

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner

v.

SITNET, LLC,
Patent Owner

Case IPR2024-00528
U.S. Patent No. 8,249,932

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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PETITIONER’S UPDATED EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 8,249,932 to Cona et al. (“’932 patent”)
1002	Prosecution History of U.S. Patent No. 8,249,932 (“Prosecution History”)
1003	Declaration of Bernard J. Jansen, Ph.D.
1004	<i>Curriculum Vitae</i> of Bernard J. Jansen, Ph.D.
1005	U.S. Publication No. 2006/0282312 to Carlson et al. (“Carlson”)
1006	U.S. Publication No. 2008/0092162 to Lundy et al. (“Lundy”)
1007	U.S. Patent No. 8,346,864 to Amidon et al. (“Amidon”)
1008	U.S. Patent No. 9,195,996 to Walsh et al. (“Walsh”)
1009	Ioannidis, J.P.A. et al., “Updated science-wide author databases of standardized citation indicators,” <i>PLOS Biology</i> (Oct. 2020)
1010	U.S. Provisional No. 60/839,683 to Lundy et al. (“’683 provisional”)
1011	U.S. Patent No. 7,263,614 to Roskind (“Roskind”)
1012	Infringement Contentions, Exhibit 9, <i>SitNet, LLC v. Meta Platforms, Inc.</i> , Case No. 1:23-cv-06389 (S.D.N.Y.)
1013	Zhang, P. et al., “Intelligent Delivery of Interactive Advertisement Content,” Bell Labs Technical Journal, 13(3):143-158 (Sept. 2008)
1014	U.S. Publication No. 2006/0095320 to Jones (“Jones”)
1015	U.S. Patent No. 8,799,073 to Shahine et al. (“Shahine”)
1016	“Why we’re buying DoubleClick” Google Blog, accessed at https://googleblog.blogspot.com/2007/06/why-were-buying-doubleclick.html (June 26, 2007) (“Google Blog”)
1017	“What is a Web Browser” Tech Dictionary (Oct. 4, 2023) (“Tech Dictionary”)
1018	“About Gmail,” Gmail by Google, accessed at https://www.google.com/mail/help/intl/en-GB/fightspam/spamexplained.html (“About Gmail”)
1019	U.S. Publication No. 2006/0242234 to Counts et al. (“Counts”)

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1020	U.S. Patent No. 7,284,033 to Jhanji (“Jhanji”)
1021	“GPS Coordinates,” TechTarget (Aug. 2022)
1022	Handbook for the Palm V™ Organizer
1023	U.S. Patent No. 7,321,920 to Washburn (“Washburn”)
1024	Tsang, M.M. et al., “Consumer Attitudes Toward Mobile Advertising: An Empirical Study,” International Journal of Electronic Commerce, 8(3):65-78 (2004)
1025	Gidófalvi, G. et al., “Estimating the Capacity of the Location-Based Advertising Channel,” Sixth International Conference on the Management of Mobile Business (2007)
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1029	“What is an ad server?,” Adjust, accessed at https://www.adjust.com/glossary/ad-server-definition/
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1031	<i>Intentionally Left Blank</i>
1032	Complaint, <i>SitNet, LLC v. Meta Platforms, Inc.</i> , Case No. 1:23-cv-06389 (S.D.N.Y.)
1033	“From the original banner to Tosh.0: The hits and misses of publisher ad plays,” Digiday, accessed at https://digiday.com/sponsored/001-328-347-628-gumgumbcs-timeline-how-publishers-monetized-their-pages-since-1988/ (Dec. 9, 2015)

