

**Aylo Freesites Ltd.
v.
WellcomeMat, LLC**

Patent Owner Demonstratives

IPR 2024-00710
U.S. Patent No. 8,307,286
June 5, 2025

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WellcomeMat Exhibit 2043

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Grounds

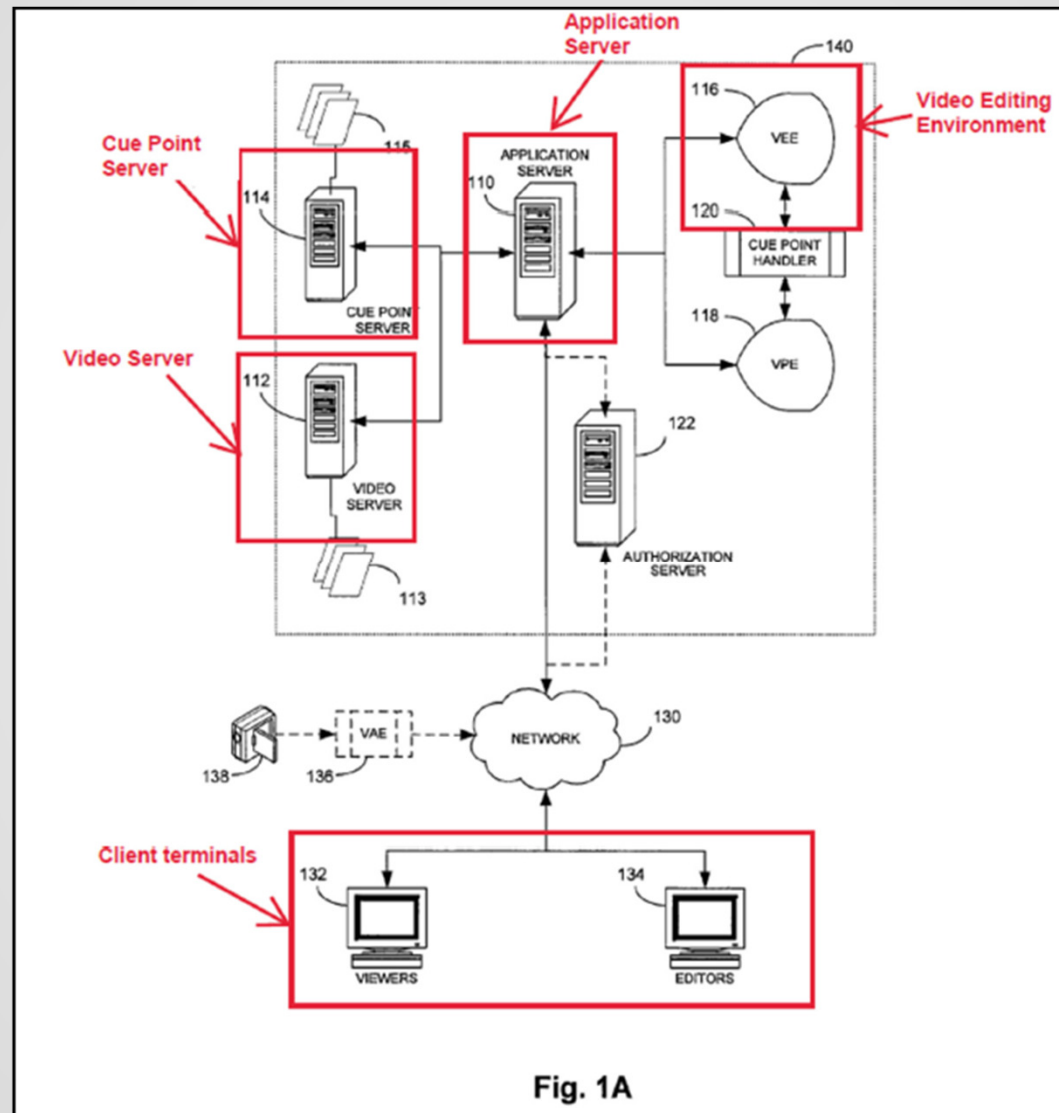
Independent Claim 13 and dependent Claims 17-20

- IPR2024-00710 (Cl. 13 and 18-20) consolidated with IPR2024-01101 (Cl. 17)
- IPR2024-01101 (Cl. 17): Grounds 1-5 duplicative except -01101 had Ground 2 for Fegan and Sull.

Ground	Challenged Claims	Reference(s)	Basis
~~1~~	~~13-15 and 18-20~~	~~Gupta~~	~~Anticipation~~
~~2~~	~~13-15 and 18-20~~	~~Fegan~~	~~Anticipation~~
~~3~~	~~13-15 and 18-20~~	~~Kim~~	~~Obviousness~~
~~4~~	~~13-15 and 18-20~~	~~Kim and Gupta~~	~~Obviousness~~
5	13-15 and 18-20	Vasilevsky and Logan	Obviousness

710 Pet, 1; 1101 Pet., 1.

'286 Patent



POR, 3; '286 Patent, Fig. 1A.

Claim Construction

Parties agree that no formal claim construction is required, but seem to disagree on the ordinary and customary meaning of certain limitations.

Patent Owner:

“Patent Owner interprets all claim terms in accordance with their ordinary and customary meaning consistent with the intrinsic evidence.”

POR, 4.

Petitioner:

“Petitioner submits that all claim terms of the Challenged Claims should be construed according to their plain and ordinary meanings for the purpose of this Petition.”

Pet, 10.

Legal Standards

- **Anticipation (Gr. 1-2)**
- **Obviousness (Gr. 2*-5)**

POR, 5.

'286 Patent: Claim 13

[13.P] 13. A method for handling video cue points, the method comprising:

[13.1] providing a computer system having at least one computer readable medium comprising a video editing environment, and being disposed at a server side of a public network;

[13.2] receiving a set of video information at the video editing environment using the computer system;

[13.3] receiving a set of cue point information at the video editing environment using the computer system;

[13.4] receiving a cue point editing command over the network from a remote client terminal disposed at a client side of the public network using the computer system;

[13.5] modifying a portion of the cue point information at the server side of the public network according to the cue point editing command received over the public network from the client terminal;

[13.6] receiving a cue point selection over the network from the remote client terminal identifying one of the cue points corresponding to a portion of the video information of one of the video files; and

[13.7] streaming the portion of the video information to the client terminal over the public network in response to receiving the cue point selection.

Ordinary & Customary Meaning of *VEE* (13.1)

Limitation 13.1 for “a computer system . . . comprising a video editing environment, and being disposed at a server-side of a public network”

Provides for server-side *video editing environment* (“*VEE*”) software . . . for performing editing of cue point information that enables the client to perform remote cue point editing over a public network as further recited in the claim.

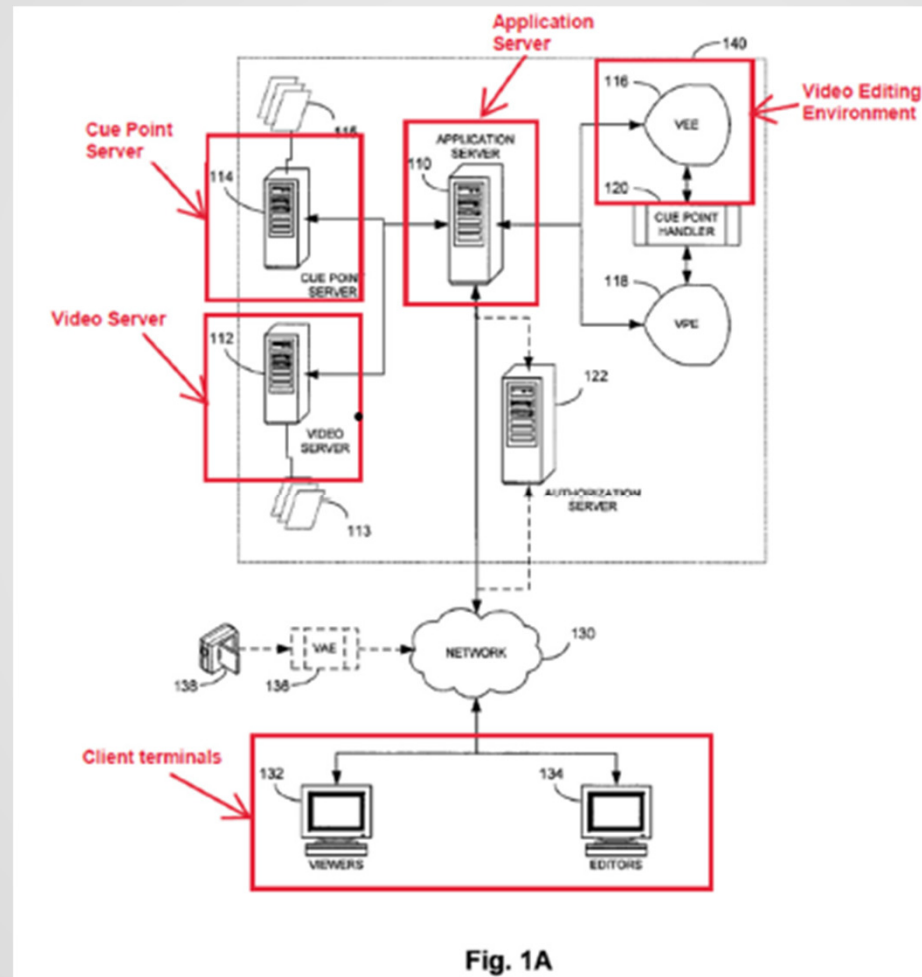
POR, 10.

- **Support in Claim language**

POR, 10

Ordinary & Customary Meaning of *VEE* (13.1)

Support in specification



Ordinary & Customary Meaning of *VEE* (13.1)

Support in specification

- Consistently described as server-side software for editing cue points to enable remote cue point editing by client.
- Figs. 1A, 1B, and 4 depict VEE as server-side software.
- 9:19-25: “application server 110 may be configured to handle various applications, including a Video Editing Environment (VEE) 116 ... to be executed ... by the application server”
- 4:1-2: “the video editing environment comprises a server-level video editor”
- 23:18-20: “For example, the cue point information form may be displayed on a client terminal while the cue point editor resides on a server terminal.”

POR, 11-12.

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Ordinary & Customary Meaning of *VEE* (13.1)

Support

Petitioner's expert agrees, explaining that the claimed system has an **“application server 110 executing a Video Editing Environment (‘VEE’).”** Ex. 1002, Houh Decl., ¶47 (emph. added). Mahon Decl., ¶¶90-92.

POR, 12.

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Ordinary & Customary Meaning of *VEE* (13.1)

Support in Prosecution History

- “[T]he seller can ... create and modify those cue points remotely, via a remote video [editing] environment running on an application server ...”
- “None of the cited art, alone or in combination, apparently teaches or suggests remote editing of and interaction with cue points associated with a video file over a public client-server architecture.”
- “[The reference] would apparently only teach local cue point handling ... at the client terminal performing the editing. This is different from remote editing of ... cue points ... over a public client-server architecture.”

POR, 13-14.

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Gupta (Gr. 1) - Anticipation

Gupta does not disclose:

- 13.1: “*providing a computer system . . . comprising a video editing environment, and being disposed at a server side of a public network*”
- 13.5: “*modifying a portion of the cue point information at the server side of the public network according to the cue point editing command received over the public network from the client terminal*”
- 13.2: “*receiving a set of video information at the video editing environment using the computer system*”

POR, 15-32.

