
Meta Platforms, Inc. v. SitNet, LLC

IPR2024-00529 (U.S. Patent No. 8,332,454)

IPR2024-00612 (U.S. Patent No. 8,249,932)

Petitioner's Demonstratives

June 11, 2025

Instituted Grounds

IPR2024-00529 ('454 Patent)

Claims Challenged	Basis	Applied References
1-7, 10-17, 19, 20	35 U.S.C. § 103(a)	Amidon (EX1005)
1-4, 6, 8-18, 20	35 U.S.C. § 103(a)	Wong (EX1006), Gogic (EX1007)

* Patent Owner has requested adverse judgment as to claims 10-19. Paper 22; Paper 26.

IPR2024-00612 ('932 Patent)

Claims Challenged	Basis	Applied References
12, 14-21	35 U.S.C. § 103(a)	Amidon (EX1007), Walsh (EX1008)
13	35 U.S.C. § 103(a)	Amidon, Walsh, Shahine (EX1015)
20	35 U.S.C. § 103(a)	Amidon, Walsh, Shahine, Jones (EX1014)

Agenda

- Disputed Issues for Amidon grounds ('454 & '932 patents)
 - Amidon's social network conference teaches an "event node"
 - Amidon renders obvious dependent claims 2 and 5 of the '454 patent
- Disputed Issues for Wong/Gogic ground ('454 patent only)
 - The Wong/Gogic combination teaches an "event node"
 - A POSA would have been motivated to combine Wong and Gogic

Amidon Grounds ('454 & '932 patents)

'454 Patent – Independent Claim 1

IPR2024-00529 ('454 Patent) – Claim 1

[1.P] A method of creating a projection of a situational network, the method comprising:

[1.1] (a) ***creating***, by an event node server, ***an event node in a multi-dimensional personal information network, the event node corresponding to a situation***

[1.2] (b) forming a projection of nodes of the situational network using geographic locations of a plurality of devices corresponding to nodes in the multi-dimensional personal information network;

[1.3] (c) transmitting an invitation to establish a link with the event node server to the devices corresponding to each node in the projection formed in step (b)

[1.4] (d) receiving a response from at least one of the devices from step (c) accepting the invitation to establish a link with the event node server

[1.5] (e) establishing a link with each device accepting the invitation

An “event node” is a node associated with an event

In one embodiment, the situational network may be established using the framework of an N-dimensional social network (NDSN), also referred to hereafter as a multi-dimensional personal information network, as described in detail below. In this embodiment, users are connected into the situational network through the NDSN using a PIA. In the context of the NDSN, a PIA associated with each user is or encompasses a node of the situational network. The situation or event itself may also be associated with a node on the SitNet, known as the event node for the SitNet. For example, an entity, such as a trusted provider of information (e.g., a news source such as CNN or weather.com), establishes an event node in an NDSN that propagates up-to-date information on the situation to PIAs of the NDSN connected to that event node. In one embodiment, the SitNet may have more than one event node.

-529 EX1001, 7:37-52; also -612 EX1001, 7:24-39.

SitNet's Expert

Q. And an event node would be an object with attributes that defines the event; is that fair?

A. Yes.

Q. Those objects are simply data structures, right?

A. That's what they are.

Rubin Depo. Tr., -529 EX1020 (-612 EX1056), 33:2-7, 41:17-20.

Disclosure of “Event Node”

In one embodiment, nodes may communicate in peer-to-peer fashion.

In one embodiment, the situational network may be established using the framework of an N-dimensional social network (NDSN), also referred to hereafter as a multi-dimensional personal information network, as described in detail below. In this embodiment, users are connected into the situational network through the NDSN using a PIA. In the context of the NDSN, a PIA associated with each user is or encompasses a node of the situational network. The situation or event itself may also be associated with a node on the SitNet, known as the event node for the SitNet. For example, an entity, such as a trusted provider of information (e.g., a news source such as CNN or weather.com), establishes an event node in an NDSN that propagates up-to-date information on the situation to PIAs of the NDSN connected to that event node. In one embodiment, the SitNet may have more than one event node.

-529 EX1001, 7:37-52; also -612 EX1001, 7:24-39.

In one embodiment, the NDSN comprises interconnected nodes, where individual users, members, entities, communities, or other aggregations of entities within the NDSN are associated with the nodes. Each node provides an associated entity with the ability to store and manage his profile and relationships with other users of the NDSN. Nodes may connect via different dimensions. Sets of nodes may exhibit high interconnectedness along some dimensions and little or no interconnection along other dimensions.

Each node is capable of communicating in a peer-to-peer fashion with other nodes in the NDSN, and thus is a user's point of connection to the NDSN, providing a user with access to information that can be obtained from other users of the NDSN with whom the user has a relationship. Conversely, a node provides a user with the ability to selectively share (by providing access to) his personal information with other users of the NDSN. A node may be, or may encompass, a user's PIA or CIA.

-529 EX1001, 14:59-15:9; also -612 EX1001, 14:41-58.

Disclosure of “Event Node”

But the disclosed methods are architecture agnostic.