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1038	Stokel-Walker, C., “How 20 years of Google’s AdSense changed the Internet,” Fast Company, accessed at https://www.fastcompany.com/90861689/how-20-years-of-googles-adsense-changed-the-internet#:~:text=%E2%80%9CIt%20allowed%20creators%20to%20monetize,totals%20more%20than%20%24100%20billion. (Mar. 29, 2023)
1039	“Google Acquires Applied Semantics,” Google, accessed at http://googlepress.blogspot.com/2004/04/google-acquires-applied-semantics.html (April 23, 2003)
1040	“Google Timeline,” The New York Times, accessed at https://www.nytimes.com/2004/04/29/business/google-timeline.html (April 29, 2004)
1041	“The Evolution of Google AdWords – A \$38 Billion Advertising Platform,” WordStream, accessed at https://www.wordstream.com/blog/ws/2012/06/05/evolution-of-adwords (Dec. 18, 2023)
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1044	U.S. Patent No. 5,774,670 to Montulli (“Montulli”)
1045	Allen, C., “Stale Cookies,” ClickZ, accessed at https://www.clickz.com/stale-cookies/ (Dec. 28, 1999)
1046	Rothenberg, R., “An Advertising Power, but Just What Does Doubleclick Do?,” The New York Times, accessed at https://www.nytimes.com/1999/09/22/technology/an-advertising-power-but-just-what-does-doubleclick-do.html (Sept. 22, 1999)
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1051	Civil Case Management Plan and Scheduling Order, <i>SitNet, LLC v. Meta Platforms, Inc.</i> , Case No. 1:23-cv-06389 (S.D.N.Y.), Document 35 (10/20/2023)
1052	Plaintiff SitNet’s Disclosure of Asserted Claims and Infringement Contentions, <i>SitNet, LLC v. Meta Platforms, Inc.</i> , Case No. 1:23-cv-06389 (S.D.N.Y.)
1053	Supplemental Declaration of Bernard J. Jansen, Ph.D.

Exhibit No.	Description
1054	Joint Claim Construction Statement, <i>SitNet, LLC v. Meta Platforms, Inc.</i> , Case No. 1:23-cv-06389 (S.D.N.Y.) (Feb. 21, 2024)
1055	<i>Intentionally Left Blank</i>
1056	Second Supplemental Declaration of Bernard J. Jansen, Ph.D.
1057	Order on Motion to Dismiss, SDNY-1-23-cv-06389-51 (March 19, 2024)
1058	U.S. Patent No. 7,747,648 to Kraft et al. (“Kraft”)
1059	Transcript of the Deposition of Dr. Aviel Rubin (February 7, 2025)
1060	U.S. Patent No. 11,470,682 to Cona et al.

I. INTRODUCTION

Patent Owner does not dispute that the prior art presented in the Petition renders obvious every element of the challenged claims except one—“a situational network.” As to the “situational network” element, Patent Owner offers no new arguments. Rather, Patent Owner merely repeats the same arguments presented in its Preliminary Response that were rejected by the Board in its Institution Decision.

Notably, Patent Owner does not challenge that the proper construction of “situational network” is “a network created in response to an event or situation,” as the Board construed the term for purposes of institution. DI, 9; POR, 1. Both Carlson and Amidon teach a “situational network” under this construction. Patent Owner’s arguments, however, seek to implicitly and impermissibly narrow this construction in an attempt to avoid the Petition’s prior art. Patent Owner’s overly rigid readings of the claims and prior art should be rejected, and all challenged claims should be found unpatentable for reasons similar to those set forth in the Board’s Institution Decision.

II. THE PARTIES AGREE ON THE PROPER CONSTRUCTION OF “SITUATIONAL NETWORK”; THE BOARD SHOULD REJECT PATENT OWNER’S ATTEMPT TO FURTHER LIMIT THAT CONSTRUCTION.

The parties agree on the proper construction of “situational network.” As the district court held and the Board adopted for purposes of institution, a “situational network” in the context of the ’932 patent is “a network created in response to an

event or situation.” EX2007, 2; DI, 9. Patent Owner does not dispute this construction but asserts that, under this construction, “a ‘situational network’ cannot be a system in which all elements were interconnected *prior to* the event or situation.” POR, 1-3 (emphasis in original). Although Meta agrees that a “situational network” is created in response to an event or situation, to the extent Patent Owner alleges that connections in a pre-existing network cannot be used in forming a “situational network,” the Board should reject such an interpretation.

As the Board stated in its Institution Decision, “the claim language merely requires that the ‘situational network’ is ‘established in response to the situation,” and “nothing precludes the use of existing social network information in forming a ‘situational network.’” DI, 34. The description in the ’932 patent is consistent with this understanding. For example, the ’932 patent discloses that a “situational network” may be formed using connections in an existing “N-dimensional social network (NDSN)”:

An N-dimensional social network (NDSN), also called a multi-dimensional personal information network, captures and manages multi-dimensional relationships between persons and other entities that are users of the network. *An NDSN may be used as a framework for establishing a Situational Network.*

EX1001, 14:10-15 (emphasis added); *see also id.*, 19:35-36 (“[A]n embodiment of a situational network may be formed using the framework of an NDSN.”).

