

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

IPR2024-00612
June 11, 2025
SitNet's Hearing Demonstratives

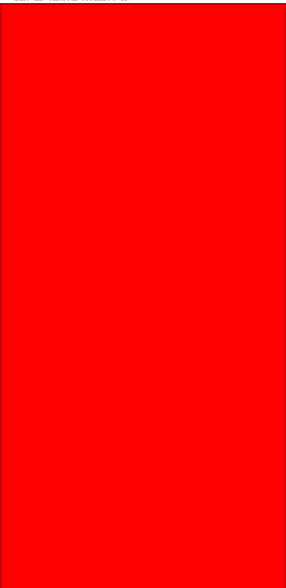
Roadmap

- The Petition fails to invalidate claims 12-21 of U.S. Patent No. 8,249,932 (“932 Patent”)
- Claim 12 recites “an event node for the situation in a multi-dimensional personal information network”
 - Social Networks are a disclosed embodiment of “multi-dimensional personal information network”
- Ground 1 (Amidon + Walsh + Shahine for claims 12, 14-21):
 - Crucially, Amidon (even with Walsh/Shahine) does not show its alleged “event node” (the “social network conference”) as a node within the social network

MOTION FOR ADVERSE JUDGMENT

IPR2024-00529

Claims 1-11, 22, and 23 - Cancelled

US 8,249,932 B1	
33 modifications within the spirit and scope thereof as defined by the appended claims and any and all equivalents thereof. The invention claimed is:  5 10 15 20 25 30 35 40 45 50 55 60 12. A method of presenting targeted advertising in a situational network, the method comprising: obtaining an indication of an occurrence of a situation; establishing an event node for the situation in a multi-dimensional personal information network; 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; 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 a aggregators;	34 aggregating information related to the situation received from the personal information aggregators connected through the situational network; and 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. 13. The method of claim 12, wherein the plurality of advertisements are received from at least one advertising entity. 14. The method of claim 12, wherein the two or more projections are based at least in part on a geographic proximity of the nodes of the situational network. 15. The method of claim 14, wherein the locations of the personal information aggregators corresponding to the nodes are determined using positional coordinates obtained from the personal information aggregators. 16. The method of claim 12, wherein different advertisements of the plurality of advertisements are provided to each of the two or more projections. 17. The method of claim 16, wherein the at least one advertisement is selected based on targeting criteria for each of the two or more projections. 18. The method of claim 17, wherein the targeting criteria is determined using aggregate user demographic information obtained from the personal information aggregators corresponding to each of the two or more projections. 19. The method of claim 12, wherein the event node is established by a situation authority using an event node server. 20. The method of claim 12, wherein the situation is a weather phenomenon. 21. The method of claim 12, wherein the connections cause a raised affinity between each of the personal information aggregators and the event node along a dimension corresponding to the situation.  * * * * *

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.
- Claim 12: “an event node for the situation *in a multi-dimensional personal information network*.”

Event Node – Construction

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

“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.” 932 Patent, 7:24-28

* * *

“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.” 932 Patent, 14:10-13

* * *

Event Node – Construction

- Consistent with the Specification, Dr. Rubin Opines:
“An ‘event node’ as described in the 932 Patent is a node in a situational network that corresponds to an event.”
EX2009, ¶91.

“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.” 932 Patent, 7:24-28

* * *

“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.” 932 Patent, 14:10-13

* * *

Event Node – Construction

- Dr Rubin repeated this belief in his deposition.

Q. In the context of a network, *what's a node*?

A. Sure. So a node is different depending on which layer of the network you're referring to. So, for example, in a TCP network, TCP/IP network, the nodes would be the communicating parties that have particular IP addresses.

And in application, it would be whatever attributes are defined by the application. So if the application is a social network, then *a node could be an object representing an entity in the social network* and it would have attributes that would define the node in it.

Q. So in declaration 529, paragraph 34, which I think is the document that you're looking at –

A. Which paragraph? I was on a different one.

Event Node – Construction

- Dr Rubin repeated this belief in his deposition.

Q. 34.

A. Yes, that's it.

Q. You -- you set forth a *definition of what a node is*?

A. Right.

Q. Where did this definition come from?

A. So this represents my understanding of how social networks work and is informed by the Facebook document in footnote 1.

Q. So are you aware that this definition of a node is nearly word-for-word from Facebook's website that's referenced in footnote 1?

A. That does not surprise me.

Q. But it's your opinion that this definition somehow applies to the nodes that are referred to in the '932, the '454 and the '345 patent?