In one embodiment, the situational network may be established using the framework of an N-dimensional social network (NDSN), also referred to hereafter as a multi-dimensional personal information network, as described in detail below. In this embodiment, users are connected into the situational network through the NDSN using a PIA. In the context of the NDSN, a PIA associated with each user is or encompasses a node of the situational network. The situation or event itself may also be associated with a node on the SitNet, known as the event node for the SitNet. For example, an entity, such as a trusted provider of information (e.g., a news source such as CNN or weather.com), establishes an event node in an NDSN that propagates up-to-date information on the situation to PIAs of the NDSN connected to that event node. In one embodiment, the SitNet may have more than one event node.

-529 EX1001, 7:37-52; also -612 EX1001, 7:24-39.

Furthermore, those skilled in the art will recognize that any of the available architectures (e.g., centralized, peer-to-peer, or combination thereof) may be used to form and sustain the various embodiments of the situational network described above, including the event relative (dynamic) SitNet or the proximity based SitNet. Certain architectures may be more applicable to certain embodiments. For example, the peer-to-peer architecture may naturally be used to form a proximity based SitNet described previously due to the inherent nature of the proximity SitNet. Nonetheless, those skilled in the art will recognize that a centralized or combination architecture may also be used for the proximity based SitNet depending on the particular situation and/or connections available.

-529 EX1001, 7:23-36; also -612 EX1001, 7:9-23.

SitNet’s Infringement Contentions Allege that a Website is an “event node”

SitNet’s Infringement Contentions

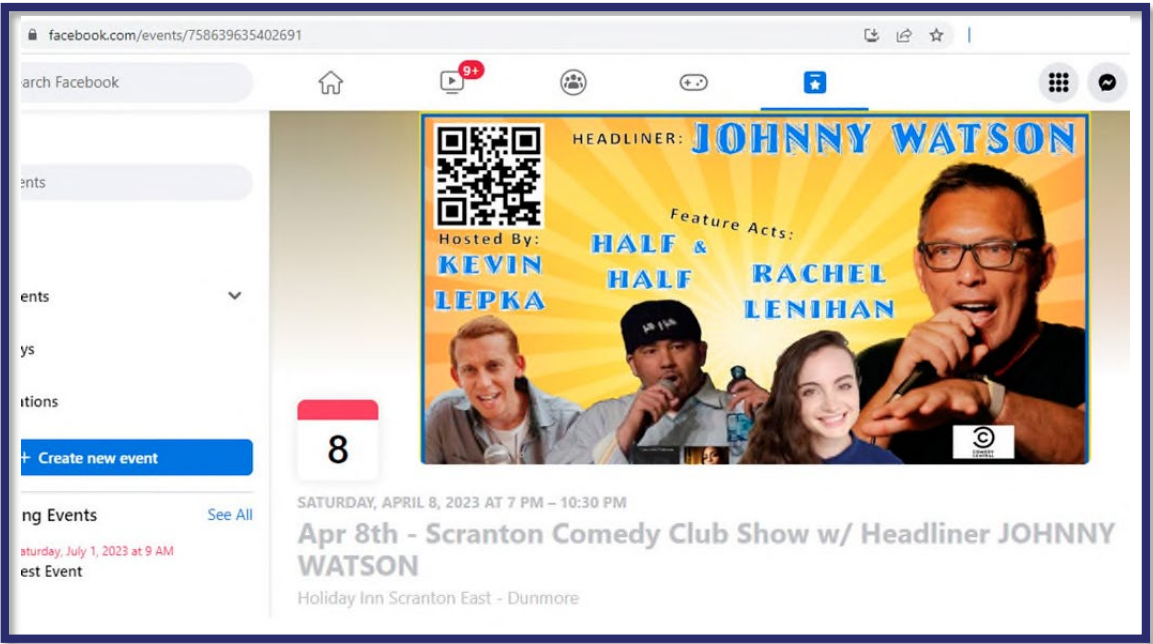
(a) creating, by an event node server, an event node in a multi-dimensional personal information network, the event node corresponding to a situation;	(a) creating, by an event node server (“graph.facebook.com,” FN5; “Official Events API,” FN6), an event node (“{id_of_then_new_event}”, FN5; https://www.facebook.com/events/758639635402691 , FN8) in a multi-dimensional personal information network (“Facebook,” FN1, FN2), the event node corresponding to a situation (“name”: “Get Started with Ticketing,” FN5; “April 8 th show,” FN7);
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-612 EX1055, 3.