The '932 patent further describes that “[a] user node in the NDSN 100 may contain the user’s profile,” which may be used to form the “situational network.” EX1001, 16:66-17:7. For example, “users may automatically be invited to” the situational network “based on a stored user profile accessible to a situation authority server 3011 associated with the event node[, which] may crawl the network for user PIAs 404, 406 that would likely be interested in the information about the event.” *Id.*, 19:58-66. In other words, the '932 patent discloses embodiments in which a “situational network” is formed based on connections between users of the larger, already-established NDSN.

Patent Owner further contends that a “situational network” must “incorporate at least one new element into the system.” POR, 3. But, contrary to Patent Owner’s contention, the '932 patent describes that the elements of the formed “situational network” are existing entities (i.e., “user PIAs”) in the NDSN. *Id.*, 16:66-17:7, 19:58-66. Indeed, in district court, Patent Owner explained that “*a subset of nodes in an online social network*, when formed in response to the occurrence of an event or situation, *is a ‘situational network’* within the meaning of the asserted claims.” EX2001, 7 (emphasis added); *Amazon.com, Inc. v. Barnesandnoble.com, Inc.*, 239 F.3d 1343, 1351 (Fed. Cir. 2001) (“A patent may not, like a nose of wax, be twisted one way to avoid [invalidity] and another to find infringement.”) (cleaned up).

Patent Owner's proffered dictionary definitions do not alter this understanding. POR, 2. That a "network" may refer to "a system of interconnected elements," as Patent Owner contends, POR, 2, does not preclude a new network from being formed based on existing network connections. As Patent Owner's own expert explains, "in a social network, the connections between the various users are logical connections, such as friendships or group memberships." EX2009, ¶61. "With this in mind, the act of creating a network logically must include constructing the interconnection that defines the network," and "[t]hese connections can be created from pre-existing connections or be derived specifically for the new network." *Id.*, ¶62 (emphasis added).

Thus, the proper construction of "situational network" does not preclude use of existing connections between users in forming the "situational network."

III. GROUNDS 1-4: THE PRESENTED COMBINATIONS OF CARLSON, SHAHINE, LUNDY, AND ROSKIND RENDER OBVIOUS CLAIMS 1-11, 22, AND 23.

Patent Owner does not dispute that the combination of Carlson and Shahine teaches every element of independent claims 1 and 22 except one—"a situational network." Patent Owner largely repeats the arguments from its POPR, which are premised on flawed interpretations of both the term "situational network" and Carlson's disclosure. For the reasons set forth below and in the Petition, Carlson renders obvious the claimed "situational network."

A. Carlson renders obvious “a situational network” (claims 1 and 22).

Repeating verbatim the same argument presented in its POPR, Patent Owner alleges, “[w]hat Petitioner has identified as ‘connections’ between the users and services as participants of Carlson’s alert interface are subscriptions established prior to the occurrence or expected occurrence of an event or situation.” *Compare* POR, 4, *with* POPR, 13. Patent Owner, therefore, asserts that “Carl[s]on’s alleged situational network and the connections within it indeed exist *prior to* the event or situation.” POR, 4 (emphasis in original); *see also id.*, 6 (“Subscribing to a service and/or indicating a preference requires establishing a connection with the service *prior to* the occurrence or expected occurrence of an event or situation.”) (emphasis in original).

As Meta explained prior to institution, Patent Owner’s argument misses the point, relying on a flawed claim interpretation restricting existing network information from being used in forming a “situational network.” Prelim. Reply, 5. That Carlson stores user subscription information does not prevent a “situational network” from later being established. Rather, Carlson’s user subscription information is used to facilitate establishment of a “situational network” when an event occurs. *See* Pet., 15-17; EX1053, ¶9; DI, 19.

Specifically, as explained in the Petition, Carlson’s “[c]ontent provider 110 detects an event at step 405,” and, in response to this detection, “[c]ontent provider

110 *determines users to receive an alert* at step 410.” Pet., 16 (citing EX1005, ¶¶52, 53) (emphasis added); Prelim. Reply, 5-6. This operation is illustrated, for example, in Figure 4A.

