

Petitioner Aylo's Demonstratives

Aylo Freesites Ltd v. WellcomeMat, LLC

Case No. IPR2024-00710*

U.S. Patent No. 8,307,286

Before Judges Karl D. Easthom, Kara L. Szpondowski, and Brian P. Murphy

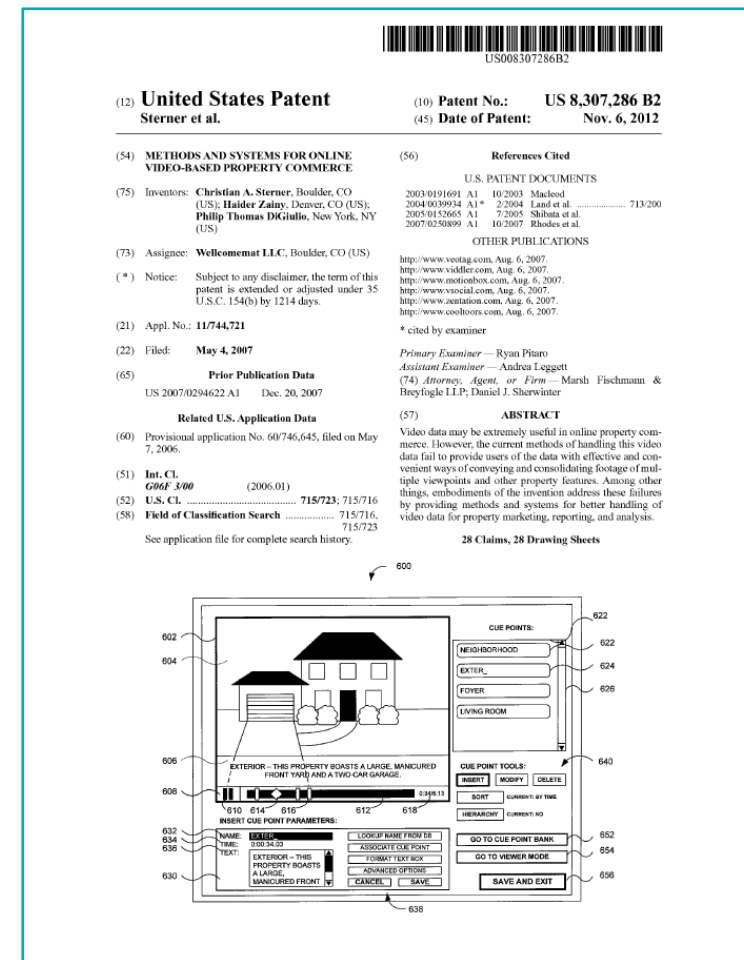
***The Board consolidated IPR2024-01101 (challenging claim 17) into this proceeding**

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Aylo Exhibit 1034 1
Aylo v. WellcomeMat
IPR2024-00710

U.S. Patent No. 8,307,286

- The '286 patent is directed to adding a chaptering feature to online videos
- The concept of chaptering a video was already well known (e.g., commonly used in DVDs)
- The '286 patent simply extends this well-known chaptering concept to online video
 - The '286 patent adopts a typical client-server framework, where the software is installed on a server (as opposed to a personal computer) and users connect to the server from their personal computers to add and edit chapters of online videos (EX1002 ("Houh Decl.") ¶¶41-45)
 - The '286 patent distinguishes over a scenario where a user edits a local video file using local software installed on the client computer ('286 patent, 2:16-25)



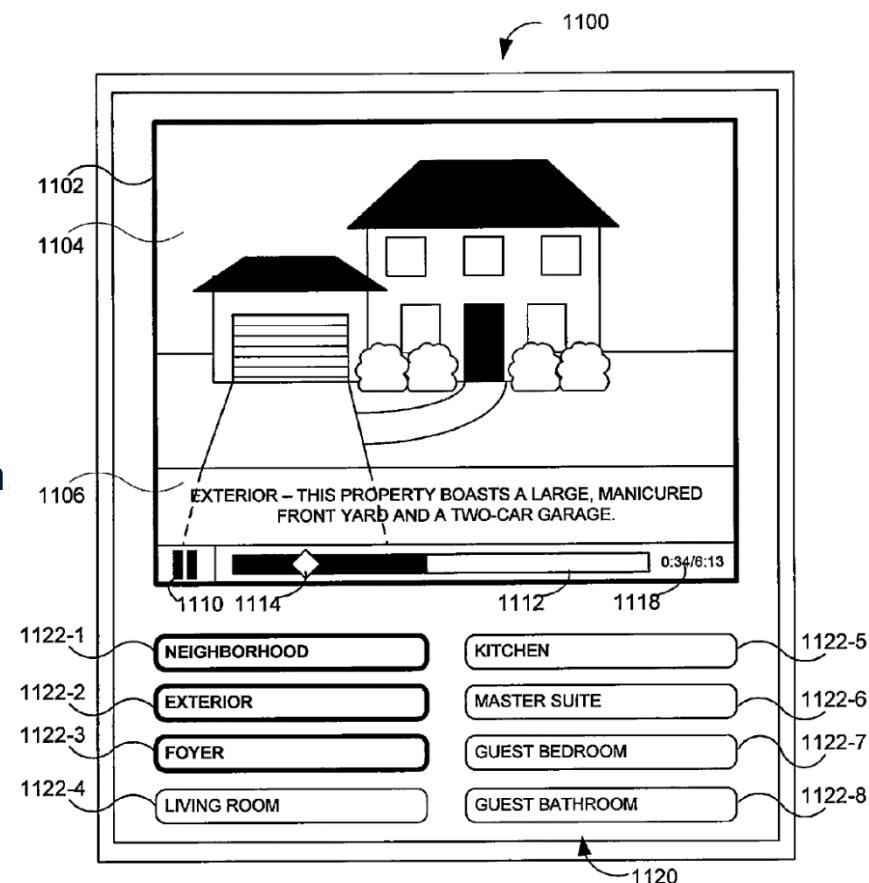
U.S. Patent No. 8,307,286

What is a “cue point”?

- “indexed time positions or tags”
- “essentially providing chapter markers for the different sections of the video”
- Example disclosed in '286 Patent
 - For a video of a hotel suite, cue points for “the bedroom, bathroom living room, and kitchenette” defined at “time positions ... zero, one, two, and three minutes”

In some embodiments, cue points may refer to **indexed time positions or tags** anywhere within a video file. In these embodiments, multiple cue points may refer to multiple time positions within a video file. For example, say a video file contains **video information about a hotel suite**, in which there is **one minute of video each** relating to the **bedroom, bathroom, living room, and kitchenette**. In this example, **four cue points** may be associated with the video file, pointing to time positions at zero, one, two, and three minutes, and **essentially providing chapter markers** for the different sections of the video.

('286 Patent, 7:50-60)



('286 Patent, Fig. 11A; see also 36:9-21)

U.S. Patent No. 8,307,286

- **What is a Video Editing Environment (“VEE”)?**

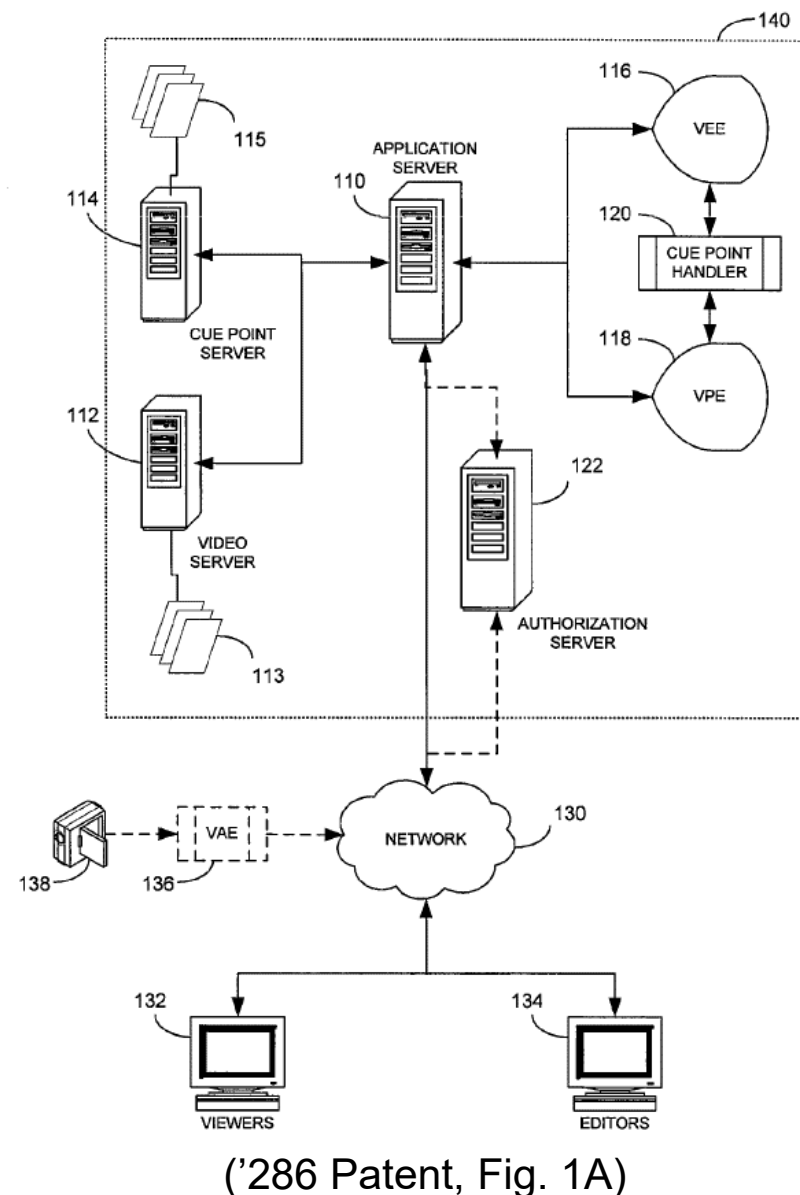
The application server runs a server-side Video Editing Environment (VEE) application(s) 116 to permit client devices to remotely edit cue point information associated with video. '286 Patent, 2:59-60, 4:1-2, 4:57-59, 6:64-66, 9:19-25, 13:2-6 (“the VEE ... load[s] as a ... server-level application”), 13:64-65 (“the VEE itself running at the ... server level”); 15:25-26, Fig 1A. Mahon Decl., ¶¶56-63.

(POR 3-4; see also POPR 6-7)

- **What is a Video Playback Environment (“VPE”)?**

FIG. 11A provides an exemplary screen shot of an embodiment of a video playback environment as viewed by a client terminal according to the invention. The video playback screen 1100 may comprise various elements which may be useful for viewing, navigating, processing, manipulating, and performing other functions relating to video and associated information.

(’286 Patent, 34:59-65)



(’286 Patent, Fig. 1A)

U.S. Patent No. 8,307,286

The '286 patent describes a server-side VEE providing a web browser user interface to a client

FIG. 5 provides an exemplary flow diagram summarizing methods relating to client terminal interactions with video editor environments in various embodiments of the invention. The method 500 may begin when a client enters a VEE 510. The client may enter the VEE 510 by executing an application invoking various software and/or hardware commands, accessing a webpage, or in any other useful way.

('286 Patent, 24:56-62)

26. The system of claim 21, wherein the application server is configured to run the video editing module over the public network, so as to provide the edit interactivity according to data received over the public network via a standard Internet browser running on the remote client terminal.

('286 Patent, claim 26)

It will be appreciated that the GUI may be generated 316 in any useful way for providing a useful interface to the VEE. For example, the GUI may be generated 316 as a webpage on a client's web browser, as a frame within a webpage, as a dedicated client-level application on the client's terminal (with the VEE itself running either at the client- or server-level), or as a background script to be executed by another application (e.g. as Visual Basic commands for an interpreter which may use those commands to generate the GUI).

('286 Patent, 13:59-67)

U.S. Patent No. 8,307,286

The '286 patent describes using client-side forms and submitting form information to the server side

- 1) The '286 patent describes using a cue point information form displayed on a client terminal to collect cue point information
- 2) The '286 patent describes the client submitting the form over the network to the server-side VEE to generate the cue point and save it (e.g., in a server-side database)

After the method 370 receives all the desired or required cue point properties, the method 370 may generate and save the cue point 392. In some embodiments, the method may ask for verification from a client before generating and/or saving the cue point 392. In other embodiments, the method 370 may only generate and/or save the cue point after the client submits the information. For example, the cue point information form may be displayed on a client terminal while the cue point editor resides on a server terminal. In this example, the client may be required to submit the form over a network to the server computer before the cue point editor has the information it needs to generate the cue point.

Further, the method 370 may save the cue point in any effective way in any location. For example, the method 370 may perform a database insert function to insert the new or modified cue point information into an existing cue point database, which may be stored on a server.

('286 Patent, 23:12-28)

U.S. Patent No. 8,307,286

The '286 patent describes using CGI scripts for handling cue point information

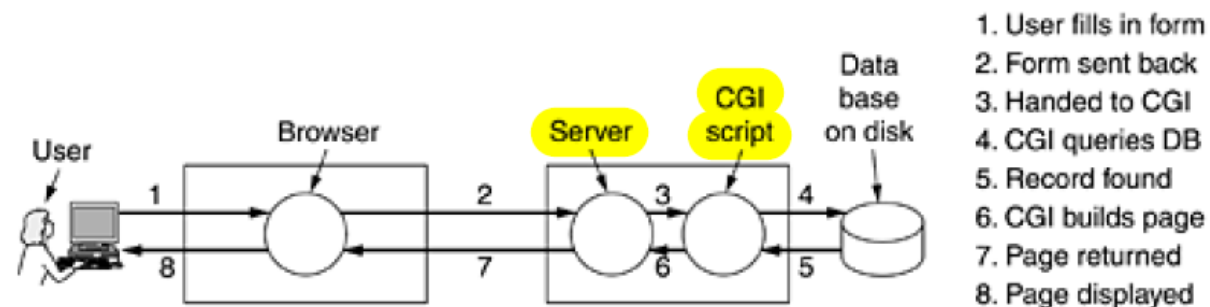
For example, the VEE GUI may load using function calls within the VEE application, the video may load 350 along with a video player application (like Adobe® Flash®) embedded in the VEE GUI, and cue point information may load 352 by executing scripts on one or more servers (e.g. CGI scripts, Structured Query Language (SQL) queries, etc.).

('286 Patent, 18:12-17)

U.S. Patent No. 8,307,286

CGI scripts are:

- server-side executed scripts
- “the traditional way to handle forms and other interactive Web pages”



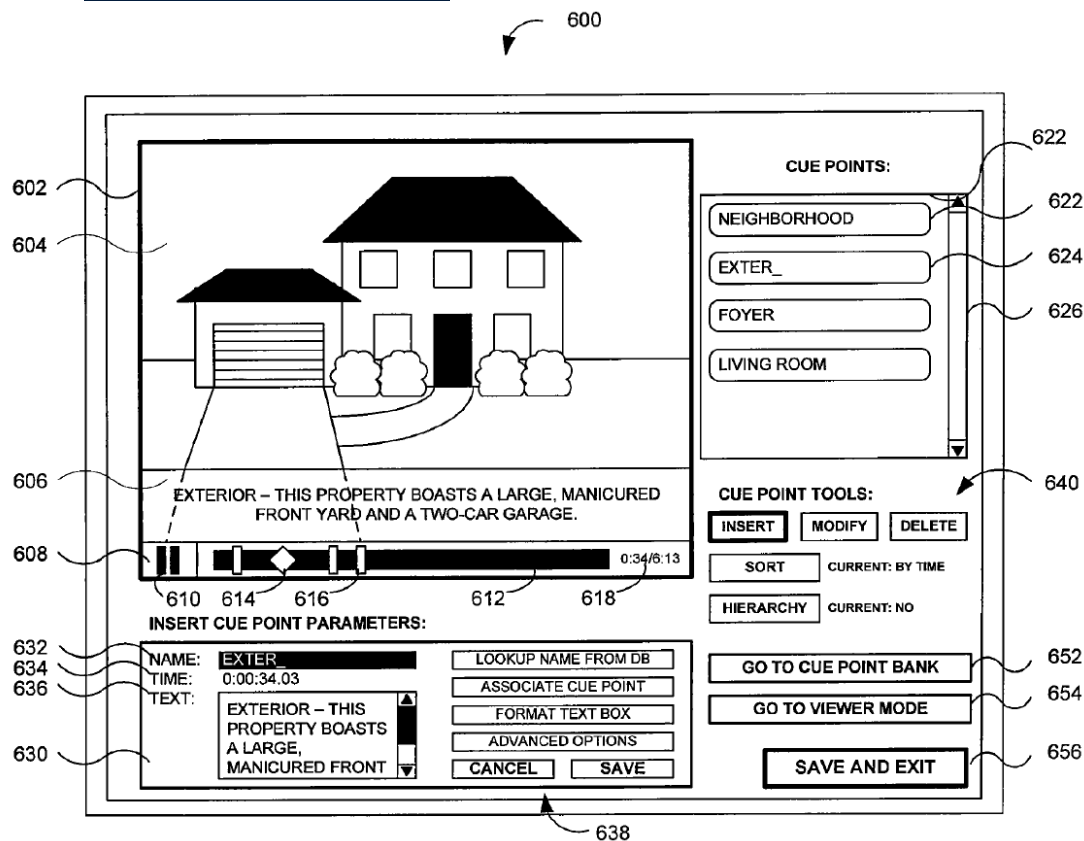
(EX2025 (Tanenbaum), 496)

The traditional way to handle forms and other interactive Web pages is a system called the **CGI (Common Gateway Interface)**. It is a standardized interface to allow Web servers to talk to back-end programs and scripts that can accept input (e.g., from forms) and generate HTML pages in response.

