

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TABLEAU SOFTWARE, LLC
Petitioner

v.

ICHARTS LLC
Patent Owner

Case IPR2024-01389
U.S. Patent No. 8,520,000

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,520,000**

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Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

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PETITIONER'S EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 8,520,000 to Duncker et al.
1002	Prosecution History of U.S. Patent No. 8,520,000
1003	Declaration of Christopher Schmandt
1004	<i>Curriculum Vitae</i> of Christopher Schmandt
1005	U.S. Publication No. 2008/0127052 to Rostoker ("Rostoker")
1006	U.S. Publication No. 2007/0113194 to Bales et al. ("Bales")
1007	U.S. Publication No. 2003/0071814 to Jou et al. ("Jou")
1008	QlikView Reference Manual V8.50 (June 2008)
1009	QlikView Server Reference Manual V8.50 (June 2008)
1010	U.S. Publication No. 2006/0112123 to Clark et al. ("Clark")
1011	O'Leary, T.J. & O'Leary, L.L., "Microsoft Office Excel 2003" (2003)
1012	O'Leary, T.J. & O'Leary, L.L., "Microsoft Office PowerPoint 2003" (2003)
1013	U.S. Application No. 61/077,728
1014	QlikView Downloads (Aug. 2, 2008), <i>available at</i> https://web.archive.org/web/20080802064135/http://ftp.qliktech.com:80/qvwebdownloads/
1015	QlikView Product Suite Download Page (July 8, 2008), <i>available at</i> https://web.archive.org/web/20080708191653/http://ftp.qliktech.com/qvwebdownloads/Release8.asp
1016	QlikView 8.50 Downloadable Files (Aug. 17, 2008), <i>available at</i> https://web.archive.org/web/20080817042640/http://ftp.qliktech.com/qvwebdownloads/Release850.asp
1017	QlikView 8.50 Documentation (Aug. 17, 2008), <i>available at</i> https://web.archive.org/web/20080817042629/http://ftp.qliktech.com:80/qvwebdownloads/Docs.asp

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Exhibit	Description
1018	QlikView 8.50 Documentation (Oct. 23, 2008), <i>available at</i> https://web.archive.org/web/20081023184538/http://ftp.qliktech.com:80/qvwebdownloads/Docs.asp
1019	QlikView 8.50 Documentation (Feb. 9, 2009), <i>available at</i> https://web.archive.org/web/20090209142916/http://ftp.qliktech.com:80/qvwebdownloads/Docs.asp
1020	QlikView Community Support (July 2, 2008), <i>available at</i> https://web.archive.org/web/20080702053130/http://www.qlikcommunity.com/support/
1021	QlikNews: Issue 5, Summer 2008 (Mar. 4, 2009), <i>available at</i> https://web.archive.org/web/20090304004927/http://www.qlikcommunity.com/1203/
1022	QlikNews: ProductView (June 26, 2008), <i>available at</i> https://web.archive.org/web/20080626190929/http://www.qlikcommunity.com/1218/
1023	QlikNews: Americas View (June 26, 2008), <i>available at</i> https://web.archive.org/web/20080626195546/http://www.qlikcommunity.com/1213/
1024	QlikView Wine Guide Intro Tab (Jan. 7, 2007), <i>available at</i> http://web.archive.org/web/20070107033756/http://thewinepress2.qliktech.com/en/Default.asp
1025	QlikView Wine Guide How To Tab (Jan. 8, 2007), <i>available at</i> http://web.archive.org/web/20070108145241/http://thewinepress2.qliktech.com/en/HowTo.asp
1026	QlikView Wine Guide Wine Selector Tab (Jan. 7, 2007), <i>available at</i> http://web.archive.org/web/20070107034057/http://thewinepress2.qliktech.com/en/Wine_Selector.asp
1027	QlikView Wine Guide Analysis Tab (Jan. 8, 2007), <i>available at</i> http://web.archive.org/web/20070108140845/http://thewinepress2.qliktech.com/en/Analysis.asp
1028	Richardson, J., et al., “Magic Quadrant for Business Intelligence Platforms,” Gartner ID No. G00154227 (Feb. 1, 2008)

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Exhibit	Description
1029	Raab, D.M., “Analytical Database Options,” <i>DM Review</i> (July 2008)
1030	Declaration of Sylvia D. Hall-Ellis, Ph.D.
1031	<i>Curriculum Vitae</i> of Sylvia D. Hall-Ellis, Ph.D.
1032	Internet Archive Declaration #1
1033	Internet Archive Declaration #2
1034	Redline Comparison – U.S. Application No. 12/205,802 Compared with U.S. Application No. 12/372,696 to Show New Matter
1035	Wills, G.J., “NicheWorks—Interactive Visualization of Very Large Graphs” (1999)
1036	Raskin, J., “The Humane Interface” (2000)
1037	Raskin, J., “Led the Team That Created User-Friendly Apple Macintosh Computer,” <i>Los Angeles Times</i> (Mar. 1, 2005)
1038	Austen, I., “I.B.M. Acquires Cognos, Maker of Business Software, for \$4.9 Billion,” <i>The New York Times</i> (Nov. 13, 2007)
1039	Viegas, F.B., et al., “ManyEyes: A site for visualization at internet scale,” <i>IEEE Transactions on Visualization and Computer Graphics</i> , 13(6):1121-1128 (Jan. 1, 2007)
1040	Stolte, C., et al., “A System for Query, Analysis and Visualization of Multi-dimensional Relational Databases,” <i>IEEE Transactions on Visualization and Computer Graphics</i> , 8(1) (Aug. 7, 2002)
1041	Hanrahan, P., et al., “Visual Analysis for Everyone: Understanding Data Exploration and Visualization,” <i>Tableau Software</i> (2007)
1042	Allaire, J., “Macromedia Flash MX—A next-generation rich client” (March 2002)
1043	Macromedia Flash (SWF) File Format Specification, v6 (2002)
1044	Flanagan, D., “JavaScript The Definitive Guide,” 4th edition (2002)
1045	U.S. Patent No. 5,414,809 to Hogan et al.
1046	U.S. Patent No. 7,296,025 to Kung et al.
1047	U.S. Patent No. 6,025,844 to Parsons

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Exhibit	Description
1048	U.S. Patent No. 8,099,674 to Mackinlay et al.
1049	Tableau Overview Video, available at https://web.archive.org/web/20080124114801/ http://www.tableausoftware.com:80/products/tour
1050	U.S. Patent No. 5,848,424 to Scheinkman et al.
1051	U.S. Publication No. 2007/0243925 to LeMay et al.
1052	U.S. Publication No. 2005/0193330 to Peters
1053	Dance et al., “Faces of the Dead,” <i>The New York Times</i> , https://archive.nytimes.com/www.nytimes.com/interactive/us/faces -of-the-dead.html (last visited Aug. 7, 2024)
1054	U.S. Patent No. 5,535,324 to Alvarez et al.
1055	U.S. Patent No. 6,529,217 to Maguire et al.
1056	Shepherd, G. & Wingo, S., “MFC Internals” (1996)
1057	Negrino, T. & Smith, D., “JavaScript and Ajax” (2007)
1058	Plaintiff iChart’s First Amended Asserted Claims, Infringement Contentions, and Document Production Disclosures (Patent Local Rules 3-1, 3-2), <i>iCharts LLC v. Tableau Software</i> , Case No. 3:24- cv-03157 (with Exhibit C)
1059	QlikView 8.50 Copyright Registration
1060	QlikView 8.50 Copyright Application
1061	Qlik Community Page, Qlikview 8.5 Manual, available at https://community.qlik.com/t5/QlikView-Administration/Qlikview- 8-5-Manual/m-p/1742630
1062	<i>Intentionally Left Blank</i>
1063	<i>Intentionally Left Blank</i>
1064	Nikolaidou <i>et al.</i> “Enterprise Information Systems Configuration: Emphasizing the Symbiotic Relationship Between Applications and the Underlying Network,” 9th IEEE International Conference on Engineering Complex Computer Systems Navigating Complexity in the e-Engineering Age (2004)
1065	Widgets 1.0: The Widget Landscape (Q1 2008), W3C

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Exhibit	Description
1066	Microsoft Computer Dictionary 5 th Edition (2002)
1067	U.S. Publication No. 2006/0101064 to Strong et al.
1068	Declaration of Deborah C. Lofton, Chief Legal Officer and Corporate Secretary of QlikTech Inc.

I. INTRODUCTION

The '000 patent describes nothing more than well-known techniques for generating and displaying charts (e.g., bar graphs, line graphs, etc.) on a computer screen. A user interface ("UI") is provided for generating interactive charts, and one of the interactive charts is selected by dragging and dropping it into a chart box folder. The interactive chart is then automatically displayed in a chart box on a second website after the drag-and-drop selection.

Data visualization tools and interactive charts were well known before the '000 patent. The other design choices claimed in the '000 patent were also known, including chart boxes, chart box folders, drag-and-drop, Flash widgets, etc. The grounds in this Petition teach or suggest every claim element in the '000 patent. The Petition is supported by the declaration of Christopher Schmandt, who has almost 40 years of experience in the field of computer graphics.

The Board should institute trial and find all claims unpatentable.

II. THE '000 PATENT

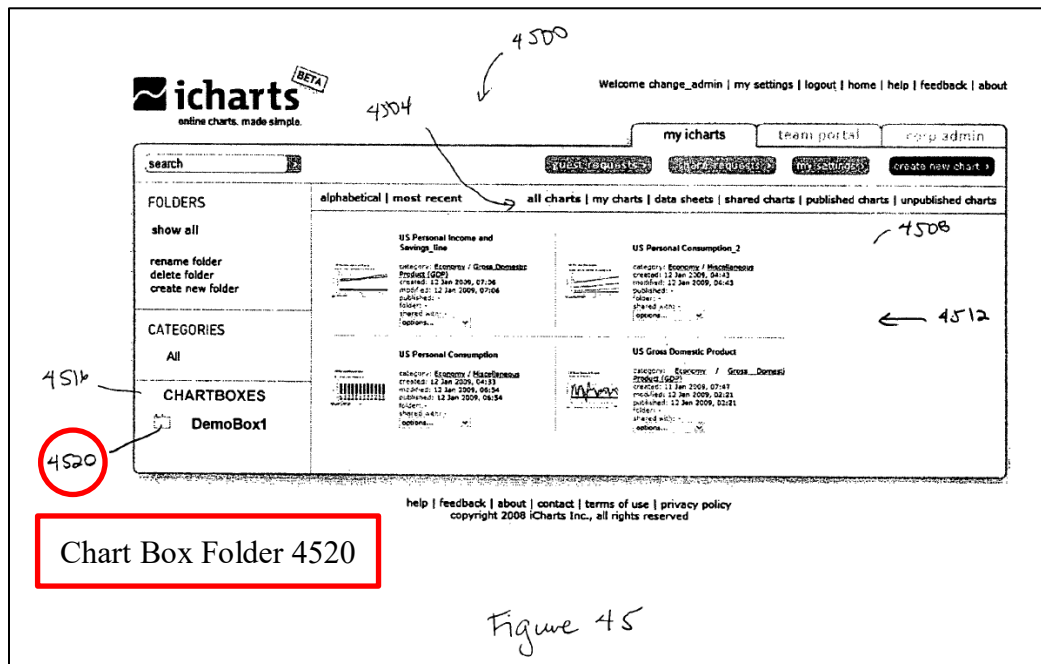
A. Overview of the '000 Patent

The '000 patent describes "[s]ystems and methods for generating and sharing interactive charts." EX1001, Abstract. "The interactive charts are generated in an online portal that allows users to customize the interactive features of the chart." EX1001, Abstract. "An online portal may also be provided to allow users to automatically embed interactive chart(s) in another website without

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reprogramming the code of the website each time the interactive chart(s) are changed or new interactive chart(s) are added.” EX1001, Abstract.