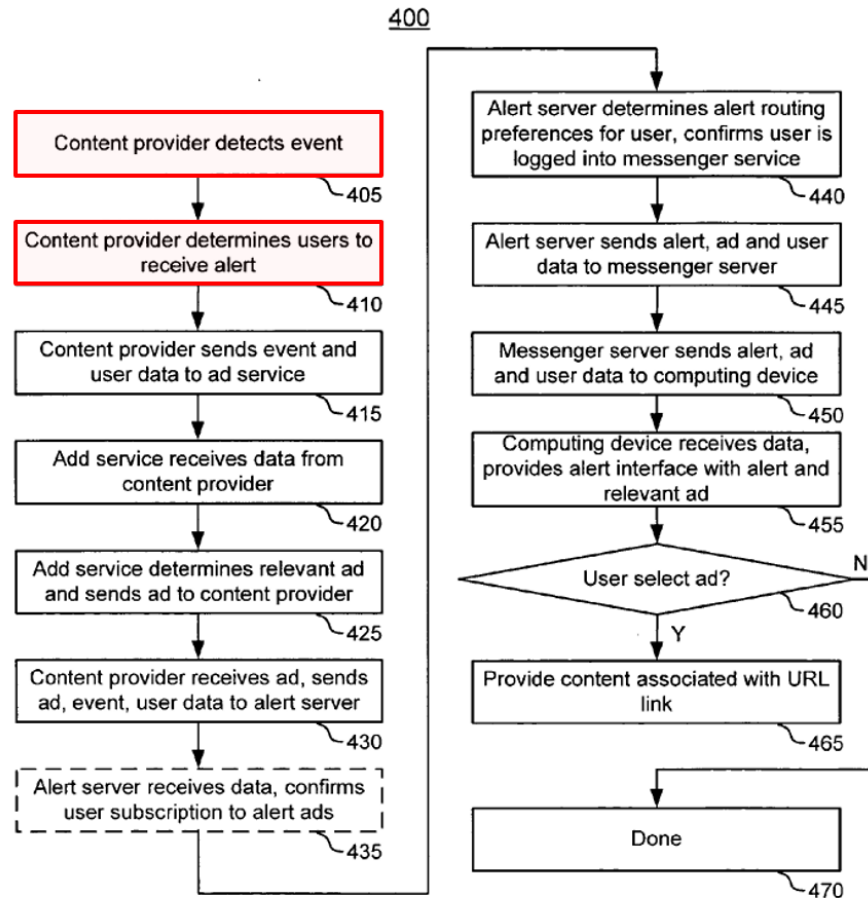


Figure 4A

EX1005, FIG. 4A (annotated).

Of note, following detection of an event in step 405, the users determined to receive an alert are not merely users subscribed to a service. Rather, Carlson discloses that users are determined based on whether they are affected by the

event. EX1005, ¶¶52-53. For example, “a user may have subscribed to a weather service,” and the user may be determined to receive an alert “when bad weather is forecasted to occur in [the] user’s area.” *Id.*, ¶52. As another example, “the user may have subscribed to a sporting news service,” and “when a local team in the user’s area has a game that will be televised, an event may be generated to inform the user of the televised game.” *Id.* That is, a user’s subscription to a particular service is used as a basis for facilitating formation of a “situational network” in response to an event—Carlson’s system determines those users affected by the event and connects them so that the users may receive an alert. *Id.*, ¶¶52-53; Pet., 15-17.

Thus, in response to an event or situation, Carlson’s user subscription information is used to determine a subset of users and connect those users to the alert service to receive an alert—in line with the agreed upon construction of “situational network.” EX1053, ¶¶9-10; DI, 19. Those connections do not exist prior to occurrence of the event because the subset of users is determined only *after* detection of an event. Such operation is precisely what Patent Owner argued satisfies the claim language in district court: “What is clear is that *a subset of nodes in an online social network*, when formed in response to the occurrence of an event or situation, *is a ‘situational network’* within the meaning of the asserted claims.” EX2001, 7 (emphasis added). In other words, by determining that a subset of users

are affected by the event, Carlson's system establishes new connections among those users, causing the users to receive information about the event.¹ EX1053, ¶10.