A. Yes.

Event Node – Construction

- Dr Rubin repeated this belief in his deposition.

Q. What's your basis for that?

A. There's nothing in the patents that overrides *this definition of a node, which is my understanding of what a node is in a social network.*

EX1056, 25:22-27:13.

Event Node – Construction

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

- (a) creating, by an event node server, **an event node in a multi-dimensional personal information network**, the event node corresponding to a situation;
- (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;
- (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);
- (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; and
- (e) establishing a link with each device accepting the invitation.

'454 Patent, Claim 1

- Claims 1 and 20 in the '454 Patent and Claim 7 in the '932 Patent explicitly state that the event node is “an event node ***in a multi-dimensional personal information network.***” And although Claim 10 in the '454 Patent does not contain that phrase, it nonetheless makes explicitly clear that all of the claimed nodes, including the “event node,” are present “***in a multi-dimensional personal information network.***”

Event Node – Petitioner’s Overly Broad Construction

- “event node” needs no construction beyond a generic “node” or “object” (e.g., citing Dr. Rubin's general node testimony from EX1056).
- This is Flawed:
 - Ignores the explicit claim limitation: “event node... in a multi-dimensional personal information network.”
 - Misrepresents Dr. Rubin’s Testimony.
 - Claim terms must be read in light of the specification (Phillips v. AWH Corp.). The '932 Patent provides defines a social network as an embodiment of how an event node operates within multi-dimensional personal information network.

**Ground 1:
Amidon + Walsh + Shahine
Fails to Disclose the "Event Node"**

Event Node – Flaws with Amidon

KEY FLAWS

- Petitioner contends.
 - Amidon's "social network conference" is the "node" and "event node" Paper 17, 7-9.
 - "social network server 16 that stores data defining one or more social networks, social network member data, and other social network data in one or more stores 22"
 - "Amidon's conference is an object in the network with a unique ID and other attributes defining it." Paper 17, 7.

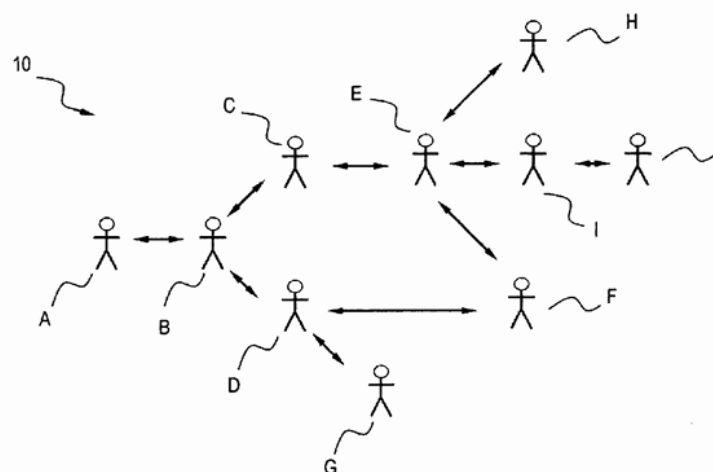
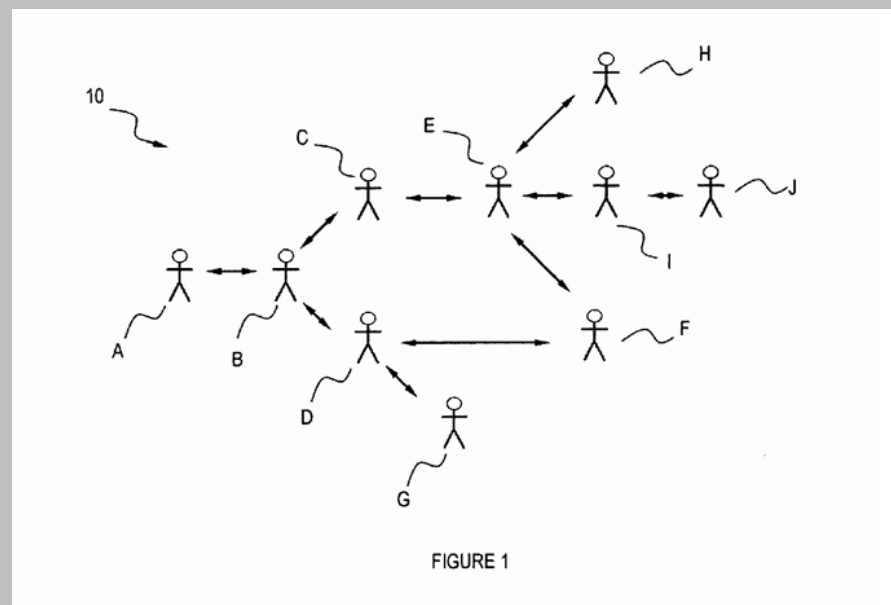