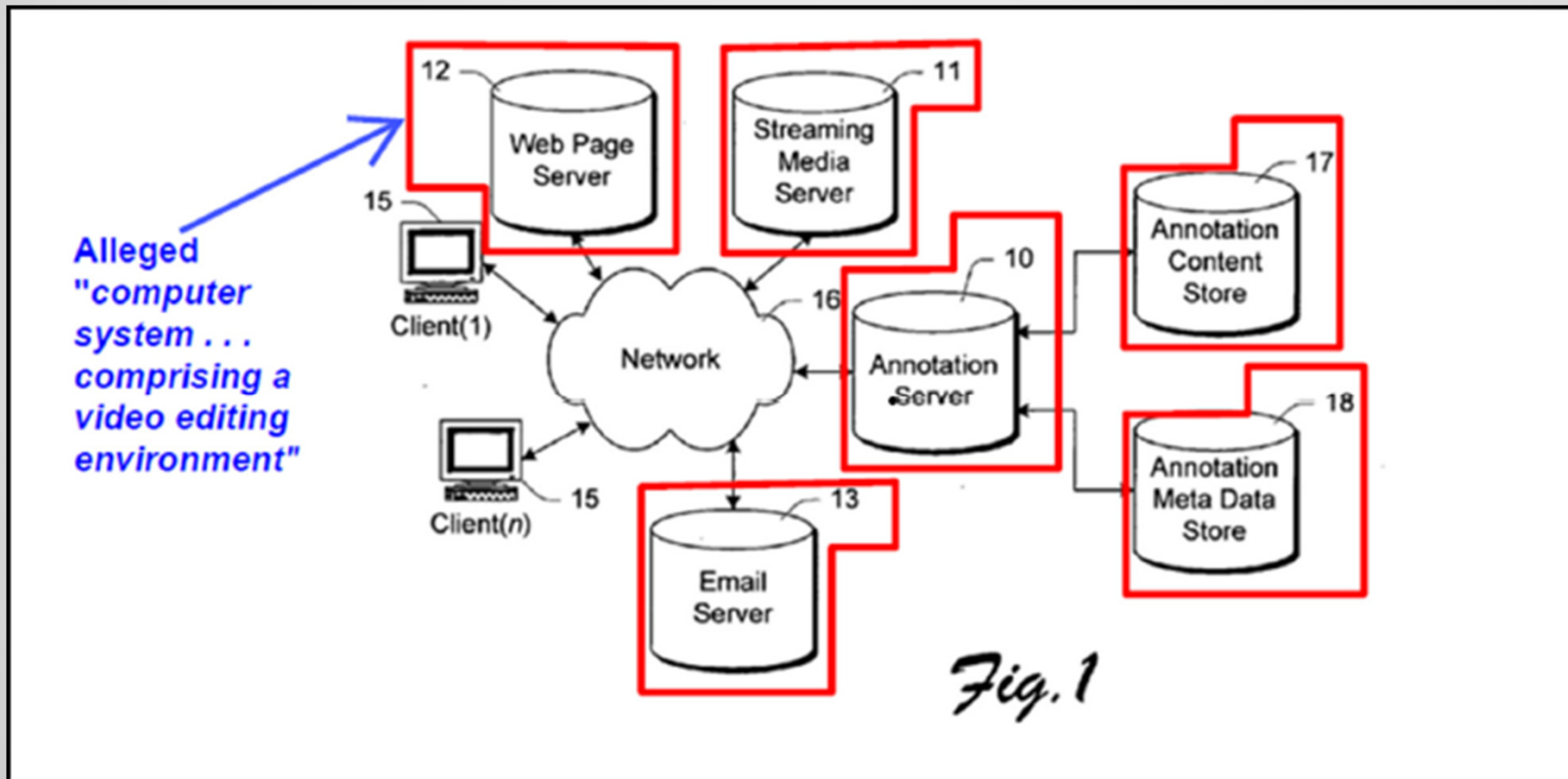
WellcomeMat Exhibit 2043

IPR2024-00710

Slide 11

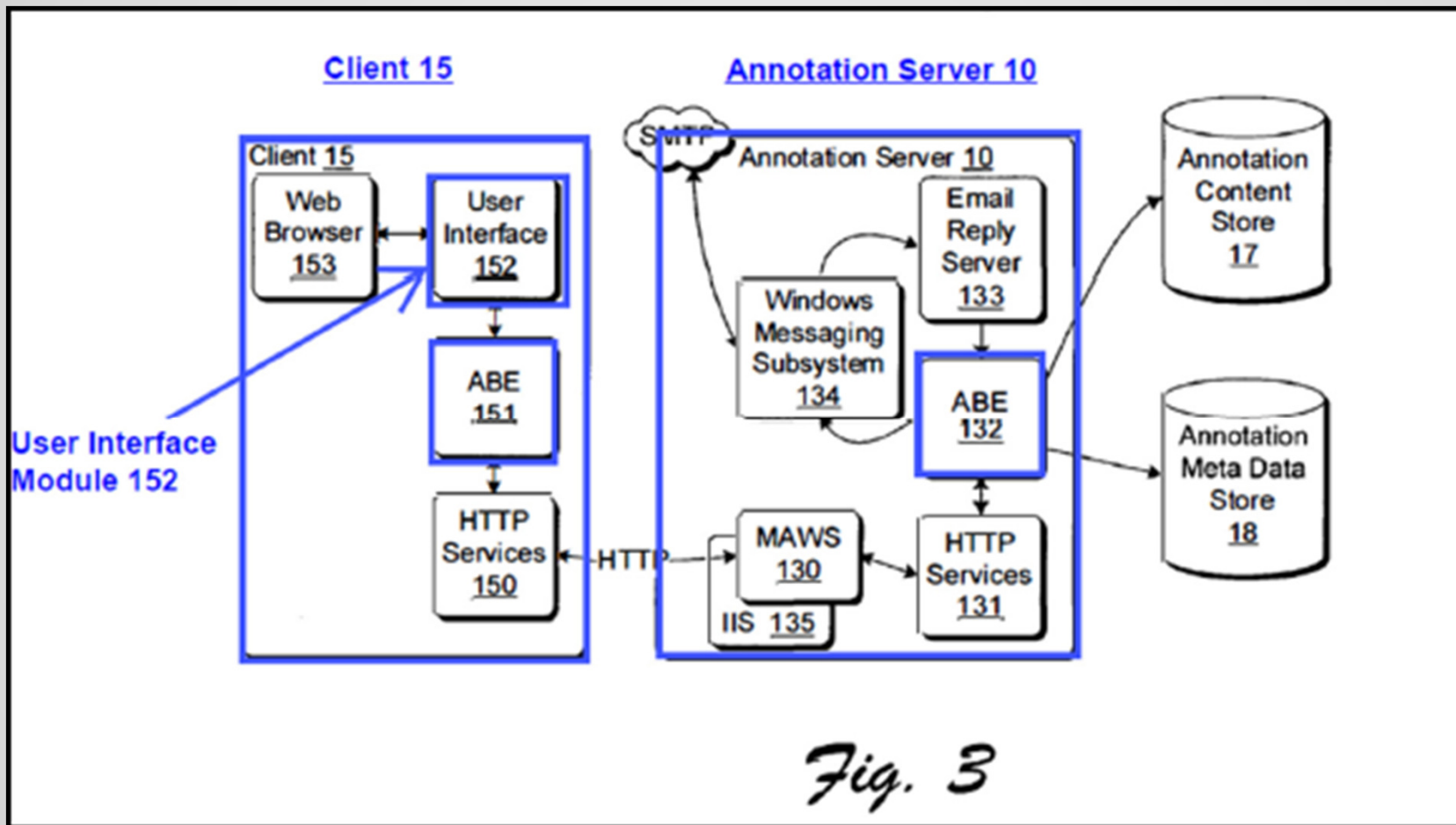
Gupta (13.1) - Anticipation

Alleged server-side video editing environment of 13.1:



POR, 15; Sur-reply, 4; Gupta, Fig. 1A.

Gupta (Gr. 1) - Anticipation



POR, 17; Gupta, Fig. 3.

Gupta (13.1) - Anticipation

Petitioner asserts annotation server 10 of Gupta meets 13.1 for “a computer system . . . comprising a video editing environment, and being disposed at a server-side of a public network”

Gupta discloses: “Annotation server 10 controls [1] the storage of annotations and [2] their provision to client computers 15.” Gupta, [0032]. Thus, the annotation server has two functions: (1) storing annotations received from client devices, and (2) retrieving annotations to send to client devices. If the annotation server had a third function for editing annotations, that passage would have been phrased differently, such as: “Annotation server 10 controls the storage of annotations, the editing of annotations, and their provision to client computers 15.” Dep. Trans. Hou, 120:25-121:10. But that is not the case. Mahon Decl., ¶98. See Gupta, [0048]. Gupta does not disclose that annotation server 10 or any of the other servers (servers 11-13) discloses the VEE limitation.

POR, 16.

Gupta (13.1) - Anticipation

Rather, a POSITA would recognize that Gupta discloses the client executing a **client-side application (UIM 152)** to perform local editing of annotations—i.e., the prior art mechanism the challenged claims improve over—as explained further below. Mahon Decl., ¶119.

POR, 15.

Gupta (13.1) - Anticipation

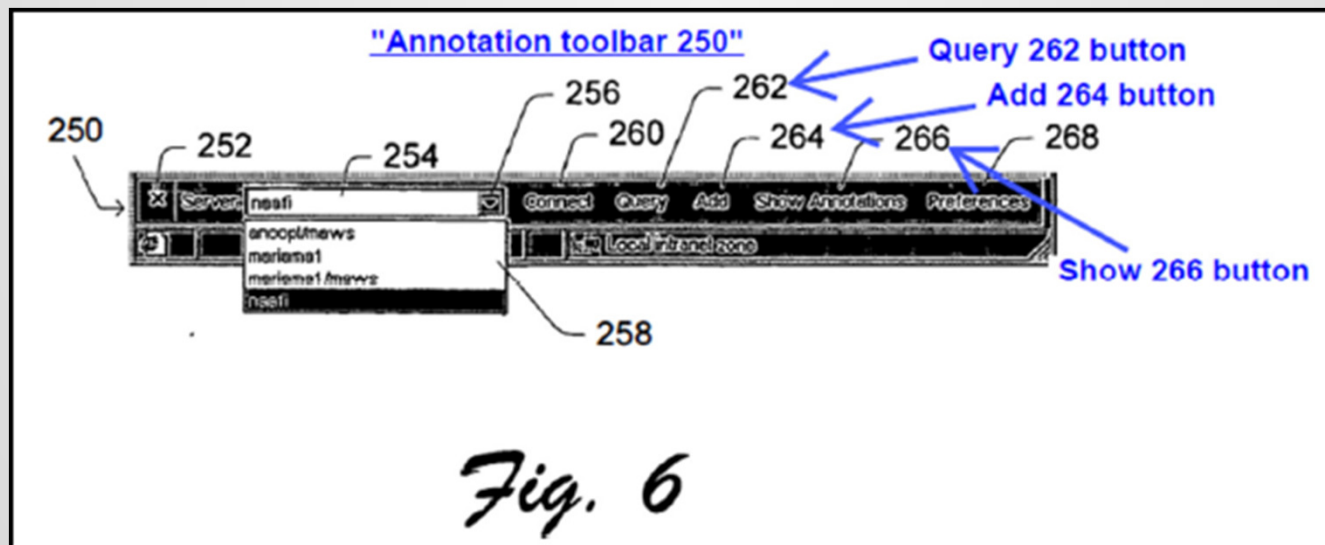
User Interface Module 152 performs local annotation editing on the client-side:

- “The [user] interface module 152 is an application program executed at client 15.” [0082]
- UIM creates client-side dialog boxes and toolbars used to create/edit annotations including Toolbar Fig. 6, Add Annotation Fig. 7, View Annotation Fig. 15, and Edit Annotation Fig. 21. [0081], [0128].
- “Annotation content authored at client 15 using user interface [module] 152 is received by ABE 132 [in annotation server 10] and maintained in annotation content store 17.” [0048]

Gupta (13.1) - Anticipation

Client-side UIM 152 generates client-side dialog boxes to edit annotations:

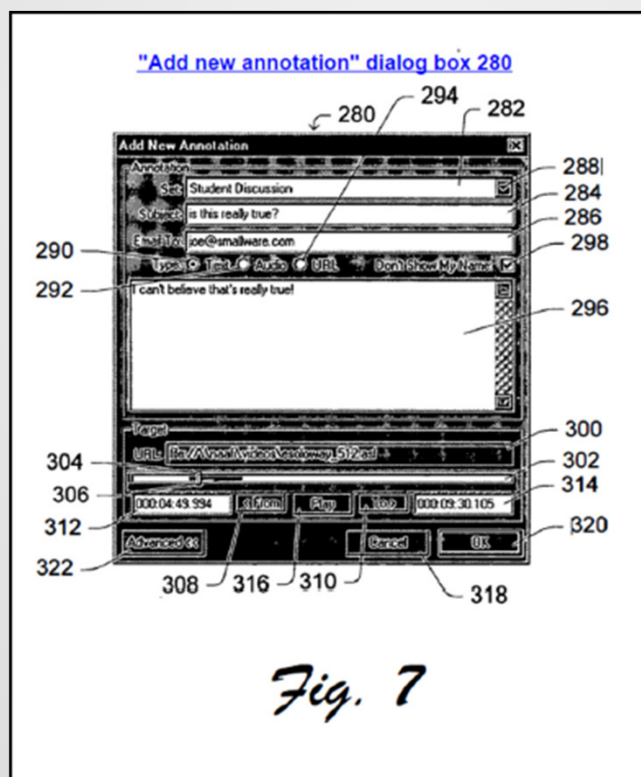
- UIM 152 generates Annotation Toolbar of Fig. 6, which allows navigation to (1) Add New Annotation dialog box of Fig. 7, and (2) View Annotation dialog box of Fig. 15, (3) which allows navigation to Edit Annotation dialog box of Fig. 21. See Gupta, [0081]-[0082], [0124], [0128], [0144].