Shown below, the '000 patent describes an embodiment where “[t]he user interface also includes a chart box region 4516 that includes a chart box folder 4520.” EX1001, 16:33-35.

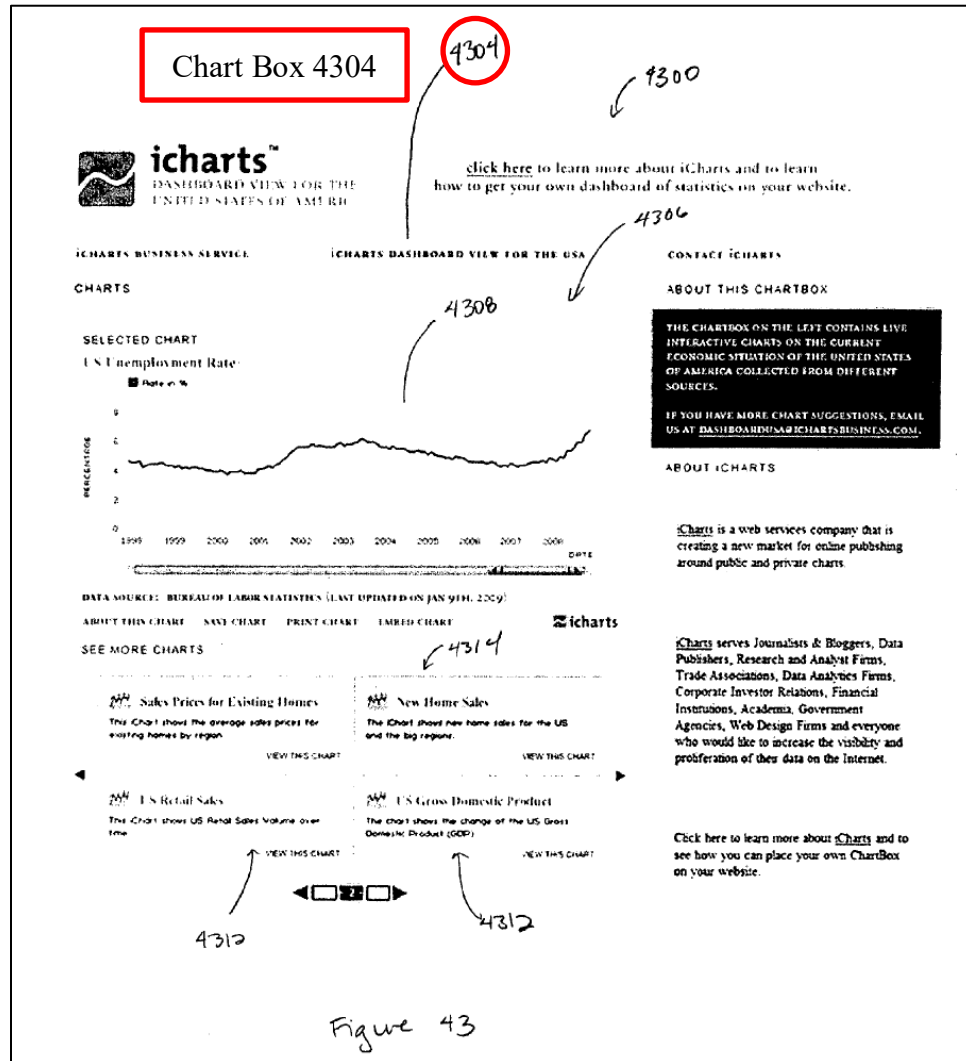


EX1001, FIG. 45 (annotated).

“The chart box folder 4520 is connected to the chart box 4304 [on a second website shown below] such that the retrieve code for data feed displays the interactive chart(s) selected by the user in the chart box folder 4520.” EX1001, 16:35-38. “The user can select the interactive chart(s) for display in the chart box 4304 by, for example, dragging and dropping one or more of the charts 4512 onto the chart box folder 4520.” EX1001, 16:38-41. “When the user drops the selected

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chart(s) 4512 onto the chart box folder 4520, the chart is automatically displayed in the chart box 4304 embedded on the user's website." EX1001, 16:41-44.



EX1001, FIG. 43 (annotated).

As Section II.E explains, iCharts, Inc. (“the Applicant”) added this embodiment in U.S. Application No. 12/372,696 on February 17, 2009.

B. Prosecution History of the '000 Patent

The Applicant filed U.S. Application No. 12/372,696 on February 17, 2009 as a continuation-in-part (CIP) of U.S. Application No. 12/205,802. In this CIP, the Applicant added new matter and twenty new claims. *See* EX1034.

In response to various rejections, EX1002, 0131-39, the Applicant amended claim 1 to recite, among other things, “displaying, in response to the request, the interactive chart embedded in a chart box on a website, wherein the interactive chart retains interactivity when embedded.” EX1002, 0153. The Applicant also cited two dictionaries, arguing that “interactive” does not mean merely customizable:

1. “interactive” means “mutually or reciprocally active.”
2. “If users receive real-time feedback from a computer so that they can modify the use of the machine, the hardware, software, or content, the system is said to be interactive.”

EX1002, 0160; EX1003, ¶¶48-55.

The Office did not adopt these definitions, so they are not controlling. Instead, the Office raised new rejections based on different prior art. EX1002, 0189-299. The Applicant then amended the claims and argued that the prior art did not describe a chart that retains interactivity when embedded as a self-contained document independent of the chart generator. EX1002, 0222-29. The examiner again issued new rejections. EX1002, 0240-49; EX1003, ¶¶55-59.

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After an examiner interview, the Applicant amended the claims to recite more limitations about the interactive chart retaining interactivity. EX1002, 0266-273. According to the Applicant, “the independent claims prescribe two levels of interactivity for the chart, (1) one that requires the presence of the generation interface that can take advantage of the chart template store when generating the chart, and (2) the other that is independent of the generation interface.” EX1002, 0272. The Office maintained its rejections. EX1002, 0286-293.

The Applicant then amended claim 1 to add the following limitations:

wherein the chart box is a web widget

...

wherein the selection is made by dragging and dropping the at least one interactive chart from the plurality of charts into a chart box folder connected to the chart box such that retrieve code for data feed displays the at least one interactive chart on the first website, and

wherein the at least one interactive chart is automatically displayed on the second website using a data feed from the first website to the second website upon the dragging and dropping selection.

EX1002, 0306. The examiner then allowed the claims. EX1002, 0325-330; EX1003, ¶¶60-67.

The prior art in this Petition discloses selecting a chart by dragging and dropping the chart into a chart box folder connected to a chart box. The art also discloses “interactive” charts under both dictionary definitions.

C. Level of Ordinary Skill in the Art

A person of ordinary skill in the art (“POSA”) at the time of the alleged invention would have had a B.S. degree in Computer Science, Computer Engineering, or equivalent experience relating to computing, as well as two to three additional years of academic or industry experience related to web application development and data visualization services. EX1003, ¶85. The POSA would have, therefore, been familiar with client-side scripting technologies, such as JavaScript and/or ActionScript. EX1003, ¶85. The POSA would have further worked as part of a multidisciplinary team and drawn upon not only her own skills, but of others on the team, e.g., to solve a given problem. EX1003, ¶85.

D. Claim Construction

Tableau has construed the terms according to their ordinary and customary meanings as understood by a POSA in view of the specification. *See Phillips v. AWH Corp.*, 415 F.3d 1303, 1312-13 (Fed. Cir. 2005). No term needs an explicit construction to resolve the controversy between the parties. *See Vivid Techs., Inc. v. Am. Sci. & Eng’g, Inc.*, 200 F.3d 795, 803 (Fed. Cir. 1999).

E. Priority Date

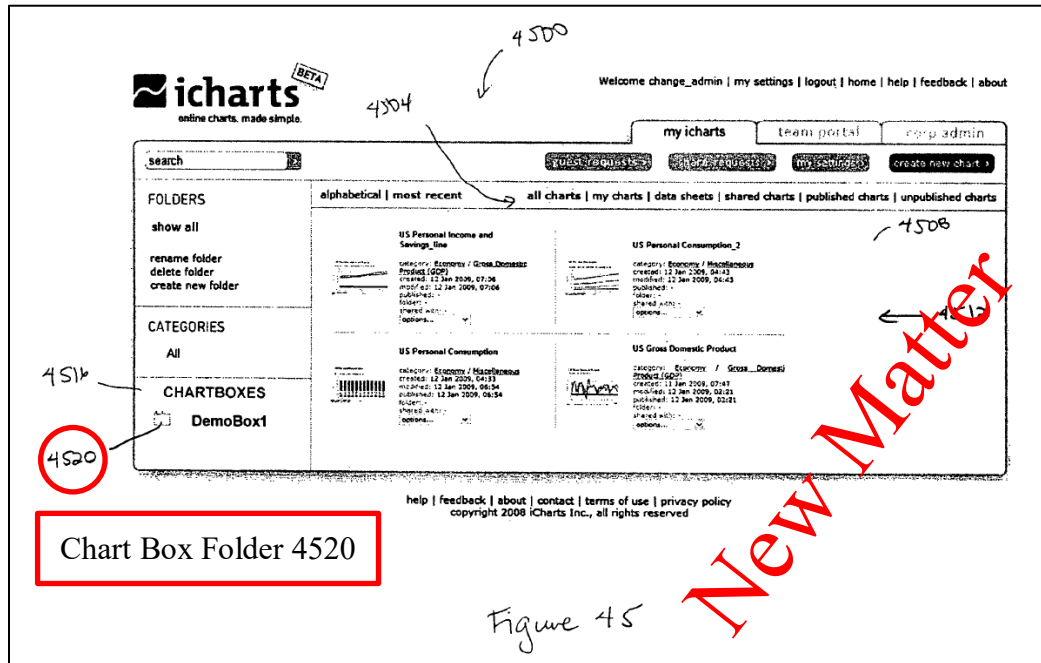
The '000 patent issued from U.S. Patent Application 12/372,696 (filed Feb. 17, 2009) and claims priority as a continuation-in-part of U.S. Application 12/205,802 (filed Sept. 5, 2008), which claims priority to U.S. Provisional Application 61/077,728 (filed July 2, 2008). The '000 patent is *not* entitled to the earlier filing dates of the '802 application or the '728 provisional.