FIGURE 1

Event Node – Flaws with Amidon

KEY FLAWS

- Just because a “social network conference” is an object within Amidon’s system 12 does not necessitate it being an event node.
 - “Social network server 16 stores data defining one or more social networks, social network member data, and other social network data in one or more stores 22.” Amidon, 9:23-25.
- Amidon discloses a system including social networks stored within social network server 16.
- The social networks stored within Amidon’s system are shown by Amidon in Fig. 1, which comprises only users.



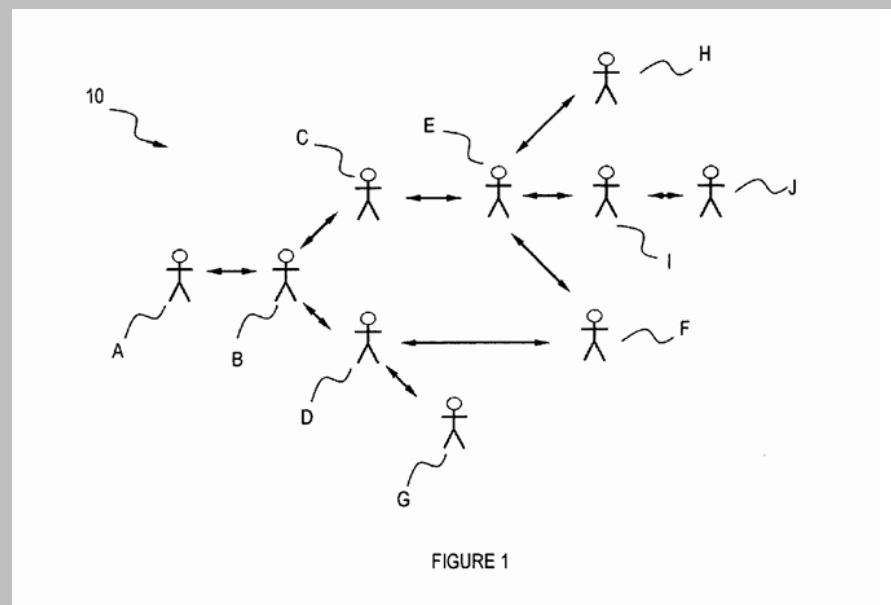
Event Node – Flaws with Amidon

KEY FLAWS

“FIG. 1 illustrates an exemplary social network 10 that may be used as the basis for one or more **social network conferences**. In this example, links between **users A, B, C, D, E, F, G, H, I, and J** are shown by double-ended arrows, although one of skill in the art will recognize that, in some situations, social network links may be unidirectional.” Amidon, 6:58-63 (emphasis added).

The Social Network Conference is thus a social network 10, which in embodiment of multi-dimensional personal information network.

Thus, per claims, it must contain an event node – which it lacks.



KEY FLAWS

Figure 1 is a screenshot of a web browser displaying a social network graph and a chat log. The browser window has a title bar and a menu bar. The main content area is divided into two panes. The left pane shows a social network graph with nodes representing people: Bob (Me), Vicky, Joe, James, Sue, Mary, John, Matthew, Zeke, and Mark. Vicky is highlighted with a dashed circle. The right pane shows a chat log with messages from various participants. The interface includes a 'Conference Source' header, participant count, duration, and options for 'Graph' and 'Tree' views.

Conference Source: Game Conversation
 # Participants: 10 Duration: 25 min
 Graph Tree
 Bob (Me) Vicky Joe James Sue Mary John Matthew Zeke Mark
 Joe: How about that game?
 Vicky: I've got a surprise for Zeke
 James: Here's some ideas I have
 Bob: What is the surprise?
 Joe: How will we keep it secret?
 Bob: Speaking of Zeke...
 Matthew: That was a great game!
 Sue: How did it end?
 Zeke: Next game is on my birthday
 Mary: Problems with the game

Replying to: I've got a surprise for Zeke

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Event Node – Flaws with Amidon

KEY FLAWS

The display area of window 200 “comprises a portion of the window comprising a display of ***social network conference group 201 comprising Bob, Vicky, James, Joe, Mary, Zeke, Sue, John, Matthew, and Mark.***” Amidon, 17:7-10 (emphasis added).