Petitioner’s Reply

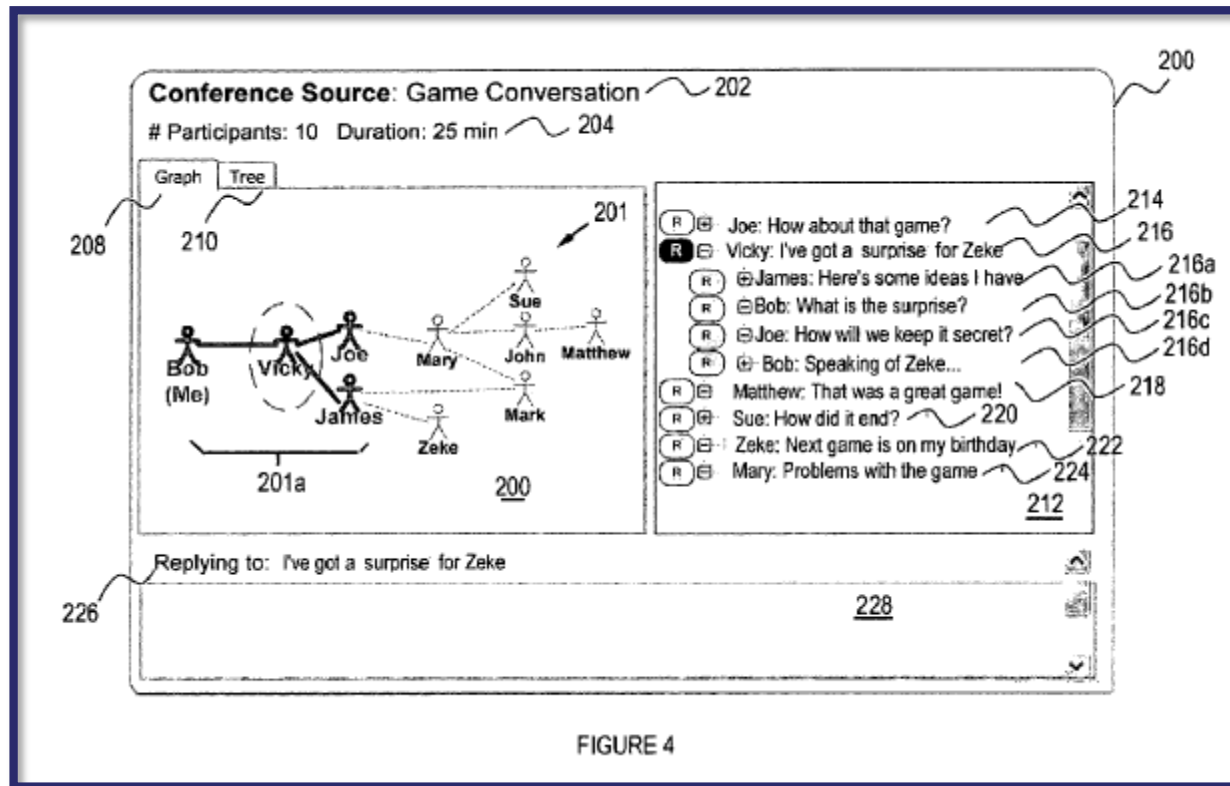
Amidon’s social network conference is no different—users connect to a conference via a “web-based application[]” to view information regarding an event. EX1007, 8:31-35; Pet., 34; EX1003, ¶117. For these reasons, the Board

-612 Pet. Reply, 10.



-612 EX1055, 6.

Amidon's social network conference teaches an “event node”



Amidon, -529 EX1005 (-612 EX1007), FIG. 4.

Amidon's social network conference (as defined by the stored data and accessible via window 200) teaches the claimed *event node*. EX1003, ¶77.

“[C]onferencing system 12,” Amidon teaches, “may store data defining social network conferences in any suitable fashion and location(s).” EX1005, 15:6-10, FIG. 3. This is consistent with the '454 patent's description of a node as “provid[ing] an associated entity with the ability to store and manage [its] profile and relationships with other users of the [social network].” EX1001, 14:62-64.

This also is consistent with the ordinary and customary meaning of node, wherein nodes may represent people, organizations, communities, locations, websites, or any other unit that is part of the network. EX1003, ¶78.

-529 Pet., 20.

Amidon's social network conference teaches an "event node"

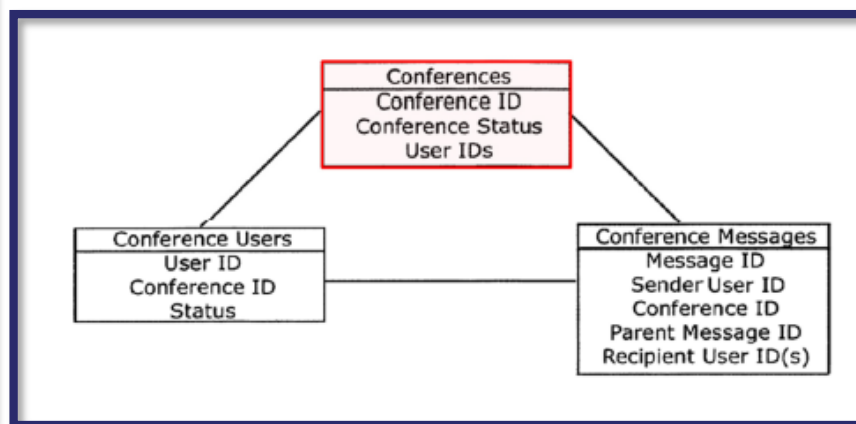
SitNet incorrectly argues a "conference cannot be a node" because a "group of individuals cannot be a node, let alone an event node."

The Petitions do not rely on the group of participating individuals, but the conference itself.

