

META PLATFORMS, INC.
PETITIONER
V.
SITNET, LLC
PATENT OWNER

IPR2024-00529
June 11, 2025
SitNet's Hearing Demonstratives

Roadmap

- The Petition fails to invalidate the claims of U.S. Patent No. 8,332,454 (“454 Patent”).
- The independent claims 1 and 20 each recite “an event node in a multi-dimensional personal information network”
 - Social Networks are a disclosed embodiment of “multi-dimensional personal information network”
- Ground 1 (Amidon):
 - Amidon does not show its alleged “event node” (the “social network conference”) as a node within the social network.

Roadmap

(cont.)

- Ground 2 (Gogic and Wong):
 - Neither Gogic nor Wong, individually or combined, discloses an “event node” (the “social network conference”) as a node within the social network.”
 - Petitioner's arguments for combination are conclusory and ignore technical realities.
 - A POSITA would not have been motivated to combine Gogic and Wong due to technical infeasibility.
- Petitioner’s arguments regarding dependent claims consequently fail.

MOTION TO WITHDRAW MOTION TO AMEND

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Proposed Substitute for Claim 10

21 (substitute for claim 10, if found unpatentable)

A method of creating a set of nodes forming a projection of a situational network, the method comprising:

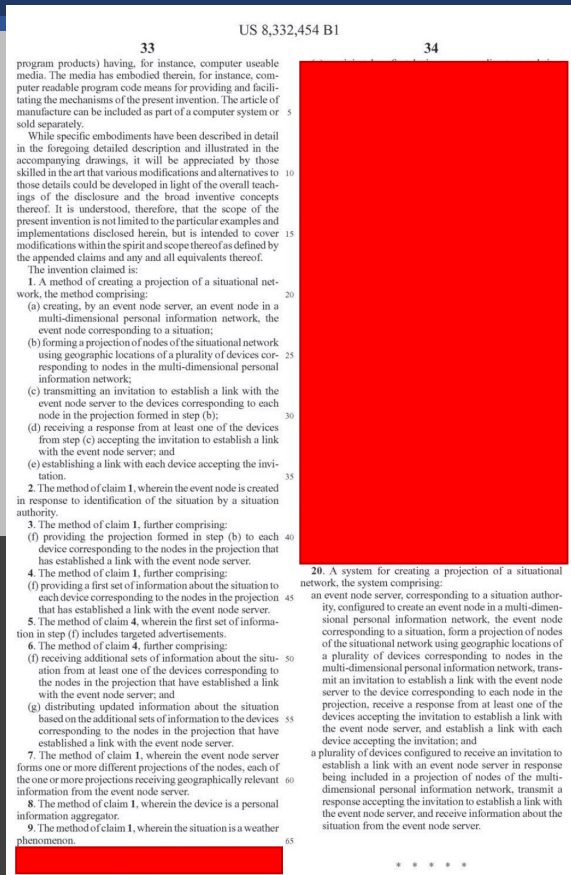
(a) receiving, by a first device corresponding to a node in a multi-dimensional personal information network, an invitation to establish a link with an event node in the multi-dimensional personal information network, said event node hosted by an event node server in response to the first device being included in a projection of nodes of the multi-dimensional personal information network;

(b) transmitting a response accepting the invitation to establish a link with the event node hosted by the event node server;

(c) establishing a link with the event node hosted by the event node server;
and

(d) receiving information about the situation from the event node hosted by the event node server.

Claims 10-19 Cancelled



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

EVENT NODE

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Event Node – Construction

- The *Markman* order in *SitNet v. Meta* noted “the claims clarify that ‘the event node corresponds to a situation.’” Ex. 2007 at 6.
- Claims 1 and 20 recite: "an event node in a multi-dimensional personal information network, the event node corresponding to a situation."

Event Node – Construction

- A social network is explicitly defined as **one embodiment** of a “multi-dimensional personal information network.”

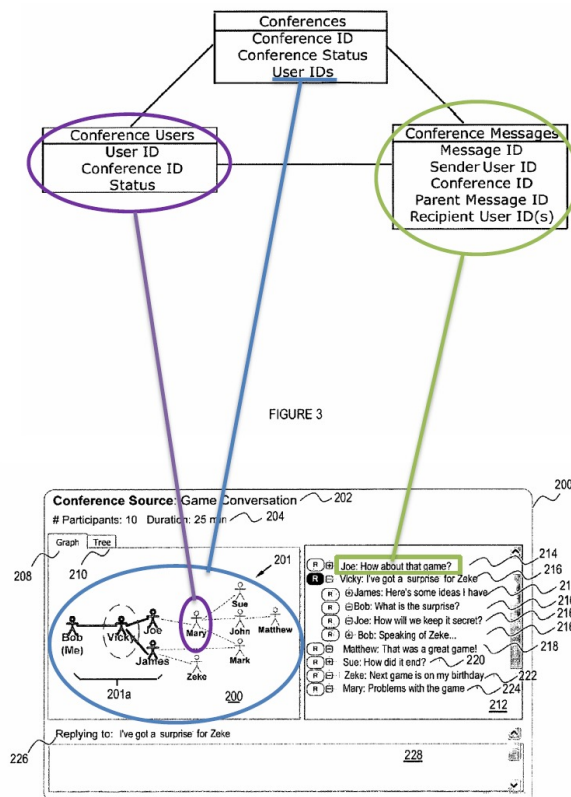
“An N-dimensional social network (NDSN), also called a multi-dimensional personal information network, captures and manages multi-dimensional relationships between persons and other entities that are users of the network.” 454 Patent, 14:28-31