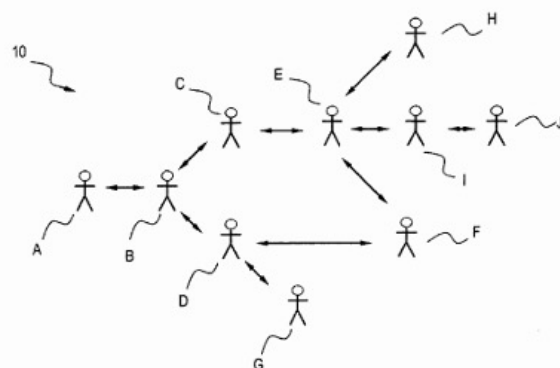


FIGURE 1

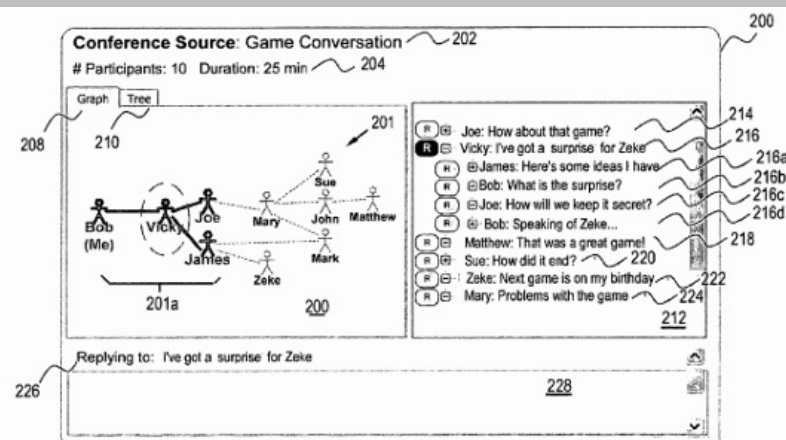


FIGURE 4

Event Node – Flaws with Amidon

KEY FLAWS

As can be seen from the depiction of window 200 in Fig. 4, the social network conference group 201 is the same social network as Fig. 1, which includes only users.

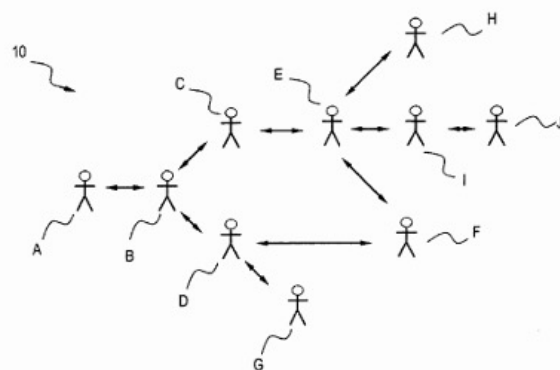


FIGURE 1

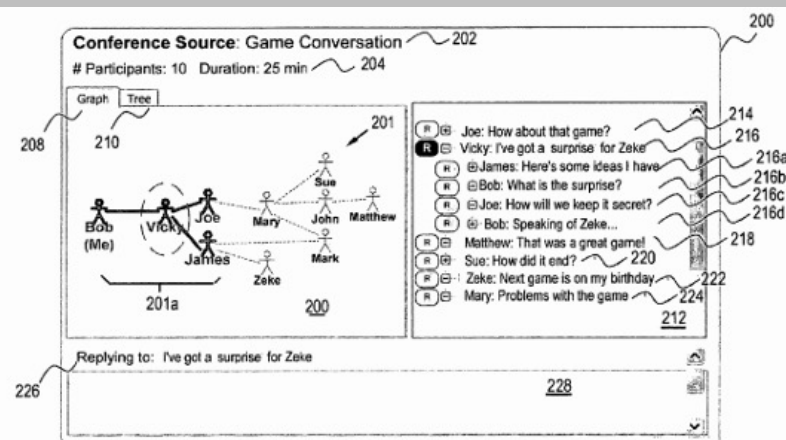


FIGURE 4

Event Node – Flaws with Amidon

KEY FLAWS

Accordingly, social network conference group is social network (an embodiment of multi-dimensional personal information network) lacking an event node.