Gupta (13.1) - Anticipation

Client-side UIM 152 generates client-side dialog boxes to edit annotations:

- UIM 152 generates Annotation Toolbar of Fig. 6, which allows navigation to Add New Annotation dialog box of Fig. 7:

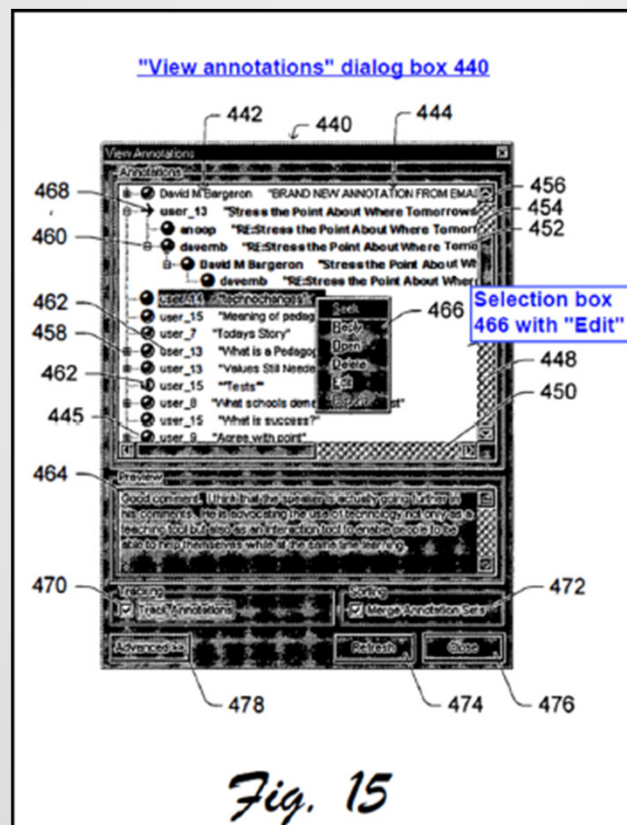


POR, 20-24.

Gupta (13.1) - Anticipation

Client-side UIM 152 generates client-side dialog boxes to edit annotations:

- UIM 152 generates Annotation Toolbar of Fig. 6, which allows navigation to View Annotation dialog box of Fig. 15. Gupta, [0128]

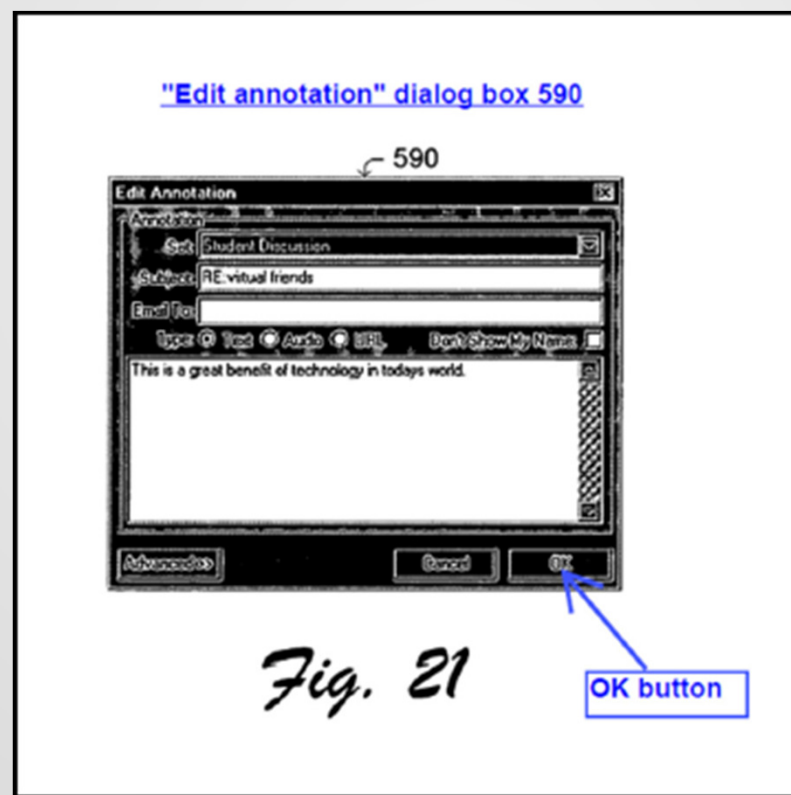


POR, 20-24.

Gupta (13.1) - Anticipation

Client-side UIM 152 generates client-side dialog boxes to edit annotations:

- UIM 152 generates View Annotation dialog box of Fig. 15, which allows navigation to Edit Annotation dialog box of Fig. 21. Gupta, [0128], [0144].



POR, 20-24.

Gupta (13.1) - Anticipation

Gupta discloses that client-side Edit Annotation dialog box is generated by client-side UIM 152, not the server-side annotation server 10:

[0128] ... Selection of the “edit” feature [in View Annotations, Fig. 15] causes [user] interface module 152 to display another dialog box [Fig. 21] allowing the user to edit the content of the annotation, as discussed in more detail below. ...

[0144] FIG. 21 illustrates an exemplary “edit annotation” dialog box 590. Edit annotation dialog box 590 is displayed in response to a user request to edit an annotation, such as selection of the “edit” option in menu 466 of FIG. 15.

Gupta (13.1) - Anticipation

Gupta's Annotation Server 10 is not editing annotations (cue points):

- “Annotation server 10 controls [1] the storage of annotations and [2] their provision to client computers 15.” [0032]
- “When a user of a client computer 15 desires to add or retrieve annotations, the client computer contacts the annotation server to perform the desired addition/retrieval.” [0034]
 - Thus, annotation server 10 stores and retrieves annotations; does not create and edit annotations.

POR, 27-28.

Gupta (13.1) - Anticipation

- Gupta's Annotation Server 10 is not editing annotations (cue points):
- “each annotation created by annotation server 10 is maintained as a single copy corresponding to . . . these different versions.” [0049]
- Paragraph [0049] read in context of other passages indicates:
 - Annotation server 10 controls the [1] storage of annotations and [2] their provision to client computers 15. [0032]. Nothing about editing annotations.
 - Multiple passages indicate editing of annotations is by client-side UIM application. See [0081]-[0082], [0128], [0144], Fig. 15, Fig. 21 (generated by UIM app).

POR, 18-19.

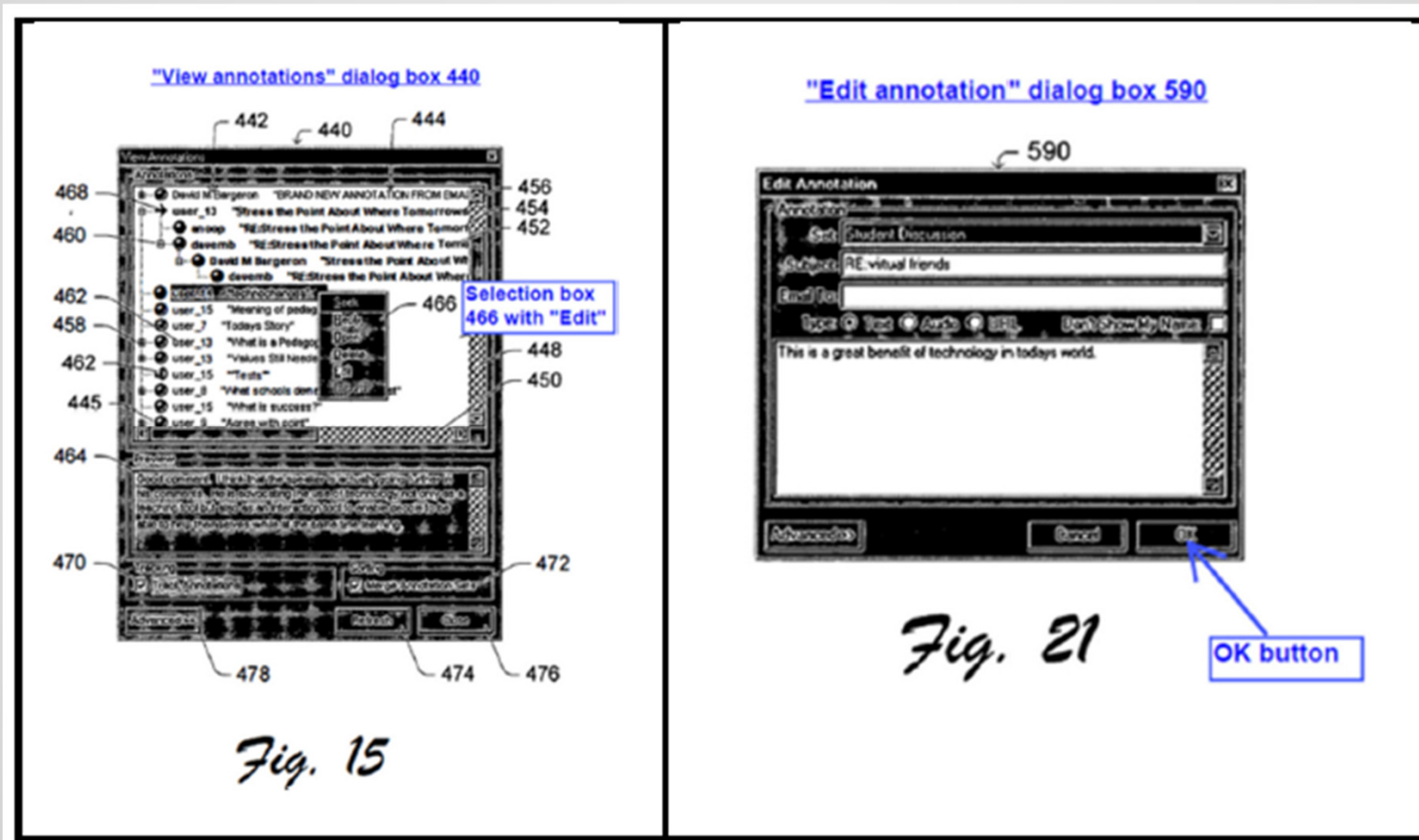
Gupta (13.1) - Anticipation

Comparison of Gupta UIM 152 module to GUI in '286 Patent

- Client-side UIM module of Gupta is an “application program” for creating and editing annotations client-side. See [0081]-[0082], Figs. 7, 15, 21.
- In contrast, GUI in '286 Patent is an interface to a *server-side Video Editing Environment* that edits cue points *server-side*.
 - See e.g., 286, 23:18-20: “For example, the cue point information form may be displayed on a client terminal while the cue point editor resides on a server terminal.”
- On reply, Petitioner focuses on client-side operations such as use of web forms.
 - Petitioner attempts to rewrite Claim 13, which focuses on server-side operations.

