UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SITNET LLC, Plaintiff, v. META PLATFORMS, INC. Defendant.	Civil Action No. 1:23-cv-06389-AS

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Local Patent Rule 11 and the Court's Case Management Addendum (Patent) (Dkt. No. 36), Plaintiff SitNet LLC ("SitNet") and Defendant Meta Platforms, Inc. ("Meta") submit this Joint Claim Construction Chart regarding the asserted claims of U.S. Patent Nos. 11,470,682 (the "'682 Patent"), 9,877,345 (the "'345 Patent"), 8,332,454 (the "'454 Patent"), and 8,249,932 (the "'932 Patent"). SitNet asserts infringement of the following claims:

- '682 Patent: claims 1-4, 11-14
- '345 Patent: claims 1, 3, 5, 6, 13-15
- '454 Patent: claims 1, 2, 4-6, 10, 12-13
- '932 Patent: claims 1-7, 22

In accordance with paragraph 6 of Court's Case Management Addendum (Patent) (Dkt No. 36), the parties identify for the Court the terms of the claims in issue and each party's proposed construction of the disputed claim language with citations only to the intrinsic evidence in support of their respective proposed constructions. Meta's proposed terms for construction are listed in Table 1. SitNet's proposed terms for construction are listed in Table 2. Additionally, true, correct and text-searchable copies of the asserted patents are filed herewith as Exhibits A through D.

Meta EX1054
IPR2024-00612
U.S. Patent No. 8,249,932

I. Meta's Proposed Terms for Construction

Term	Patent and claim(s)	Meta's Proposed Construction	Meta's Supporting Intrinsic Evidence[1]	SitNet's Proposed Construction	SitNet's Supporting Intrinsic Evidence[2]
central processing unit, coupled to the network controller, configured to verify that the information item is related to the situation; and in response to the verifying, make a message board related to the situation available to a second plurality of user devices [; . . . determine that a new user device has accessed the roll call list using the message board; and in response to determining that the device has accessed the roll call list via the message board, update a user profile associated with the new user device]	'682 cl. 1-4	means-plus-function; indefinite	'682 Patent at 6:63-7:2; *id*., claims 1, 11. File History of U.S. Pat. App. No. 16/730,339, December 9, 2021 Non-Final Rejection at 2-5; File History of U.S. Pat. App. No. 16/730,339, June 8, 2022 Request for Reconsideration After Non-Final Rejection at 1-8.	Not indefinite; plain and ordinary meaning	'682 Patent 6:1-35; 6:36-50; 6:51-7:14; 7:15-38; 15:61-16:39; 17:53-18:6; 21:28-22:29; 22:42-23:29; 24:6-37; 25:24-49; 27:11-28:2; 29:21-56; 29:57-30:35; Figs. 4-8, 15, 16, 25-29, 32-35, 39-42.

[1] For brevity, Meta has cited only the specification and figures of a single patent containing each claim term. Meta hereby discloses, and reserves the right to cite, the corresponding disclosures of any other patent containing each claim-term.

[2] For brevity, SitNet has cited only the specification and figures of a single patent containing each claim term. SitNet hereby discloses, and reserves the right to cite, the corresponding disclosures of any other patent containing each claim-term.

Term	Patent and claim(s)	Meta's Proposed Construction	Meta's Supporting Intrinsic Evidence[1]	SitNet's Proposed Construction	SitNet's Supporting Intrinsic Evidence[2]
verifying that the information item is related to the situation	'682 cl. 11-14	means-plus-function; indefinite	'682 Patent at 6:63-7:2; *id*., claims 1, 11. File History of U.S. Pat. App. No. 16/730,339, December 9, 2021 Non-Final Rejection at 2-5; File History of U.S. Pat. App. No. 16/730,339, June 8, 2022 Request for Reconsideration After Non-Final Rejection at 1-8.	Not indefinite; plain and ordinary meaning	'682 Patent 6:1-35; 6:36-50; 6:51-7:14; 7:15-38; 15:61-16:39; 17:53-18:6; 21:28-22:29; 22:42-23:29; 24:6-37; 25:24-49; Figs. 4-8, 15, 16, 25-29, 32-35, 39-42.
roll call information	'345 cl. 5	indefinite	'345 Patent, claims 1, 5.	Not indefinite; "the roll call list"	'345 Patent 27:3-28:16; Figs. 32-33.
creating, by an event node server, an event node in a multi-dimensional personal information network	'454 cl. 1, 2, 4-6	means-plus-function; indefinite	'454 Patent at 19:56-60, 22:51-23:42; *id*. at Figs. 28, 35.	Not indefinite; plain and ordinary meaning	'454 Patent 4:6-22; 5:46-6:12; 7:37-64; 19:52-25:16; 26:24-27:34; Figs. 34-38.
an event node server . . . configured to create an event node in a multi-dimensional personal information network	'454 cl. 20	means-plus-function; indefinite	'454 Patent at 19:56-60, 22:51-23:42; *id*. at Figs. 28, 35.	Not indefinite; plain and ordinary meaning	'454 Patent 4:6-22; 5:46-6:12; 7:37-64; 19:52-25:16; 26:24-27:34; Figs. 34-38.