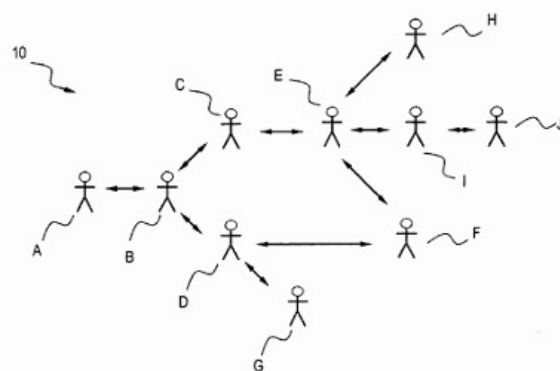


FIGURE 1

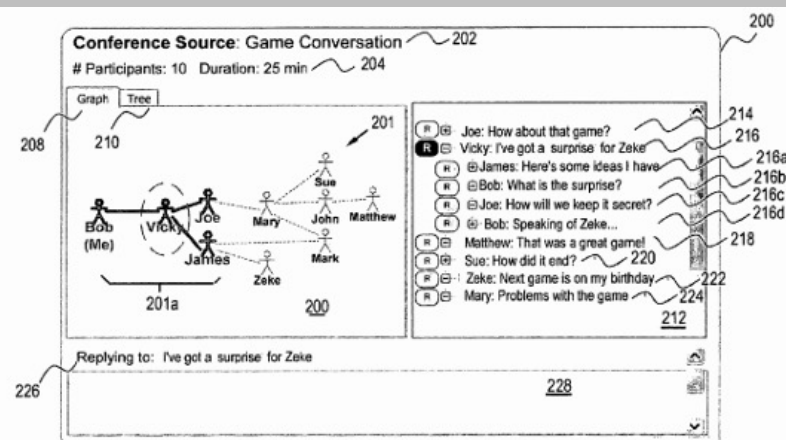
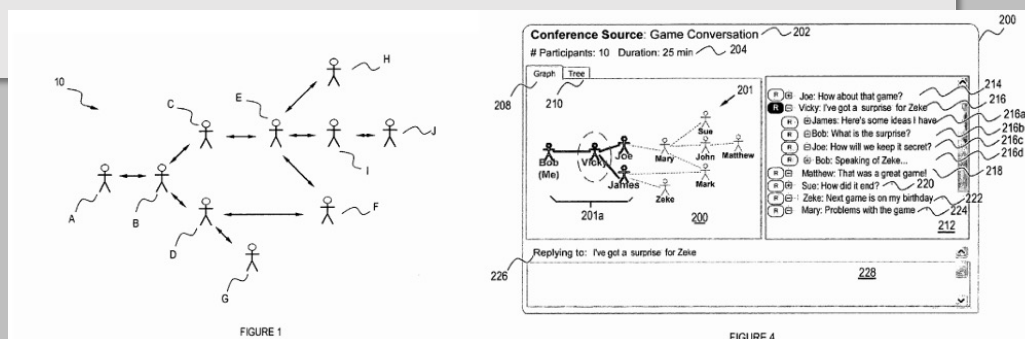


FIGURE 4

Event Node – Flaws with Amidon

KEY FLAWS

- Characterizing the “social network conference” as a node contradicts its very name.
 - The first part of the name is “social network,” which Amidon defines as “a group of persons or other entities (“members”) linked to one another through one or more types of social connections.” Amidon, 1:28-30.
 - A conference is a meeting or exchange of views, a group of individuals communicating. Amidon's description (text, audio, video messages between users; Figs. 4 & 5 showing users in discussion) aligns with this, not with a singular functional node.