Gupta (13.1) - Anticipation

Petitioner's theory for limitation 13.1 and 13.4 is based on client-side dialog boxes created by client-side UIM 152:



Sur-reply, 5-6.

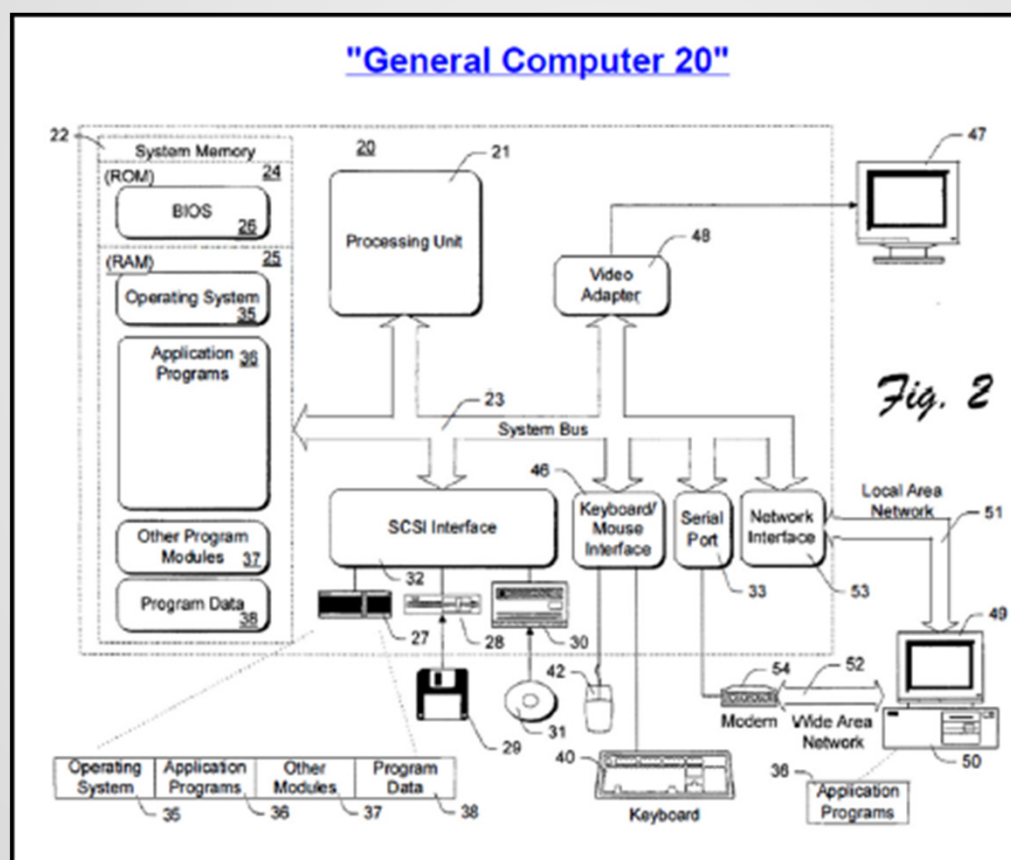
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IPR2024-00710

Slide 25

Gupta (13.1) - Anticipation

Fig. 2's generic computer 20 "that can be used as a client or server" to perform generic functions does not disclose that annotation server 10 meets limitation 13.1.
See Gupta, [0037]-[0042].



POR, 24-25.

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Gupta (13.1) - Anticipation

Petitioner's expert's arguments that annotation server 10 discloses limitation 13.1:

- 1. ABE module 132 disclosed as having “functionality for accessing stores 17 and 18.” Does not disclose 13.1. See [0048].**
 - “Annotation content authored by client 15 using [UIM] 152, is received by ABE 132 and maintained in . . . content store 17.” See [0048]**
- 2. Edit Annotation dialog box of Fig. 21.**
 - This is client-side dialog box generated by client-side UIM 152. Does not disclose 13.1. Gupta, [0081-0082], [0128], [0144].**
- 3. User selects OK button in Fig. 21.**
 - Does not disclose annotation server 10 is performing 13.1.**

Gupta (13.1) - Anticipation

Gupta's reference to use of standard HTTP requests

- General reference to use of HTTP:
 - “Generally, commands are formulated at client computer 15 and forwarded to annotation server 10 via HTTP requests.” [0044]
 - ABE 151 “translates user actions into commands destined for [annotation] server 10.” Gupta, [0045]
- HTTP request-response protocol is standard for all client-server interactions over Internet.
- Conventional use of HTTP does not disclose that the ABE 151 is sending a command to cause a *Video Editing Environment* application to perform annotation editing at annotation server 10, as required by limitations 13.1-13.5

Gupta (13.1) - Anticipation

Petitioner's theory on reply re Gupta's MAWS 130:

- Improper new theory.
- Gupta discloses that MAWS “provide the web server functionality of annotation server 10.” [0047]
 - Generic statement that annotation server 10 has a web server on front-end. Does not disclose 13.1 and 13.4-13.5.
- No support in Gupta for new argument on reply that server-side MAWS generates dialog boxes of Fig. 7 (Add Annotation) and Fig. 21 (Edit Annotation).
 - Instead, Gupta teaches that client-side UIM 152 generates client-side Figs. 7 and 21 for adding/editing annotations.

Gupta (13.5) - Anticipation

Gupta does not anticipate limitation 13.5 for “*modifying a portion of the cue point information at the server side . . . according to the cue point editing command received . . . from the client terminal*”

- Petitioner’s theory for 13.1 is based on Edit Annotations of Fig. 21.
- Gupta [0144] on Fig. 21 does not disclose modifying annotation information at server-side.
- Gupta [0100] on selecting OK only discloses “sends the new annotation information to annotation server 10.” Does not disclose modifying at server-side in response to *cue point editing command*.
- Gupta [0048] on ABE 132 describes receiving and storing annotation content “authored at client 15.” Does not disclose modifying at server-side in response to *cue point editing command*.

Gupta (Claim 15) - Anticipation

Gupta does not anticipate Claim 15 for “receiving an edit mode entry signal over the [public] network from the client terminal . . . and switching the video editing environment to the cue point editing mode in response”

- Petitioner argues that selecting “Edit” tab in Fig. 15 of Gupta discloses *edit mode entry signal* of Cl. 15.
- But Gupta only discloses that selection of Edit tab causes UIM 150 to locally change from Fig. 15 to Fig. 21 (Edit Annotation). No disclosure of a signal being sent *over the network* from client to server-side to cause a change in the *video editing environment*.
- [0128]: “Selection of the ‘edit’ feature causes [user] interface module 152 to display another dialog box [Fig. 21] allowing the user to edit . . . the annotation.”
- Gupta discloses generation of Fig. 21 from Fig. 15 without any disclosure of a signal being sent *over the network* from client to server-side.

Gupta (Claim 18) - Anticipation

Gupta does not anticipate Claim 18 for “receiving, over the network, authentication information relating to access authority of the remote client terminal”

- Gupta’s description that user can establish read/write access controls does not disclose “*authentication information*” being sent “*over the network.*”
 - No evidence read/write access controls are transmitted anywhere.
 - Not inherent because access controls could be locally-input to server side (any of servers 10-13) instead of being transmitted *over the public network.*
- No evidentiary support that Gupta’s client 15 has an IP address and username/password that is transmitted “*over the network,*” as alleged.

POR, 34-35; Sur-reply, 10-11.

Fegan (Gr. 2) - Anticipation

Fegan does not disclose:

- 13.1: “*providing a computer system . . . comprising a video editing environment, and being disposed at a server side of a public network*”
- 13.4: “*receiving a cue point editing command over the network from a remote client terminal . . . using the computer system [at the server-side]*”
- 13.5: “*modifying a portion of the cue point information at the server side of the public network according to the cue point editing command received over the public network*”

POR,11-43.

Fegan (Gr. 2) - Anticipation

Decision on Institution

- Board questioned whether Fegan disclosed limitations 13.1 and 13.4-13.5. Instn. Dec., 33.
- Board asked “whether the segmenting and annotation tools . . . are executed on the client side or server side of the network.”
- Patent Owner shows that segmentation/annotation tools are executed on client-side of network.
 - Annotation editing in Fegan is not performed by server-side software, does not meet limitation 13.1.

POR, 35-36.

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Fegan (Gr. 2) - Anticipation

Fegan does not anticipate 13.1 for a “computer system . . . comprising a video editing environment, and being disposed at a server side of a public network”

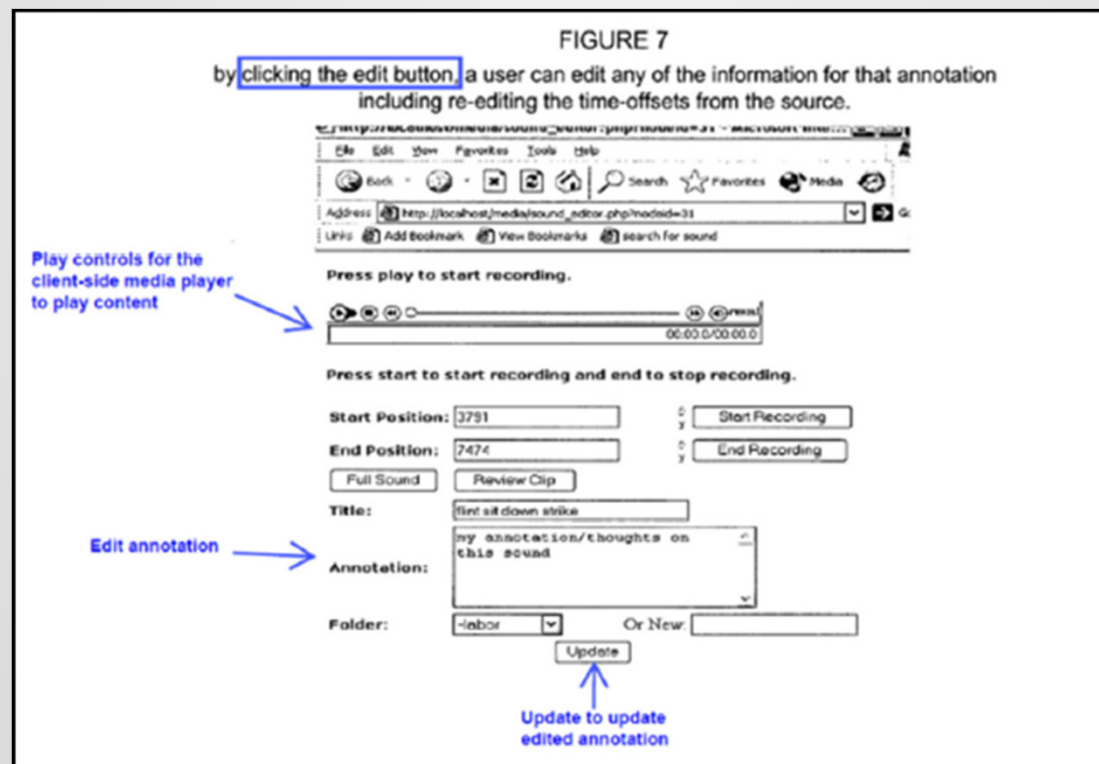
- “Technical tools for carrying out the multimedia presentation are maintained on server-side.” [0007]
- Disclosed editing of annotations in Fig. 4 and Fig. 7 uses client-side software to perform editing of annotations. [0074], [0076], [0080]
- Nowhere does Fegan disclose server-side applications for performing the editing of annotations.

POR, 35-41; Sur-reply, 12-13.