As was noted above, conferencing system 12 may store data defining social network conferences in any suitable fashion and location(s). For example, social network conferences may be defined using a plurality of data structures such as are illustrated in FIG. 3. Conferences may be defined by a database record including a conference ID and list of users by user ID. Conference activity may be cross-referenced between database records—for instance, a record may be included for each user indicating the status of each user with regard to one or more conferences by conference ID. For example, status indicators may include "active," "invited but inactive," and "invited but declined."

Each message may be tracked by a record including a unique message ID and cross-reference to a conference ID. Furthermore, the message record may include a list of recipients by user ID or other data indicating recipients, such as a cross-reference to other records. For instance, the message record may also include one or more cross-references to other message records. For example, a reply message can include a cross reference to one or more message IDs the message is in reply to.

Amidon, -529 EX1005 (-612 EX1007), 15:6-26.



Amidon, -529 EX1005 (-612 EX1007), FIG. 3
(as annotated in -612 EX1003, ¶79).

In one embodiment, the NDSN comprises interconnected nodes, where individual users, members, entities, communities, or other aggregations of entities within the NDSN are associated with the nodes. Each node provides an associated entity with the ability to store and manage his profile and relationships with other users of the NDSN. Nodes may connect via different dimensions. Sets of nodes may exhibit high interconnectedness along some dimensions and little or no interconnection along other dimensions.

-529 EX1001, 14:59-67; also -612 EX1001, 14:41-49.

The '454/'932 patents describe that a "node" manages a profile and relationships.

Amidon's social network conference teaches an "event node"

Amidon's conference connects users in communication about the event.

communicating with one another. Rather, as I explained in my prior declaration, EX1018, ¶17, Amidon's conference, like the '454 patent's event node, connects the users in communication about the event or situation. *See, e.g.*, EX1001, 30:39-61; EX1005, 16:65-18:50, FIG. 4.

Dr. Cooperstock, -529 EX1021, ¶15.

13. As I explain in my original declaration, 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 participating in the conference can direct messages to desired users in the conference." EX1007, 2:57-63; EX1003, ¶72. Each conference is formed in response to a situation ("a user can specify the nature . . . of a conference," EX1007, 2:57-63). Therefore, Amidon's conferences connect a subset of the users of the larger social network in response to an event or situation. EX1003, ¶¶71-73.

Dr. Jansen, -612 EX1053, ¶13.

Amidon's social network conference teaches an "event node"

Amidon's conference need not include the event as a participant, because the conference *is* the event node.

19. Patent Owner further contends that Amidon's "conferences do not include as a participant the situation or event underlying the conference," and therefore do not include an event node corresponding to a situation. POR, 11. Again, I disagree with this assertion. As I have explained in my prior declaration, Amidon's conference need not include a node corresponding to the situation because Amidon's conference *is* the event node. EX1018, ¶17.

Dr. Cooperstock, -529 EX1021, ¶19.

16. SitNet and Dr. Rubin apparently miss the point. As I explain in my original declaration, Amidon's social network conference *itself* is the claimed "event node": "Amidon teaches '*establishing an event node for the situation in a multi-dimensional personal information network*' in the form of a 'social network conference' to which users may connect." EX1003, ¶¶79-80. An additional node is unnecessary because the conference *is* the node—i.e., a node to which conference participants connect. Nothing in SitNet's proposed construction requires the "event node" to be a conference participant.

Dr. Jansen, -612 EX1053, ¶16.

Amidon's social network conference teaches an "event node"

SitNet incorrectly argues "Amidon also fails to disclose that its social network conferences include an 'event.'"

It is sufficient that the event is *associated with* the event node.

Patent Owner does not persuasively explain, or provide evidence that the event or situation must be a *participant* to the conference to qualify as an "event node." Rather, we note that the '454 patent states that "[t]he situation or event itself may also be *associated with a node*," which supports Petitioner's contentions that the nature of the conference (i.e., the situation or event) is associated with a node (i.e., the conference).

-529 DI, 15-16; *also* -612 DI, 25-26.

ational network through the NDSN using a PIA. In the context of the NDSN, a PIA associated with each user is or encompasses a node of the situational network. The situation or event itself may also be associated with a node on the SitNet, known as the event node for the SitNet. For example, an

-529 EX1001, 7:42-46; *also* -612 EX1001, 7:29-33.

'454 Patent – Amidon renders claim 2 obvious

IPR2024-00529 ('454 Patent) – Claim 2

[2] The method of claim 1, wherein the event node is created in response *to identification of the situation by a situation authority*.

The '454 patent describes “situation” and “situation authority” broadly.

information related to the situation. Situation authorities 207 include, but are not limited to news organizations, such as news agencies (e.g., CNN), weather agencies (e.g., The Weather Channel), traffic agencies (e.g., Traffic.com), emergency relief organizations (e.g., The American Red Cross), and government agencies (e.g., local fire departments, state Departments of Transportation, Federal Emergency Management Agency (FEMA)). There is a corresponding situation authority server 2011, also referred to as an event node server

-529 EX1001, 4:10-17.

information is passed between the participants.