TABLE 1: DISPUTED CONSTRUCTIONS

Term	Patent and claim(s)	Meta's Proposed Construction	Meta's Supporting Intrinsic Evidence[1]	SitNet's Proposed Construction	SitNet's Supporting Intrinsic Evidence[2]
caus[e/ing] an automatic redirection of a web browser application operating on each of the devices	'932 cl. 1-7, 22	[causing/cause] a redirection of a web browser application operating on each of the devices without user action	'932 Patent at 4:19-22, 8:59-66, 19:43-48, 24:32-37, 24:45-48, 24:51-60, 28:25-32, 29:12-18, 30:23-34; *id.* at Fig. 25. File History of U.S. Pat. App. No. 11/924,748, October 31, 2011 Non-Final Rejection at 2-5; File History of U.S. Pat. App. No. 11/924,748, January 30, 2012 Amendment and Request for Reconsideration after Non-Final Rejection at 3-8 (amendment of claims), 10-13 (argument/remarks); File History of U.S. Pat. App. No. 11/924,748, June 4, 2012 Notice of Allowability at 2-4.	Plain and ordinary meaning	'932 Patent 8:3-28; 24:24-67; 25:56-26:64; 27:19-28:13; 31:14-41; 32:41-58; Figs. 2, 24-28, 32-33.

Term	Patent and claim(s)	Meta's Proposed Construction	Meta's Supporting Intrinsic Evidence[1]	SitNet's Proposed Construction	SitNet's Supporting Intrinsic Evidence[2]
a web browser application	'932 all claims	an application that enables users to browse World Wide Web pages across the Internet	'932 Patent at 32:41-45. File History of U.S. Pat. App. No. 11/924,748, October 31, 2011 Non-Final Rejection at 2-5; File History of U.S. Pat. App. No. 11/924,748, January 30, 2012 Amendment and Request for Reconsideration after Non-Final Rejection at 3-8 (amendment of claims), 10-13 (argument/remarks); File History of U.S. Pat. App. No. 11/924,748, June 4, 2012 Notice of Allowability at 2-4.	Plain and ordinary meaning	'932 Patent 8:3-28; 24:24-67; 25:56-26:64; 27:19-28:13; 31:14-41; 32:41-58; Figs. 2, 24-28, 32-33.

Term	Patent and claim(s)	Meta's Proposed Construction	Meta's Supporting Intrinsic Evidence[1]	SitNet's Proposed Construction	SitNet's Supporting Intrinsic Evidence[2]
causing an automatic redirection of a web browser application operating on each of the devices to a webpage . . . and providing to each of the devices at least one of the plurality of advertisements for display on the webpage	'932 cl. 1-7	"caus[ing] an automatic redirection . . . to a webpage" must occur prior to "provid[ing] at least one of the plurality of advertisements [. . .] for display on the webpage"	'932 Patent at 24:49-53, 27:34-28:29. File History of U.S. Pat. App. No. 11/924,748, October 31, 2011 Non-Final Rejection at 2-5; File History of U.S. Pat. App. No. 11/924,748, January 30, 2012 Amendment and Request for Reconsideration after Non-Final Rejection at 3-8 (amendment of claims), 10-13 (argument/remarks); File History of U.S. Pat. App. No. 11/924,748, June 4, 2012 Notice of Allowability at 2-4.	Plain and ordinary meaning	'932 Patent 8:3-28; 24:24-67; 25:56-26:64; 27:19-28:13; 31:14-41; 32:41-58; Figs. 2, 24-28, 32-33.