Fegan (13.1) - Anticipation

Fegan does not anticipate 13.1 for a “computer system . . . comprising a video editing environment, and being disposed at a server side of a public network”

- Annotation Edit Window of Fegan Fig. 7 does not disclose 13.1.



POR, 35-41; Sur-reply, 12-13.

Fegan (13.1) - Anticipation

Annotation Edit Window of Fegan. Fig. 7 does not disclose 13.1

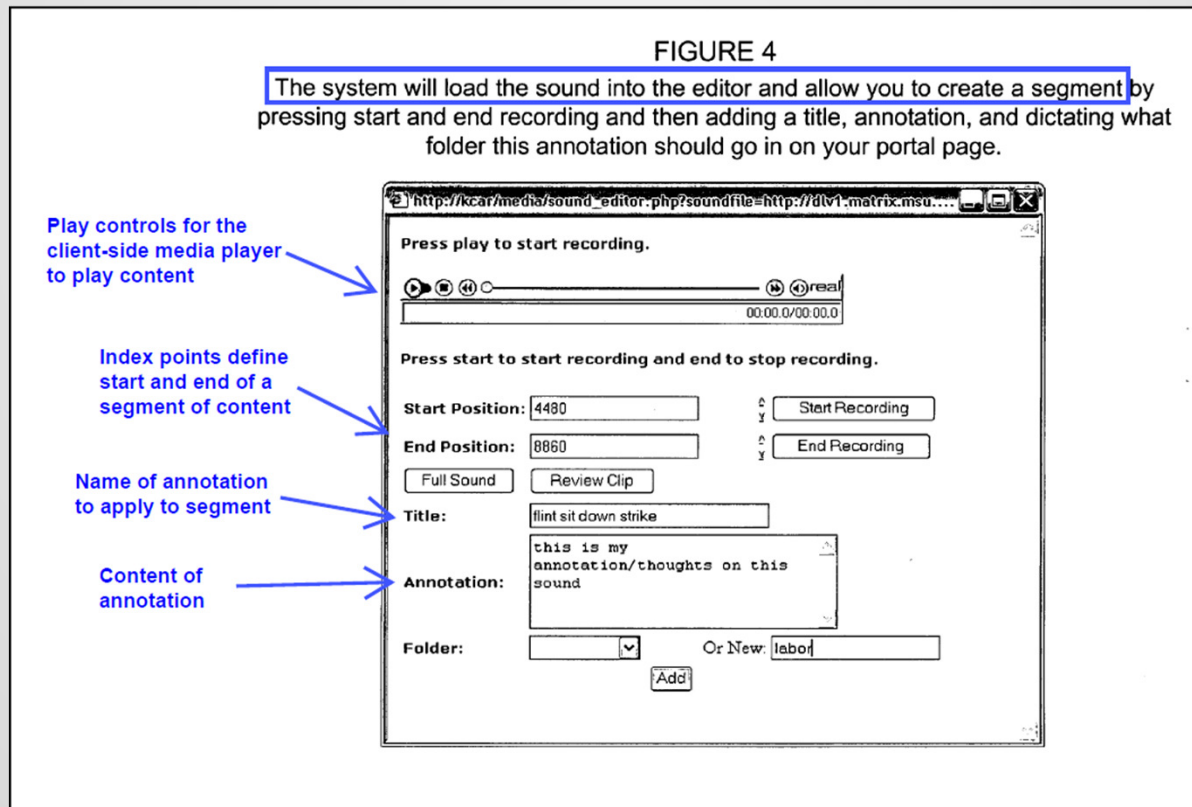
- URL reference to `//localhost/` indicates browser interacts with local computer to perform any editing locally (local cue point editing)
- “FIG. 7 shows a saved annotation that has been opened via the directory for further editing. In preferred embodiments, annotations may be freely created, edited, and deleted without limitation.” Fegan, [0071].
 - Only description of Fig. 7.
 - Describes client-side software for editing annotations.
 - Does not disclose server-side annotation editing in response to *cue point editing command*.

POR, 35-36; Sur-reply, 12-13.

Fegan (13.1) - Anticipation

Fegan does not anticipate 13.1 for a “computer system . . . comprising a video editing environment, and being disposed at a server side of a public network”

- Annotation Creation Window of Fegan. Fig. 4 does not disclose 13.1.



POR, 35-41.

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Fegan (13.1) - Anticipation

Annotation Creation Window of Fegan. Fig. 4 does not disclose 13.1

- Top of Fig. 4: “The system will load the sound into the editor and allow you to create a segment . . .”
- Fig. 4 Describes client-side software for editing annotations.
- Fig. 4 does not disclose server-side annotation editing in response to *cue point editing command*.

POR, 35-36; Sur-reply, 12-13.

Fegan (13.1) - Anticipation

Reference to server database software like MYSQL does not disclose 13.1

- “The present invention is not limited to particular kinds of server-side software. In some preferred embodiments, the databases are driven by MYSQL . . . In some preferred embodiments, the features of the present invention are encoded in PHP and JavaScript . . .”
Fegan, [0010].
- Database software like MYSQL provides for storage/retrieval of data from database
 - No disclosure of server-side *video editing environment* for server-side cue point editing in response to *cue point editing commands* from clients
 - Generic disclosure of PHP and JavaScript does not disclose 13.1.

POR, 39; Sur-reply, 12-13, 16-17.

Fegan (13.1) - Anticipation

References to using remote servers to search content or save search results does not disclose 13.1

- Passages relating to hyperlink (Figs. 1-2) used to execute program to search for content do not disclose editing of annotations. [0071]
- Passages relating to software on remote servers for storing annotations do not disclose editing of annotations. [0083]
- Reply conflates *editing/modifying* of Claim 13 with storage/retrieval of annotations.
 - Claim requires server-side *editing/modifying* in response to *cue point editing command* from client.
- Passages relating to “user’s portal page” (Figs. 5-6) relate to local storage (“localhost”). Does not disclose server-side *editing/modifying* in response to *cue point editing command*.

Fegan (13.1) - Anticipation

Figs. 5-6 do not disclose 13.1

- Selecting Edit thumbnail in Figs. 5-6 merely transitions user to Fig. 7 browser page.
- No disclosure that selecting Edit in Figs. 5-6 discloses server-side *editing/modifying* annotations in response to *cue point editing command* from client per 13.1-13.5.
 - Top of Fig. 7: “by clicking the edit button, a user can edit any of the information for that annotation . . .”

POR, 41.

Fegan (13.4-13.5) - Anticipation

Fegan does not anticipate 13.4 and 13.5 for “receiving a cue point editing command over the network from a remote client terminal” and “modifying a portion of the cue point information at the server side . . . according to the cue point editing command”

- **Petitioner relies on Update button in Annotation Edit Window of Fig. 7.**
- **No disclosure that selecting Update button causes transmission *over the network* of a *cue point editing command* that causes server-side *modifying* of annotation.**
- **Fegan does not disclose any operation triggered by selecting Update button.**

POR, 41-43; Sur-reply, 14-15.

Fegan (13.4-13.5) - Anticipation

Petitioner's argument re selecting Update in Fig. 7

- Entire disclosure in Fegan on Fig. 7 in [0081]:

FIG. 7 shows a saved annotation that has been opened via the directory for further editing. In preferred embodiments, annotations may be freely created, edited, and deleted without limitation.

- No disclosure that selecting Update button causes transmission *over the network* of a *cue point editing command* that causes server-side *modifying* of annotation.

POR, 35-41; Sur-reply, 14-15.

Fegan (13.4-13.5) - Anticipation

Petitioner's argument re selecting Update in Fig. 7

As shown earlier, Figure 7 likewise has a “localhost” URL, which shows that the browser is communicating with a “localhost” and thus is not sending a *cue point editing command over the public network*. POR, 39, 41-43. Further, the ground asserted is **anticipation**, and the Petitioner cannot fill gaps in the Fegan reference by the alleged “understanding of a POSITA.”

Sur-reply, 15.

Fegan (13.4-13.5) - Anticipation

Petitioner's new argument re selecting Add in Fig. 4

- Improper new theory of obviousness for 13.4-13.5, not in Petition.
- Fegan does not disclose any particular operation occurs when Add button is selected.
 - Fegan does not discuss Add button at all.
 - Fig. 4 is Annotation Creation Window creates new annotation, not for *editing/modifying* of annotations per 13.4-13.5

Sur-reply, 15-16.

Fegan (Claim 15) - Anticipation

Fegan does not anticipate Claim 15 for “receiving an edit mode entry signal over the [public] network from the client terminal . . . and switching the video editing environment to the cue point editing mode in response”

- **Petitioner argues that selecting Edit button in Fig. 5 of Fegan discloses *edit mode entry signal* of Cl. 15.**
- **Selection of Edit in Fig. 5 transitions user to Fig. 7.**
- **No disclosure that selecting Edit button causes an edit mode entry signal to be transmitted *over the network*.**
- **Board questioned whether Fegan anticipates Claim 15. DI, 33.**

POR, 43-44; Sur-reply, 18-19.

Fegan (Claim 15) - Anticipation

Fegan does not anticipate Claim 15 for “receiving an edit mode entry signal over the [public] network . . . from the client terminal . . . and switching the video editing environment to the cue point editing mode in response”

- **URL of Figs. 5-7 is “localhost.” Even if Fegan disclosed Edit causing a signal (it does not), it would not be a signal *over the [public] network*.**
- **General use of HTTP does not disclose Claim 15.**
- **Generic description in Fegan [0037] of client browsers sending requests to web servers does not disclose Claim 15.**
- **New PHP theory on reply should be disregarded. Even so, any signal would be transmitted locally to “localhost” (see Figs., 5, 7), not *over the [public] network*.**

POR, 43-44; Sur-reply, 18-19.

Fegan (Claim 18) - Anticipation

Fegan does not anticipate Claim 18 for “receiving, over the [public] network, authentication information relating to access authority”

- Petitioner relies on “personal portal” that “allows the user to edit and organize collected materials.” Fegan, [0009], [0081].
- Personal portal does not disclose receiving *authentication information* over a public network.
- Reply concedes Claim 18, arguing a POSITA “would have understood” reference to portal page to “involve” sending *authentication information*.
- Petitioner cites to definition of “security protocol” in Fegan as “an electronic security system . . . to limit access to processor to specific users.” Does not disclose sending any signal *over the network*.

POR, 44-45; Sur-reply, 19-20.

Gupta and Sull (Gr. 2*) re Claim 17

- **Sull cited only for additional limitation of dependent Claim 17.**
- **Accordingly, Claim 17 is patentable over Gupta/Sull for same reasons as Gupta (Gr. 1) for Claim 13.**

POR, 15-32.