Accordingly, as the Board found in its Institution Decision, Carlson teaches a "situational network." DI, 17-19.

B. Carlson, alone or in combination with Shahine, Lundy, and/or Roskind renders obvious dependent claims 2-11 and 23.

Patent Owner does dispute that Carlson, Shahine, Lundy, and Roskind render obvious the additional limitations recited in dependent claims 2-11 and 23. *See generally* POR. The Board should find these claims unpatentable for the reasons set forth in the Petition.

¹ Carlson's determination of a subset of users affected by an event is further consistent with Patent Owner's expert's understanding of creating a connection within a network. For example, Dr. Rubin testifies that "in a social network, the connections between the various users are logical connections, such as friendships or group memberships." EX2009, ¶61; *see also* EX1059, 14:10-16. Carlson's system creates similar logical connections, linking the subset of users that are affected by the event.

IV. GROUNDS 5 AND 6: THE PRESENTED COMBINATIONS OF AMIDON, WALSH, SHAHINE, AND JONES RENDER OBVIOUS CLAIMS 1-11, 22, AND 23.

Patent Owner does not dispute that the combination of Amidon, Walsh, and Shahine teaches every element of independent claims 1 and 22 except “a situational network.” Again, Patent Owner largely repeats the arguments from its POPR, which are premised on flawed interpretations of both the term “situational network” and Amidon’s disclosure. For the reasons set forth below and in the Petition, Amidon renders obvious the claimed “situational network.”

A. Amidon renders obvious “a situational network” (claims 1 and 22).

Patent Owner again repeats the arguments presented in its POPR, alleging: “Amidon’s architecture does not create new connections. Instead, Amidon[’s] architecture incorporates chatrooms, referred to as ‘conferences,’ created using *existing* social networks to determine the participants in a chatroom (i.e., conference). POR, 8-9 (emphasis in original); POPR, 16 (arguing the same). Patent Owner thus asserts that Amidon does not teach a “situational network” because “Amidon merely uses the existing connections within a social network to determine members.” POR, 9. But, as the Board found in its Institution Decision, “nothing precludes the use of existing social network information in forming a

‘situational network.’” DI, 34.²

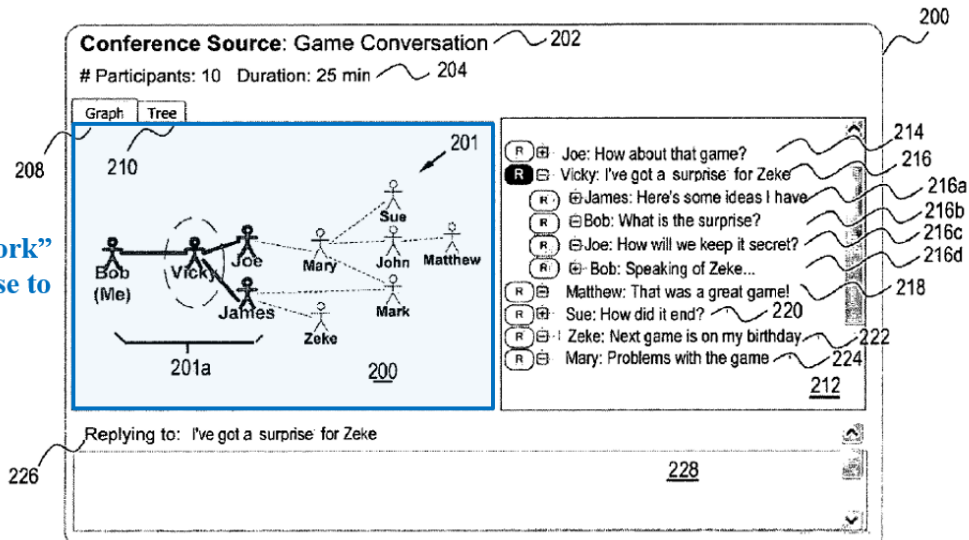
Amidon’s operation is similar to that disclosed in the ’932 patent specification. For example, as Patent Owner argued in its POPR, the ’932 patent discloses an embodiment in which “users may automatically be invited to connect to the event node corresponding to the event.” EX1001, 19:58-60; POPR, 7-8 (citing same). Importantly, “[t]he automatic invitation may be *based on a stored user profile* accessible to a situation authority server 3011 associated with the event node[, which] may crawl the network for *user PIAS 404, 406 that would likely be interested in the information about the event.*” EX1001, 19:60-64 (emphasis added). This embodiment of the ’932 patent, therefore, uses existing social network information (i.e., “stored user profile” information of users in the existing NDSN) to form a “situational network.” *Id.*, 19:35-36, 19:58-64; EX1053, ¶14.