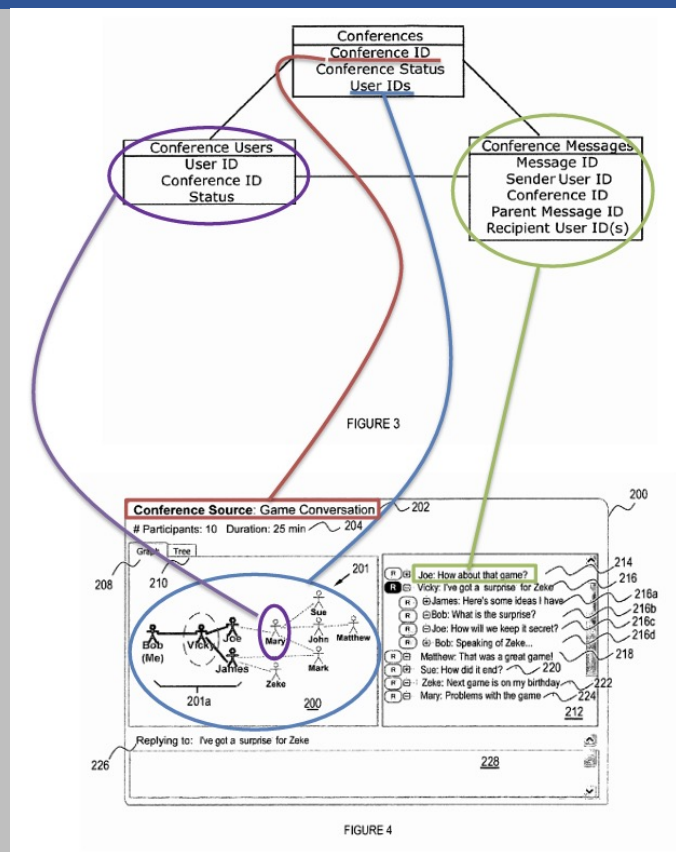


DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Event Node – Flaws with Amidon

KEY FLAWS

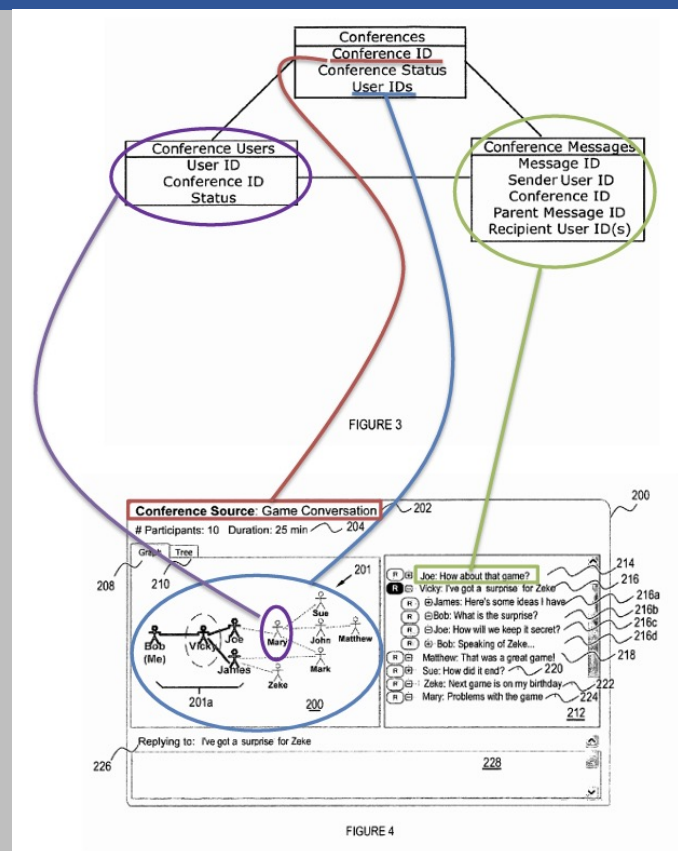
- Petitioner's Characterization of "Social Network Conference" as a node is not support by Amidon
 - Amidon's social network server 16 "stores data defining one or more social networks." Amidon, 9:23-24.
 - "Social network conferences may be defined using a plurality such as are illustrated in FIG. 3. Conferences may be defined by a **database record including a conference ID and list of users by user ID.**" Amidon, 15:8-10. (Blue Line)
 - "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." Amidon, 15:12-15. (Purple Line)



Event Node – Flaws with Amidon

KEY FLAWS

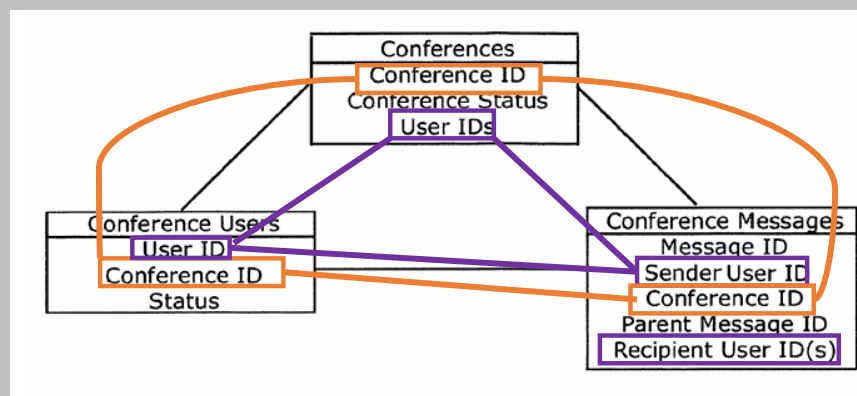
- Petitioner's Characterization of "Social Network Conference" as a node is not support by Amidon"
 - "[w]indow 200 further includes conference thread display area 212. Based on information received from social network conferencing system 12, thread display area 212 includes a plurality of threads (214, 216, 218, 220, 222, 224), each thread comprising data (messages, content, etc.) exchanged 25 amongst the members of conference 201. Amidon, 16:65-18:50; Id. at FIG. 4. (Green Line)
- Accordingly, Amidon uses a plurality of of data structures to define the elements of an interface window 200.