(Tanenbaum, 496)

U.S. Patent No. 8,307,286

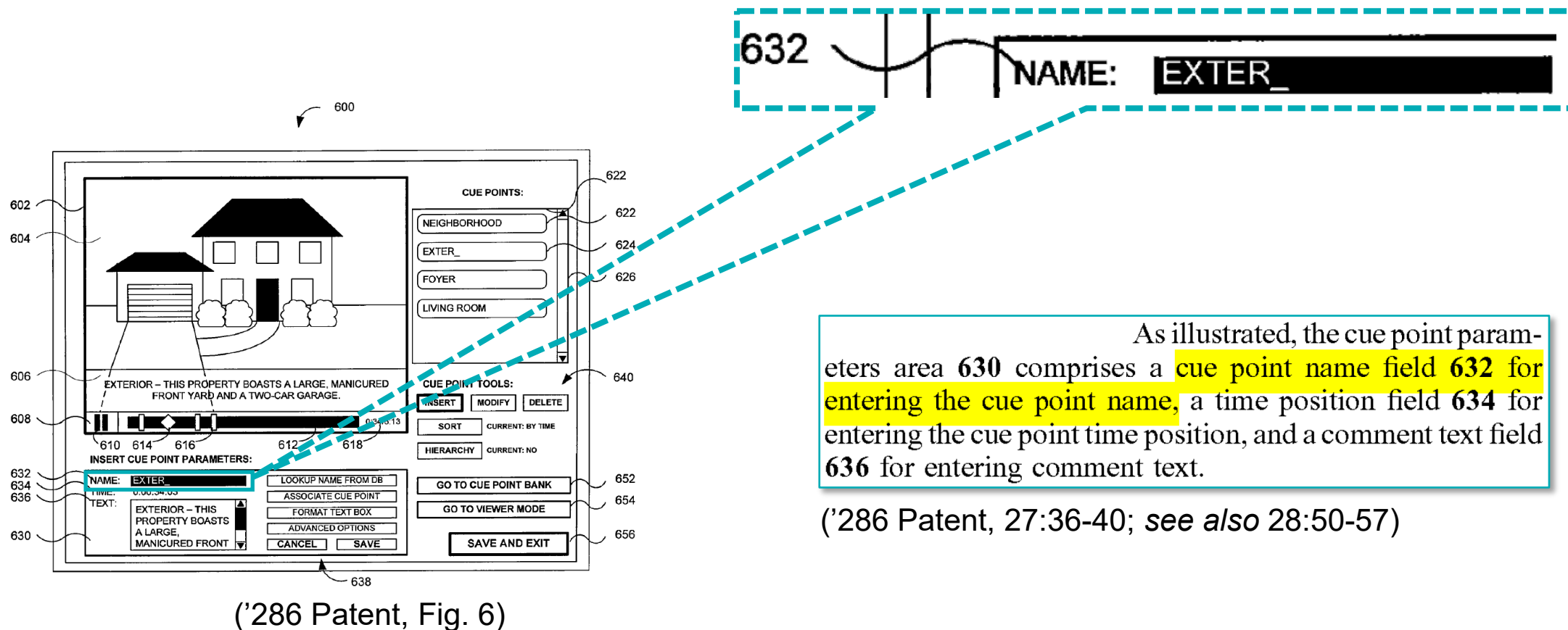
The '286 patent illustrates an exemplary user interface provided to the client for a server-side VEE



(’286 Patent, Fig. 6)

U.S. Patent No. 8,307,286

The '286 patent illustrates a “name” form field for a user to input cue point information



As illustrated, the cue point parameters area 630 comprises a cue point name field 632 for entering the cue point name, a time position field 634 for entering the cue point time position, and a comment text field 636 for entering comment text.

(’286 Patent, 27:36-40; see also 28:50-57)

U.S. Patent No. 8,307,286

The '286 patent describes using client-side forms and submitting form information to the server side

- 1) The '286 patent describes using a cue point information form displayed on a client terminal to collect cue point information
- 2) The '286 patent describes the client submitting the form over the network to the server-side VEE to generate the cue point and save it (e.g., in a server-side database)

In one example, a client may choose to save new cue point information, at which point the method 300 may save the information to a relational database stored on a cue point server with an attribute pointing to the loaded video file.

('286 Patent, 16:11-23)

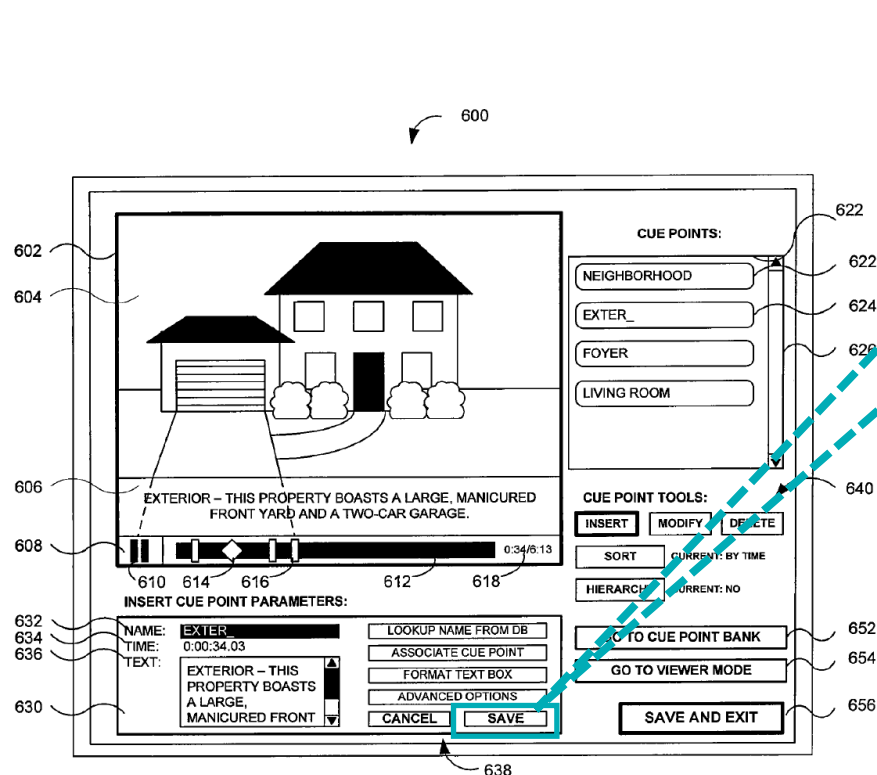
After the method 370 receives all the desired or required cue point properties, the method 370 may generate and save the cue point 392. In some embodiments, the method may ask for verification from a client before generating and/or saving the cue point 392. In other embodiments, the method 370 may only generate and/or save the cue point after the client submits the information. For example, the cue point information form may be displayed on a client terminal while the cue point editor resides on a server terminal. In this example, the client may be required to submit the form over a network to the server computer before the cue point editor has the information it needs to generate the cue point.

Further, the method 370 may save the cue point in any effective way in any location. For example, the method 370 may perform a database insert function to insert the new or modified cue point information into an existing cue point database, which may be stored on a server.

('286 Patent, 23:12-28)

U.S. Patent No. 8,307,286

The '286 patent illustrates a “Save” button to “save” and “submit” cue point information



('286 Patent, Fig. 6)

Additionally, as illustrated, various virtual buttons are provided, including . . . a “Save” button for allowing a client to save the current cue point editing and possibly submit the cue point information.

('286 Patent, 27:40-59)

U.S. Patent No. 8,307,286

The '286 patent describes the “save” and “submit” operations involve submitting/uploading form information from the client to the server-side VEE

After the method 370 receives all the desired or required cue point properties, the method 370 may generate and save the cue point 392. In some embodiments, the method may ask for verification from a client before generating and/or saving the cue point 392. In other embodiments, the method 370 may only generate and/or save the cue point after the client submits the information. For example, the cue point information form may be displayed on a client terminal while the cue point editor resides on a server terminal. In this example, the client may be required to submit the form over a network to the server computer before the cue point editor has the information it needs to generate the cue point.

('286 Patent, 23:12-23)

Further, cue point associations may be updated 326 in any useful way, including after submission, after exit from the VEE, or substantially in real time. In some embodiments, the information may be maintained within files on a server. These files may be continually or periodically updated during the cue point editing process. In other embodiments, the client may be working with very large files, large numbers of cue points, limited bandwidth, limited network reliability, or other technological limitations. In these environments, or for other reasons, it may be desirable or necessary to temporarily store all information affected by the editor in local files. These local files may reside in one or more locations, including as temporary files on the client's terminal or in temporary files on the server computer. The final updated information may then be saved to databases, or other, more permanent, storage locations when the client uploads the information or exits the VEE.

('286 Patent, 16:24:41)

U.S. Patent No. 8,307,286

To summarize, the '286 patent describes that:

- 1) the VEE causes a user interface (e.g., form) to be displayed on the client side
- 2) a user enters modified cue point information on the client side via the client user interface
- 3) the entered cue point information is submitted from the client side to the server-side VEE to edit the cue point at the server side (e.g., update the cue point database)

Unpatentability Grounds

Ground #	Challenged Claim(s)	Basis for Unpatentability
1	13-15 and 17-20	Anticipation by Gupta
2	13-15 and 18-20 17	Anticipation by Fegan Obviousness over Fegan and Sull
3	13-15 and 17-20	Obviousness over Kim
4	13-15 and 17-20	Obviousness over Kim and Gupta
5	13-15 and 17-20	Obviousness over Vasilevsky and Logan

WO 03/067594 A1

Aylo Exhibit 1005

Aylo Exhibit 1005

Vasilevsky
Int'l Pub. No. WO 03/067594
Published: Aug. 14, 2003

Challenged Claims

Claims 13-15 and 17-20 being challenged

- Claim 13 is the sole independent claim

[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.

Claim 13

Claim 13 imposes **only two** requirements for the recited video editing environment (“VEE”)

1. The VEE is part of a server-side computer system (limitation 13.1)
2. The VEE receives a set of video information (limitation 13.2) and receives a set of cue point information (limitation 13.3)

Claim 13 contains no additional language further limiting the VEE.

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;
- • •

Claim 13

Patent Owner's expert, Dr. Mahon, agrees that claim 13 does not impose any VEE requirements beyond those recited in limitations 13.1 through 13.3

Q Do any of the other limitations of Claim 13, other than Limitations 13.1, 13.2, and 13.3, refer to the video-editing environment?

A The video-editing environment is not limited with respect to any of the other claim elements -- sub elements of Claim 13.

Q And your reference to "any of the other claim elements," you mean any remaining ones other than 13.1 through 3?

A That is correct.

(EX1024 ("Mahon Dep."), 110:17-22)

Q So Limitations 13.1, 13.2, and 13.3 are the limitations within Claim 13 which define the video-editing environment?

...

A Those elements, 13.1, 13.2, 13.3, disclose aspects of the video-editing environment, but they don't -- from the perspective of a POSITA, they're not limiting the video-editing environment in any other way.

(Mahon Dep, 111:5-13)

Reply 1

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE



Ground 1 – Anticipation by Gupta

Ground 1 – Anticipation by Gupta

(Claim 13)

Issues in dispute regarding Gupta and claim 13

- 1) Does Gupta disclose providing a computer system comprising a VEE and disposed at a server side of a public network (limitation 13.1)?
 - 2) Does Gupta disclose receiving a set of video information at the VEE (limitation 13.2)?
 - 3) Does Gupta disclose receiving a set of cue point information at the VEE (limitation 13.3)?
 - 4) Does Gupta disclose receiving a cue point editing command over the network from a client-side terminal (limitation 13.4)?
 - 5) Does Gupta disclose modifying a portion of the cue point information at the server side according to the cue point editing command (limitation 13.5)?
- **Patent Owner does not dispute that Gupta discloses limitations 13.6 and 13.7**

[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.

Ground 1 – Anticipation by Gupta (Claim 13)

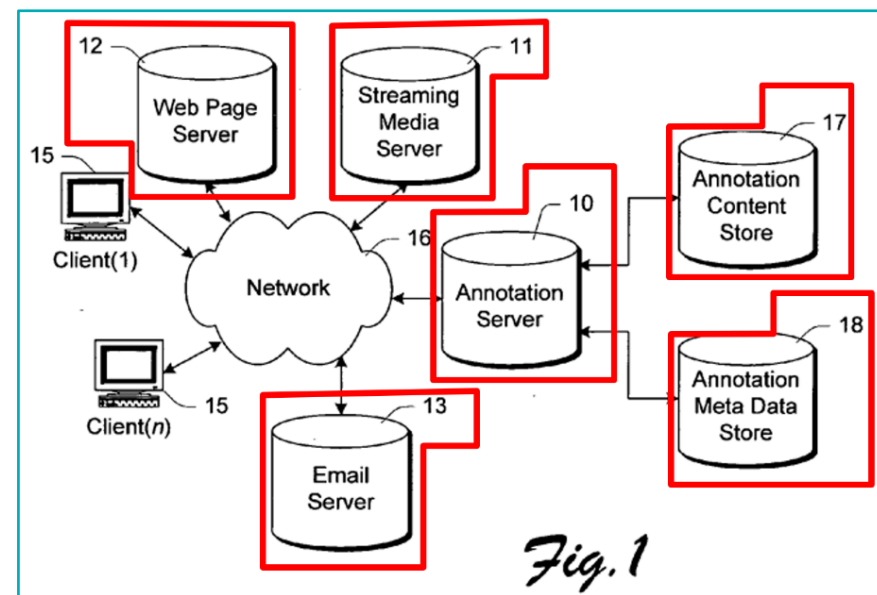
Gupta discloses a server-side editing environment to edit video annotations

Gupta discloses *providing a computer system (e.g., servers and storage devices at a server side of a public network, including servers 10-13 and stores 17-18)*. EX1004, ¶¶[0032]-[0034].

(Pet. 15)

The at least one computer-readable medium *comprising a video editing environment (e.g., software for both editing annotations and streaming video, executed by servers 10-13 and stores 17-18)*. Annotation server 10 executes

(Pet. 16)



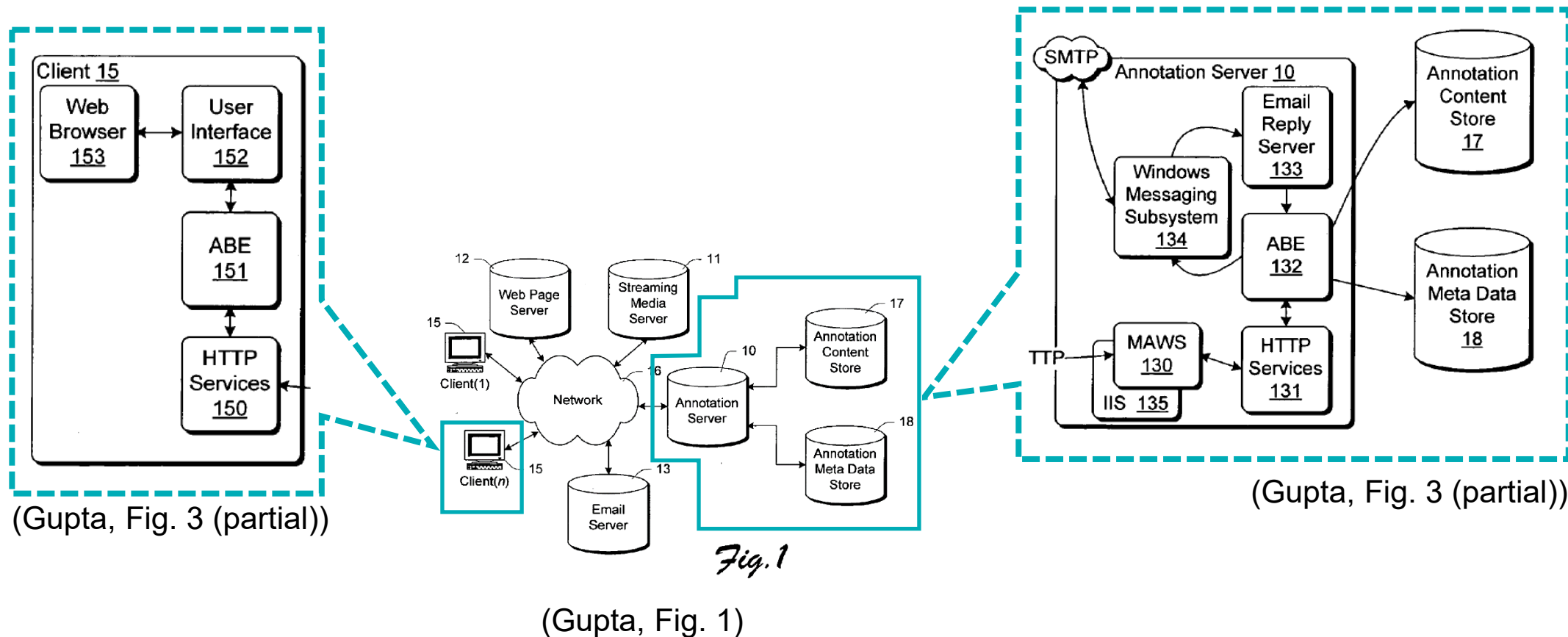
(Pet. 15 (citing Gupta, Fig. 1))