Examples of events or situations 3005 that might initiate the formation of a situational network include weather phenomenon, such as hurricanes, tornadoes, severe thunderstorms, or winter storms; emergency situations, such as building fires, aircraft crashes, or toxic substance releases; natural disasters, such as earthquakes, tsunamis, or floods; weather related activities, such as skiing or surfing; navigation and/or travel incidents, such as road closures or construction, vehicle accidents, traffic congestion, roadway debris, or air turbulence; and public health crises, such as disease outbreak. Many of these event types are interrelated. For example, there

-529 EX1001, 4:48-57.

'454 Patent – Amidon renders claim 2 obvious

Amidon's user (i.e., situation authority) encompasses organizations, such as those described in the '454 patent.

This disclosure refers generally to “users” and “members” participating in and receiving information regarding social network conferences. The term “user” is meant to broadly include not only an individual, but also other entities, such as groups of individuals and organizations when treatable as a single unit.

Amidon, -529 EX1005, 5:3-8.

Amidon's user *identifies the situation*.

26. Patent Owner argues that Amidon's user does not provide information about the situation. POR, 14. In Amidon, the user (i.e., the situation authority) identifies the set of parameters (i.e., a situation) in response to which the conference (i.e., the event node) is created. A POSA would have understood that each parameter—identified and provided by the user—is information concerning a situation because the particular set of parameters is the situation. See EX1003, ¶105. For example, in the case of a conference to be automatically created upon detecting users sharing content on a particular topic, the user identifies that topic—e.g., the user specifies that the “particular topic” is identified as “Vacation,” EX1005, 21:18-26. The fact that the conference topic is “Vacation” is itself information concerning the situation. And it is Amidon's user that identifies and

Dr. Cooperstock, -529 EX1021, ¶26.

'454 Patent – Amidon renders claim 5 obvious

IPR2024-00529 ('454 Patent) – Claims 4 and 5

[4] The method of claim 1, further comprising:

(f) providing a ***first set of information about the situation*** to each device corresponding to the nodes in the projection that has established a link with the event node server.

[5] The method of claim 4, wherein ***the first set of information in step (f) includes targeted advertisements***.

Contrary to SitNet's argument, claim 5 does not require the targeted advertisement to include information "about the situation."

'454 Patent – Amidon renders claim 5 obvious

A POSA would have applied Amidon's Background teachings to the disclosed embodiments.

Communication tools that utilize data available from social network systems have also been proposed. For example, in some such systems, a user may direct announcements or sales pitches toward members of a social network based on member parameters, such as degree of separation or member characteristics, such as demographic groupings or group membership. Other proposed systems may use social network data to block messages based on similar parameters, for example, in order to recognize and/or to filter out spam messages.

Amidon, -529 EX1005, 2:29-37.

29. Patent Owner argues that Amidon's disclosure regarding targeted advertisements is merely in the Background section, and "is not made in connection with the [] disclosed invention in Amidon." POR, 15. It would have been readily apparent to a POSA that this teaching would apply to the social network-based communication tools of Amidon's disclosed embodiments, because it applies to communication tools utilizing data from social network systems more generally. *See* EX1005, 2:29-37.

Dr. Cooperstock, -529 EX1021, ¶29.

Wong/Gogic Ground ('454 patent only)

The Wong/Gogic combination teaches an “event node”

Wong teaches facilitating communication between users via nodes.

[0019] Each active node can contain information pertaining to the living individual person that it represents, communication tools, data and files, storage space, network information and tools to edit the network of living and non-living entities. Nodes can contain genetic information. Each active node allows the individual person that it represents to log into the system and access its own node and its associated “control panel”. The user can upon registration and thereafter, carry out a number of tasks or activities while at the “control panel” of his/her node, including 1) edit his/her own node; 2) build a network of living and non-living entities (hereinafter “the network”); 3) edit the network; 4) communicate with other entities within or outside the network using the features of the social network; and 5) make use of projects and features facilitated by the network of living and non-living entities. As described further below, the control panel allows an individual person to i) expand and edit the network of living and non-living entities by: adding nodes and linkages; editing nodes and linkages; inviting other individual persons to join; and ii) communicate with nodes in the same network of living and non-living entities, other nodes in the computerized network, as well as other living individual persons outside the network of living and non-living entities; send invitations; accept invitations; grant permissions; share information; compare information; and make use of the projects and features facilitated by the network of living and non-living entities.

The Wong/Gogic combination teaches an “event node”

Wong teaches adding new nodes.

Wong teaches four exemplary node types, but also teaches there may be additional main node types.

[0021] Once registered with the system, a user may start construction of his/her network of living and non-living entities 24 (FIG. 2). The network of living and non-living entities is represented by a number of elements, each representing a living or non-living entity, which are referred to as “nodes” 30, joined by connections 32, referred to as “linkages”, to other nodes 30. “Linkage” refers to the direct link between two adjacent nodes or the chain of links and nodes between non-adjacent nodes. The user, 31, can construct a network or join an existing network by adding, creating and linking new nodes 30 or by linking existing nodes, wherein nodes 30 represent people 33 (living and deceased), places 35, objects 37 and animals 39. Each time a node is added, that node is assigned a unique identifier, the nodes and their linkages thereby forming a network of living and non-living entities.