Event Node – Flaws with Amidon

KEY FLAWS

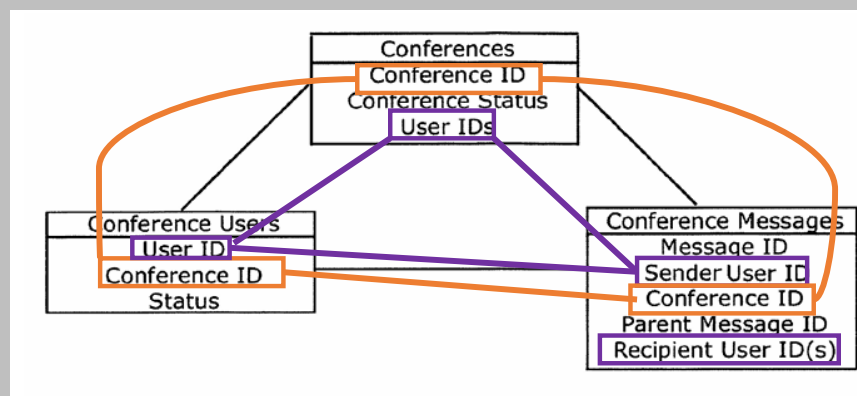
- The Plurality of Data Structures form a relational database.
 - “conferences may be defined by a database record including a conference ID and list of users by user ID.” Amidon, 15:10-12.
 - “Conference activity may be cross-referenced between database records—for instance, a record may be included for each user indicating the status of each user with regard to one or more conferences by conference ID.” Amidon, 15:12 15



Event Node – Flaws with Amidon

KEY FLAWS

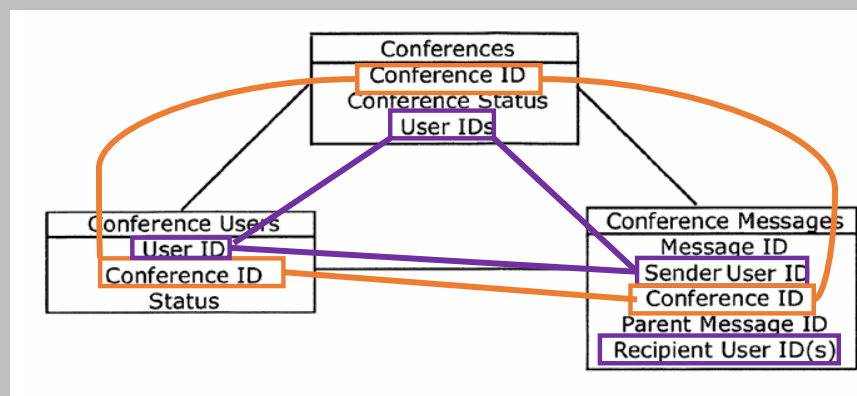
- The Plurality of Data Structures form a relational database.
 - “Each message may be tracked by a record including a unique message ID and cross-reference to a conference ID.” Amidon, 15:18-19.
 - “[T]he message record may include a list of recipients by user ID or other data indicating recipients, such as a cross reference to other records.” Amidon, 15:20-22.