- Patent Owner does not dispute that Gupta's "annotations" constitute cue points

Ground 1 – Anticipation by Gupta

(Claim 13)

Gupta discloses a server-side VEE providing a web browser user interface to a client

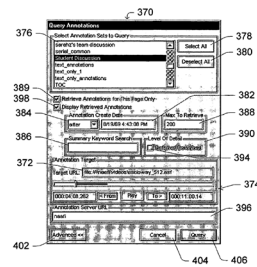


Ground 1 – Anticipation by Gupta (Claim 13)

Gupta discloses a server-side VEE providing a web browser user interface to a client

Assignee: **Microsoft Corporation, Redmond, WA**

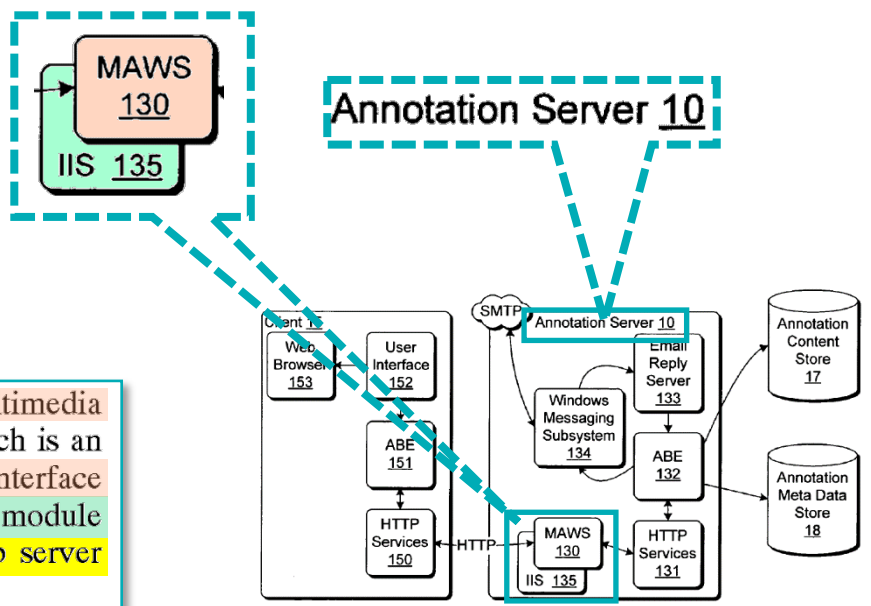
United States
Patent Application Publication
Gupta et al.
Pub. No.: US 2005/0081159 A1
Pub. Date: Apr. 14, 2005
Provisional application No. 60/300,452, filed on Sep. 15, 1999.
Publication Classification
(51) Int. Cl. G06F 3/00, G06F 15/16
(52) U.S. Cl. 705/750, 725/720, 709/204
Inventors: Anoop Gupta, Woodbury, N.Y.; David M. Bergman, New York, N.Y.
Attorney: Microsoft Corporation, Redmond, WA
Related U.S. Application Data
Ref. to: 60/300,452
Filed: Oct. 18, 2004
Pub. No.: 60/300,452
Pub. Date: Apr. 14, 2005



(Gupta, cover)

[0047] Annotation server 10 includes the Multimedia Annotation Web Server (MAWS) module 130, which is an Internet Services Application Programming Interface (ISAPI) plug-in for Internet Information Server (IIS) module 135. Together, these two modules provide the web server functionality of annotation server 10.

(Gupta ¶[0047])

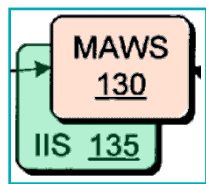


(Gupta, Fig. 3)

Ground 1 – Anticipation by Gupta

(Claim 13)

Gupta discloses a server-side VEE providing a web browser user interface to a client



(Gupta, Fig. 3 (portion))

[0047] Annotation server 10 includes the Multimedia Annotation Web Server (MAWS) module 130, which is an Internet Services Application Programming Interface (ISAPI) plug-in for Internet Information Server (IIS) module 135. Together, these two modules provide the web server functionality of annotation server 10.

(Gupta ¶[0047])

ISAPI Extensions

This section describes information about developing dynamic Web content using ISAPI extensions. ISAPI provides the same functionality as CGI, but can be executed faster than CGI, ASP, and files that call COM+ components.

(EX1028 (Microsoft web site))



Internet Information Services

Internet Information Services (IIS) 6.0 is a powerful Web server that provides a highly reliable, manageable, and scalable Web application infrastructure for all versions of Windows Server 2003.

(EX1027 (Microsoft web site))

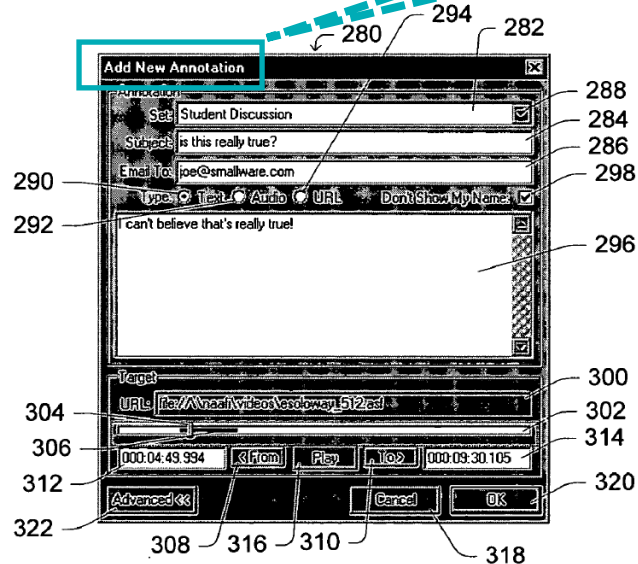
Ground 1 – Anticipation by Gupta

(Claim 13)

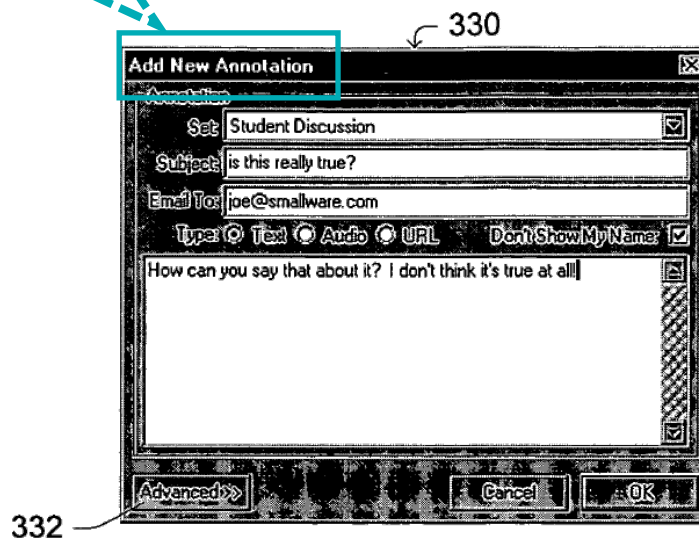
Gupta discloses a server-side VEE providing a web browser user interface to a client

Add New Annotation

Edit Annotation

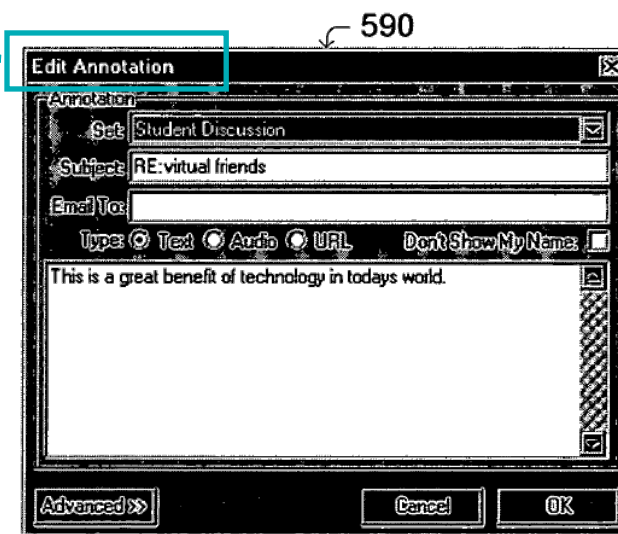


(Gupta, Fig. 7)



[0102] FIG. 8 shows another exemplary “add new annotation” dialog box 330. Dialog box 330 is similar to dialog box 280 of FIG. 7, but is a reduced option box.

(Gupta, Fig. 8; ¶[0102])



[0144] FIG. 21 illustrates an exemplary “edit annotation” dialog box 590. . . .

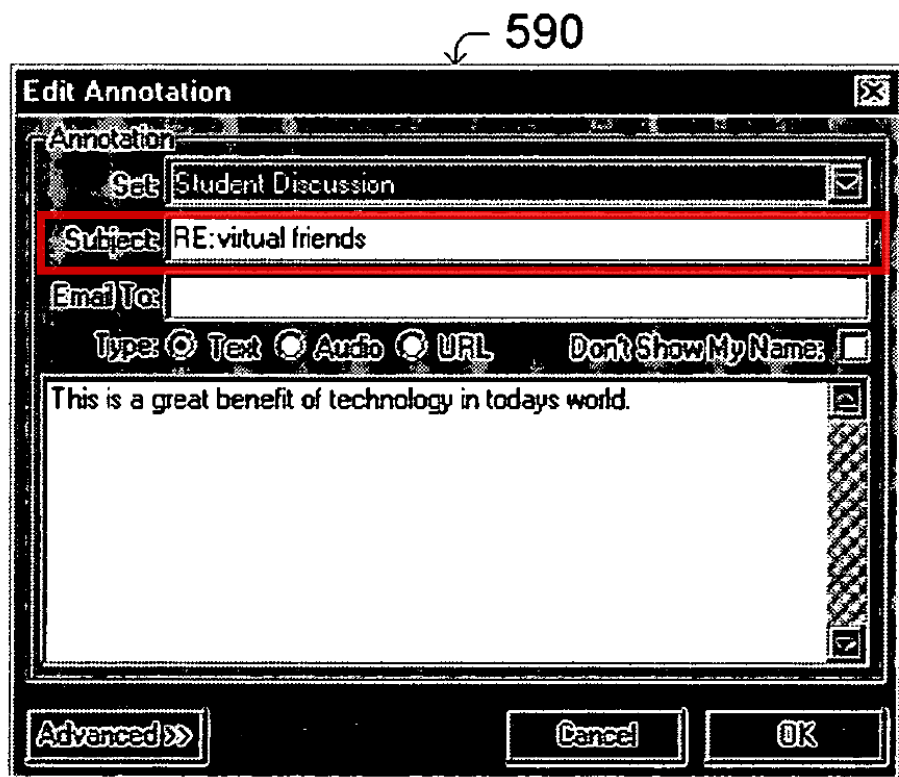
New information can be entered into the fields, analogous to add annotation dialog box 330 of FIG. 8.

(Gupta, Fig. 21; ¶[0144])

Ground 1 – Anticipation by Gupta

(Claim 13)

Gupta discloses the user interface presenting form fields for user input of annotation information



(Gupta, Fig. 21)

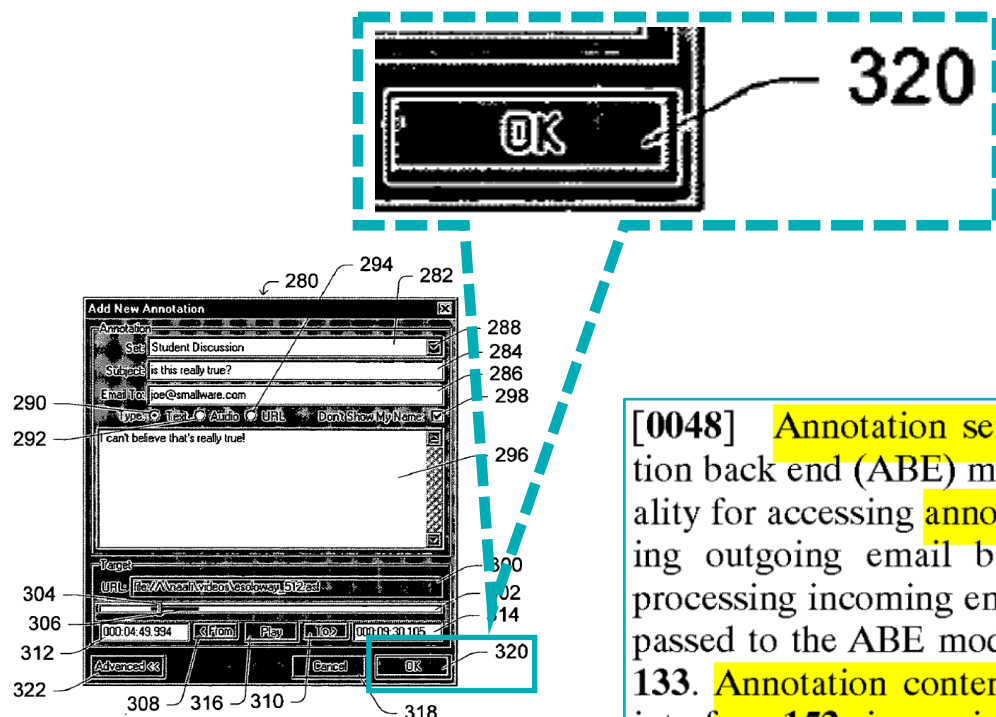
[0144] FIG. 21 illustrates an exemplary “edit annotation” dialog box 590. Edit annotation dialog box 590 is displayed in response to a user request to edit an annotation, such as selection of the “edit” option in menu 466 of FIG. 15. Dialog box 590 includes information and fields displaying the current information for the annotation, analogous to dialog box 560 of FIG. 20. New information can be entered into the fields, analogous to add annotation dialog box 330 of FIG. 8.

(Gupta ¶[0144])

Ground 1 – Anticipation by Gupta

(Claim 13)

Gupta's "OK" button causes the client to send the entered form information to annotation server 10 for storage



(Gupta, Fig. 7)

[0100] Dialog box 280 also includes a cancel button 318, an OK button 320, and an advanced button 322. Selection of cancel button 318 causes interface 152 to close the dialog box 280, canceling out of the add new annotation process. Selection of OK button 320 causes interface 152 to forward the information entered in dialog box 280 to annotation backend 151, which sends the new annotation information to annotation server 10 of FIG. 3. Interface 152 then closes dialog box 280, the new annotation being entered.

(Gupta ¶[0100])

[0048] Annotation server 10 further includes an annotation back end (ABE) module 132, which contains functionality for accessing annotation stores 17 and 18, for composing outgoing email based on annotation data, and for processing incoming email. Incoming email is received and passed to the ABE module 132 by the Email Reply Server 133. Annotation content authored at client 15, using user interface 152, is received by ABE 132 and maintained in annotation content store 17. Received meta data (control information) corresponding to the annotation content is maintained in annotation meta data store 18.

(Gupta ¶[0048])

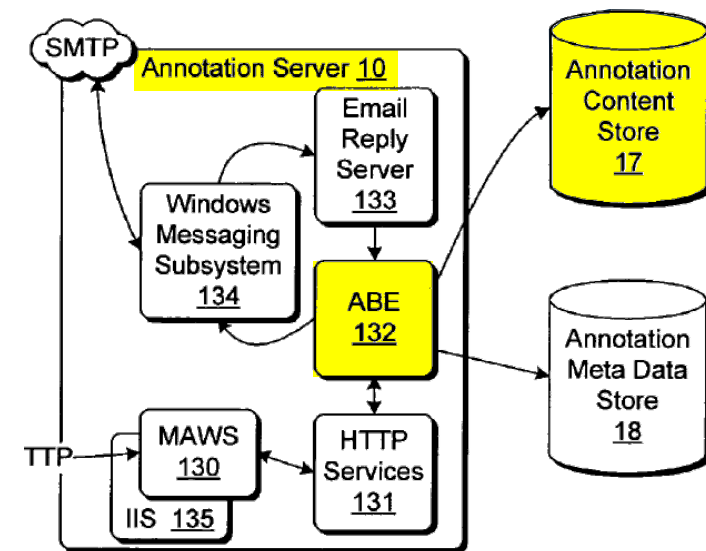
Ground 1 – Anticipation by Gupta

(Claim 13)

Patent Owner's expert, Dr. Mahon, confirms annotation information in Gupta is submitted from the client side to the server side for storage

Gupta also states: “Annotation content authored by client 15, using [client-side] user interface [UIM] 152, is received by ABE 132 and maintained in annotation content store 17.” Gupta, [0048]. This indicates that annotations are created at the client-side and the ABE 132 receives them from the client and stores them in the database 17.