“When neither the PTO nor the Board has previously considered priority, there is simply no reason to presume that claims in a CIP application are entitled to the effective filing date of an earlier filed application.” *PowerOasis, Inc. v. T-Mobile USA, Inc.*, 522 F.3d 1299, 1305 (Fed. Cir. 2008). Here, to be entitled to a filing date before the February 17, 2009 filing date of its CIP, Patent Owner iCharts LLC (“iCharts”) must show that an earlier application in the family has §112 support for the issued '000 patent claims. *Dynamic Drinkware, LLC v. Nat'l Graphics, Inc.*, 800 F.3d 1375, 1378 (Fed. Cir. 2015). iCharts cannot make this showing because substantial new matter was added in the '696 application. Petitioner prepared a redline comparison between the '802 application and the '696 application. EX1034. It shows that Figures 43-45 and the corresponding description in the '000 patent, EX1001, 15:49-16:59, are new matter.

The new matter relates to the embodiment claimed in the '000 patent. EX1003, ¶¶81-84. In the new matter, shown below, “[t]he user interface also

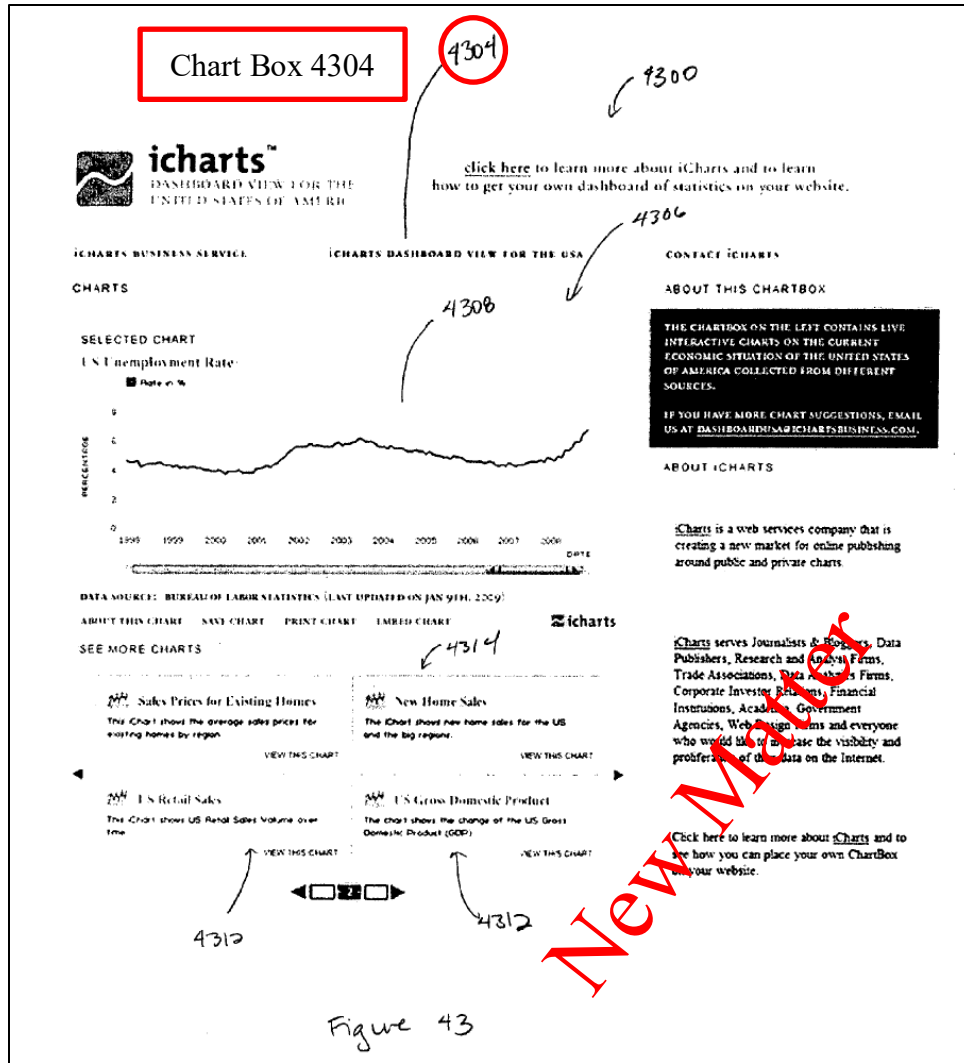
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includes a chart box region 4516 that includes a chart box folder 4520.” EX1001, 16:33-35.



EX1001, FIG. 45 (annotated).

“The chart box folder 4520 is connected to the chart box 4304 [on a second website shown below] such that the retrieve code for data feed displays the interactive chart(s) selected by the user in the chart box folder 4520.” EX1001, 16:35-38. “The user can select the interactive chart(s) for display in the chart box 4304 by, for example, dragging and dropping one or more of the charts 4512 onto the chart box folder 4520.” EX1001, 16:38-41. “When the user drops the selected chart(s) 4512 onto the chart box folder 4520, the chart is automatically displayed in the chart box 4304 embedded on the user’s website.” EX1001, 16:41-44. All of this is new matter *not* in the ’802 application or the ’728 provisional.



EX1001, FIG. 43 (annotated).

Accordingly, iCharts's earlier applications do not have §112 support for:

at least one interactive chart embedded in a chart box on a second website, wherein the chart box is a web widget dragging and dropping the at least one interactive chart from the plurality of charts into a chart box folder connected to the chart box such that retrieve code for data

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feed displays the at least one interactive chart on the first website

wherein the at least one interactive chart is automatically displayed on the second website using a data feed from the first website to the second website upon the dragging and dropping selection

EX1003, ¶¶68-84. The earlier applications also fail to disclose a “*flash widget*,” “*displaying one or more of the plurality of interactive charts in the chart box on the second website*,” or “*displaying a plurality of interactive charts embedded in a plurality of chart boxes on the second website*” (claims 2-4). EX1003, ¶¶68-84.

The earliest priority date is therefore February 17, 2009 (the filing date of the '000 patent itself). Indeed, iCharts agrees “[e]ach and every Asserted Claim of the '000 Patent has a priority date of February 17, 2009.” EX1058, 0009.

III. IDENTIFICATION OF THE CHALLENGE (37 C.F.R. § 42.104(B))

A. Citation of Prior Art

The grounds in this petition rely on the following prior-art references:

Reference	Exhibit	Date	Prior Art
U.S. Publication No. 2008/0127052 to Rostoker	EX1005	Filed Dec. 26, 2006	§102(a), (e)
U.S. Publication No. 2003/0071814 to Jou <i>et al.</i>	EX1007	Published Apr. 17, 2003	§102(b)
U.S. Publication No. 2006/0101064 to Strong <i>et al.</i>	EX1067	Published May 11, 2006	§102(b)

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U.S. Publication No. 2006/0112123 to Clark <i>et al.</i>	EX1010	Published May 25, 2006	§102(b)
QlikView Reference Manual. v8.50, 1st ed.	EX1008	Published By July 8, 2008	§102(a)
QlikView Server Reference Manual. v8.50, 1st ed.	EX1009	Published By July 8, 2008	§102(a)
U.S. Publication No. 2007/0113194 to Bales <i>et al.</i>	EX1006	Published May 17, 2007	§102(b)

B. QlikView Manuals

The QlikView Reference Manual, v8.50, 1st ed. (EX1008) and the QlikView Server Reference Manual, V8.50, 1st ed. (EX1009) (collectively the “QlikView Manuals”) describe a well-known system and are printed publications available to the public at least by July 8, 2008 (before the ’000 patent’s February 17, 2009 priority date, see Section II.E). *See* EX1008; EX1009; EX1014-EX1028; EX1003, ¶¶148-59; EX1030, ¶¶23-41; EX1068, ¶¶4-7; EX1032 (authenticating dates for EX1008 and EX1015-EX1019); EX1033 (authenticating dates for EX1014 and EX1020-27).

Whether a document qualifies as a “printed publication” that is “available to the public” is a question of law based on underlying factual findings. *In re Enhanced Sec. Research, LLC*, 739 F.3d 1347, 1354 (Fed. Cir. 2014). “This court has interpreted § 102 broadly, explaining that even relatively obscure documents qualify as prior art so long as the public has a means of accessing them.” *Id.* For

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example, product manuals and catalogs that were available to the public constitute prior art under §102(a). *See id.*, 1354-57; *Weber, Inc. v. Provisur Techs., Inc.*, 92 F.4th 1059, 1067-69 (Fed. Cir. 2024).

Like the product manuals in *Enhanced* and *Weber*, the QlikView Manuals were available to a POSA. In 2008, QlikView was a well-known software product sold by QlikTech International AB (“QlikTech”). EX1003, ¶¶148-49; EX1030, ¶¶23-25; EX1068, ¶¶4-7. In the Americas alone, QlikView had 40,000 users in over 1,000 organizations. EX1023, 1. QlikTech was perceived as “the ‘coolest’ vendor in BI” (Business Intelligence) and “a BI standard by midsize firms.” EX1028, 0017-18.

A POSA would have known about version 8.50 of QlikView. EX1003, ¶150. By at least June 26, 2008, QlikTech announced that QlikView version 8.50 was scheduled for release on June 30, 2008. EX1022, 1; EX1068, ¶7. As of its release date, a POSA would have understood that it could view the QlikView Manuals in the installation package. *See* EX1014; EX1015; EX1016; EX1017; EX1003, ¶¶150-51; EX1068, ¶7.

The QlikView Manuals were also available on QlikTech’s website. Dr. Sylvia Hall-Ellis, an expert in Library and Information Science, submitted a declaration explaining how a POSA would have found the QlikView Manuals. EX1030, ¶¶26-40. She shows that QlikTech’s website added the “QlikView 8.50”

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hyperlink by **July 8, 2008**. EX1030, ¶¶30, 38; EX1015, 1. From this hyperlink, a POSA would have navigated to “[t]he latest available QlikView Reference Manuals,” EX1016, including download links to both QlikView Manuals. EX1030, ¶¶30-31, 38; EX1017. QlikTech’s website states that the last modified date for both QlikView Manuals is June 16, 2008, which is consistent with the date on the documents. *Compare* EX1017, with EX1008, 0001, 0537, 0866; EX1009, 0001. And QlikTech represented to the U.S. Copyright Office that QlikView 8.50 was published on July 8, 2008, which is consistent with QlikTech adding “QlikView 8.50” to its website on that date. EX1059; EX1060, 2; EX1030, ¶¶29, 37.