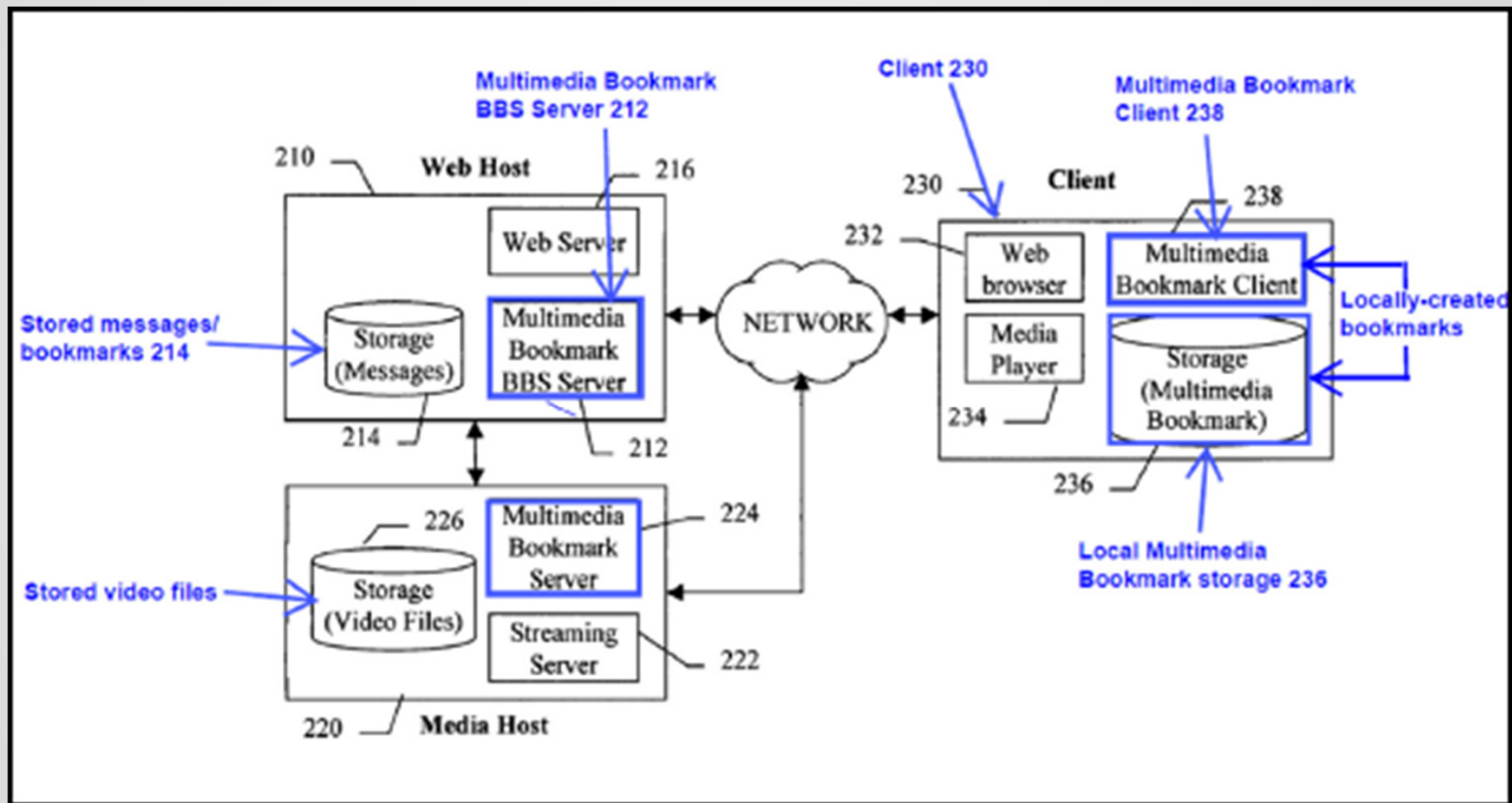
Kim (Gr. 3) - Obviousness

Kim does not meet Claim 13:

- Petitioner's reply did not respond to POR for Ground 3 (Kim).
- Board questioned whether Kim meets limitations 13.1 and 13.4-13.5. See DI, 36.
- 13.1: “*providing a computer system . . . comprising a video editing environment, and being disposed at a server side of a public network*”
- 13.4: “*receiving a cue point editing command over the network from a remote client terminal . . . using the computer system*”
- 13.5: “*modifying a portion of the cue point information at the server side of the public network according to the cue point editing command received over the public network*”

POR, 45-53; Sur-reply, 20.

Kim – Fig. 2



POR, 45-53.

Kim (13.1)

Kim does not teach 13.1 for a “*computer system . . . comprising a video editing environment, and being disposed at a server side of a public network*”

- Bookmarks are created locally using client-side multimedia bookmark client 238 running on client 230. Kim, [0283]-[0284], [0288], Fig. 2.
- Bookmarks are stored locally at client-side bookmark storage 236 and can be uploaded from local storage to a BBS server. [0281], [0288].
- Petitioner concedes “multimedia BBS server 212 receives a multimedia bookmark created locally at client 230.” See Pet., 57.
- No teaching of server-side *video editing environment* for *editing/modifying* bookmarks in response to *cue point editing command*.

POR. 35-41; Sur-reply, 12-13.

Kim (13.1)

Petitioner's various arguments on Kim

- Neither of Kim's server-side Web Host 210 or Media Host 220 performs bookmark *editing/modifying* per 13.1-13.5.
- Multimedia bookmark server 224 can provide bookmark image from stored video to client 20 or BBS server 212. Not *editing/modifying* in response to *cue point editing commands* per 13.1-13.5.
- Uploading of locally-created bookmark from client 230 to MM BBS server 212. BBS server 212 not *editing/modifying* in response to *cue point editing command* per 13.1-13.5.

POR, 48-49.

Kim (13.1)

Petitioner's various arguments on Kim

- **Administrator editing of bookmark advertisements for emails. See Kim, Figs. 18A-18C.**
 - **Kim does not teach administrator editing is performed by a *server-side video editing environment* per 13.1.**
 - **Kim does not teach administrator editing is performed by a server-side component like Web Host 210 or Media Host 220.**
 - **POSITA would understand administrator editing would be performed at client 20 with administrator privileges.**
- **Kim does not teach/suggest server-side VEE for *editing/modifying* in response to *cue point editing commands* per 13.1-13.5.**

POR, 49-50.

Kim (13.4-13.5)

Kim does not teach 13.4-13.5 for “receiving a cue point editing command over the network from a remote client terminal” and “modifying a portion of the cue point information at the server side of the public network”

- **Petitioner’s submission of Gr. 4 Kim/Gupta using Gupta to meet limitations 13.4-13.5 is tacit admission that Kim is deficient.**
- **Petitioner refers to various “Save” buttons on client-side interfaces for advertising embodiment of Figs. 18A-18C.**
- **Petitioner refers to Save button 1822 (Fig. 18A), Save Button 1838 (Fig. 18B), and Save button 1850 (Fig. 18C).**
 - **Save buttons simply transition user from one display to the next. No teaching of *cue point editing command* from client over the network to server-side per 13.4.**

POR, 51-53.

Kim (13.4-13.5)

Kim does not teach 13.4-13.5 for “receiving a cue point editing command over the network from a remote client terminal” and “modifying a portion of the cue point information at the server side of the public network”

- Petitioner refers to Add bookmark control button 108 of Fig. 1.
- But creation of bookmarks is client-side operation by client-side multimedia bookmark client 238 on client 230. See Kim, Fig. 2.
 - Add button 108 merely adds bookmark to local storage 236 in Fig. 2.
 - No teaching of *cue point editing command* from client *over the network* to server-side per 13.4.

POR, 51-53.

Kim (13.4-13.5)

Kim does not teach 13.4-13.5 for “*receiving a cue point editing command over the network from a remote client terminal*” and “*modifying a portion of the cue point information at the server side of the public network*”

- **Petitioner back-up argument to modify Kim for client 230 to send claimed *cue point editing command* to cause *editing/modifying* at the server side.**
- **POSITA would not make modification because contrary to Kim design for bookmark creation/editing on client-side using multimedia bookmark client and for client-side storage.**
- **No need for client 230 to send a *cue point editing command* to perform *editing/modifying* on server-side because Kim already provides *editing/modifying* function on client-side.**

POR, 52-53.

Kim (Claim 15)

Kim does not teach “receiving an edit mode entry signal over the network . . . and switching the [VEE] to the cue point editing mode in response”

- **Petitioner relies on selecting Save button 1822 in Fig. 18A of Kim or Add bookmark button 922 of Sull.**
 - **No disclosure in Kim that selecting Save button or Add bookmark button causes any command signal to be sent *over the network* per Claim 15.**
- **Kim discloses that bookmarks are locally created/edited using client-side multimedia bookmark client 238 on client 230.**
- **No reason for client 230 to send an *edit mode entry signal* over the network to enter *cue point editing mode* on server-side because Kim performs bookmark creation/editing on the client-side.**

POR, 53-54.

Kim (Claim 15) (cont'd)

Kim does not teach “receiving an edit mode entry signal over the network . . . and switching the [VEE] to the cue point editing mode in response”

- **Petitioner asserts that HTTP request would be sent from client 230 when user selects Save 1822 in Fig. 18A to transition to Fig. 18B.**
 - **No evidence in Kim to support.**
 - **Kim teaches that user interfaces are provided by client-side multimedia bookmark client 238.**
 - **Kim does not teach/suggest alleged HTTP request.**

POR, 53-54.

Kim (Claim 18)

Kim does not teach “receiving, over the network, authentication information relating to access authority of the remote client terminal”

- Kim’s retrieval of key to access DRM-packaged video “used to unpack the packaged video.” Kim, [0343]-[0345].
- License key is retrieved to unpackage video, not to perform bookmark editing per Claim 13 in view of Claim 18.

POR, 55.

Kim and Gupta (Gr. 4) - Obviousness

Kim/Gupta is deficient:

- Petitioner's reply did not respond to POR for Kim/Gupta (Gr. 4).
- Gupta only added to allegedly provide 13.4-13.5 ("*cue point editing command*") missing from Kim.
- Kim/Gupta does not teach 13.1 for reasons for Gr. 1 Gupta.
- Kim/Gupta does not teach 13.5 for reasons for Gr. 1 Gupta.

POR, 55-56; Sur-reply, 20.

Kim and Gupta (Gr. 4)

Kim/Gupta is deficient:

- **Limitations 13.4-13.5: Petitioner relies on user Gupta user's selection of OK button in Fig. 21 (Edit Annotations) to send new annotation information from client to server.**
- **No motivation to combine Gupta with Kim.**
- **Petitioner argues Gupta would provide Kim with “client-side editing functionality disclosed by Gupta.”**
 - **Kim already provides client-side editing functionality per Ground 3 (Kim).**
 - **Thus, no reason to combine.**

POR, 55-56.

Vasilevsky and Logan (Gr. 5) - Obviousness

Vasilevsky/Logan does not meet Claim 13:

- 13.1 for *“computer system . . . comprising a video editing environment, and being disposed at a server side of a public network”*
- 13.2 for *“receiving a set of video information at the video editing environment using the computer system”*
- 13.3 for *“receiving a set of cue point information at the video editing environment using the computer system”*
- 13.4-13.5 for *“receiving a cue point editing command over the network from a remote client terminal”* and *“modifying a portion of the cue point information at the server side of the public network according to the cue point editing command”*

POR, 57-74; Sur-reply, 20-28.

Vasilevsky and Logan (Gr. 5)

Vasilevsky/Logan does not meet 13.1 for “a computer system . . . comprising a video editing environment, and being disposed at a server side of a public network”