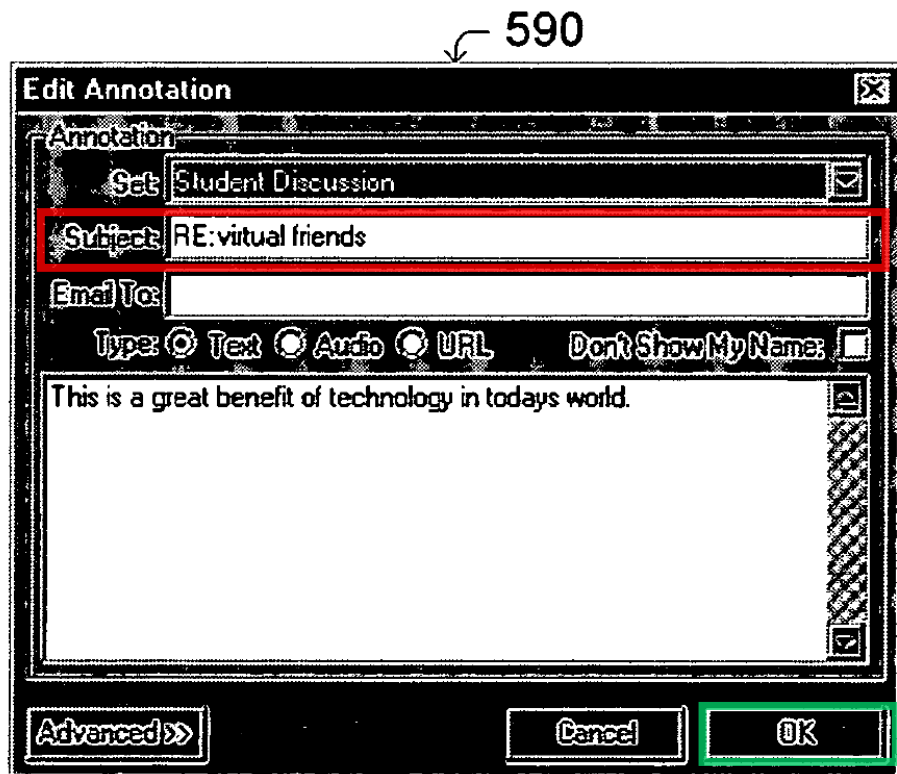
(Mahon Decl. ¶127)



(Gupta, Fig. 3 (partial))

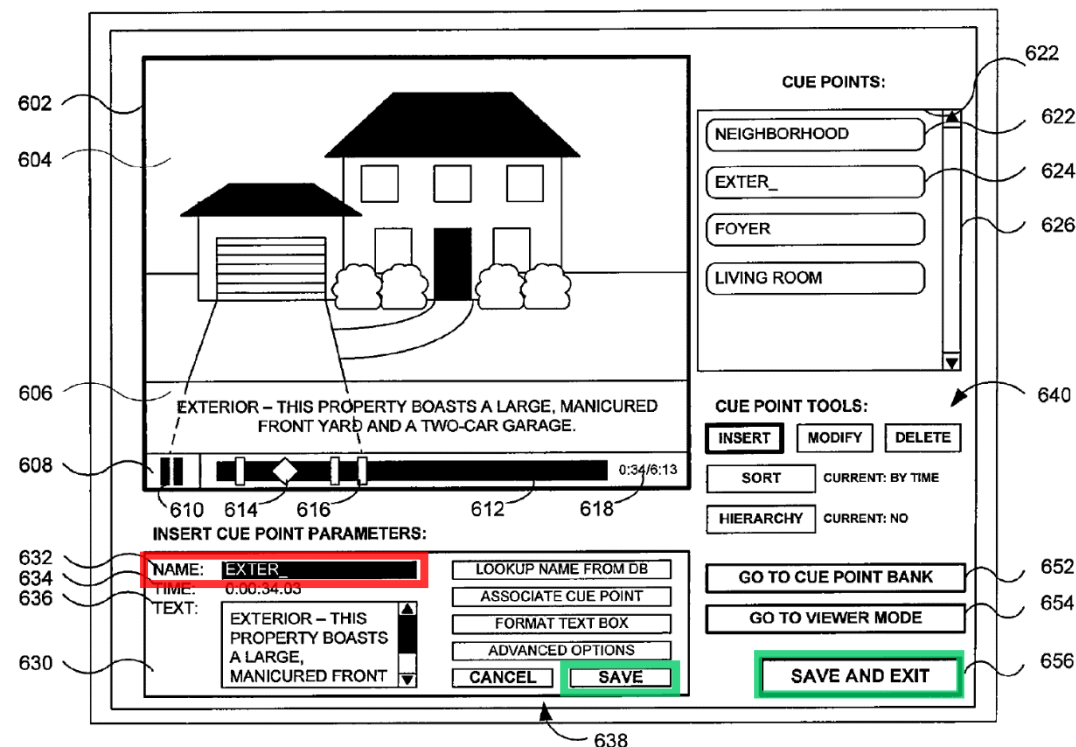
Ground 1 – Anticipation by Gupta (Claim 13)

Gupta



(Gupta, Fig. 21)

'286 patent

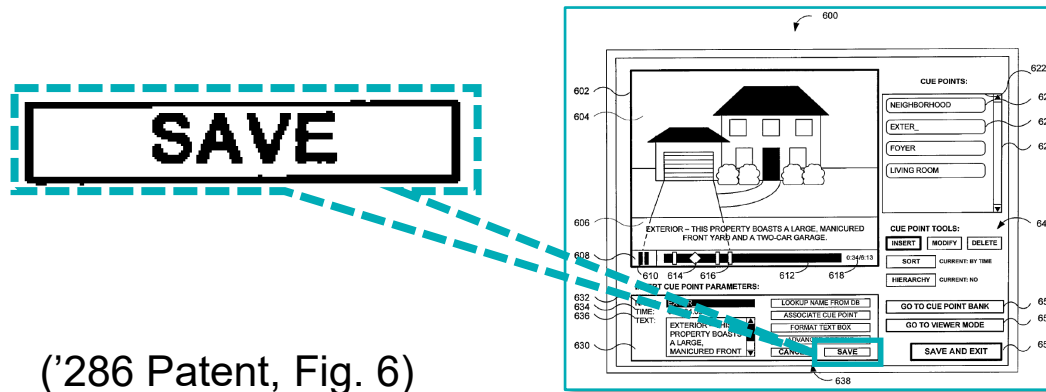
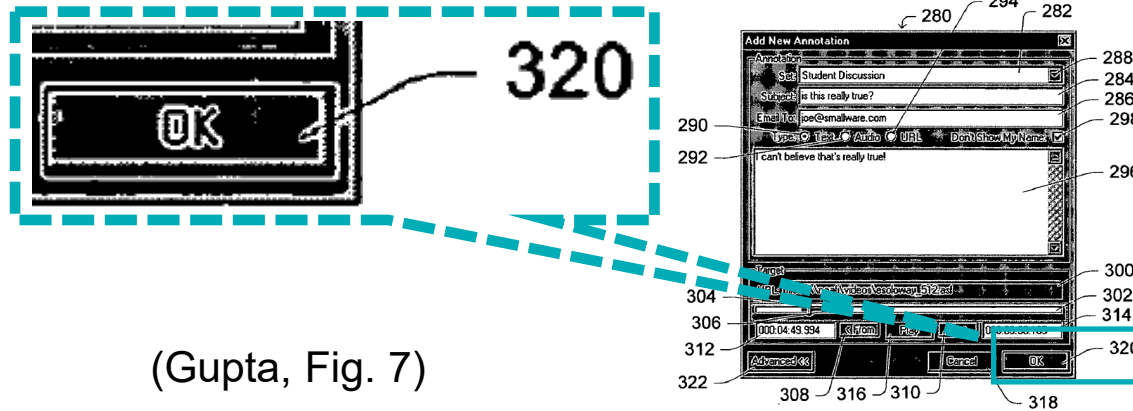


('286 patent, Fig. 6)

Ground 1 – Anticipation by Gupta

(Claim 13)

Gupta's "OK" button performs analogous actions to the '286 patent's "Save" button



After the method 370 receives all the desired or required cue point properties, the method 370 may generate and save the cue point 392. In some embodiments, the method may ask for verification from a client before generating and/or saving the cue point 392. In other embodiments, the method 370 may only generate and/or save the cue point after the client submits the information. For example, the cue point information form may be displayed on a client terminal while the cue point editor resides on a server terminal. In this example, the client may be required to submit the form over a network to the server computer before the cue point editor has the information it needs to generate the cue point.

Further, the method 370 may save the cue point in any effective way in any location. For example, the method 370 may perform a database insert function to insert the new or modified cue point information into an existing cue point database, which may be stored on a server.

('286 Patent, 23:12-28)

Ground 1 – Anticipation by Gupta

(Claim 13)

To summarize, Gupta discloses that:

- 1) the annotation server 10 causes a user interface (e.g., form) to be displayed on the client side (via Microsoft IIS and ISAPI web server functionality)
- 2) a user enters modified annotation information on the client side via the client user interface (via Fig. 21 interface)
- 3) the entered annotation information is submitted from the client side to the annotation server 10 to edit the annotation at the server side (e.g., by updating data stores 17, 18)

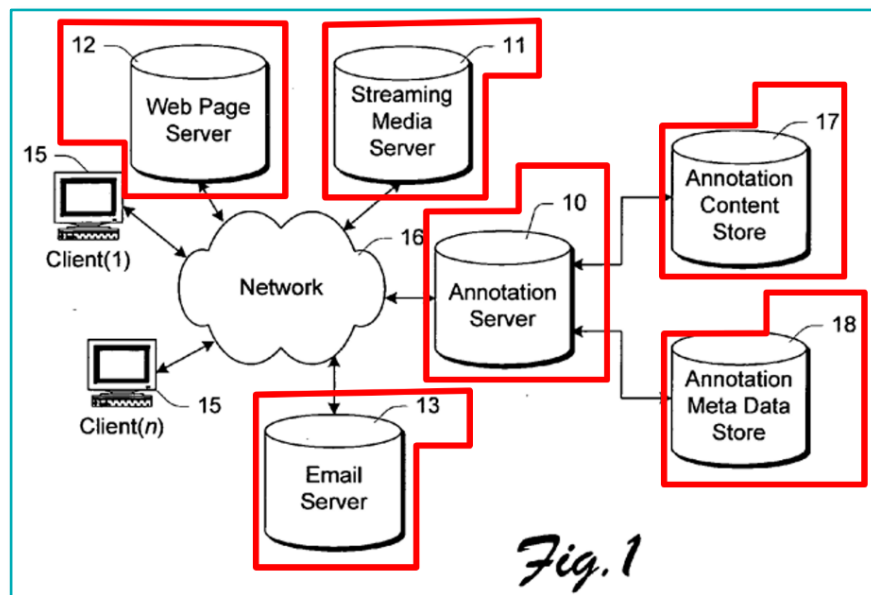
➔ Gupta discloses an analogous system to that described in the '286 patent.

Ground 1 – Anticipation by Gupta

(Claim 13)

Gupta discloses limitation 13.1

- Annotation server 10 provides web interface to client for editing videos, utilizing Microsoft IIS and ISAPI functionality (Gupta, Figs. 1, 3; ¶[0047])



(Gupta, Fig. 1)

- [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.

Ground 1 – Anticipation by Gupta (Claim 13)

Patent Owner concedes claim 13 encompasses the recited VEE accessed via a client web browser

¹ The claim encompasses the use of a browser to access a server-side VEE that performs editing of cue points per limitation 13.1. For example, the '286 Patent discloses that the server-side VEE cue point editing can be controlled by a client device using a browser. See '286 Patent, 13:58-67.

POR, 38 n.1 (citing '286 Patent, 13:58-67)

Since filing their Second Joint Claim Construction and Prehearing Statement (Dkt. 210), the parties have agreed to the following additional construction:

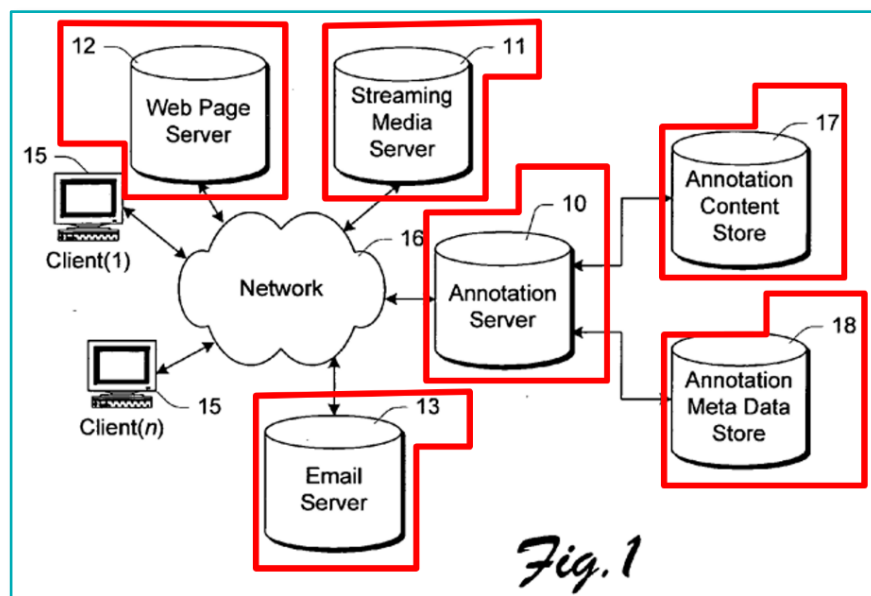
#	Term	Agreed Construction
1	“video editing environment” / “video editing module” [Claims 13, 14, 15, 19, 21, 23, 24, 26, 27, 28]	“software, including a program, application, or <u>webpage</u> , for video editing”

(EX1033 (Patent Owner’s opening claim construction brief) at 2)

Ground 1 – Anticipation by Gupta (Claim 13)

Gupta discloses limitation 13.2

- Streaming media server 11 receives streaming media content for annotation (Gupta ¶[0030])
- Streaming media server 11 has access to streaming media content including “live” media streams, which are annotated and “stored ... in a database or other file storage system” (Gupta ¶[0030])



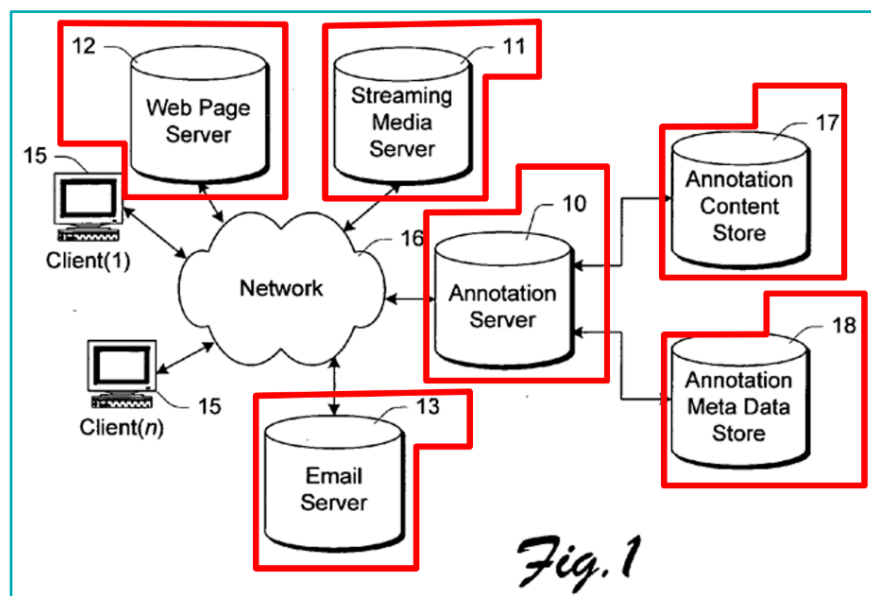
[13.P] 13. A method for handling video cue points, the method comprising:

- [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.

Ground 1 – Anticipation by Gupta (Claim 13)

Gupta discloses limitation 13.3

- Annotation server 10 receives cue point information entered at client via web user interface provided via annotation server 10's IIS/ISAPI functionality (Gupta, Figs. 1, 3; ¶¶[0047]-[0048])



- [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.

Ground 1 – Anticipation by Gupta

(Claim 13)

Gupta discloses limitation 13.4

- Annotation server 10 receives cue point editing command when user selects “OK” in Fig. 21 interface to submit form field edits to annotation server 10 (Gupta ¶¶[0100], [0144])

[0100] Dialog box 280 also includes a cancel button 318, an OK button 320, and an advanced button 322. Selection of cancel button 318 causes interface 152 to close the dialog box 280, canceling out of the add new annotation process. Selection of OK button 320 causes interface 152 to forward the information entered in dialog box 280 to annotation backend 151, which sends the new annotation information to annotation server 10 of FIG. 3. Interface 152 then closes dialog box 280, the new annotation being entered.

(Gupta ¶[0100])

[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.

Ground 1 – Anticipation by Gupta

(Claim 13)

Gupta discloses limitation 13.5

- Gupta's Fig. 21 interface is used for modifying existing annotations (Gupta ¶[0144])
- Annotation server 10 modifies cue point information at server side by updating data stores 17, 18

[0144] FIG. 21 illustrates an exemplary “edit annotation” dialog box 590...

New information can be entered into the fields, analogous to add annotation dialog box 330 of FIG. 8.

(Gupta, Fig. 21; ¶[0144])

Annotation content authored at client 15, using user interface 152, is received by ABE 132 and maintained in annotation content store 17. Received meta data (control information) corresponding to the annotation content is maintained in annotation meta data store 18.

(Gupta ¶[0048])

[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.

Ground 1 – Anticipation by Gupta

(Claim 13)

Issues in dispute regarding Gupta and claim 13

- ✓ 1) Does Gupta disclose providing a computer system comprising a VEE and disposed at a server side of a public network (limitation 13.1)?
- ✓ 2) Does Gupta disclose receiving a set of video information at the VEE (limitation 13.2)?
- ✓ 3) Does Gupta disclose receiving a set of cue point information at the VEE (limitation 13.3)?
- ✓ 4) Does Gupta disclose receiving a cue point editing command over the network from a client-side terminal (limitation 13.4)?
- ✓ 5) Does Gupta disclose modifying a portion of the cue point information at the server side according to the cue point editing command (limitation 13.5)?