Ground 1:
Amidon Fails to Disclose the Claimed “Event Node”
(*i.e.*, with the required functionality in an NDSN)

Event Node – Flaws with Amidon

KEY FLAWS

- Amidon's "social network conference" is a social network – i.e., an embodiment of multi-dimensional personal information network, "event node."
- Amidon doesn't show such a "conference" (even if considered a node) existing as a node within a larger social network as claimed. (Sur-Reply, p. 6)
- A "Conference" is a Grouping, Not a Functional Node:
 - Amidon's "conference" is a meeting/group of users communicating, or data representing this group. (POR, p. 7-8; Pet. Reply, p. 6)



**Ground 2:
The Gogic & Wong Combination
Does Not Yield the Claimed “Event Node”**

Event Node – Flaws with Gogic & Wong

- Petitioner **admits** neither Gogic nor Wong individually teaches an “event node.” (Pet. Reply, p. 18)
- Gogic = wireless ad-hoc groups.
 - Participants in Gogic's system (dispatcher, CDs, CM, MSC/BS) are not the '454 Patent's functional “event node.” (POR, p. 17-19)
- Wong = generic social network nodes. (POR, p. 15-16, 19)
- Petitioner wrongly accuses SitNet of only looking at references individually. (Pet. Reply, p. 18)
 - SitNet argues the result of any purported combination **still lacks** the claimed “event node.”

Event Node – Flaws with Gogic & Wong

- Petitioner: POSA would see a “new node (i.e., an event node)” would be useful in Wong from Gogic's teachings. (Pet. Reply, p. 19, citing EX1003, ¶177-178)
 - This is Conclusory: (POR, p. 20)
 - No specific explanation of how this “new node” would possess the NDSN integration and peer-to-peer information propagation capabilities of the '454 Patent's event node.
 - Combination Lacks a Nexus to the Claimed “Event Node”:
 - Even if a POSA combined the general ideas (ad-hoc group + social network), this doesn't automatically create the specific, functionally defined “event node” of the '454 Patent.
 - Where is the teaching for this “new node” to be integrated into an NDSN and to propagate situation information peer-to-peer?
 - Dr. Cooperstock's supporting citations (EX1006, EX1007, EX1010) (Pet. Reply, p. 19-20) do not fill this gap for the specific claimed features.

Event Node – Flaws with Gogic & Wong

- A POSA would not have been motivated to combine Gogic and Wong due to fundamental **technical disparities**. (POR, p. 21-25)
 - Gogic: Telecom-specific (CDMA, GSM, AMPS), signaling protocols.
 - Wong: General IP computer networks.
- Petitioner's "Bodily Incorporation" Argument Misses the Point: (Pet. Reply, p. 20)
 - SitNet's argument is not merely about physical incompatibility.
 - It's about the lack of a clear, reasonable path for a POSA to integrate such disparate operational principles and technologies to arrive at the functionally specific "event node in an NDSN" as claimed. The foundational technologies are too different for the combination to be obvious or readily achievable in the manner claimed. (Sur-Reply, p. 14)
- Dr. Cooperstock's **expertise limitations** regarding early mobile social networks are relevant. (POR, p. 20-21; Reply, p. 21-22)

Event Node – Flaws with Gogic & Wong

1 J. COOPERSTOCK

2 years later.

3 Q. In this era, would a person of
4 ordinary skill in the art use a cell phone
5 to navigate a social network?

6 A. I haven't offered any explicit
7 discussion or contemplated that in my --
8 your question in my declaration. And my
9 own personal experience with social
10 networks post dates the arrival of
11 Smartphones, so I'm not -- I'm not really
12 in a position to be able to opine on
13 whether users would interact with social
14 networks in the era described by Gojek or
15 when Gojek's provisional -- yeah, the
16 provisional application from 2005 was
17 filed.

Ex. 2010.

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Conclusion

- Petitioner has failed to demonstrate unpatentability.
- Petitioner's Flawed Approach:
 - Relies on an overly broad, out-of-context construction of “event node.”
 - Fails to show prior art teaches the specific functionality and NDSN context of the claimed “event node.”
 - Asserts conclusory combinations without bridging critical gaps to the claimed invention.
- The ‘454 Patent claims are patentable over the asserted art.
- The Board should confirm the patentability of all challenged claims.