[0022] FIG. 3 illustrates the hierarchy of node types and sub-types. While four main node types are preferred, the number of main node types may be greater or less. For each main node type there are multiple sub-types or designations, and each sub-type can have sub-types etc. For example the

Wong, -529 EX1006, ¶¶21-22.

The Wong/Gogic combination teaches an “event node”

Wong teaches communicating “alerts” via the social network.

Communication Between Nodes

[0044] The interaction of an individual person or organization of persons who is represented by an active node within a network of living and non-living entities with another individual person or organization of persons who is represented by an active node within the same or another network of living and non-living entities is facilitated by the social networking features of the network of living and non-living entities. The social networking features of the network of living and non-living entities facilitate many forms of communication, such as notification of updates, alerts, sharing of files and photos, blogs, instant messaging and comments. Also, the sender can select those in the network of living and non-living entities who can receive or view a particular communication or file. An electronic

Wong, -529 EX1006, ¶44.

The Wong/Gogic combination teaches an “event node”

Gogic teaches creating an ad-hoc location-based communication group in response to identifying an event or condition.

The present invention is a system and method for providing group communication services to an ad-hoc group formed according to vicinity with other users of communication device(s) (CD), or according to proximity of a given locality, in an existing communication system. During emergency situations, the formation of a communication group based on proximity of other users, or based on user's location being confined to a given area, may allow emergency services to be more efficiently or more appropriately deployed. Generally, a collection of neighboring CDs is not subscribed into a specific communication group. The various embodiments of the present invention provide a method and system for the identification, grouping, and regulation of use of limited communication resources available to neighboring CDs.

Gogic, -529 EX1007, 4:16-29.

FIG. 4 illustrates the formation of an ad-hoc group in response to an emergency notification, wherein the group is formed on the basis of proximity to a designated location. A dispatcher 400 identifies the occurrence or presence of an event or condition wherein communications between proximately located users could be beneficial. Dispatcher 400 requests 402 the setting of an emergency flag in a commonly monitored channel (“common channel”) such as a paging or broadcast channel that is regularly monitored by CDs located in the area of interest.

Gogic, -529 EX1007, 10:16-25.

The Wong/Gogic combination teaches an “event node”

In the combination, an ad-hoc location-based communication group is formed in Wong's system. **A new node (i.e., an event node) is formed to facilitate this communication.**

EX1007, 10:18-21. In response to identifying the event or condition, Gogic creates an ad-hoc communication group as initiated, for example, by dispatcher 400 via administrator interface 226. EX1007, 7:25-34, 10:16-11:13, FIG. 4. Based on these teachings of Gogic—and because, in Wong, communication happens between nodes, EX1006, ¶44—a POSA would have recognized that a new node (i.e., an *event node*) related to the identified event or condition (i.e., a *situation*) would be useful in Wong's social network to facilitate communication related to the event or condition. The nodes/users linked to this new event node in Wong's system would, thus, form an ad-hoc communication group, which is desirable as taught by Gogic.

Dr. Cooperstock, -529 EX1003, ¶177.

The Wong/Gogic combination teaches an “event node”

SitNet does not address Petitioner’s proposed combination, and improperly focuses on the references individually.

1. Neither Gogic nor Wong Disclose an Event Node

As detailed *supra*, independent claims 1 and 20 each recite a “event node” within a multi-dimensional personal information network (*i.e.*, an N-dimensional social network) that corresponds to a situation. As also detailed *supra*, independent claim 10 recites an “event nodes server” within a multi-dimensional personal information network (*i.e.*, an N-dimensional social network) corresponding to an event node. The Petition fails to demonstrate that either Wong (U.S. Publication No. 2008/0103784) or Gogic (U.S. Patent No. 8,103,300) disclose or suggest an “event node server.” The combination of Wong and Gogic, therefore, cannot render the challenged claims invalid and unpatentable.

-529 POR, 16.

We do not agree with Patent Owner. The test for obviousness is not whether the claimed invention is expressly suggested in any one or all of the references, but whether the claimed subject matter would have been obvious to those of ordinary skill in the art *in light of the combined teachings of those references*. See *In re Keller*, 642 F.2d 413, 425 (CCPA 1981); *In re Burckel*, 592 F.2d 1175, 1179 (CCPA 1979) (“[A] reference must be considered not only for what it expressly teaches, but also for what it fairly suggests.”).

-529 Institution Decision, 22-23.

A POSA would have been motivated to combine Wong and Gogic

A POSA would have been motivated to modify Wong's social network communication system to incorporate Gogic's teachings of forming an ad-hoc location-based communication group.

163. In my opinion, a POSA would have been motivated to modify Wong's social network communication system to incorporate Gogic's teachings of an ad-hoc location-based communication group.

Dr. Cooperstock, -529 EX1003, ¶163.