Ground 1 – Anticipation by Gupta

(Claim 15)

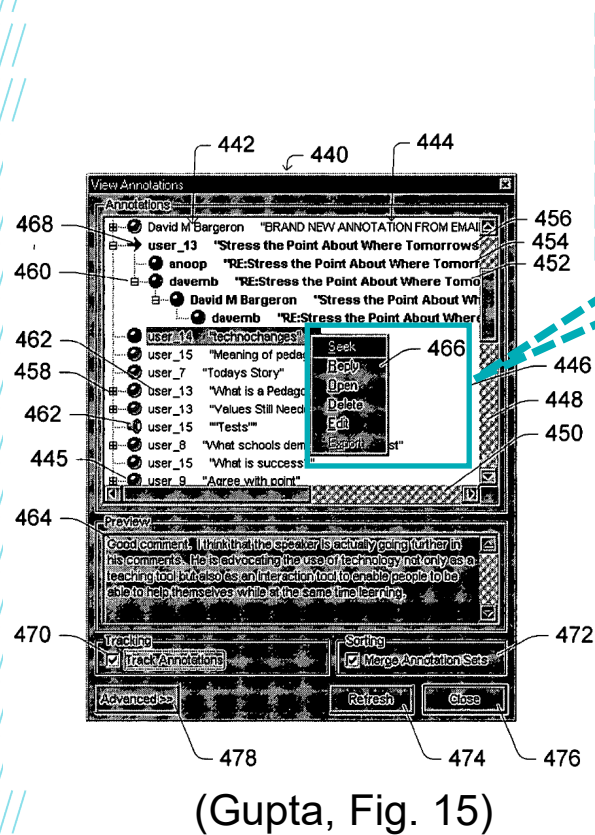
Issue in dispute regarding Gupta and claim 15

- Does Gupta disclose receiving an edit mode entry signal over the network from the client terminal representing entry into the cue point edit mode?

15. The method of claim 14, further comprising:
receiving an edit mode entry signal over the network from the client terminal representing entry into the cue point edit mode, and
switching the video editing environment to the cue point editing mode in response to receiving the edit mode entry signal.

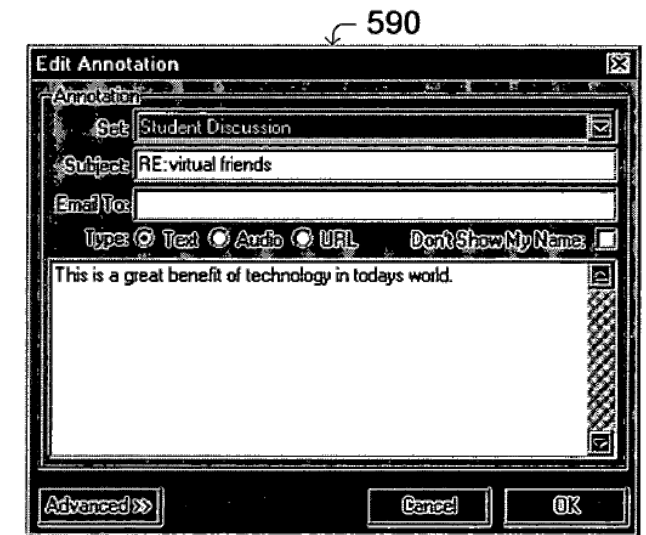
Ground 1 – Anticipation by Gupta (Claim 15)

Gupta discloses the computer system receiving an “edit mode entry signal” when a user selects “Edit” option to request the Fig. 21 interface



[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 ¶[0144])



(Gupta, Fig. 21)

Ground 1 – Anticipation by Gupta

(Claim 15)

Gupta discloses commands sent from client to annotation server 10 via HTTP requests

[0043] Client/Server Relationship

[0044] FIG. 3 illustrates an exemplary annotation server and client computer in more detail. As noted above, generally, commands are formulated at client computer 15 and forwarded to annotation server 10 via HTTP requests.

(Gupta ¶¶[0043]-[0044])

When a user of a client computer 15 desires to add or retrieve annotations, the client computer 15 contacts the annotation server 10 to perform the desired addition/retrieval.

(Gupta ¶[0034])

123. As I explain above, Gupta describes annotation server 10 having “web server functionality” including a “HTTP Services module 131 which manages communication with client 15.” . . .

124. Web server interaction involves a client sending an HTTP request to the web server, and the web server responding to the request by sending HTML information to render a web page interface on the client’s web browser. *Id.*, ¶¶[0044]
. . .

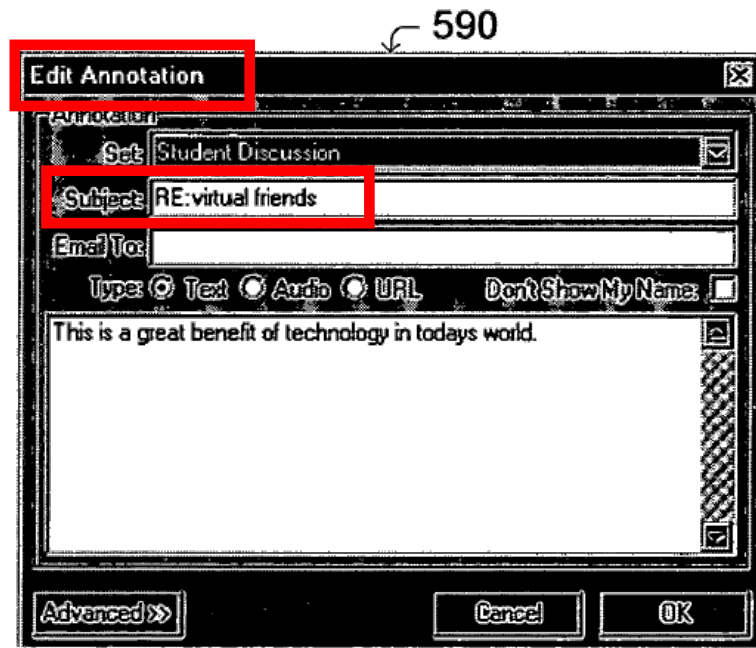
125. Therefore, in Gupta, when a user selects the “edit” option for a selected annotation, annotation server 10 receives an edit mode entry signal to enter a cue point edit mode and provide HTML pages to display the “Edit Annotation” dialog box on the client computer 15’s web browser.

(Houh Decl. ¶¶123-25)

Ground 1 – Anticipation by Gupta

(Claim 15)

Fig. 21 interface displays current annotation information, which is stored on data stores 17 and 18 and retrieved by annotation server 10



(Gupta, Fig. 21)

[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. Dialog box 590 includes information and fields displaying the current information for the annotation, analogous to dialog box 560 of FIG. 20.

(Gupta ¶[0144])

[0032] Annotation server 10 controls the storage of annotations and their provision to client computers 15. The annotation server 10 manages the annotation meta data store 18 and the annotation content store 17.

(Gupta ¶[0032])

➔ Therefore, an “edit mode entry signal” is received by annotation server when a user selects “Edit” option, to generate Fig. 21 interface having current annotation information and provided to client

Ground 1 – Anticipation by Gupta

(Claim 18)

Issue in dispute regarding Gupta and claim 18

- Does Gupta disclose receiving, over the network, authentication information relating to access authority of the remote client terminal?

18. The method of claim **13**, further comprising receiving, over the network, authentication information relating to access authority of the remote client terminal.

Ground 1 – Anticipation by Gupta

(Claim 18)

Gupta discloses:

- “annotation server 10 ... supports read and write security, allowing the creator of the set to identify which users are able to read and/or write to the annotation set”
- “only those sets for which the user has write access can be entered”
- Annotations added by individuals with “appropriate access rights”

According to one embodiment of the invention, annotation server 10 of FIG. 3 supports read and write access controls, allowing the creator of the set to identify which users are able to read and/or write to the annotation set. In this embodiment, only those sets for which the user has write access can be entered as set identifier 282.

(Gupta ¶[0090])

[0007] Multimedia presentations may also include “annotations” relating to the multimedia presentation. An annotation is data (e.g., audio, text, video, etc.) that corresponds to a multimedia presentation. Annotations can be added by anyone with appropriate access rights to the annotation system (e.g., the lecturer/trainer or any of the students/trainees).

(Gupta ¶[0007])

Ground 1 – Anticipation by Gupta (Claim 18)

Dr. Houh confirms a POSITA would have understood Gupta features to involve receiving authentication information “over the network”

133. This authentication information is received over the network (*e.g.*, Internet), as Gupta describes that “the creator of the set” (*e.g.*, client 15) provides such “read and write controls” to annotation server 10 and such intercommunication is over public network 16.

(Houh Decl. ¶133 (citing Gupta ¶[0090]))

Since Gupta’s annotation server 10 “controls the storage of annotations **and their provision to client computers**” (Gupta, ¶[0032] (*emphasis added*)), a POSITA would have understood that (i) the annotation creator must supply authentication information (identifying users’ read/write access information) to annotation server 10 so annotation server 10 can effect such controlled access to the creator’s annotations, and (ii) a viewer user must also supply authentication information (*e.g.*, user/login credentials) for the annotation server 10 to provision to it access-restricted annotations. In fact, my Original Declaration explains this principle. EX1002,

(Houh Reply Decl. ¶66)



Ground 2 – Anticipation by Fegan

Ground 2 – Anticipation by Fegan (Claim 13)

Issues in dispute regarding Fegan and claim 13

- 1) Does Fegan disclose providing a computer system comprising a VEE and disposed at a server side of a public network (limitation 13.1)?
 - 2) Does Fegan disclose receiving a set of video information at the VEE (limitation 13.2)?
 - 3) Does Fegan disclose receiving a set of cue point information at the VEE (limitation 13.3)?
 - 4) Does Fegan disclose receiving a cue point editing command over the network from a client-side terminal (limitation 13.4)?
 - 5) Does Fegan disclose modifying a portion of the cue point information at the server side according to the cue point editing command (limitation 13.5)?
- **Patent Owner does not dispute that Fegan discloses limitations 13.6 and 13.7**

[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.

Ground 2 – Anticipation by Fegan (Claim 13)

Fegan describes server-side system for annotating videos

(57)

ABSTRACT

The present invention relates to systems and methods for identifying, segmenting, collecting, annotating, and publishing multimedia materials. In some embodiments, the present invention provides a comprehensive server-side system for editing, annotating, managing and presenting multimedia events from a plurality of multimedia sources.

(Fegan, Abstract)

FIELD OF THE INVENTION

[0003] The present invention relates to systems and methods for identifying, segmenting, collecting, annotating, and publishing multimedia materials. In some embodiments, the present invention provides a comprehensive server-side system for editing, annotating, managing and presenting multimedia events from a plurality of multimedia sources.

(Fegan ¶[0003])

- Patent Owner does not dispute that Fegan’s “annotations” constitute cue points

Pet. 33, 39-41; Reply 19-24

SUMMARY OF THE INVENTION

[0005] The present invention relates to systems and methods for identifying, segmenting, collecting, annotating, and publishing multimedia materials that are stored on remote servers. In some embodiments, the present invention provides a comprehensive server-side system for managing and presenting multimedia events from a plurality of multimedia sources.

...

[0008] Thus, in addressing the limitations of the prior art, the present invention provides comprehensive systems for identifying, segmenting, collecting, annotating, and publishing multimedia materials. In preferred embodiments, the systems and methods are hosted in an entirely server-side environment, such that client computers can identify, segment, collect, annotate, organize, and publish complex multimedia presentations containing multimedia files or portions of multimedia files from a plurality of sources (e.g., any web site offering multimedia on the internet).

(Fegan ¶¶[0005], [0008]; see also ¶¶[0010], [0015])

Ground 2 – Anticipation by Fegan (Claim 13)

Fegan touts advantages of server-side approach

The technical tools for carrying out the multimedia presentation are maintained on the server-side, rather than forcing the user on the client-side to navigate the difficulties of the management of the multimedia files.

(Fegan, ¶[0007])

An advantage of such systems is the ability to manage complex presentations without burdening the client's computer hardware and allowing access to the presentation from any number of client computers.

(Fegan, ¶[0008])

Ground 2 – Anticipation by Fegan

(Claim 13)

Fegan discloses using server-side functionality (e.g., PHP) to produce the web pages for its web interface

In some preferred embodiments, the features of the present invention are encoded in **PHP** ...

(Fegan ¶[0010])

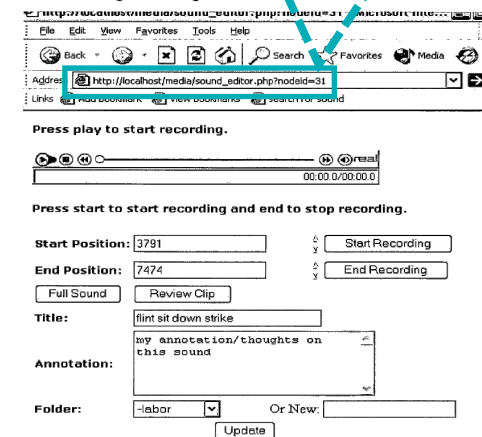
154. Fegan's computer system (including servers and storage) has at least one computer-readable medium (e.g., server memory and/or storage) because Fegan's system runs on "server-side software" such as MySQL and **PHP**, which uses the remote server's memory/storage.

(Houh Decl. ¶154)

 http://localhost/media/sound_editor.php?nodeid=31

FIGURE 7

by clicking the edit button, a user can edit all of the information for that annotation including re-editing the time-offsets from the source.



(Fegan, Fig. 7)

Ground 2 – Anticipation by Fegan (Claim 13)

PHP are scripts executed **server-side** to produce web pages upon requests from client

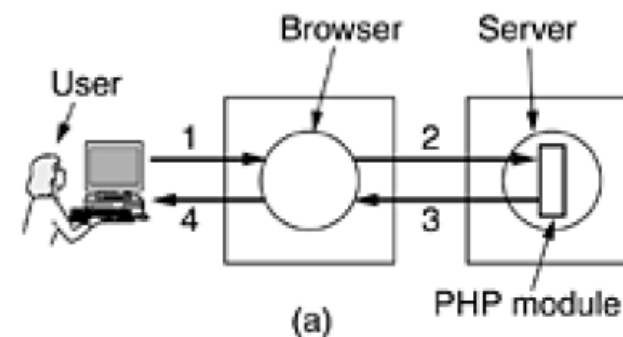
CGI scripts are not the only way to generate dynamic content on the server side. Another common way is to embed little scripts inside HTML pages and have them be executed by the server itself to generate the page. A popular language for writing these scripts is **PHP** (**PHP: Hypertext Preprocessor**). To use it, the server has to understand PHP (just as a browser has to understand XML to interpret Web pages written in XML). Usually, servers expect Web pages containing PHP to have file extension *php* rather than *html* or *htm*.

(EX2025 (Tanenbaum), 496)

154. Fegan's computer system (including servers and storage) has at least one computer-readable medium (e.g., server memory and/or storage) because Fegan's system runs on "server-side software" such as MYSQL and PHP, which uses the remote server's memory/storage.

(Houh Decl. ¶154)

Figure 7-37. (a) Server-side scripting with PHP.



(Tanenbaum, 500 (Fig. 7-37(a)))

Ground 2 – Anticipation by Fegan

(Claim 13)

Fegan discloses a server-side environment providing a web browser user interface to a client

FIGURE 4

The system will load the sound into the editor and allow you to create a segment by pressing start and end recording and then adding a title, annotation, and dictating what folder this annotation should go in on your portal page.

Press play to start recording.

Press start to start recording and end to stop recording.

Start Position: 4490 Start Recording

End Position: 8860 End Recording

Full Sound Review Clip

Title: flint sit down strike

Annotation: this is my annotation/thoughts on this sound

Folder: labor Or New: labor Add

(Fegan, Fig. 4)

Annotation: this is my annotation/thoughts on this sound

FIGURE 7

by clicking the edit button, a user can edit any of the information for that annotation including re-editing the time-offsets from the source.

Press play to start recording.

Press start to start recording and end to stop recording.

Start Position: 3791 Start Recording

End Position: 7474 End Recording

Full Sound Review Clip

Title: flint sit down strike

Annotation: my annotation/thoughts on this sound

Folder: labor Or New: Update

(Fegan Fig. 7; see also ¶[0081])

Ground 2 – Anticipation by Fegan (Claim 13)

Fegan discloses:

- Fig. 7 interface includes an “Update” button
- server-side environment receives annotation information from client

[0012] Thus, in some embodiments, the present invention provides a system for manipulating, annotating, and managing a plurality of remote, multimedia files in a server-side environment, the system comprising a host computer network configured to carry out one or more of the following:

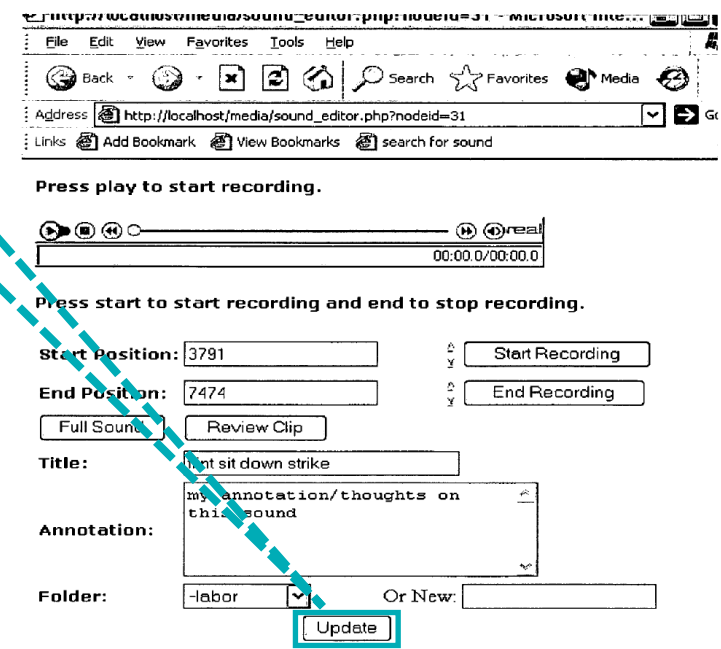
...

d) receive multimedia file annotation information from the client computer,

(Fegan ¶[0012])

Update

FIGURE 7
by clicking the edit button, a user can edit any of the information for that annotation including re-editing the time-offsets from the source.