Term	Patent and claim(s)	Meta's Proposed Construction	Meta's Supporting Intrinsic Evidence[1]	SitNet's Proposed Construction	SitNet's Supporting Intrinsic Evidence[2]
a central server . . . configured to . . . cause an automatic redirection of a web browser application operating on each of the devices to a webpage . . . and provide at least one of the plurality of advertisements to each of the devices for display on the webpage	'932 c. 22	"caus[ing] an automatic redirection . . . to a webpage" must occur prior to "provid[ing] at least one of the plurality of advertisements [. . .] for display on the webpage"	'932 Patent at 24:49-53, 27:34-28:29. File History of U.S. Pat. App. No. 11/924,748, October 31, 2011 Non-Final Rejection at 2-5; File History of U.S. Pat. App. No. 11/924,748, January 30, 2012 Amendment and Request for Reconsideration after Non-Final Rejection at 3-8 (amendment of claims), 10-13 (argument/remarks); File History of U.S. Pat. App. No. 11/924,748, June 4, 2012 Notice of Allowability at 2-4.	Plain and ordinary meaning	'932 Patent 8:3-28; 24:24-67; 25:56-26:64; 27:19-28:13; 31:14-41; 32:41-58; Figs. 2, 24-28, 32-33.
profile	'932 cl. 5	indefinite	'932 Patent, claims 1, 5	Not indefinite; "a profile for the at least one individual"	'932 Patent 14:41-49, 15:10-30; 16:66-17:17, 18:8-20:2; 27:3-46; 28:49-67; 29:10-27; Figs. 15-16.

TABLE 1: DISPUTED CONSTRUCTIONS

II. SitNet's Proposed Terms for Construction

Term	Patent and claim(s)	SitNet's Proposed Construction	SitNet's Supporting Intrinsic Evidence	Meta's Proposed Construction	Meta's Supporting Intrinsic Evidence
a situational network	'345 cl. 1, 13 '454 cl. 1 '932 cl. 1, 22	a network that is a subset of a larger network, comprising member nodes, formed in response to an event or situation	'932 Patent 3:20-4:64, 5:8-7:39, 19:35-20:34,23:41-24:67, 25:1-26:64, 29:43-31:41, Figs. 1-3, 12-13, 18-19, 22-33, 28, 39-45.	a network created when an occurrence or expected occurrence of an event or situation causes connections to be established between, within or among a set of participants	'454 Patent at 3:60-4:5, 4:63-6:12, 6:28-57, 6:63-7:52, 14:28-67, 19:52-20:4, 21:65-22:1, 29:59-30:16, 30:36-38, 31:30-57; *id*. at Figs. 1, 35, 41, 43-45; *id*., claims 1-4, 6-7, 10, 12-13, 20. '932 Patent, claims 1, 6-7, 12, 22. '345 Patent, claims 1, 13.

TABLE 1: DISPUTED CONSTRUCTIONS

Term	Patent and claim(s)	SitNet's Proposed Construction	SitNet's Supporting Intrinsic Evidence	Meta's Proposed Construction	Meta's Supporting Intrinsic Evidence
a situational authority	'345 cl. 13 '454 cl. 2 '932 cl. 6, 22	a server with one or more event nodes providing information concerning a situation	'932 Patent 3:20-4:64, 4:65-5:7, 5:8-7:39, 19:35-20:34,23:10-24:67, 25:1-26:64, 27:19-28:67, 29:43-31:41, Figs. 1-3, 12-13, 18-19, 22-33, 28, 39-45.	an entity comprising a trusted provider that aggregates and provides comprehensive information related to the situation	'454 Patent at 4:6-22, 6:31-46, 6:58-7:14; 7:37-64, 19:52-20:31, 23:26-56, 24:14-17, 25:4-16, 26:27-29, 26:45-56, 29;1-4, 29:59-66, 30:36-38; *id*. at Figs. 1, 32, 34-38, 43, 45; *id*., claims 1-4, 6-7, 10, 12, 13, 19, 20. '932 Patent, claims 1, 6, 12, 19, 22. '345 Patent, claims 1, 4, 13.

Term	Patent and claim(s)	SitNet's Proposed Construction	SitNet's Supporting Intrinsic Evidence	Meta's Proposed Construction	Meta's Supporting Intrinsic Evidence
a projection of a situational network	'454 cl. 1, 10, 20	a subset of a personal information network, comprising member nodes, formed in response to an event or situation	'454 Patent 3:34-5:11, 5:12-5:21, 5:22-7:52, 19:52-20:50,23:26-25:16, 25:17-27:13, 27:35-29:16, 29:59-31:61, Figs. 1-3, 12-13, 18-19, 22-33, 28, 39-45.	a subset of a situational network	'454 Patent at 14:28-67, 16:26-17:2, 20:32-50, 21:65-22:50, 28:19-29, 29:44-58:16; *id*. at Figs. 30, 38; *id*., claims 1, 3-4, 6-7, 10, 20. File History of U.S. Pat. App. No. 11/924,711, June 22, 2010 Non-Final Rejection at 2-3; File History of U.S. Pat. App. No. 11/924,711, November 18, 2010 Amendment/Request for Reconsideration after Non-Final-Rejection at 15-19.
event node	'454 cl. 1, 10, 20 '932 cl. 7	a node on a personal information network corresponding to an event or situation	'454 Patent 4:6-22; 5:46-6:12; 7:37-64; 19:52-25:16; 26:24-27:34; Figs. 34-38.	a node on a situational network corresponding to an event or situation	'454 Patent at 7:44-46, 7:51-52, 14:59-67, 15:10-16, 19:52- 22:2, 22:51-24:64, 25:4-6, 29:44-46, 30:39-41, 31:10-14; *id*. at Fig. 29; *id*., claims 1-4, 6-7, 10, 12, 13, 19, 20. '932 Patent, claims 1, 6-7, 12.