The purpose of the QlikView Manuals also show that they were publicly accessible. EX1003, ¶150; EX1068, ¶7. Both QlikView Manuals tell a POSA how to install and use QlikView. EX1008, 0014; EX1009, 0010. The manuals also invite customers to contact QlikTech support services. EX1008, 0017. “Where, as here, a publication’s purpose is dialog with the intended audience, that purpose indicates public accessibility.” *Weber*, 92 F.4th at 1067-68 (cleaned up).

For at least these reasons, the QlikView Manuals were publicly available before the ’000 patent’s priority date (February 17, 2009). *Cf. Enhanced*, 739 F.3d at 1354-57; *Weber*, 92 F.4th at 1067-69

C. Statutory Grounds for the Challenge

Ground	Basis	References	Claims
1	§103	Rostoker and Strong	1-4
2	§103	Rostoker, Strong, and Jou	1-4
3	§103	Rostoker, Strong, and Clark	1-4
4	§103	QlikView Manuals and Bales	1, 3, 4

IV. OVERVIEW OF THE PRIOR ART

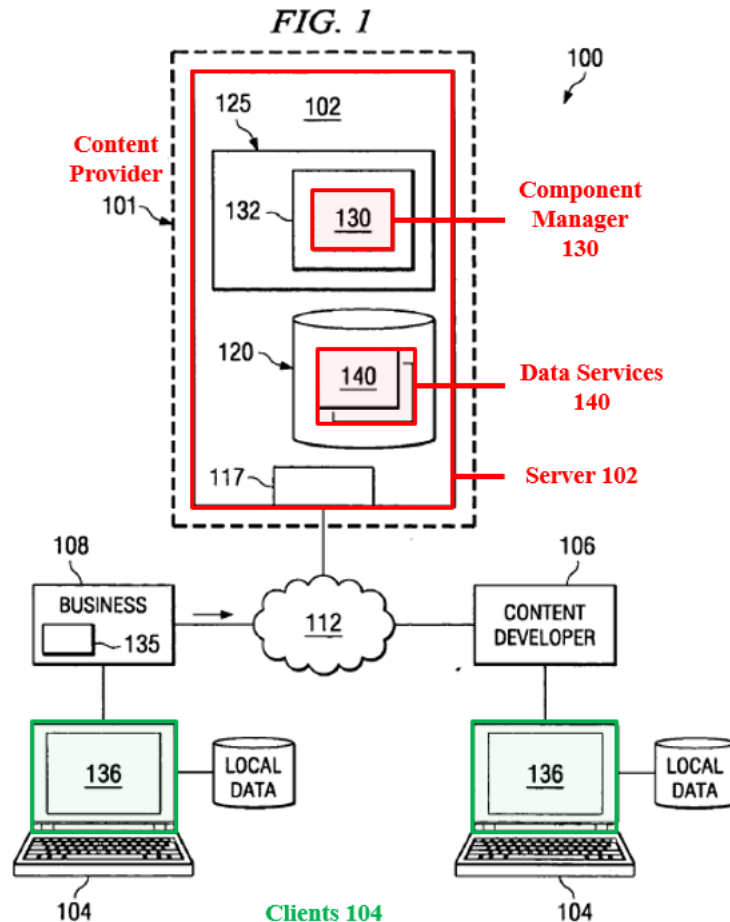
Embedding an interactive chart in a chart box folder on a second website was well known. Selecting charts with drag-and-drop was also well known.

A. Rostoker

Rostoker describes “methods, systems, and software for providing a compilation of composite applications (‘xApps’) and xApp components that may be modified, reconfigured, and/or adapted to meet a user's desires or requirements of a business application.” EX1005, ¶4. “Each component or application includes one or more pre-constructed user interfaces (UIs) and performs one or more predetermined functions, services, or queries.” *Id.*; EX1003, ¶133.

Figure 1 of Rostoker “illustrates an example system 100 for presenting, providing, or otherwise managing enterprise application content and other data services 140 via a content provider 101.” EX1005, ¶18. As illustrated below,

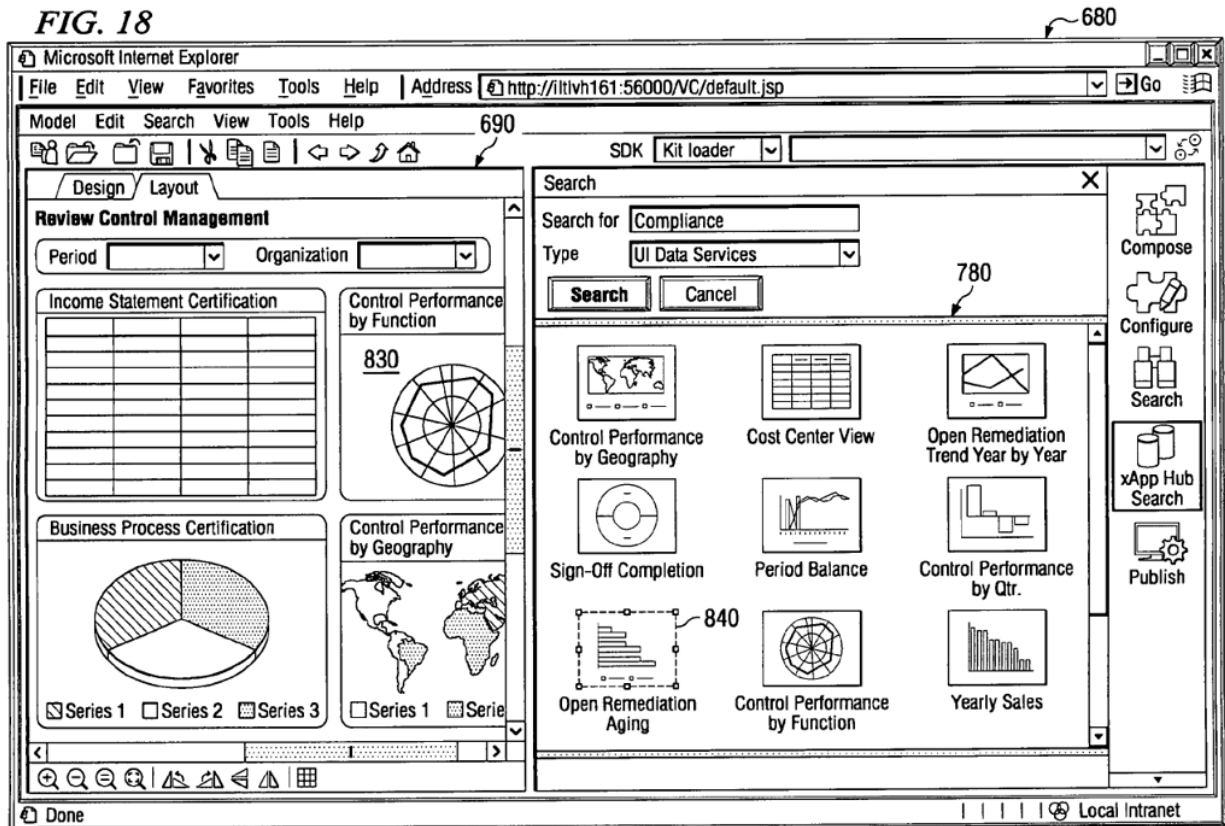
“system 100” includes “server 102, one or more clients 104, one or more content developers (or vendors) 106, [and] one or more businesses 108, at least some of which communicate across network 112.” EX1005, ¶29.



EX1005, FIG. 1 (annotated).

“[T]he content provider 101 uses a component manager 130, or other similar information hub of enterprise knowledge and components, to present a plurality of data services 140 to businesses 108, or their individual users, as well as other companies and users in the network.” EX1005, ¶19. And a “modeling environment

132 may be utilized to create, adapt, or configure the data services 140 (available to a user via the component manager 130) for creating a custom application, such as a business application, to fulfill a need of the user,” as illustrated below in Figure 18. EX1005, ¶¶140; EX1003, ¶¶134-37.



EX1005, FIG. 18.

B. QlikView Manuals

The QlikView Manuals describe Version 8.50 of QlikView, a well-known data visualization tool. EX1028, 0002, 0017-18; EX1003, ¶¶148; EX1030, ¶¶23-25. The QlikView Manuals explain how a developer loads data into QlikView and generates interactive charts using the following UIs. EX1008, 0242-51, 0881-947.