(Fegan, Fig. 7)

Ground 2 – Anticipation by Fegan (Claim 13)

Dr. Houh confirms a POSITA's understanding of the role of Fegan's "Update" button in Fig. 7

Thus, after editing text fields as shown in FIG. 7, when the user selects "Update," a cue point editing command to edit the annotation is sent from the client computer to the server and is therefore received at the computer system's remote server. *Id.*, ¶[0003] ("the present invention provides a

(Houh Decl. ¶172)

176. Therefore, a POSITA would have understood that the user's selection of "update" after changing annotation information in the FIG. 7 interface results in sending a cue point editing command—an instruction to the computer system to edit a portion of the annotation—because the computer system responds by carrying out the requested action (*see* limitation [13.5] below).

(Houh Decl. ¶176)

93. A POSITA would have understood that Fegan's "Add" and "Update" buttons must send segments/annotation information to the server side for storage. Otherwise, Fegan's system would have no way for the web server to present the current segments/annotations to the user via the user's portal page (*e.g.*, Figs. 5-7).

(Houh Reply Decl. ¶93)

Ground 2 – Anticipation by Fegan (Claim 13)

Fegan discloses the server-side environment maintaining the annotations

[0015] The present invention also provides a method for managing a plurality of multimedia files in a server-side environment, comprising one or more of the following steps:
a) providing the systems of the present invention; b) . . .
e) receiving the multimedia file annotation information from the client computer; f) storing the playlist selection information and the multimedia file annotation information to generate a multimedia presentation;

(Fegan ¶[0015])

An advantage of such systems is the ability to manage complex presentations without burdening the client's computer hardware and allowing access to the presentation from any number of client computers.

(Fegan ¶[0008])

Ground 2 – Anticipation by Fegan (Claim 13)

Fegan discloses each user having a “personal portal page” providing access to further edit an annotation

[0081] After a user designates a location for storage and retrieval of the annotative information, the information appears on the user's personal portal page that can be accessed through a browser window.

...

FIG. 7 shows a saved annotation that has been opened via the directory for further editing.

(Fegan ¶[0081])

FIGURE 7

by clicking the edit button, a user can edit any of the information for that annotation including re-editing the time-offsets from the source.

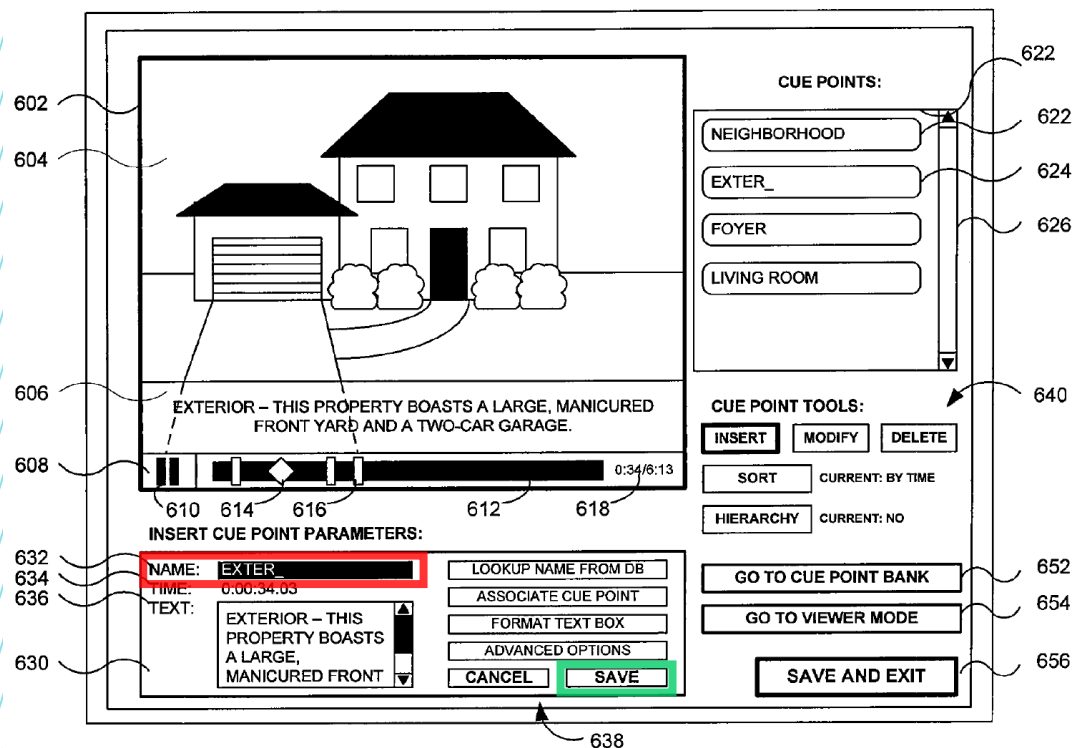
The screenshot shows a web browser window with the address bar displaying 'http://localhost/media/sound_editor.php?nodeid=31'. The browser's menu bar includes File, Edit, View, Favorites, Tools, and Help. The toolbar contains buttons for Back, Forward, Home, Search, Favorites, Media, and a Go button. Below the address bar, there are links for 'Add Bookmark', 'View Bookmarks', and 'search for sound'. The main content area of the browser displays a form for editing a sound annotation. At the top, it says 'Press play to start recording.' followed by a progress bar with a play button and a 'real' label. Below this, it says 'Press start to start recording and end to stop recording.' The form includes input fields for 'Start Position' (3791) and 'End Position' (7474), each with a 'y' checkbox and a corresponding button ('Start Recording' and 'End Recording'). There are also buttons for 'Full Sound' and 'Review Clip'. The 'Title' field contains the text 'flint sit down strike'. The 'Annotation' field is a text area containing 'my annotation/thoughts on this sound'. The 'Folder' field is a dropdown menu showing '-labor', with an 'Or New:' field next to it. An 'Update' button is at the bottom.

(Fegan, Fig. 7)

Ground 2 – Anticipation by Fegan

(Claim 13)

'286 patent



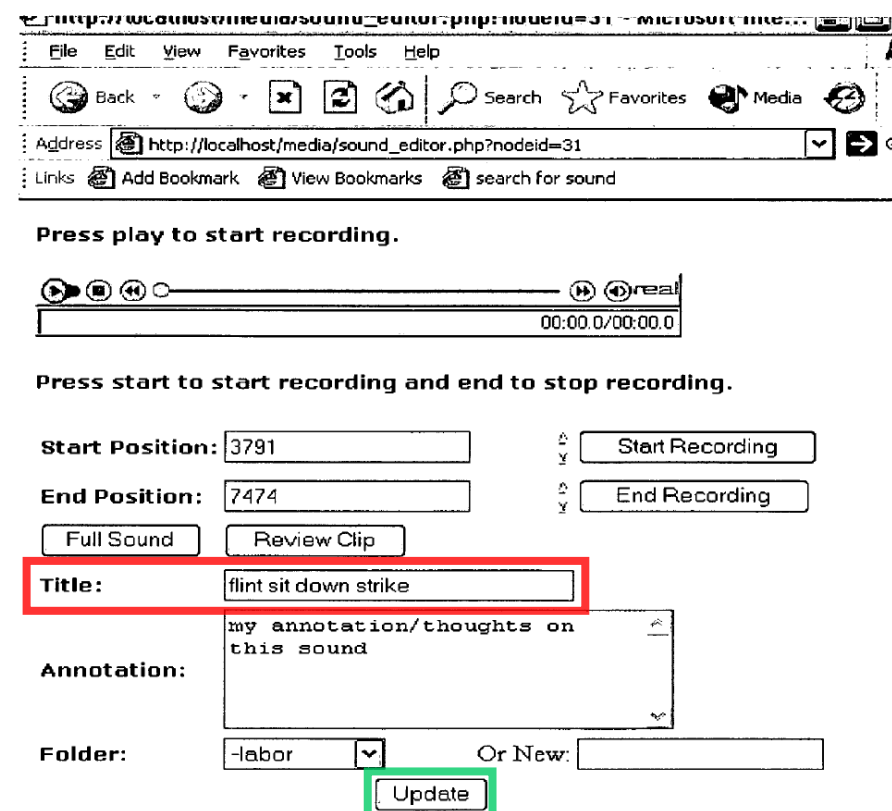
('286 patent, Fig. 6)

Pet. 45; Reply 26-27

Fegan

FIGURE 7

by clicking the edit button, a user can edit any of the information for that annotation including re-editing the time-offsets from the source.



(Fegan, Fig. 7)

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Ground 1 – Anticipation by Fegan

(Claim 13)

Fegan discloses limitation 13.1

- Fegan discloses a “comprehensive server-side system” and an “entirely server-side environment” for annotating and segmenting videos (Fegan, ¶¶[0005], [0008])
- Fegan provides this environment via a web browser interface to client (Fegan, ¶¶[0037], [0042])
- Fegan’s web server utilizes PHP to generate interface web pages (*i.e.*, server-side scripts executed on a web server) (Fegan, ¶[0010], Figs. 4-7)

- [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.

Ground 2 – Anticipation by Fegan (Claim 13)

Fegan discloses the same aspects of a server-side VEE that are described in the '286 Patent and encompassed by limitation 13.1

The application server runs a server-side Video Editing Environment (VEE) application(s) 116 to permit client devices to remotely edit cue point information associated with video. '286 Patent, 2:59-60, 4:1-2, 4:57-59, 6:64-66, 9:19-25, 13:2-6 (“the VEE ... load[s] as a ... server-level application”), 13:64-65 (“the VEE itself running at the ... server level”); 15:25-26, Fig 1A. Mahon Decl., ¶¶56-63.

(POR 3-4)

¹ The claim encompasses the use of a browser to access a server-side VEE that performs editing of cue points per limitation 13.1. For example, the '286 Patent discloses that the server-side VEE cue point editing can be controlled by a client device using a browser. See '286 Patent, 13:58-67.

(POR 38 n.1 (citing '286 Patent, 13:58-67))

Reply 4, 21-28

Ground 2 – Anticipation by Fegan

(Claim 13)

Fegan discloses the same aspects of a server-side VEE receiving cue point information collected via form fields, that are described in the '286 Patent

For example, the cue point information form may be displayed on a client terminal while the cue point editor resides on a server terminal. In this example, the client may be required to submit the form over a network to the server computer before the cue point editor has the information it needs to generate the cue point.

('286 Patent, 23:18-23)

Ground 2 – Anticipation by Fegan (Claim 13)

Patent Owner’s “localhost” Sur-reply argument should be rejected

- 1) New argument is first presented in Patent Owner’s Sur-reply and is thus waived
- 2) Patent Owner’s argument contradicts Fegan’s teachings of the client and server being separate
- 3) Dr. Houh testifies that a POSITA would have understood Fegan’s “localhost” in its screenshot figures as solely for ease in generating the screenshots used for the patent application

1. DUE DATE 1

Patent Owner may file—

- a. A response to the petition (37 C.F.R. § 42.120). If Patent Owner elects not to file a response, Patent Owner shall arrange a conference call with the parties and the Board. Patent Owner is cautioned that any arguments not raised in the response may be deemed waived; and

(Scheduling Order (Paper 14) at 9)

Ground 2 – Anticipation by Fegan (Claim 13)

Patent Owner’s “localhost” Sur-reply argument should be rejected

- 1) New argument is first presented in Patent Owner’s Sur-reply and is thus waived
- 2) Patent Owner’s argument contradicts Fegan’s teachings of the client and server being separate
- 3) Dr. Houh testifies that a POSITA would have understood Fegan’s “localhost” in its screenshot figures as solely for ease in generating the screenshots used for the patent application

[0008] Thus, in addressing the limitations of the prior art, the present invention provides comprehensive systems for identifying, segmenting, collecting, annotating, and publishing multimedia materials. In preferred embodiments, the systems and methods are hosted in an entirely server-side environment, such that client computers can identify, segment, collect, annotate, organize, and publish complex multimedia presentations containing multimedia files or portions of multimedia files from a plurality of sources (e.g., any web site offering multimedia on the internet).

(Fegan ¶[0008])

[0015] The present invention also provides a method for managing a plurality of multimedia files in a server-side environment, comprising one or more of the following steps: a) providing the systems of the present invention; b) . . .
e) receiving the multimedia file annotation information from the client computer; f) storing the playlist selection information and the multimedia file annotation information to generate a multimedia presentation;

(Fegan ¶[0015])

Ground 2 – Anticipation by Fegan (Claim 13)

Patent Owner’s “localhost” Sur-reply argument should be rejected

- 1) New argument is first presented in Patent Owner’s Sur-reply and is thus waived
- 2) Patent Owner’s argument contradicts Fegan’s teachings of the client and server being separate
- 3) Dr. Houh testifies that a POSITA would have understood Fegan’s “localhost” in its screenshot figures as solely for ease in generating the screenshots used for the patent application

I also note that while these screenshots refer to “localhost”, a POSITA would have clearly recognized that the use of localhost is merely for ease of generating the actual screenshots used for the patent application, particularly since Fegan’s main objective relates to a server-side environment distinct from the client. Fegan, ¶¶[0006]-[0008].

(Houh Reply Decl. ¶108)

Ground 1 – Anticipation by Fegan

(Claim 13)

Fegan discloses limitation 13.2

- Fegan discloses the remote server receiving a multimedia presentation created by the user, which is “stored entirely on a remote server” (Fegan, ¶[0085])

[0085] The systems and methods of the present invention may be used to publish stored multimedia presentations by making them available for access by others over a computer network (e.g., the Internet). For example, a first user in a first location may create a multimedia presentation that is stored entirely on a remote server.

(Fegan ¶[0085])

- [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.

Ground 1 – Anticipation by Fegan

(Claim 13)

Fegan discloses limitation 13.3

- Fegan's remote server (server-side environment) receives annotation information inputted at the client web browser (e.g., when adding a new annotation) (Fegan, ¶¶[0012], [0015]; Houh Reply Decl. ¶93)

[0012] Thus, in some embodiments, the present invention provides a system for manipulating, annotating, and managing a plurality of remote, multimedia files in a server-side environment, the system comprising a host computer network configured to carry out one or more of the following:

...

d) receive multimedia file annotation information from the client computer,

(Fegan ¶[0012])

[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.

Ground 1 – Anticipation by Fegan (Claim 13)

Fegan discloses limitation 13.4

- Fegan's remote server receives cue point editing command when user selects "Update" in Fig. 7 interface to modify an existing annotation (Fegan ¶¶[0012], [0015]; Houh Decl. ¶¶172-76; Houh Reply Decl. ¶93)
- Fegan discloses using PHP to process submitted browser form information (Fegan ¶[0010], Figs. 4-7)

[0012] Thus, in some embodiments, the present invention provides a system for manipulating, annotating, and managing a plurality of remote, multimedia files in a server-side environment, the system comprising a host computer network configured to carry out one or more of the following:

...
d) receive multimedia file annotation information from the client computer,

(Fegan ¶[0012])

Pet. 43-46; Reply 24-29

[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.

Ground 1 – Anticipation by Fegan

(Claim 13)

Fegan discloses limitation 13.5

- Submitted annotations are maintained on the remote server, and thereafter edits to existing annotations likewise maintained on the remote server (Fegan ¶¶[0085], [0015])
- Saved annotations appear on user's personal portal page (Fegan ¶[0081], Fig. 5)

[0015] The present invention also provides a method for managing a plurality of multimedia files in a server-side environment, comprising one or more of the following steps: a) providing the systems of the present invention; b) . . .
e) receiving the multimedia file annotation information from the client computer; f) storing the playlist selection information and the multimedia file annotation information to generate a multimedia presentation;

(Fegan ¶[0015])

- [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.

Ground 2 – Anticipation by Fegan (Claim 13)

Issues in dispute regarding Fegan and claim 13

- ✓ 1) Does Fegan disclose providing a computer system comprising a VEE and disposed at a server side of a public network (limitation 13.1)?
- ✓ 2) Does Fegan disclose receiving a set of video information at the VEE (limitation 13.2)?
- ✓ 3) Does Fegan disclose receiving a set of cue point information at the VEE (limitation 13.3)?
- ✓ 4) Does Fegan disclose receiving a cue point editing command over the network from a client-side terminal (limitation 13.4)?
- ✓ 5) Does Fegan disclose modifying a portion of the cue point information at the server side according to the cue point editing command (limitation 13.5)?

Ground 2 – Anticipation by Fegan (Claim 15)

Issue in dispute regarding Fegan and claim 15

- Does Fegan disclose receiving an edit mode entry signal over the network from the client terminal representing entry into the cue point edit mode?

15. The method of claim 14, further comprising:
receiving an edit mode entry signal over the network from the client terminal representing entry into the cue point edit mode, and
switching the video editing environment to the cue point editing mode in response to receiving the edit mode entry signal.