EX1007, 10:18-21. In response to identifying the event or condition, Gogic creates an ad-hoc communication group as initiated, for example, by dispatcher 400 via administrator interface 226. EX1007, 7:25-34, 10:16-11:13, FIG. 4. Based on these teachings of Gogic—and because, in Wong, communication happens between nodes, EX1006, ¶44—a POSA would have recognized that a new node (i.e., an event node) related to the identified event or condition (i.e., a situation) would be useful in Wong's social network to facilitate communication related to the event or condition. The nodes/users linked to this new event node in Wong's system would, thus, form an ad-hoc communication group, which is desirable as taught by Gogic.

Dr. Cooperstock, -529 EX1003, ¶177.

A POSA would have been motivated to combine Wong and Gogic

SitNet's arguments that Meta presents a "technically infeasible" combination are premised on an improper bodily incorporation theory that **ignores the actual proposed combination**.

SitNet contends that a combination of Gogic with Wong "would have been technically infeasible." POR, 21. But SitNet's arguments focus entirely on the specific hardware implementation described in Gogic's exemplary embodiments. POR, 21-25. The asserted combination, however, does not rely on Gogic's specific hardware. Instead, Petitioner relies more generally on Gogic's teachings that forming an ad-hoc communication network in response to an event or condition is advantageous. *See* Pet., 47-49.

-529 Reply, 20.

Thank you

Independent Claims

'454 Patent – Independent Claim 1

IPR2024-00529 ('454 Patent) – Claim 1

[1.P] A method of creating a projection of a situational network, the method comprising:

[1.1] (a) **creating**, by an event node server, ***an event node in a multi-dimensional personal information network, the event node corresponding to a situation***

[1.2] (b) forming a projection of nodes of the situational network using geographic locations of a plurality of devices corresponding to nodes in the multi-dimensional personal information network;

[1.3] (c) transmitting an invitation to establish a link with the event node server to the devices corresponding to each node in the projection formed in step (b)

[1.4] (d) receiving a response from at least one of the devices from step (c) accepting the invitation to establish a link with the event node server

[1.5] (e) establishing a link with each device accepting the invitation

'454 Patent – Independent Claim 20

IPR2024-00529 ('454 Patent) – Claim 20

[20.P] A system for creating a projection of a situational network, the system comprising:

[20.1] an event node server, corresponding to a situation authority, configured to
create an event node in a multi-dimensional personal information network, the event node corresponding to a situation,

form a projection of nodes of the situational network using geographic locations of a plurality of devices corresponding to nodes in the multi-dimensional personal information network,
transmit an invitation to establish a link with the event node server to the device corresponding to each node in the projection,
receive a response from at least one of the devices accepting the invitation to establish a link with the event node server, and
establish a link with each device accepting the invitation; and

[20.2] a plurality of devices configured to receive an invitation to establish a link with an event node server in response being included in a projection of nodes of the multidimensional personal information network, transmit a response accepting the invitation to establish a link with the event node server, and receive information about the situation from the event node server.

'932 Patent – Independent Claim 12

IPR2024-00612 ('932 Patent) – Claim 12

[12.P] A method of presenting targeted advertising in a situational network, the method comprising:

[12.A] obtaining an indication of an occurrence of a situation;

[12.B] ***establishing an event node for the situation in a multi-dimensional personal information network;***

[12.C] automatically connecting personal information aggregators corresponding to a plurality of individuals to the event node, the personal information aggregators each corresponding to a different node in the multi-dimensional personal information network and assigned an access level according to a role of the respective individual within the situational network;

[12.D] creating two or more projections of the nodes of the multi-dimensional personal information network based at least in part on the access levels of the individuals corresponding information [] aggregators;

[12.E] aggregating information related to the situation received from the personal information aggregators connected through the situational network;

[12.F] providing the information and at least one of a plurality of advertisements to each of the information aggregators based on which of the two or more projections includes the respective personal information aggregator.

Claim Construction – “Event Node”

Construction of “Event Node”

District Court’s Construction

“Needs no construction”

Construction of “Event Node”

Claims do not require communication about the situation *by the event node*.

The patents include embodiments with users sharing information directly with others.

situation with the situation authority 207. A user 250 may also share information related to the situation with another user in the NDSN using a connection established between the user's PIA 404 and another PIA 406. PIA 406 may or may not be connected to the event node server 3011. In one embodiment,

-529 EX1001, 20:1-5; also -612 EX1001, 19:51-55.

Notifications may be distributed in the SitNet 300 using a peer to peer connections, or through connections to a centralize service, such as one that includes the situation authority.

-529 EX1001, 30:36-38; also -612 EX1001, 30:20-22.

that includes the situation authority.”). Based on the embodiments described in the '454 patent, a POSA would have understood that the claimed event node may, but is not required to, provide peer-to-peer communication with users.

Dr. Cooperstock, -529 EX1021, ¶10.

Construction of “Event Node”

Specification provides *examples*, not a definition.

In one embodiment, the situational network may be established using the framework of an N-dimensional social network (NDSN), also referred to hereafter as a multi-dimensional personal information network, as described in detail below. In this embodiment, users are connected into the situational network through the NDSN using a PIA. In the context of the NDSN, a PIA associated with each user is or encompasses a node of the situational network. The situation or event itself may also be associated with a node on the SitNet, known as the event node for the SitNet. For example, an entity, such as a trusted provider of information (e.g., a news source such as CNN or weather.com), establishes an event node in an NDSN that propagates up-to-date information on the situation to PIAs of the NDSN connected to that event node. In one embodiment, the SitNet may have more than one event node.