TABLE 1: DISPUTED CONSTRUCTIONS

Term	Patent and claim(s)	SitNet's Proposed Construction	SitNet's Supporting Intrinsic Evidence	Meta's Proposed Construction	Meta's Supporting Intrinsic Evidence
a multi-dimensional personal information network	'454 cl. 1, 10	a network that captures and manages relationships between users of the network	'454 Patent 3:34-5:11, 5:12-5:21, 5:22-7:52, 14:28-20:50,23:26-25:16, 25:17-27:13, 27:35-29:16, 29:59-31:61, Figs. 1-3, 12-21, 22-35, 39-45.	a network with a decentralized architecture outside the control of a single entity, which captures and manages multi-dimensional relationships between persons and other entities that are users of the network	'454 Patent at 6:28-46, 7:37-53, 14:28-16:10, 31:30-57. File History of U.S. Pat. App. No. 11/924,711, June 22, 2010 Non-Final Rejection at 2-3; File History of U.S. Pat. App. No. 11/924,711, November 18, 2010 Amendment/Request for Reconsideration after Non-Final-Rejection at 15-19.
form[ing] a projection of nodes of the situational network using geographic locations of a plurality of devices corresponding to nodes	'454 cl. 1, 20	creat[e/ing] a subset of the personal information network based on the geographic location of the user devices	'454 Patent 3:34-5:11, 5:12-5:21, 5:22-7:52, 17:17-36, 19:52-21:39, 21:65-22:50, 23:26-25:16, 25:17-27:13, 27:35-29:16, 29:44-31:61, Figs. 1-3, 12-13, 18-19, 22-33, 28, 30, 39-45.	no construction necessary; the terms "projection" and "situational network" take the constructions ordered by the Court	*See* evidence cited for "projection" and "situational network."

TABLE 1: DISPUTED CONSTRUCTIONS

Term	Patent and claim(s)	SitNet's Proposed Construction	SitNet's Supporting Intrinsic Evidence	Meta's Proposed Construction	Meta's Supporting Intrinsic Evidence
connect[s/ing] devices corresponding to a plurality of individuals to the situational network established in response to the situation	'932 cl. 1, 22	create[s/ing] a subset of a larger network in response to a situation based at least in part on an effect of the situation on the network users or their property	'932 Patent 3:20-4:64, 5:8-7:39, 19:35-20:34,23:41-24:67, 25:1-26:64, 29:43-31:41, Figs. 1-3, 12-13, 18-19, 22-33, 28, 39-45.	no construction necessary; the term "situational network" takes the construction ordered by the Court	*See* evidence cited for "situational network."

Dated: February 21, 2024

Respectfully submitted,

/s/ Naresh K. Kannan

BARCLAY DAMON LLP
Douglas J. Nash
John D. Cook
Denis J. Sullivan
Barclay Damon Tower
125 East Jefferson Street
Syracuse, New York 13202
(315) 425-2700
dnash@barclaydamon.com
jcook@barclaydamon.com
dsullivan@barclaydamon.com

Naresh K. Kannan
80 State Street
Albany, New York 12207
(518) 429-4200
nkannan@barclaydamon.com

Greg G. Gutzler
DICELLO LEVITT LLC
485 Lexington Avenue
New York, New York 10017
(646) 933-1000
ggutzler@dicellolevitt.com

David L. Hecht
Hecht Partners LLP
125 Park Avenue, 25th Floor
New York, New York 10017
dhecht@hechtpartners.com
(212) 851-6821

Counsel for Plaintiff SitNet LLC

/s/ Kathryn Bi

DAVIS POLK & WARDWELL LLP
Dana M. Seshens
Kathryn Bi
450 Lexington Avenue
New York, NY 10017
Tel: (212) 450-4000
dana.seshens@davispolk.com
kathryn.bi@davispolk.com

Ashok Ramani (*pro hac vice*)
1600 El Camino Real
Menlo Park, CA 94025
Tel: (650) 752-2000
ashok.ramani@davispolk.com

Counsel for Defendant Meta Platforms, Inc.