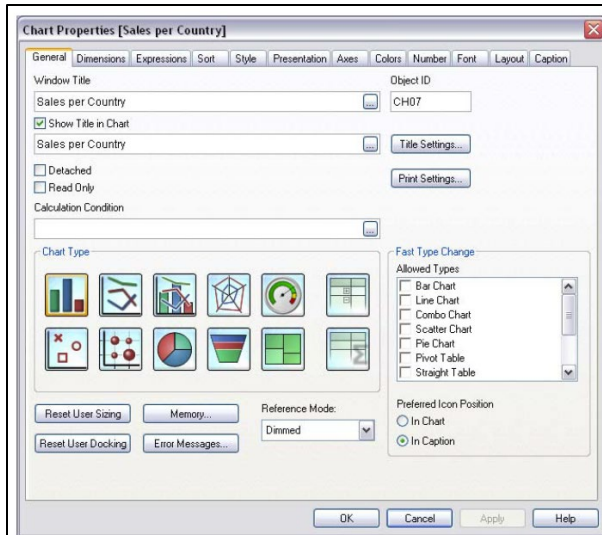


Figure 1. The General page in the Chart Properties dialog

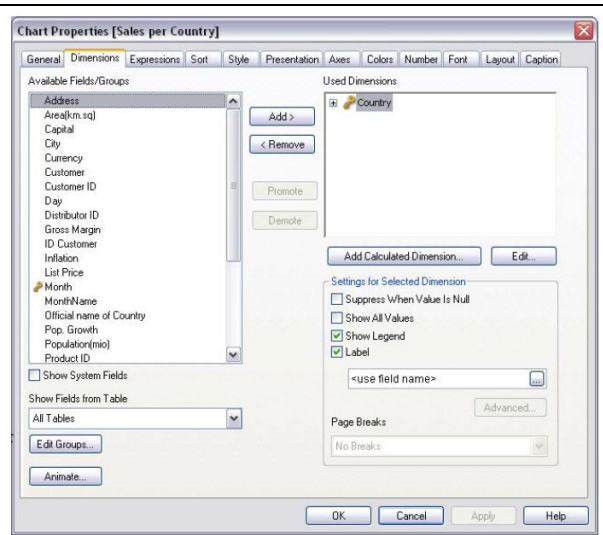
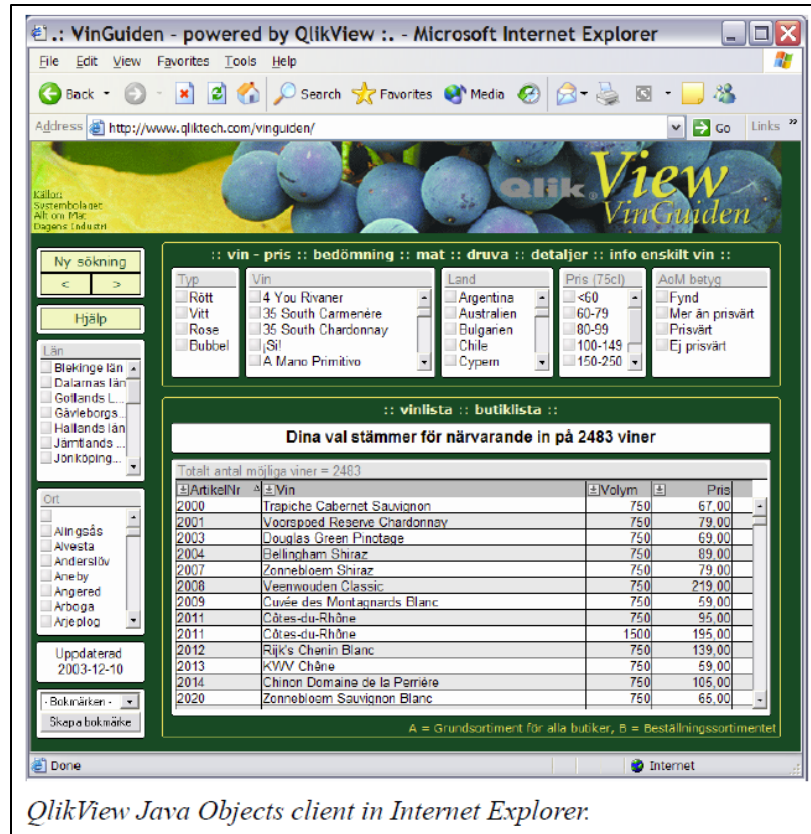


Figure 4. The Dimensions page in the Chart Properties dialog

EX1008, 0882, 0894.

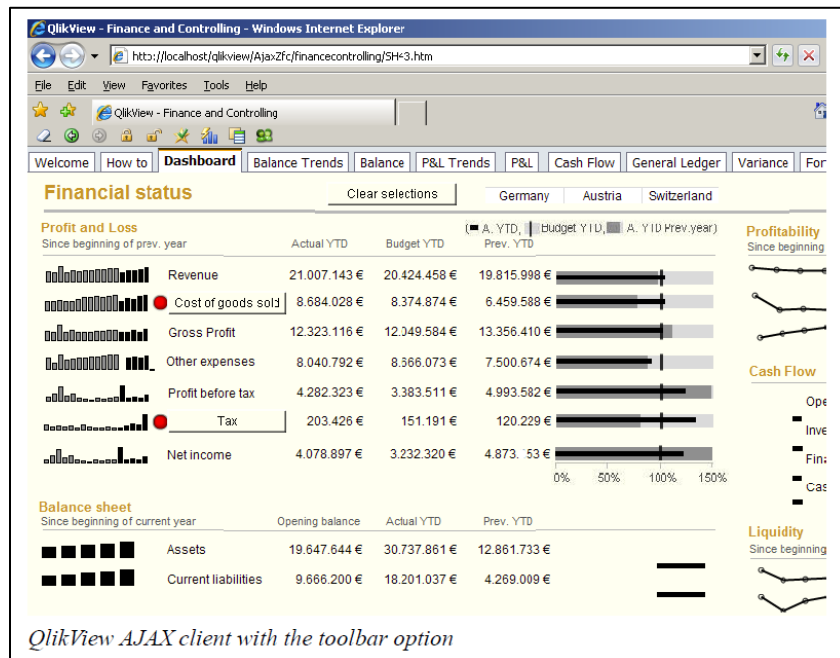
A developer can then embed the interactive chart in a chart box on a second webpage. EX1009, 0123. As the following two examples show, QlikView's charts retain interactive features. EX1003, ¶¶157-59.

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QlikView Java Objects client in Internet Explorer.

EX1009, 0133.



QlikView AJAX client with the toolbar option

EX1009, 0155.

A. Secondary References

The secondary references (Jou, Clark, Bales) disclose implementation details relevant to the claims. Strong discloses publishing a data object upon modification to the data object. EX1003, ¶¶138-39. Jou discloses interactive features such as data filtering, drill-down, and zoom. EX1003, ¶¶140-45. Clark discloses publishing interactive charts to other websites, including enterprise portals. EX1003, ¶¶146-47. And Bales discloses drag-and-drop functionality to display content on websites. EX1006, Abstract; EX1003, ¶¶160-66.

V. GROUND 1: ROSTOKER IN VIEW OF STRONG RENDERS OBVIOUS CLAIMS 1-4.

A. Independent Claim 1

1. [1P] “A computer-implemented method.”

Rostoker teaches the preamble. EX1003, ¶¶169-73. Particularly, Rostoker is directed to “**methods**, systems, and software for providing a compilation of composite applications (‘xApps’) and xApp components that may be modified, reconfigured, and/or adapted to meet a user's desires or requirements of a business application.” EX1005, ¶4. “Each component or application includes one or more pre-constructed user interfaces (UIs) and performs one or more predetermined functions, services, or queries.” EX1005, ¶4; EX1003, ¶170.

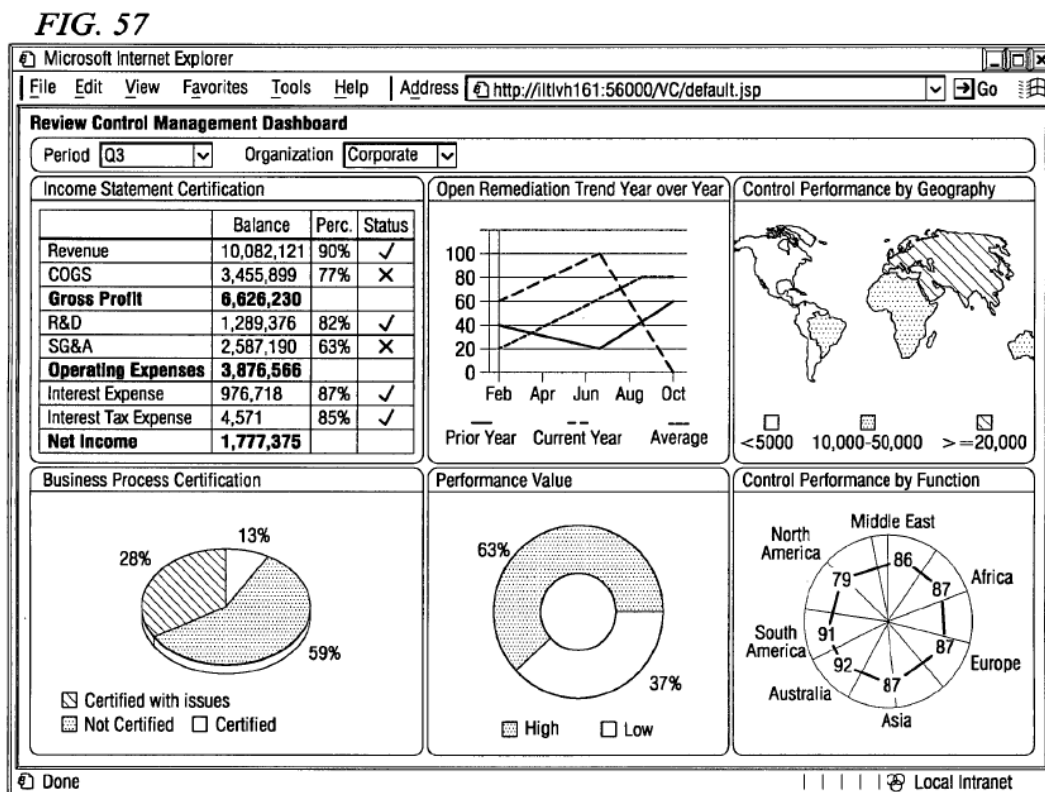
Rostoker further discloses “a storefront having a knowledge base or compilation of software components, applications, or other data services that can

easily be modified or integrated into different business analyst and end user tools.”

EX1005, ¶16. “The user may locate the components by searching the hub,” and

“[t]he user may then select a pre-existing application or component and use the selected component or application without modification or use the component or application as a template....” EX1005, ¶6¹; *see also id.*, ¶8; EX1003, ¶171.

Figure 57 illustrates an example application generated by Rostoker’s methods that includes multiple chart-based “xApps.” EX1005, ¶71; FIG. 57; EX1003, ¶172.



¹ Emphasis added unless otherwise indicated.

EX1005, FIG. 57.

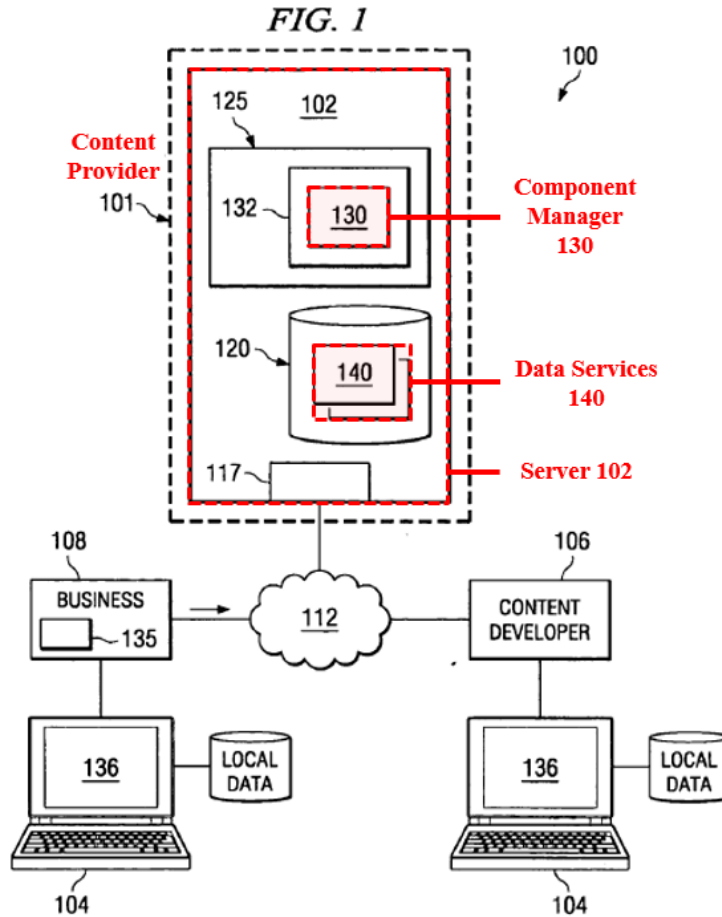
Accordingly, Rostoker teaches the preamble of claim 1.

