television content at the hotspot via a set-top box in the same way Costa’s set-top box improves its own hotspot, i.e., being able to reach a larger audience that might not have their own devices (or might not be viewing their own device) when an advertisement is to be displayed.

Ex. 1002, ¶163; Paper 2 (-00422 Pet.), 11-12

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Ex. 1001, 6:37-40; Paper 2 (-00422 Pet.), 27, 50

[0105] In another embodiment, real-time advertising is provided at one or more physical locations (e.g., billboard at Times Square, NY) based on real-time bidding between advertising entities. In particular, advertising entities, e.g., businesses competing for the right to exclusively advertise in real-time at a particular location, send bids to the

Ex. 1007 (Baig), [0105];
Paper 2 (-00422 Pet.), 26-27