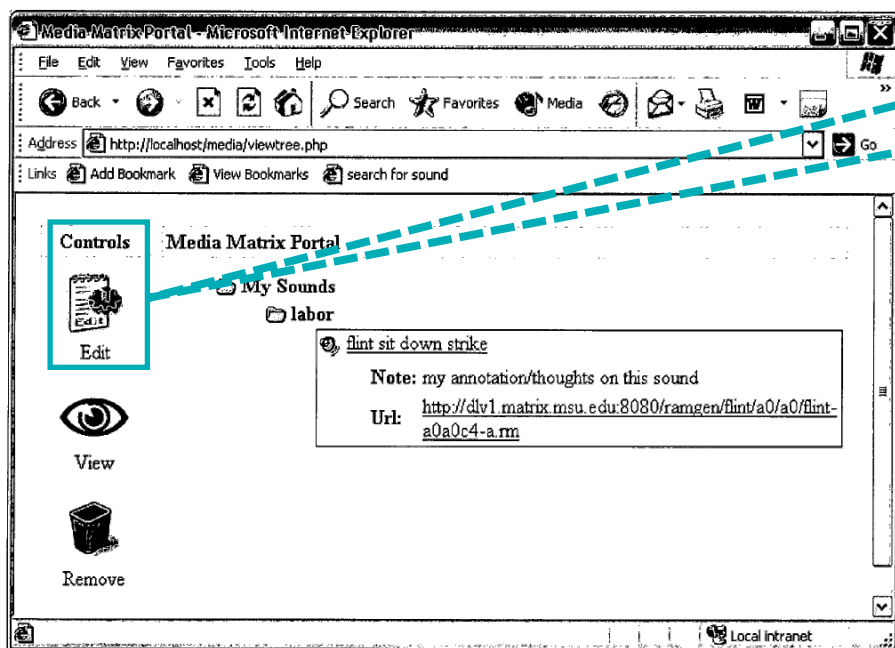
Ground 2 – Anticipation by Fegan

(Claim 15)

Fegan discloses transitioning from portal interface (Fig. 6) to annotation edit interface (Fig. 7)

FIGURE 6

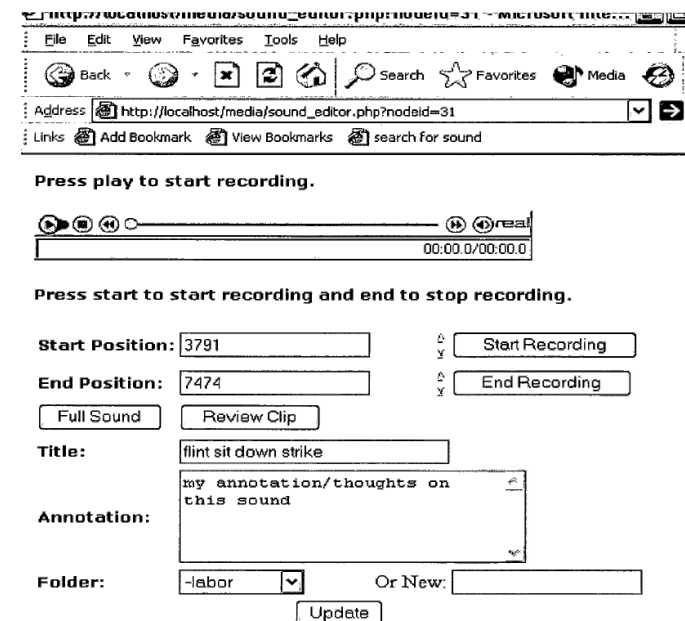
Clicking on the annotation brings up its info as well as **controls** for working with the annotation (view, **edit**, delete, etc...)



(Fegan Fig. 6)

FIGURE 7

by **clicking the edit button**, a user can edit any of the information for that annotation including re-editing the time-offsets from the source.



(Fegan Fig. 7)

Ground 2 – Anticipation by Fegan (Claim 15)

Fegan refers to fundamental web pages operation involving the client sending a request and the server serving web pages as a response

[0037] As used herein, the term “client-server” refers to a model of interaction in a distributed system in which a program at one site **sends a request** to a program at another site and **waits for a response**. The requesting program is called the “client,” and the program that responds to the request is called the “server.” In the context of the World Wide Web (discussed below), the **client is a “Web browser” (or simply “browser”)** that runs on a computer (e.g., desktop, cell phone, hand-held, etc.) of a user; **the program which responds to browser requests by serving Web pages is commonly referred to as a “Web server.”**

(Fegan ¶[0037])

Ground 2 – Anticipation by Fegan

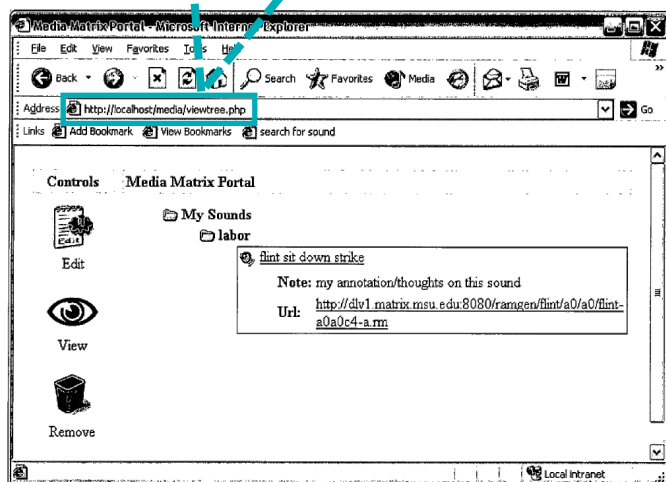
(Claim 15)

Fegan discloses different URLs and PHP scripts executed between Figs. 5/6 and Fig. 7 to generate respective interfaces



FIGURE 6

Clicking on the annotation brings up it's info as well as controls for working with the annotation (view, edit, delete, etc...)

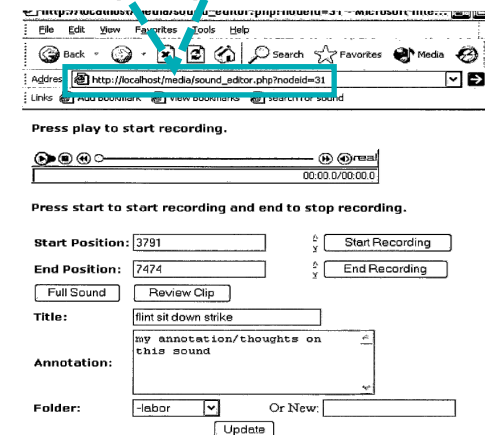


(Fegan Fig. 6)



FIGURE 7

by clicking the edit button, a user can edit any of the information for that annotation including re-editing the time-offsets from the source.



(Fegan Fig. 7)

Ground 2 – Anticipation by Fegan (Claim 15)

Fegan discloses different URLs and PHP scripts executed between Figs. 5/6 and Fig. 7 to generate respective interfaces

Dr. Houh confirms that different PHP scripts involve separate retrieval and execution by the web server

108. Notably as seen in these figures, Fegan specifically illustrates that the browser transition from Figure 5 to Figure 7 involves requesting a **different** PHP script (“viewtree.php” -> “sound_editor.php”) to be executed. Given that these two screenshots are based on different PHP scripts, a POSITA would have understood that each screenshot is separately retrieved from the web server and that selecting the “Edit” button in Figure 5 involves a client request (*i.e.*, the claimed “edit mode entry signal”) to the web server to execute the “sound_editor.php” PHP script and serve the dynamic web page of Figure 7 to the client.

(Houh Reply Decl. ¶108)

Ground 2 – Anticipation by Fegan (Claim 18)

Issue in dispute regarding Fegan and claim 18

- Does Fegan disclose receiving, over the network, authentication information relating to access authority of the remote client terminal?

18. The method of claim **13**, further comprising receiving, over the network, authentication information relating to access authority of the remote client terminal.

Ground 2 – Anticipation by Fegan (Claim 18)

Fegan discloses each user having a personal portal page hosted server-side and accessed via web browser

In some embodiments, each user has a personal “portal” hosted on the system of the present invention that allows the user to edit and organize collected materials and to create complex publications and presentations that include multimedia clips and annotations.

(Fegan ¶[0009])

[0081] After a user designates a location for storage and retrieval of the annotative information, the information appears on the user’s personal portal page that can be accessed through a browser window. FIG. 5 shows a browser window displaying a user-created directory of annotative information associated with multimedia files. In preferred embodiments of the present invention, the directory allows a user to select, open, edit, close, or delete the annotative information associated with a multimedia file.

(Fegan ¶[0081])

Ground 2 – Anticipation by Fegan (Claim 18)

- Dr. Houh testifies that Fegan's teaching of a user's personal portal page involves the server receiving authentication information to grant/deny access to the portal
- Fegan's teaching of an individual personal portal page is uncontested by Dr. Mahon

203. Providing a user with its own server-side portal in Fegan involves the server receiving over the network from the client some form of authentication information (whether a username/password, IP address, public/private key, biometrics, etc.) to confirm that the user has access to that particular portal page, and thus granting or denying access based upon that authentication information.

(Houh Decl. ¶203)

Grounds 3-4 – Obviousness over Kim or Kim and Gupta

Ground 5 – Obviousness over Vasilevsky and Logan

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 13)

Issues in dispute regarding Vasilevsky/Logan and claim 13

- 1) Would a POSITA have been motivated to modify Vasilevsky's client-server architecture operating over a Home Area Network to operate over a public network, such as the Internet, as taught by Logan with a reasonable expectation of success (limitation 13.1)?
 - 2) To the extent the VEE requires software, does Vasilevsky's "Application Unit" include software (limitation 13.1)?
 - 3) Is video information from Memory 118 received "at" Vasilevsky's Video Manager (VEE) (limitation 13.2) and is cue point information received "at" Vasilevsky Application Unit (VEE) (limitation 13.3)?
 - 4) Is the command from Vasilevsky's clients to edit the bookmarks a "cue point editing command" (limitations 13.4-13.5)?
- **Unlike for the Gupta and Fegan grounds, Patent Owner does not dispute that Vasilevsky discloses a VEE that is server-side**

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 13)

Vasilevsky discloses a centralized media server and clients connected by a Home Area Network

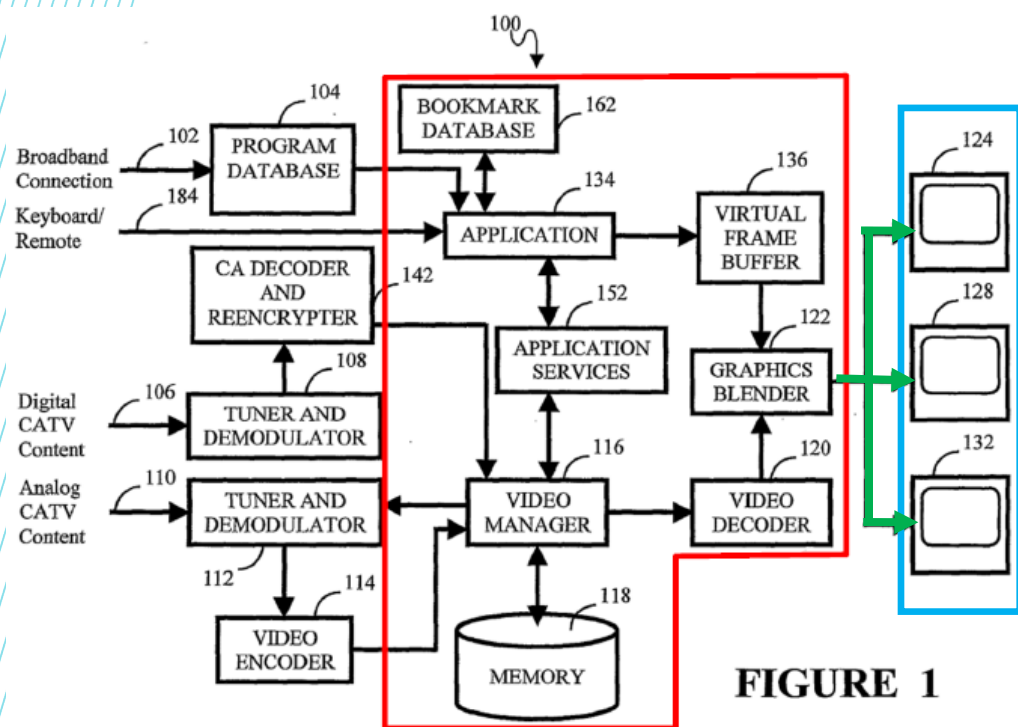


FIGURE 1

(Vasilevsky, Fig. 1)

The computer system *being disposed at the server side of a public network* (e.g., [home area network] HAN/Internet), in contrast to a client side of HAN where client 124 is located. *Id.*, Fig. 1, Abstract, 11:9-10, 16:6-12 (“media server ... is a centrally located means for storing multiple programs that are readily and contemporaneously accessible by, and readily and contemporaneously controlled by multiple local client devices via a HAN”).

(Pet. 76)

Vasilevsky's **centralized media server** contains a **VEE** including **Application Unit** and **Video Manager**



The system users communicate with the media server via a user interface or **Application Unit 134**, which converts user commands to commands compatible with the media server. The Application Unit 134 is also **responsible for generating a graphical user interface (GUI)** containing an electronic program guide (EPG) for display, and input by an

(Vasilevsky, 14:6-7)

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 13)

Vasilevsky discloses its system being connected to a Wide Area Network like the Internet

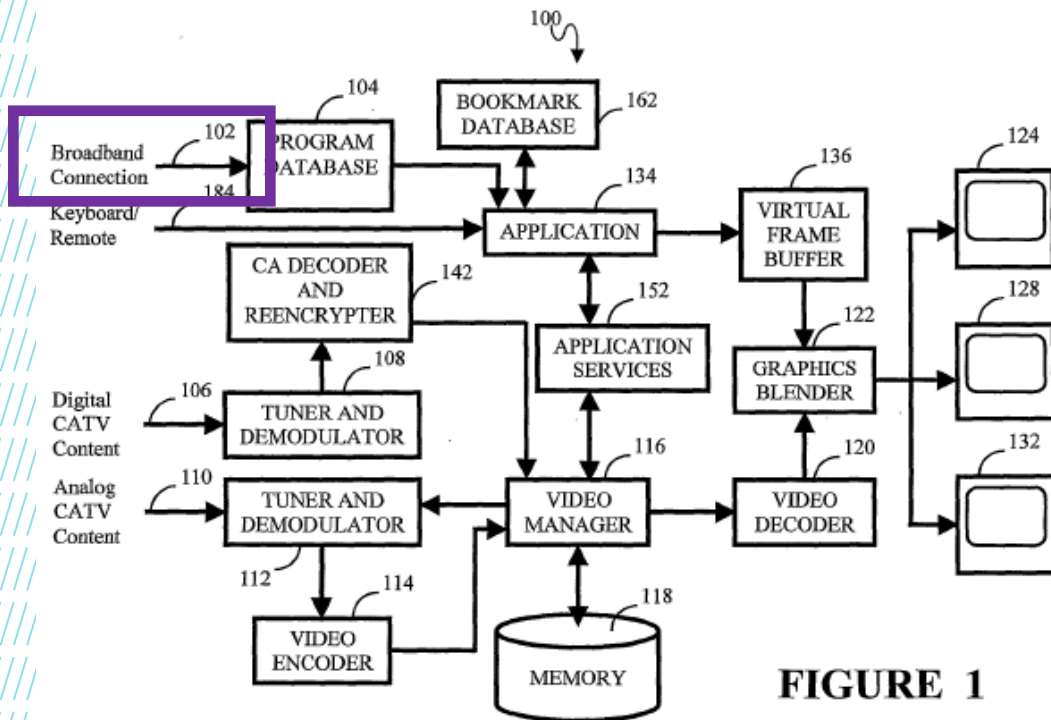


FIGURE 1

(Vasilevsky, Fig. 1 (annotated))

It would have at least been “obvious to try” a public network because it involved choosing from a finite number of identified, predictable solutions with a reasonable expectation of success (*i.e.*, the only types of networks to choose from are private or public). Moreover, Vasilevsky’s system is already connected to a public network (WAN), further motivating such modification. EX1008, 12:8-10 (“the program database 104 obtains programming information via a broadband or wide area network (WAN) connection 102 to a host computer (not shown).”). EX1002, ¶325.

(Pet. 77-78)

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 13)

Logan teaches providing access to client-server video bookmarking system over the Internet

[0050] The communication methods or apparatus used to transport metadata and/or content to the user as illustrated at 130 may take many different forms, including: the Internet,

(Logan ¶[0050])

[0308] In addition, metadata contributed by other users and stored in a public database 254 as well as private metadata from a database 255 may be downloaded to the PVR by the metadata service's download facility 250. The metadata stored at 251-255 may be created, edited and deleted using a Web server 261 or other server 262 operated by the metadata service to permit the public (other viewers) to contribute to the metadata as illustrated at 264, as well as providing the ability for employees of the metadata service to create and modify the stored metadata as indicated at 265.