- 2. [1A] “receiving a selection, on a first website, of at least one interactive chart from a plurality of interactive charts.”**

Rostoker teaches this limitation. EX1003, ¶¶174-88.

- (a) Rostoker teaches “receiving a selection, on a first website, of at least one ... chart from a plurality of ... charts.”**

Figure 1 of Rostoker “illustrates an example system 100 for presenting, providing, or otherwise managing enterprise application content and other data services 140 via a content provider 101.” EX1005, ¶18. As illustrated below, “system 100” includes “server 102, one or more clients 104, one or more content developers (or vendors) 106, [and] one or more businesses 108, at least some of which communicate across network 112.” EX1005, ¶29.

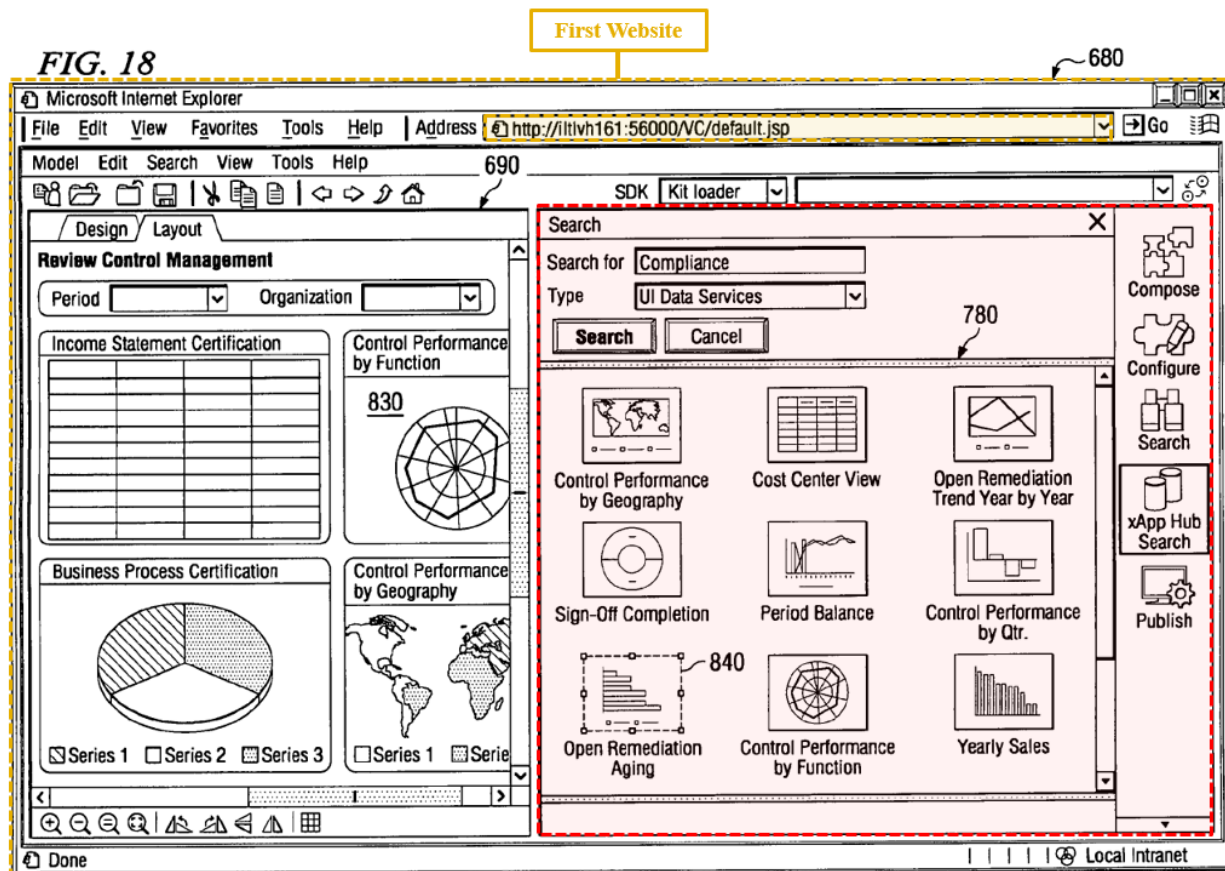


EX1005, FIG. 1 (annotated).

Rostoker discloses that “content provider 101 may be considered a storefront, hub, or retailer of business content and solutions.” EX1005, ¶18; *see also* EX1005, ¶6 (“[T]he system includes a storefront having a knowledge base or compilation of software components, applications, or other data services...”). Rostoker’s hub or “storefront can typically be accessed in a stand-alone fashion (such as a **website**).” EX1005, ¶18; *see also* EX1005, ¶29 (“**server 102** [of content provider 101] may also include or be communicably coupled with a **web server**....”). The “storefront” or “hub” is provided via “a component manager

130,” which “present[s] a plurality of data services 140 to businesses 108, or their individual users, as well as other companies and users in the network.” EX1005, ¶19; *see also* EX1005, ¶21 (“the content provider 101 may provide or utilize a bank of easily searched xApps and xApp components (services/queries with prebuilt UIs)....”); EX1003, ¶¶175-76.

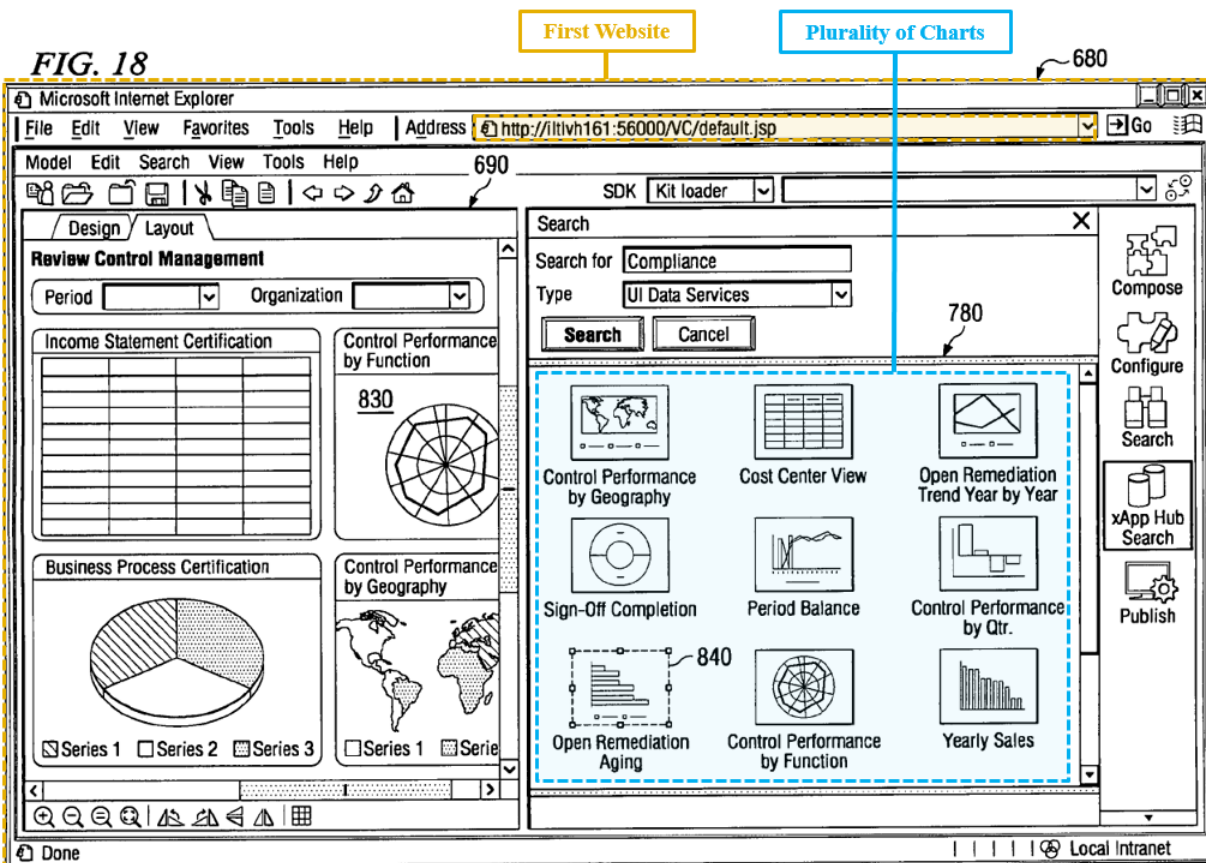
An example hub is shown in Figure 18, which illustrates a number of “xApps” (including “Data Services” components) displayed “on a first website” provided by content provider 101. EX1005, ¶67, FIG. 18; EX1003, ¶177.



EX1005, FIG. 18 (annotated).

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As illustrated in Figure 18, the xApps available on the “first website” include “a plurality of ... charts,” for example the bar charts included in the “Open Remediation Aging” and “Control Performance by Qtr.” xApps, and the line graphs included in the “Open Remediation Trend Year by Year” and “Period Balance” xApps. EX1005, FIG. 18; *see also* EX1005, FIG. 14 (describing the “Open Remediation Aging” xApp as including a “[b]ar chart identifying truck logistic capacity”); EX1003, ¶178.



EX1005, FIG. 18 (annotated).

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Rostoker further discloses “*receiving a selection, on a first website, of at least one ... chart from a plurality of ... charts.*” As noted for [1P], a “user may locate [] components by searching the hub,” and “[t]he user may then select a **pre-existing application or component** and use the selected component or application without modification or use the component or application as a template....” EX1005, ¶6; *see also* EX1005, ¶8 (“A search may return one or more applications, application components, or other business process components that the user may import and configure to operate in a predetermined manner.”); EX1003, ¶179. Figures 18 and 19 of Rostoker, for example, show selection of the “xApp 840” (“*at least one ... chart from a plurality of ... charts*”) by a user. EX1005, ¶67 (“**xApp 840 [is] selected in the field 780 in FIG. 18. FIG. 19 shows the addition of the xApp 840 to the UI 690** as well as the selection of xApp 850 in the field 780.”), FIGs. 18, 19.