Amidon discloses similar operation. The Petition explains that, in Amidon’s system, “a user can specify the nature and extent of a conference amongst members of a social network,” and “[o]nce a conference has been initiated, users

² Significantly, in related proceedings IPR2024-00529 and IPR2024-00612, Patent Owner does not challenge that Amidon teaches a “situational network.” *See generally* IPR2024-00529, POR; IPR2024-00612, POR.

participating in the conference can direct messages to desired users in the conference,” as illustrated in Amidon’s Figure 4. EX1007, 2:57-63, FIG. 4; Pet., 57. And each conference is formed in response to a situation (“a user can specify the nature . . . of a conference,” EX1007, 2:57-63).

**Example
“situational network”
formed in response to
a situation**



EX1007, FIG. 4 (annotated).

Thus, Amidon’s conferences connect a subset of the users of the larger social network in response to an event or situation such that users can communicate with one another. EX1053, ¶13; Pet., 56-57 (citing EX1003, ¶¶197-99), 62-64 (citing EX1003, ¶¶208-09).

Amidon further discloses “accessing social network data identifying relationships between members of the social network” when forming a conference. EX1007, 3:31-33. “Based on the social network data and the distribution parameter(s), . . . users may be identified for inclusion in a social network

conference.” *Id.*, 3:33-36. And, similar to the ’932 patent, the “social network data” may include information such as “characteristics for each user (*profile information*, etc.) [and] relationships between each user.” *Id.*, 9:23-30 (emphasis added). Once users are identified for inclusion in a conference, Amidon discloses an embodiment in which Amidon’s messaging server “may send an invitation to users . . . to join in [a] conference,” just as described by the ’932 patent. *Compare* EX1007, 21:5-8, *with* EX1001, 19:58-64. Therefore, as the Board found in its Institution Decision, Amidon’s formation of a “situational network” follows the embodiments described in the ’932 patent specification. DI, 34.

Patent Owner’s arguments are further undermined by its own statements in district court, which support that Amidon teaches a “situational network.” As noted previously, Patent Owner explained that “a subset of nodes in an online social network, when formed in response to the occurrence of an event or situation, is a ‘situational network’ within the meaning of the asserted claims.” EX2001, 7.

Patent Owner’s characterization of what satisfies a “situational network” is precisely what Amidon teaches—a subset of nodes in Amidon’s social network are formed within a conference in response to the occurrence of a situation. EX1053, ¶12. And Amidon expressly records this new connection as “data defining [the] social network conference[]”—“[c]onferences may be defined by a database record including a conference ID and *list of users* by user ID.” EX1007, 15:6-12

(emphasis added).

Accordingly, as the Board found in its Institution Decision, Amidon teaches a “situational network.” DI, 32-34.

B. Amidon, alone or in combination with Walsh, Shahine, and/or Jones renders obvious dependent claims 2-11 and 23.

Patent Owner does dispute that Amidon, Walsh, Shahine, and Jones render obvious the additional limitations recited in dependent claims 2-11 and 23. *See generally* POR. The Board should find these claims unpatentable for the reasons set forth in the Petition.

V. CONCLUSION

For the foregoing reasons and the reasons set forth in the Petition, the Board should find the challenged claims unpatentable.

Respectfully submitted,

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

1. This Petitioner's Reply complies with the type-volume limitation of 5,600 words, comprising 2,511 words, excluding the parts exempted by 37 C.F.R. § 42.24(c).

2. This Petitioner's Reply complies with the general format requirements of 37 C.F.R. § 42.6(a) and has been prepared using Microsoft® Word 2016 in 14-point Times New Roman font.

Respectfully submitted,

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

I certify that the above-captioned **PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE** and associated Exhibits 1056-1060 were served in their entirety upon the Patent Owner on February 26, 2025, upon the following parties via email:

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