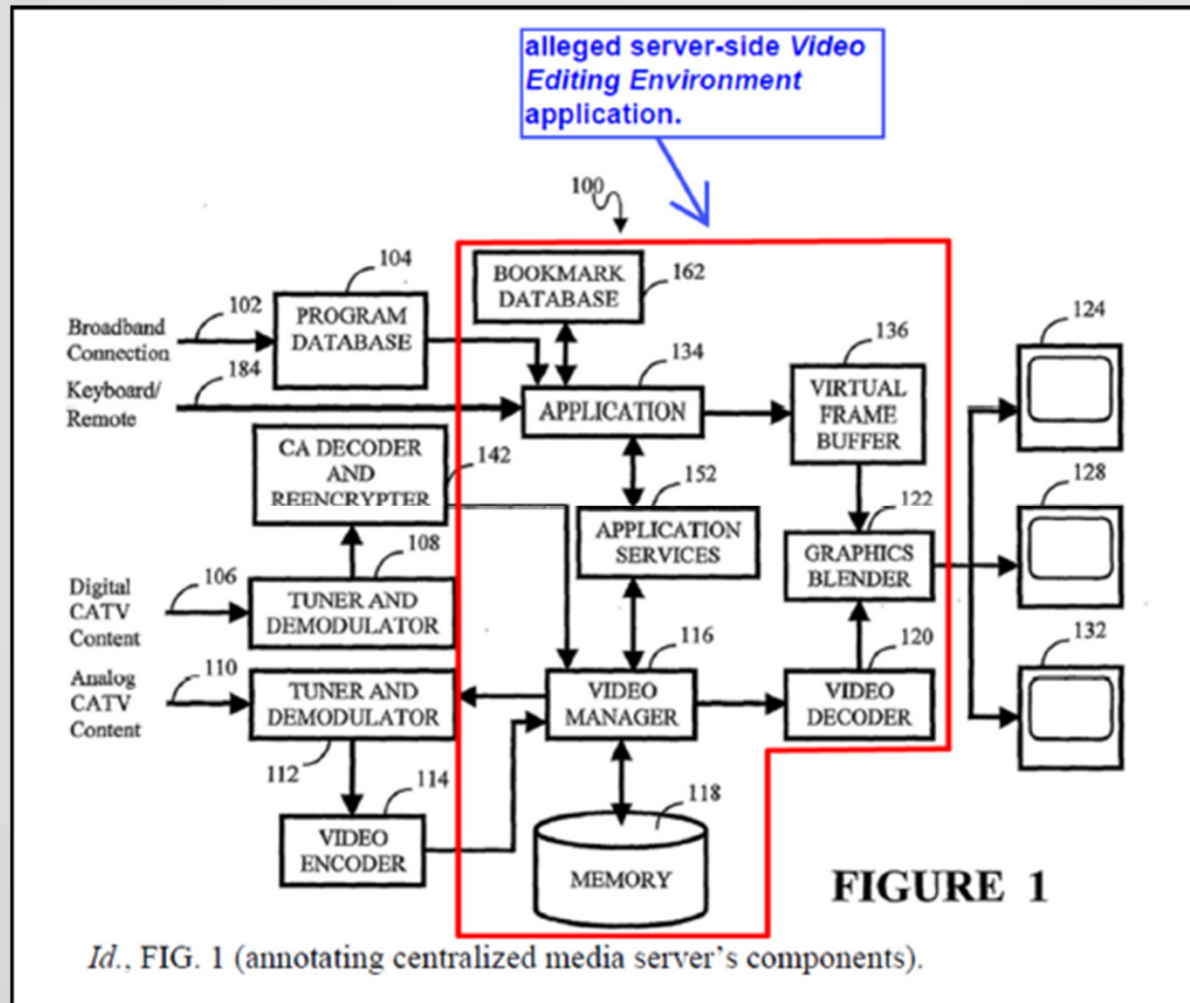
Vasilevsky describes a centralized DVR system (“centralized media server”) hosted on a Home Area Network (HAN) servicing TV viewers in the home. Vasilevsky, Abstract, Fig. 1. Petitioner asserts that the claimed “*computer system . . . comprising a video editing environment*” application is a portion of the centralized media server of Vasilevsky:

POR, 55-56; Sur-reply, 20.

WellcomeMat Exhibit 2043

Vasilevsky and Logan (13.1)

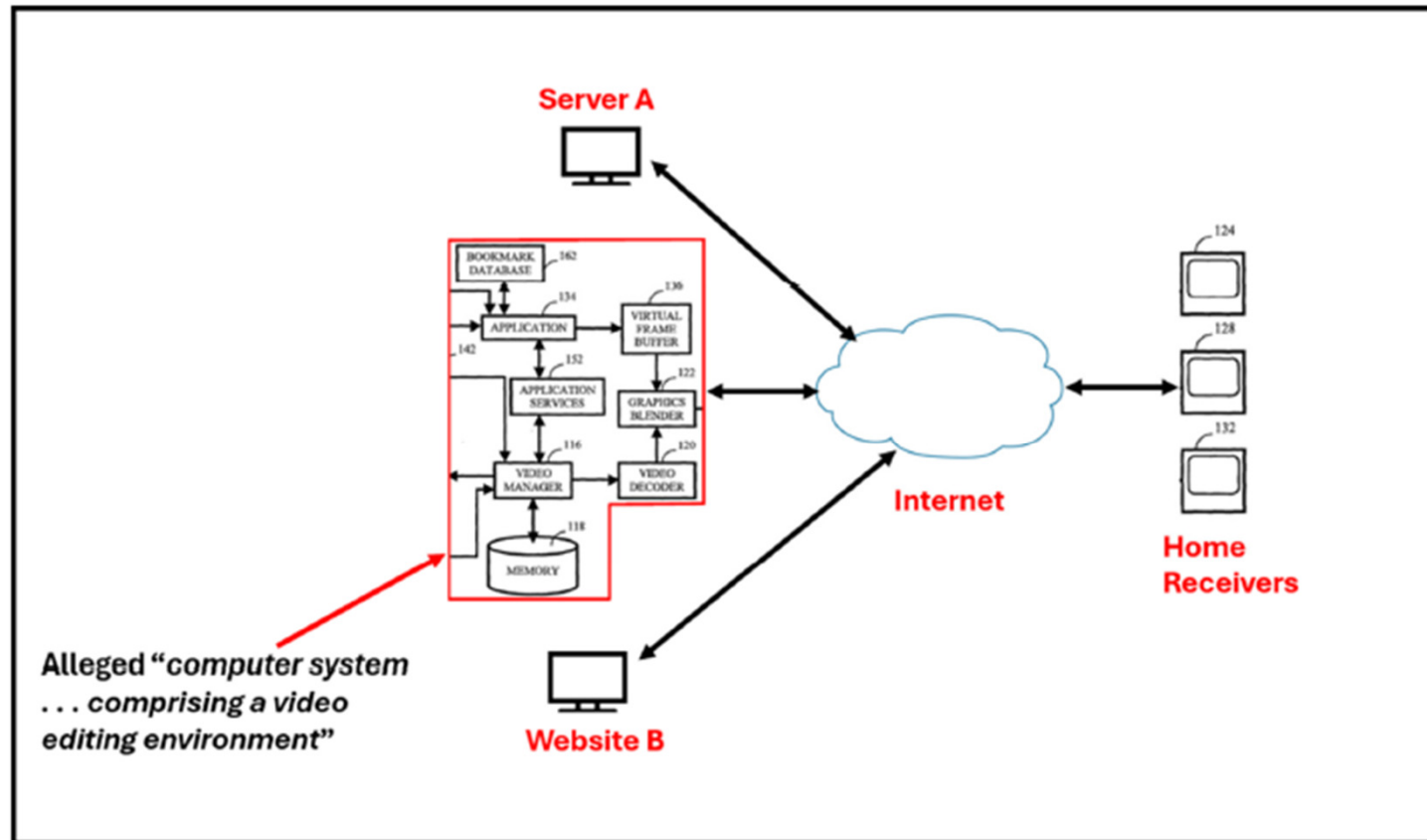
Petitioner argues that the VEE of limitation 13.1 is a selected portion of Vasilevsky's Centralized DVR System:



POR, 63-67; Pet., 75.

Vasilevsky and Logan (13.1)

Modified Vasilevsky system in Dr. Mark Mahon's declaration:



See Ex. 2022.

POR, 67 (citing ¶ 340 of Dr. Mahon Decl., Ex. 2015); Sur-reply, 22.

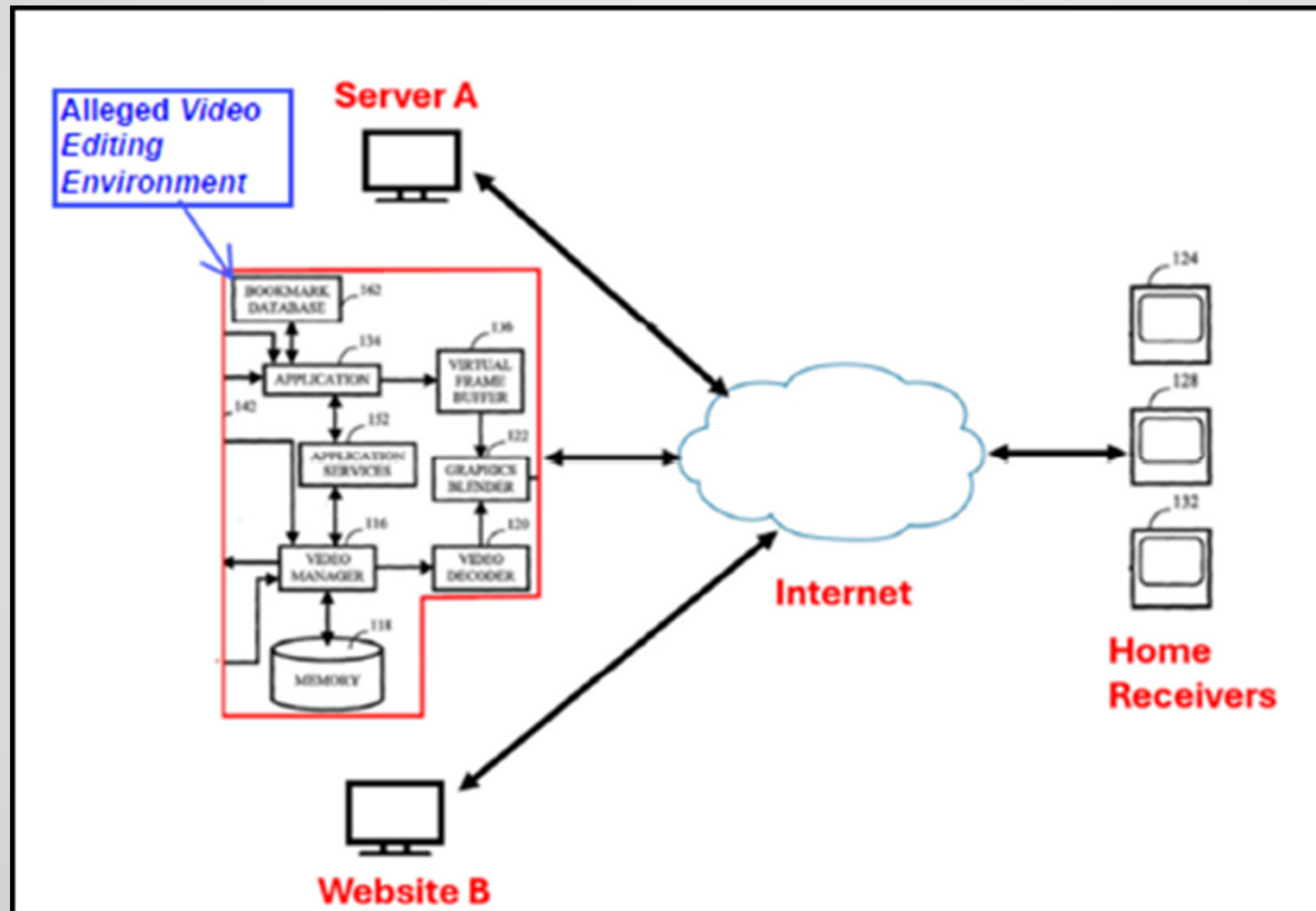
IPR2024-00710

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Slide 67

Vasilevsky and Logan (13.1)

Petitioner argues that the alleged VEE would be rehosted onto the public Internet (modified Vasilevsky system):



Vasilevsky and Logan (13.1)

Modified Vasilevsky system fails to meet 13.1:

- **Modified Vasilevsky would not work**
- **POSITA would not have reason to modify Vasilevsky as proposed**
- **No reasonable expectation of success for proposed modified Vasilevsky system**

POR, 63; Sur-reply, 22.

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IPR2024-00710

Slide 69

Vasilevsky and Logan (13.1)

Modified Vasilevsky system would not work:

- ***VEE* is missing digital/analog television tuner-demodulators; conditional access decoder/re-encryptor, and video encoder from original system of Vasilevsky, Fig. 1 – Undisputed**
- ***VEE* rehosted onto Internet is missing front-end circuitry necessary to receive/decode/decrypt television programming.**
- ***VEE* rehosted onto Internet has no cable lines to receive digital and analog television transmissions. See “Digital CATV Content” and “Analog CATV Content.” See Fig. 1.**

POR, 63; Sur-reply, 22-23.

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IPR2024-00710

Slide 70

Vasilevsky and Logan (13.1)

Petitioner on reply:

- Argues modified Vasilevsky system on the Internet would “maintain” cable line connections from its original Home Area Network implementation.
 - Petition did not disclose connecting cable lines to alleged *VEE* rehosted onto Internet.
- Argues it was “known” for television content to be delivered over Internet.
 - Petition did not propose system including modifying TV end user receivers 124-132 to receive/decode TV content over Internet instead of cable lines.