(Logan ¶[0308])

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 13)

A POSITA would have been motivated to modify Vasilevsky to allow Vasilevsky's clients to connect to the centralized media server via the public Internet network

- Logan discloses the desirability of implementing its bookmarking system over a public network (e.g., Internet) “to permit the public (other viewers) to contribute” to the system
- A POSITA would have recognized that implementing Vasilevsky's system on a public network, as taught by Logan, would have allowed more users in a broader public network to participate in the system to add, modify, and playback video bookmarks

323. A POSITA would have been motivated to implement Vasilevsky's system on a public network, as taught by Logan, to allow users to access the system when they are not on their home network (e.g., access could now be from anywhere in the world as opposed to just over a user's home network). A POSITA would have recognized that such a modification would have beneficially allowed more users access via a wider public network to participate in the system to add, modify, and playback video bookmarks (e.g., this ease of access and expanded access would allow the system to become more popular and allow sharing of bookmarked video clips with users outside the home network).

(Houh Decl. ¶323)

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 13)

The modification simply permits Vasilevsky's **clients** to connect to the **centralized media server** via the **public Internet network**

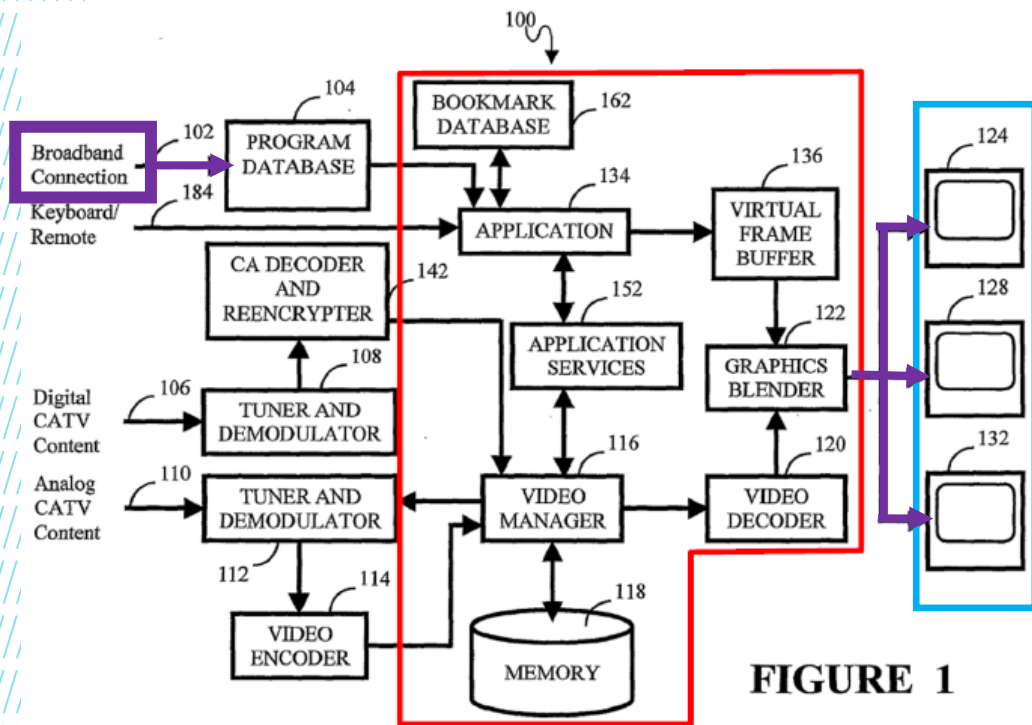


FIGURE 1

(Vasilevsky, Fig. 1 (annotated))

A POSITA would have been motivated to modify Vasilevsky's network (HAN) to be a public network (Internet) as disclosed by Logan. Logan discloses the desirability of implementing its bookmarking system over a public network such as the Internet (EX1009, ¶¶0050) "to permit the public (other viewers) to contribute" to the system (*id.*, ¶¶0308)]. A POSITA would have recognized that implementing Vasilevsky's system on a public network, as taught by Logan would have beneficially allowed more users in a broader public network to participate in the system to add, modify, and playback video bookmarks. EX1002, ¶¶315-23.

(Pet. 77)

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 13)

Patent Owner's own exhibit reinforces this modification being desirable and straightforward for a POSITA

Since cable, satellite, and other sources of television content typically enter the house at a few discrete locations, allowing access to the content over a home network gives the user more freedom to enjoy the content throughout the home.

Another possible application would be to enable a user to access and control television and other A/V content from any number of remote networks where a broadband connection is available to the user (e.g., at an airport, at work, at school, in a hotel, in a cafe, at an acquaintance's house).

(EX2032 ¶[0004])

equipment to use the broadcasting system. The computer network over which the broadcaster and media player client communicate may comprise a wide area network, such as the Internet, allowing the user to receive media content from the home to anywhere in the world where a connection to the network is available.

(EX2032 ¶[0007])

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 13)

Dr. Mahon testifies the VEE is not limited to software; regardless, Vasilevsky's centralized media server executes software

Q Does that mean the VEE is a software application, then?

A It's not restricted to be software, but it can certainly be software, and it would be an application, in that instance.

(Mahon Dep., 79:6-10)

A There would be software and various types of software running on any instantiation where you're providing a server for clients to access.

(Mahon Dep., 57:15-17)

Pet. 78-79; Reply 37-38

The system users communicate with the media server via a user interface or Application Unit 134, which converts user commands to commands compatible with the media server. The Application Unit 134 is also responsible for generating a graphical user interface (GUI) containing an electronic program guide (EPG) for display, and input by an

(Vasilevsky, 15:15-19)

the reading of program content information from memory are controlled by a video manager 116.

(Vasilevsky, 14:6-7)

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 13)

Vasilevsky's video information is received "at" the Video Manager and cue point (bookmark) information is received "at" the Application Unit

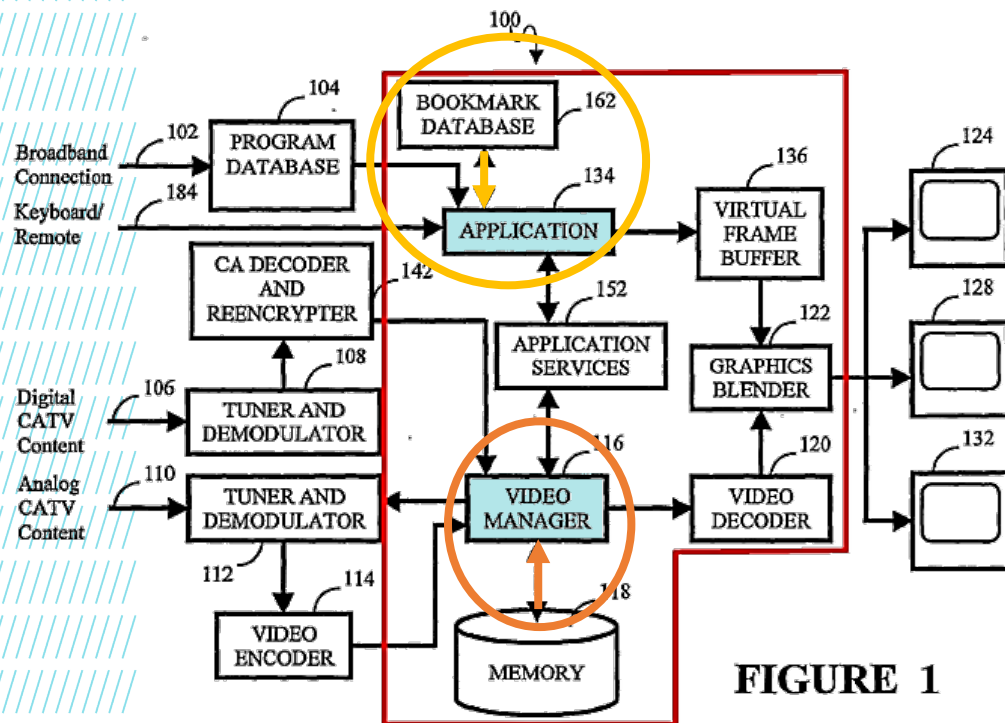


FIGURE 1

(Vasilevsky, Fig. 1 (annotated))

The set of cue point information is received at the video editing environment using the computer system because bookmarks are received by the software executed by Application Unit 134 and Bookmark Database 162 such as when receiving a new bookmark from client 124 or retrieving a bookmark for client 124 to edit. *Id.*, 15:15-20, 19:12-20; 21:1-8, 22:8-15; EX1002, ¶¶330-34.

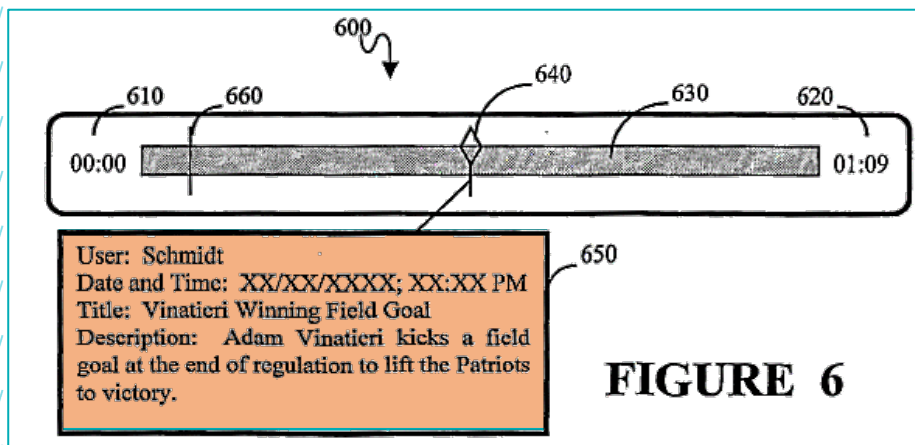
(Pet. 82)

("[T]he reading of program content information from memory are controlled by a video manager 116."), 13:19-14:1 ("television signals and other program signals are stored in memory 118"), 21:1-8.

(Pet. 79)

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 13)

The command from Vasilevsky's clients to **modify the bookmark information** is a “cue point editing command”



(Vasilevsky, Fig. 6 (annotated))

Figure 6 shows a variation 600 of the bookmark display 400 in Figure 4. The elements 610, 620, 630, 640, 650 and 660 are analogous to the elements 410, 420, 430, 440, 450 and 460, respectively. However, the identifier 650 is in the form of a more detailed text box that includes such information as the bookmark establisher's name, a title of the bookmark, and a brief description of what occurred in the program just prior to the pause point. A system user can enter or modify all of the information.

(Vasilevsky, 22:8-15)

11. The system of Claim 7, wherein said bookmark indicia are modifiable by a user, and said bookmark indicia further comprise bookmark name information.

(Vasilevsky, claim 11)

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 13)

Issues in dispute regarding Vasilevsky/Logan and claim 13

- ✓ 1) Would a POSITA have been motivated to modify Vasilevsky's client-server architecture operating over a Home Area Network to operate over a public network, such as the Internet, as taught by Logan with a reasonable expectation of success (limitation 13.1)?
- ✓ 2) To the extent the VEE requires software, does Vasilevsky's "Application Unit" include software (limitation 13.1)?
- ✓ 3) Is video information from Memory 118 received "at" Vasilevsky's Video Manager (VEE) (limitation 13.2) and is cue point information received "at" Vasilevsky Application Unit (VEE) (limitation 13.3)?
- ✓ 4) Is the command from Vasilevsky's clients to edit the bookmarks a "cue point editing command" (limitations 13.4-13.5)?

Ground 5 – Obviousness over Vasilevsky and Logan

Issues in dispute

1) Claim 15

- a. Whether the command to the server when a user at a client selects a bookmark for modifying/editing includes an edit mode entry signal.

2) Claim 18

- a. Whether Vasilevsky's teaching that editing of a bookmark is restricted to the user who created the bookmarks teaches receiving authentication information over the network.

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 15)

Vasilevsky's clients send edit mode entry signals (user commands) over network to server to enter GUI for editing bookmarks (Figure 6).

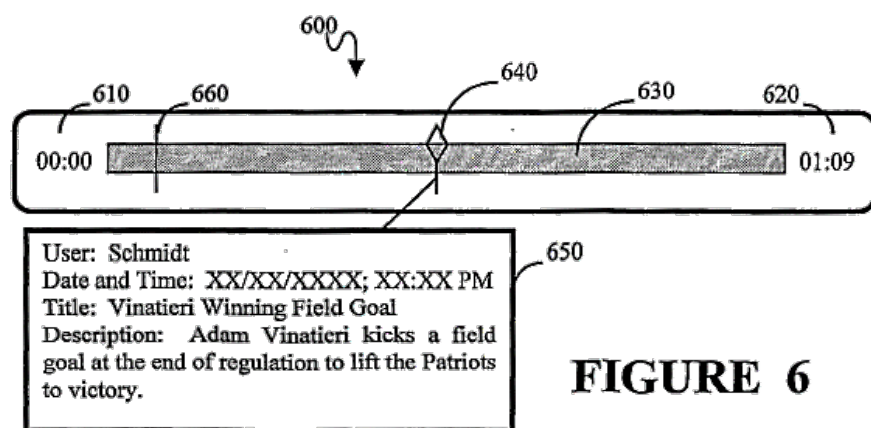


FIGURE 6

(Vasilevsky, Figure 6)

Figure 6 shows a variation 600 of the bookmark display 400 in Figure 4. The elements 610, 620, 630, 640, 650 and 660 are analogous to the elements 410, 420, 430, 440, 450 and 460, respectively. However, the identifier 650 is in the form of a more detailed text box that includes such information as the bookmark establisher's name, a title of the bookmark, and a brief description of what occurred in the program just prior to the pause point. A system user can enter or modify all of the information.

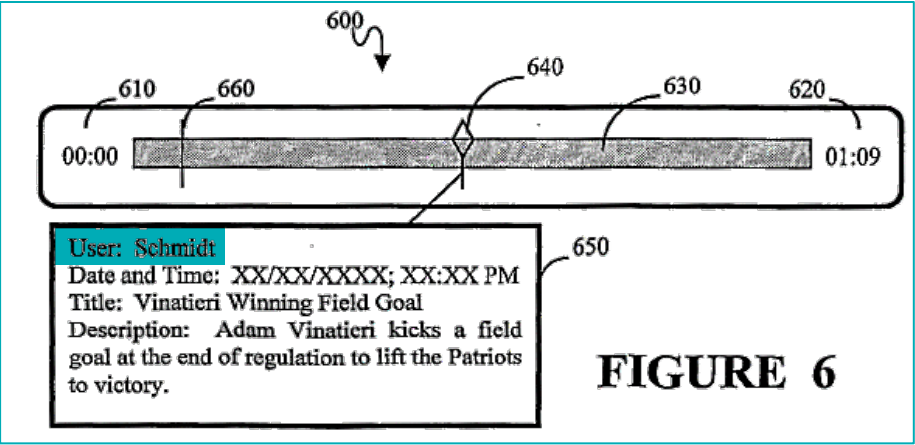
(Vasilevsky, 22:8-15)

The system users communicate with the media server via a user interface or Application Unit 134, which converts user commands to commands compatible with the media server. The Application Unit 134 is also responsible for generating a graphical user interface (GUI) containing an electronic program guide (EPG) for display, and input by an

(Vasilevsky, 15:15-19)

Ground 5 – Obviousness over Vasilevsky and Logan (Claim 18)

Vasilevsky’s server receives over the network authentication information relating to access authority of the user who established the bookmark.



(Vasilevsky, Figure 6 (annotated))

BOOKMARK LISTING		
PROGRAM	USER	LOCATION
<u>Home Improvement</u>	<u>Publius Virgil</u>	0 hrs., 13 min., 15 sec. out of 0 hrs., 30 min., 0 sec.
<u>Home Improvement</u>	<u>Mary Shelley</u>	0 hrs., 20 min., 37 sec. out of 0 hrs., 30 min., 0 sec.
<u>NFL: Raiders v. Patriots</u>	<u>Victor Hugo</u>	3 hrs., 3 min., 12 sec. out of 3 hrs., 15 min., 0 sec.
<u>XXXXXXXXXXXXX</u>	<u>XXXXXXXXXXXXX</u>	<u>XXXXXXXXXXXXXXXXXXXX</u> <u>XXXXXXXXXXXXXXXXXXXX</u>
<u>XXXXXXXXXXXXX</u>	<u>XXXXXXXXXXXXX</u>	<u>XXXXXXXXXXXXXXXXXXXX</u> <u>XXXXXXXXXXXXXXXXXXXX</u>

(Vasilevsky, Figure 7 (annotated))

5. The system of Claim 1, wherein said media server is adapted to enable a particular program bookmark to be edited only by a user purporting to have established the particular bookmark.

(Vasilevsky, claim 5)

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

U.S. Patent No. 8,307,286

Petitioner's expert, Dr. Houh, confirms a POSITA would have understood '286 Patent Figure 6 as depicting web forms for submitting cue point information to a server-side VEE

19. In my opinion, Figure 6 of the '286 Patent illustrates an example of the user interface that may be used in the example described in the passage reproduced above (of the '286 Patent, 23:12-28). The '286 Patent describes Figure 6 as illustrating “an exemplary screen shot of an embodiment of a video editing environment as viewed by a client terminal.” '286 Patent, 5:53-55, 25:64-66 (emphasis added). As seen in this figure, the user interface includes form fields for user input of cue point information. ...

(EX1023 (“Houh Reply Decl.”) ¶19)

25. Thus, a POSITA would have possessed such knowledge of web forms and would have understood '286 Patent Figure 6's “Save” and “Save-and-Exit” buttons to provide such functionality and operate in this manner. The '286 Patent plainly discloses using forms provided on the client user interface, with a “Save” or “Submit”-type button which triggers transmission of the entered information to the server side which is handled by the server-side software for creating/modifying cue point information at the server-side.

(Houh Reply Decl. ¶25)