FIG. 18

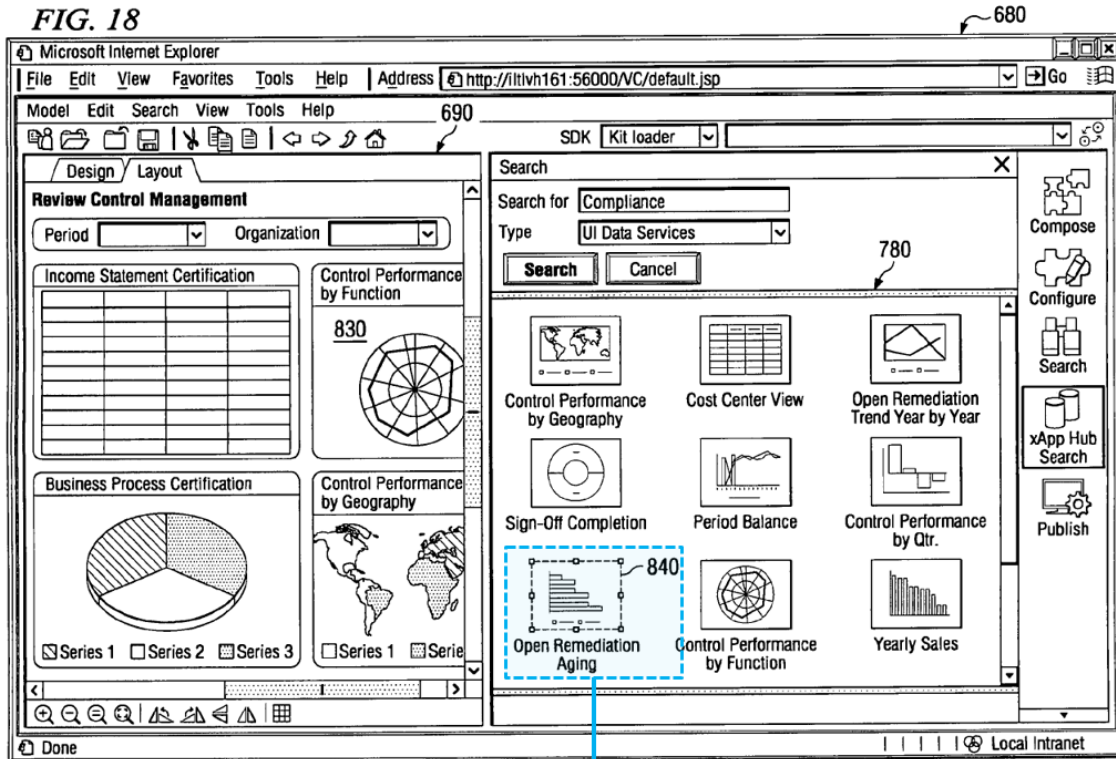
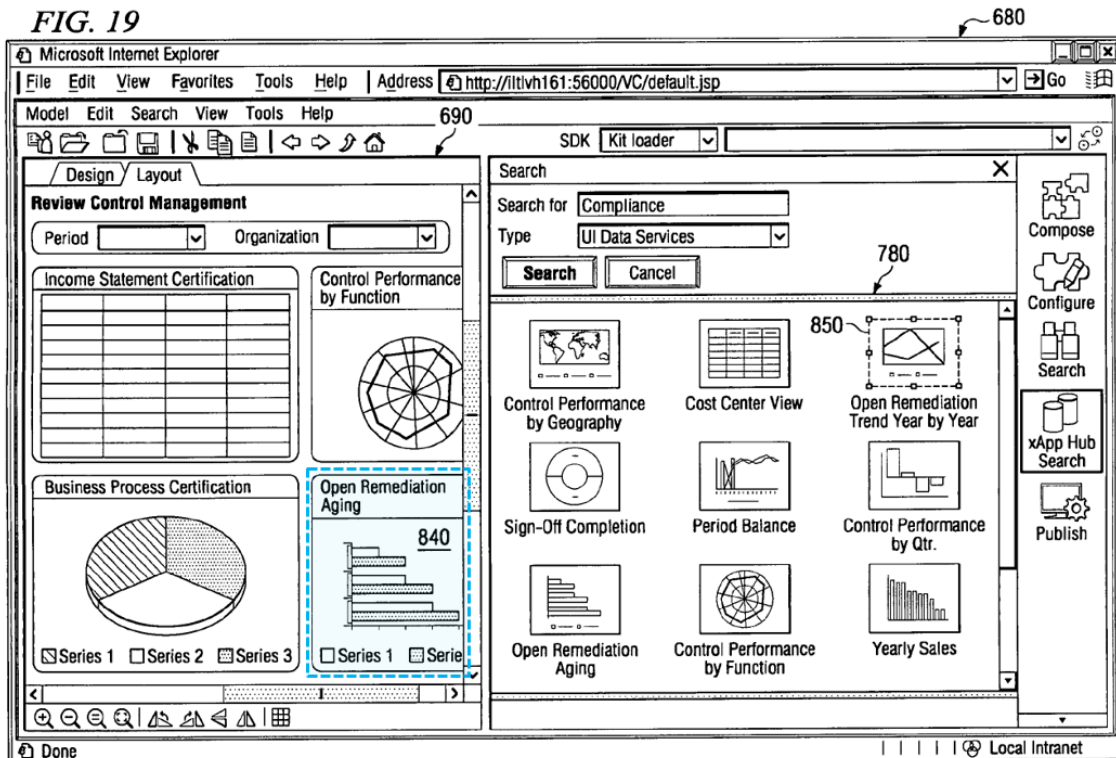


FIG. 19



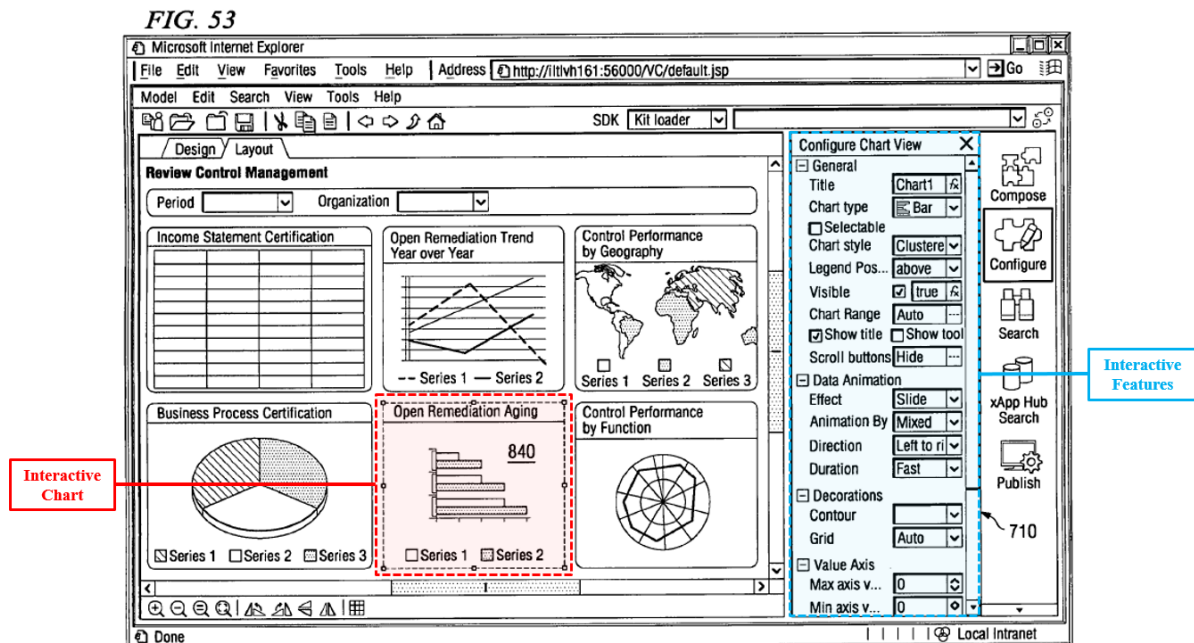
EX1005, FIGs. 18, 19 (annotated).

Thus, Rostoker discloses “receiving a selection, on a first website, of at least one ... chart from a plurality of ... charts.” EX1003, ¶180.

(b) Rostoker teaches that its charts are “interactive charts.”

Rostoker also teaches that its charts are “interactive charts.”

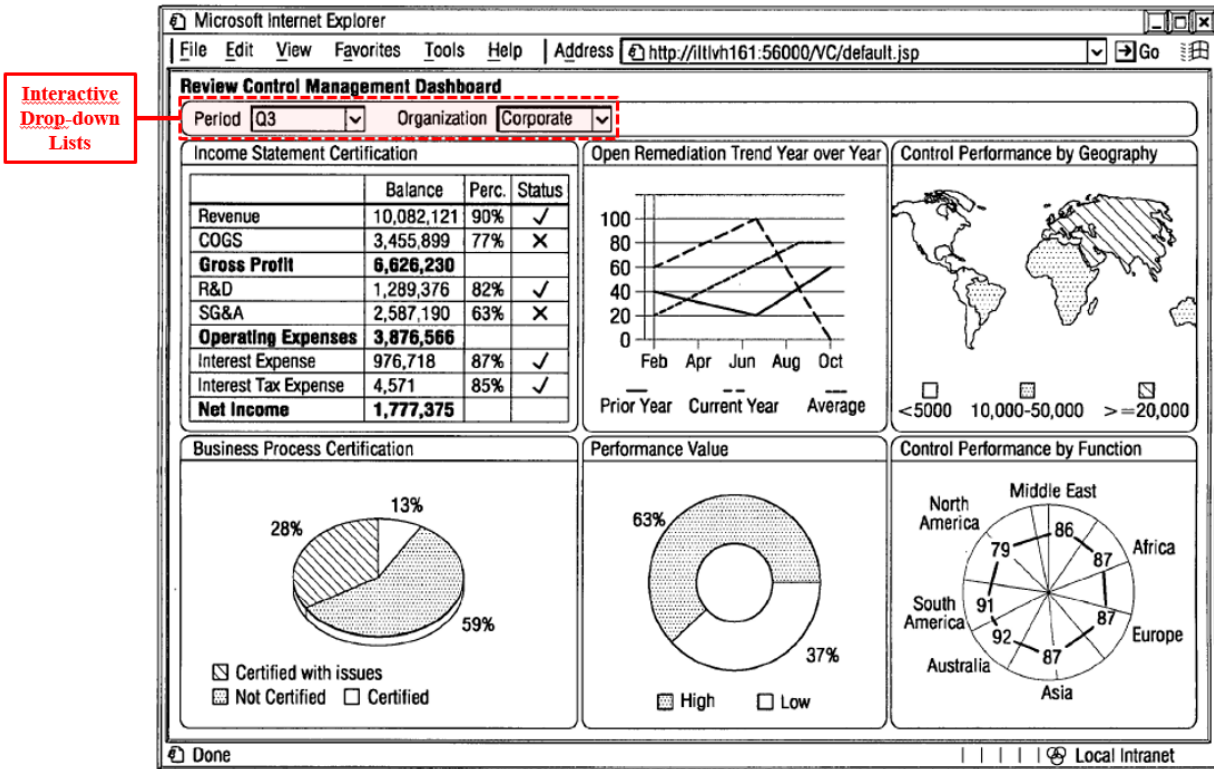
First, Rostoker discloses a “Configure Chart View” toolbar that allows a user to enable “interactive” features of the chart. EX1005, ¶71 (“In FIG. 53, xApp 840 is selected and the toolbar 710 lists the tools for configuring the xApp 840”); EX1003, ¶181. As shown in Figure 53, the “Configure Chart View” toolbar includes multiple “interactive” features, such as making the chart “Selectable,” including “Scroll buttons” to scroll the chart, and adding “Data Animation[s].” EX1005, FIG. 53, ¶71; EX1003, ¶181.