Sur-reply, 23-24.

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IPR2024-00710

Slide 71

Vasilevsky and Logan (13.1)

Fundamental defects:

- Petition never asserted/established that proposed modified Vasilevsky system had a reasonable expectation of success.
- Petitioner never explains nature of its proposed combination and how proposed combination works.
- Petitioner fails to explain how proposed combination meets claim limitations.

Sur-reply, 23-24.

WellcomeMat Exhibit 2043

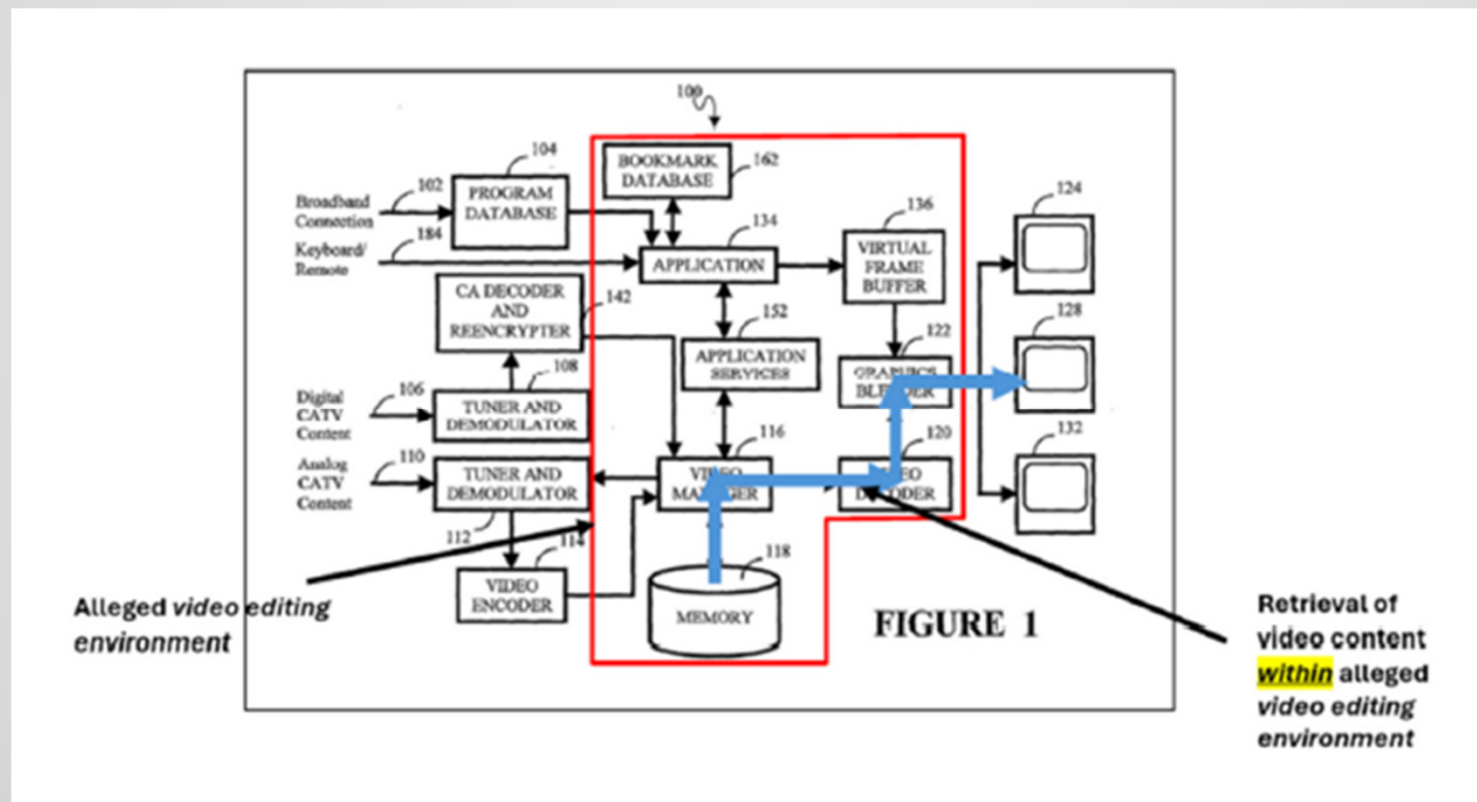
IPR2024-00710

Slide 72

Vasilevsky and Logan (13.2)

Modified Vasilevsky system fails to meet 13.2 for “*receiving a set of video information at the video editing environment*”

- Petitioner shows receiving video within VEE, *not at* VEE

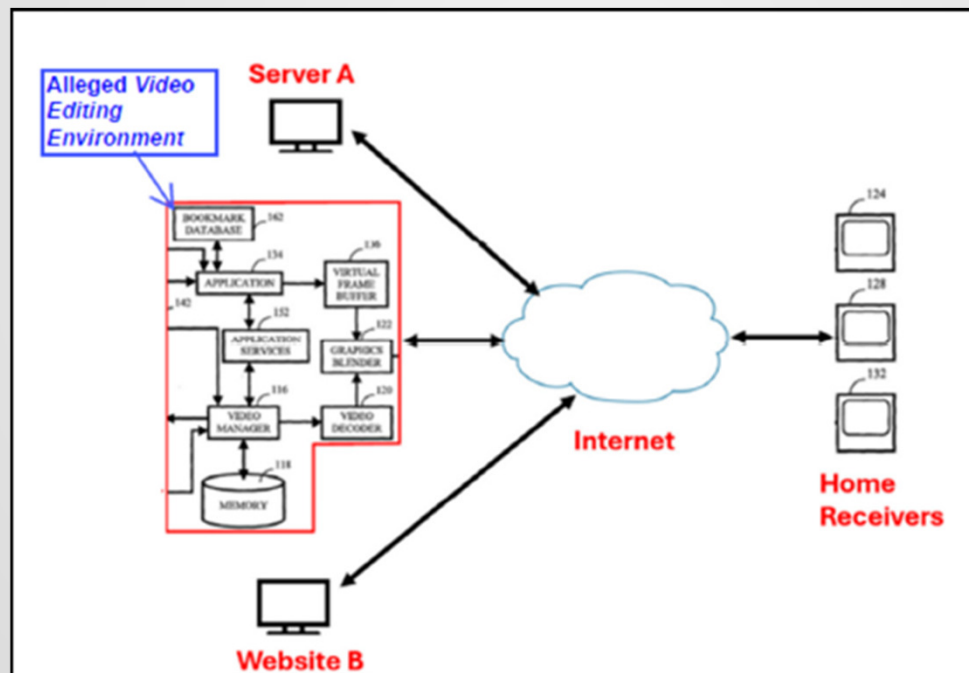


POR, 68-69; Sur-reply, 25-26.

Vasilevsky and Logan (13.2)

Modified Vasilevsky system fails to meet 13.2 for “*receiving a set of video information at the video editing environment*”

- Petitioner fails to show proposed modified Vasilevsky system receives video per limitation 13.2

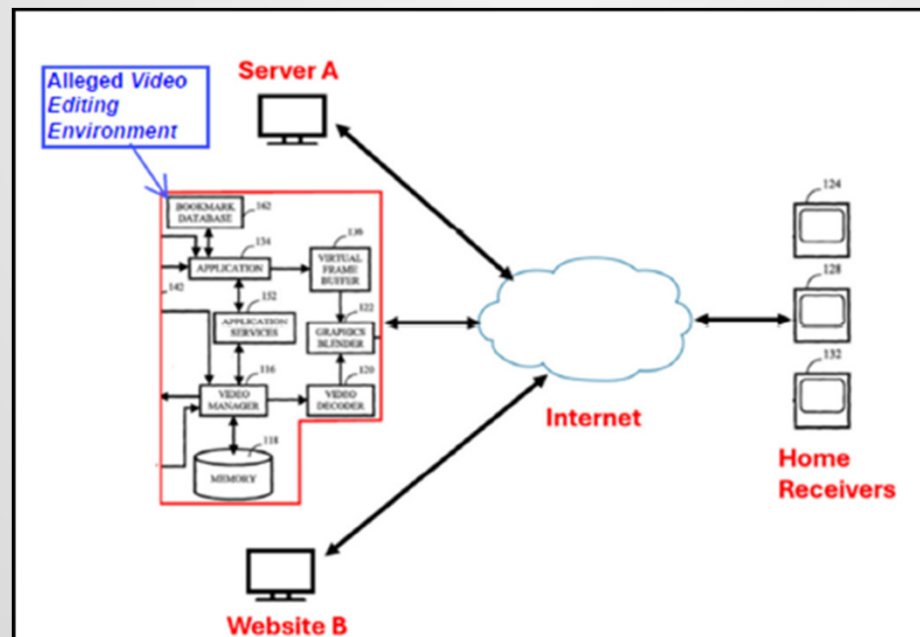


POR, 68-69; Sur-reply, 25-26.

Vasilevsky and Logan (13.3)

Modified Vasilevsky system fails to meet 13.3 for “*receiving a set of cue point information at the video editing environment*”

- Petitioner shows receiving bookmarks (cue points) within VEE, not at alleged VEE.
- Petitioner fails to show that proposed modified Vasilevsky system receives bookmarks per limitation 13.3.



POR, 70-71; Sur-reply, 26-27.

Vasilevsky and Logan (13.1-13.5)

Just as the defender of a patent cannot merely attack the references individually, and must instead address the proposed combination presented by the challenger, the challenger of the patent must demonstrate that the limitations are met by the challenger's proposed combination and not by merely pointing to individual references. *In re Keller*, 642 F.2d 413, 426 (C.C.P.A. 1981). *See In re Merck & Co.*, 800 F.2d 1091, 1097 (Fed. Cir. 1986). The Reply does not address this issue or these cases whatsoever.

POR, 69; Sur-reply, 27.

Vasilevsky and Logan (13.4-13.5)

Vasilevsky/Logan does not meet 13.4-13.5 for “receiving a cue point editing command over the network from a remote client terminal” and “modifying a portion of the cue point information at the server side of the public network”

- **Petitioner fails to show proposed modified Vasilevsky system rehosted onto Internet receives a *cue point editing command* from end user device *over the network*.**
- **No showing how end user TV devices 124-132 would be modified to transmit command signals over Internet.**
- **No showing how application unit 134 in alleged *VEE* would be modified to receive/process commands over Internet instead of direct user input per unmodified Vasilevsky. See Vasilevsky, Fig. 1.**

POR, 72-73; Sur-reply, 27-28.

Vasilevsky and Logan (Cl. 15)

Vasilevsky/Logan does not meet “receiving an edit mode entry signal over the [public] network from the client terminal”

- **Petitioner refers to bookmark display of Fig. 6: “A system user can enter or modify all of the information.” Vasilevsky, 22:14-15.**
 - **Does not teach sending a signal *over the network***
 - **Does not teach an *edit mode entry signal* over the network**
- **Improper new inherency argument on reply that “client must issue a command to the server over the network to enter an edit command.” Reply, 39.**
 - **Not inherent because user could locally modify annotation without sending signal over network.**
 - **No showing limitation is met by proposed modified Vasilevsky system rehosted on Internet.**

POR, 74-75; Sur-reply, 28-29.

WellcomeMat Exhibit 2043

Vasilevsky and Logan (Cl. 18)

Vasilevsky/Logan does not meet “receiving, over the [public] network, authentication information relating to access authority of the . . . client”

- **Petitioner refers to Vasilevsky Cl. 5 that “said media server is adapted to enable a particular bookmark to be edited only by a user purporting to have established the particular bookmark”**
 - **Does not teach sending *authentication information over the network***
 - **Not inherent because authentication information could be locally entered into alleged *VEE*.**

POR, 75-76; Sur-reply, 29-30.

Questions

Further Questions?