-529 EX1001, 7:37-52; also -612 EX1001, 7:24-39.

In one embodiment, the NDSN comprises interconnected nodes, where individual users, members, entities, communities, or other aggregations of entities within the NDSN are associated with the nodes. Each node provides an associated entity with the ability to store and manage his profile and relationships with other users of the NDSN. Nodes may connect via different dimensions. Sets of nodes may exhibit high interconnectedness along some dimensions and little or no interconnection along other dimensions.

Each node is capable of communicating in a peer-to-peer fashion with other nodes in the NDSN, and thus is a user's point of connection to the NDSN, providing a user with access to information that can be obtained from other users of the NDSN with whom the user has a relationship. Conversely, a node provides a user with the ability to selectively share (by providing access to) his personal information with other users of the NDSN. A node may be, or may encompass, a user's PIA or CIA.

-529 EX1001, 14:59-15:9; also -612 EX1001, 14:41-58.

Construction of “Event Node”

Claims do not require *communication* about the situation by the event node.

Dr. Rubin’s definition of a “node” does not require communication.

34. **Node** - A node within a social network is an object that has attributes defining the node. A node can be various types of objects. For example, Meta defines in their Graph API documentation that “a node is an individual object with a unique ID. For example, there are many User node objects, each with a unique ID representing a person on Facebook. Pages, Groups, Posts, Photos, and Comments are just some of the nodes of the Facebook Social Graph.”¹ Thus, in addition to the connections (i.e., edges) of the graph, a node has attributes that contain unique properties about the node.

Dr. Rubin, -529 EX2009, ¶34; also -612 EX2009, ¶34.

12. I also understand that Patent Owner’s expert, Dr. Rubin opines that a “node” in the context of the ’454 patent is “an object that has attributes defining the node.” EX2009, ¶34. I generally agree with this opinion, which is consistent with the plain and ordinary meaning of a node.

Dr. Cooperstock, -529 EX1021, ¶12.

Construction of “Event Node”

Meta’s experts agree. No construction is needed.

47. I have been informed that the challenged claims of the ’454 patent are to be given their ordinary and customary meaning as understood by one of ordinary skill in the art at the time of the invention in light of the specification and the prosecution history pertaining to the patent. Based on my review of the challenged claims, it is my opinion that none of the claim terms require explicit constructions. Accordingly, all claim terms should receive their plain and ordinary meaning, in the context of the ’454 patent specification.

Dr. Cooperstock, -529 EX1003, ¶47.

38. I have been informed that the challenged claims of the ’932 patent are to be given their ordinary and customary meaning as understood by one of ordinary skill in the art at the time of the invention in light of the specification and the prosecution history pertaining to the patent. Based on my review of the challenged claims, it is my opinion that none of the claim terms require explicit constructions. Accordingly, all claim terms should receive their ordinary and customary meaning, in the context of the ’932 patent specification.

Dr. Jansen, -612 EX1003, ¶38.

Construction of “Event Node”

Dr. Rubin purports to apply the District Court construction (i.e., “no construction”), but improperly reads in limitations from the specification in his analysis.

23. It is my understanding that claim construction is a matter of law and that the claims of a patent define the invention claimed. I understand that an Opinion and Order construing the claims of the ‘345 Patent was issued in *SitNet LLC v. Meta Platforms, Inc.* No. 1:23-cv-06389-AS (S.D.N.Y. July 24, 2024) and that Patent Owner requested under 37 C.F.R. § 42.100(b) the Board to consider and adopt the District Court’s construction.

24. I have adopted those claim constructions during my analysis of the IPR filings, and I have been guided by these constructions in the discussion of the grounds of invalidity.

Dr. Rubin, -529 EX2009, ¶¶23-24; also -612 EX2009, ¶¶23-24.

* Dr. Rubin’s testimony includes a typographical error, incorrectly referring to “the ‘345 Patent” instead of the ‘454 and ‘932 patents.

Given that an event node “propagates up-to-date information on the situation” and that “each node is capable of communicating in a peer-to-peer fashion with other nodes,” an event node must be a node with an NDSN that communicates information regarding the event in a peer-to-peer fashion with other nodes of a NDSN situational net. Thus, the event node is a node within the NDSN and cannot constitute a social network. The event node cannot facilitate the creation of other nodes.

Dr. Rubin, -529 EX2009, ¶69.

records. As such, Amidon does not define an NDSN, but instead discloses that a conference is a database entry containing a list of users relating the conference to the various user records, but does not disclose or suggest objects with attributes defining them. Furthermore, Amidon does not disclose peer-to-peer connections between nodes that are required for nodes within NDSN by ‘454 Patent. The conferencing disclosed by Amidon uses the centralized relational database as discussed above.

Dr. Rubin, -529 EX2009, ¶73; also -612 EX2009, ¶96.