Event Node – Flaws with Amidon

KEY FLAWS

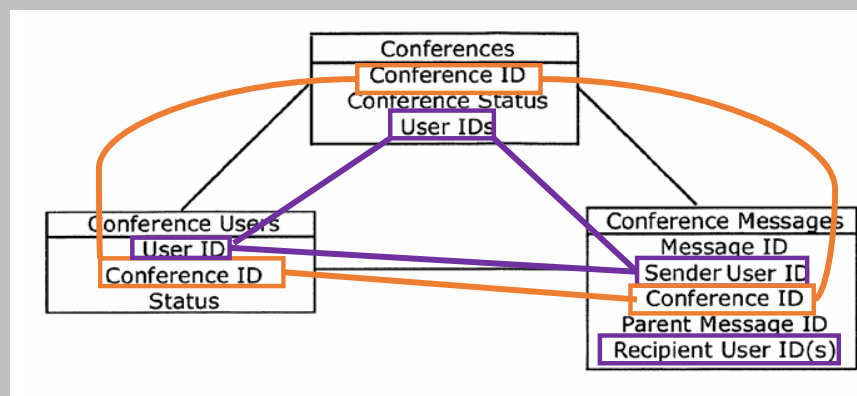
- Dr. Rubin Recognized that the plurality of Data Structures form a relational database
 - The record includes a cross-reference (foreign key) establishing a relationship with another database entry representing a user – i.e., the “user ID”. Ex 2008, ¶ 96.
 - This relationship by foreign key cross-reference is shown in Fig, 3 by the line connecting the “Conferences” database record with the “Conference Users” database record. Ex 2008, ¶ 96.



Event Node – Flaws with Amidon

KEY FLAWS

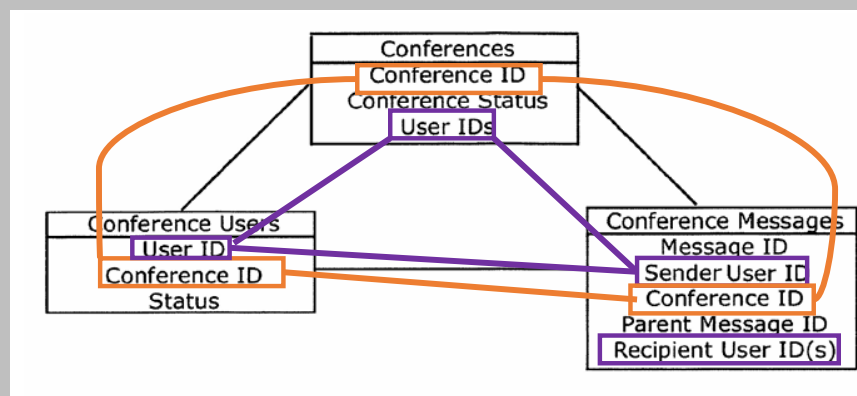
- Dr. Rubin Recognized that the plurality of Data Structures form a relational database
 - Fig. 3 shows a relationship between a database record for each conference (in “Conferences”) and a database record for a message (in “Conference Messages”). Ex 2008, ¶ 96.
 - each Conference Message record within the database includes a foreign key (conference ID) relating it to a specific conference. Ex 2008, ¶ 96.
 - The relationship is shown by the line connecting the “Conference Messages” database record to the “Conferences” database record. Ex 2008, ¶ 96.



Event Node – Flaws with Amidon

KEY FLAWS

- Dr. Rubin Recognized that the plurality of Data Structures form a relational database
 - Each Conference Message record within the database includes a foreign key (user ID) relating it to a specific conference user that either received or sent the message. Ex 2008, ¶ 96.
 - The relationship is shown by the line connecting the “Conference Messages” database record to the “Conference Users” database record. Ex 2008, ¶ 96.



Event Node – Flaws with Amidon (+W +S)

- Claim 12 requires: “an event node... in a multi-dimensional personal information network (i.e., NDSN).”
- Petitioner's Critical Omission (POSR, p. 9):
 - Petitioner argues Amidon’s “social network conference” is a “node” (e.g., a data object), but they fail to show that this “conference-node” exists as a component node within a disclosed social network in Amidon, Walsh, or Shahine.
 - Amidon's Social Networks (Fig. 1, Fig. 4 conference group) consist of user nodes only.
 - There's no teaching of the “social network conference” itself being a sub-component node of a larger multi-dimensional personal information network.

Event Node – Flaws with Amidon (+W +S)

- Amidon's "social network conference" is more aptly characterized as a type of social network itself (a group of users interacting around a topic), not a singular node within one. (POSR, p. 12)
- Conclusion: The claimed limitation of an "event node in a multi-dimensional personal information network" is not met.

Event Node – Lacking (+W +S)

- Petitioner's Ground 1 relies on Amidon for the “event node.” (Petition, at 16)
- The Patent Owner's Response (p. 10) and Sur-Reply (p. 9, 15) note that Petitioner does not assert that Walsh or Shahine provide the missing “event node” if Amidon fails to do so.
- Therefore, if Amidon doesn't teach the “event node” within a multi-dimensional personal information network, **the addition of Walsh and Shahine does not remedy this fundamental failure.**
 - The combination still lacks the core “event node” element.