EX1005, FIG. 53 (annotated).

Second, Figure 57 of Rostoker “shows the new or modified application after execution.” EX1005, ¶71.

FIG. 57

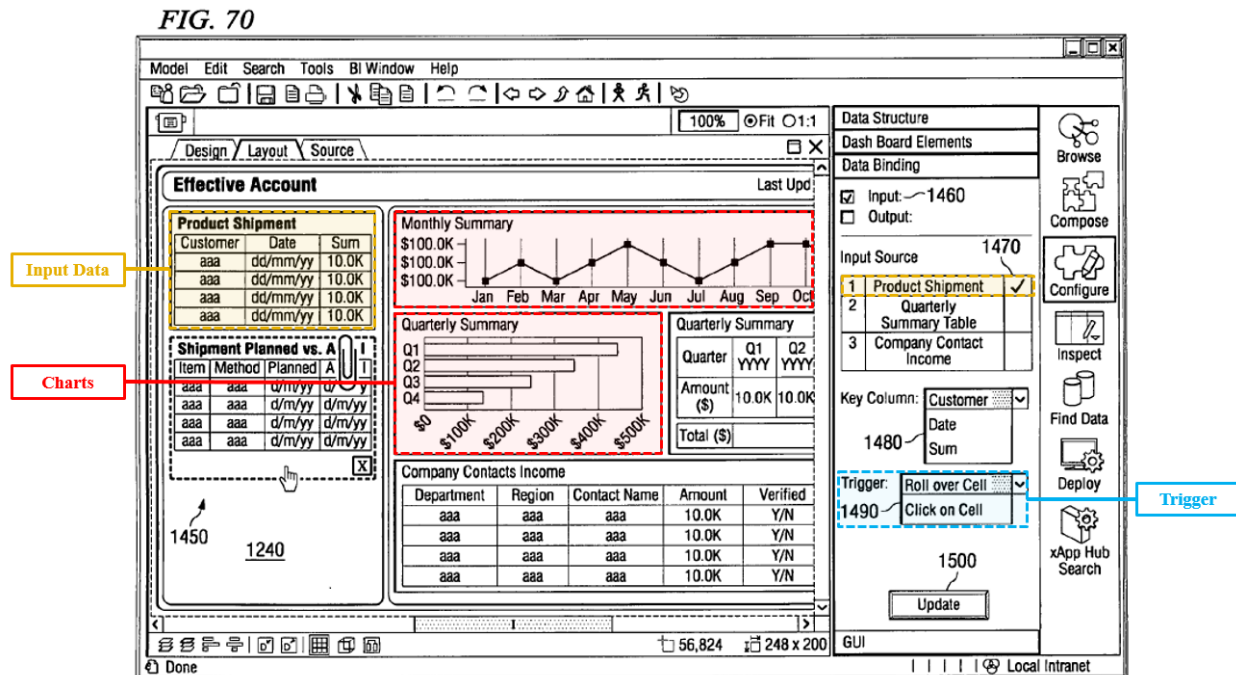


EX1005, FIG. 57 (annotated).

As illustrated in Figure 57, Rostoker’s executed application includes drop-down lists for “Period” and “Organization.” EX1005, FIG. 57. A POSA would have understood that by changing the selection in a drop-down list (e.g., changing the “Period” from Q3 to Q2), the data in one or more of the selected charts would also change. EX1003, ¶182. A POSA would have understood this type of interaction to be present within Rostoker’s system because it would have beneficially allowed users to view data specific to the selected “Period” and

“Organization,” as indicated by Rostoker’s Figure 57—the drop-down lists would serve little purpose otherwise. EX1003, ¶¶110-14, 182-83.

Third, Rostoker discloses “trigger[s] to cause the input or output of [] data” to be associated with components, as shown, for example, in Figure 70. EX1005, ¶74, FIG. 70.



EX1005, FIG. 70 (annotated).

As illustrated in Figure 70, a POSA would have understood that the “Click on Cell” trigger would allow a user to change the information displayed in the charts (e.g., “Monthly Summary” and “Quarterly Summary”) when a user clicks a particular cell in the “Product Shipment” table. EX1005, FIG. 70; EX1003, ¶¶184-85. Such operation would be beneficial to allow the user to drill down into

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summary data for each individual customer, as depicted in Figure 70. EX1003,

¶185.

Fourth, Rostoker has interactive buttons, as illustrated in Figures 71 and 72.

FIG. 71

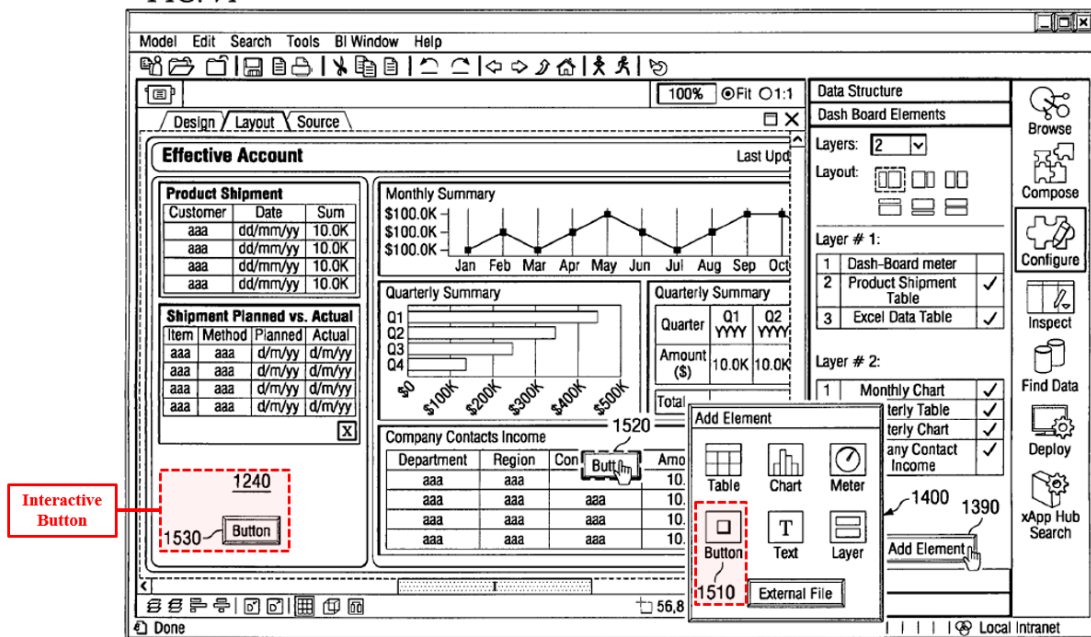
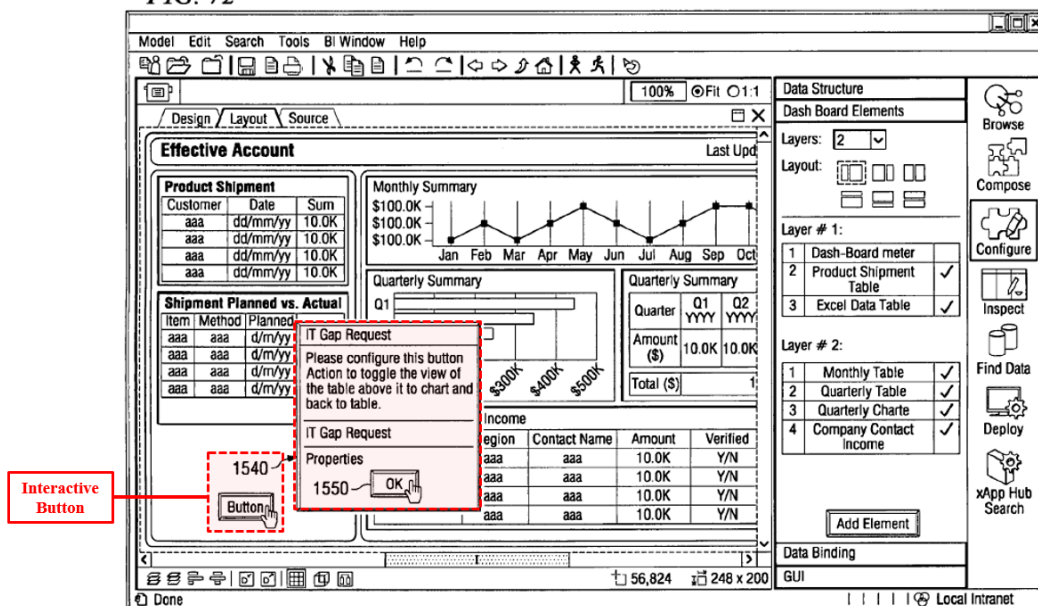


FIG. 72



EX1005, FIGs. 71, 72 (annotated).

As indicated by Figures 71 and 72, a user may configure “button object 1530” to, when clicked, “to cause a table included with the application to switch between a table view and a chart view.” EX1005, ¶75, FIGs. 71, 72. In other words, the button allows a user to interactively show and hide the “chart view.” EX1005, ¶75, FIGs. 71, 72; EX1003, ¶186.

The types of interactive features taught by Rostoker are consistent with those disclosed in the ’000 patent. EX1003, ¶187. For example, the ’000 patent describes “interactive features that allow a user to interact with the chart to, for example, modify or change their view of the chart, learn more about the chart data, and the like.” EX1001, 9:9-13. And the ’000 patent discloses that these “interactive features” can include, for example, “a zoom feature, a data mouse-over pop-up window, a data hide/share feature, an audio playback feature, a drill down feature, a data gliding feature and the like.” EX1001, 9:13-16; EX1003, ¶187. As discussed above, Rostoker’s interactive options provide similar “data hide/share” and “drill down features,” as well as additional “interactive features” within the scope of the claim. EX1001, 9:9-16; EX1003, ¶187.

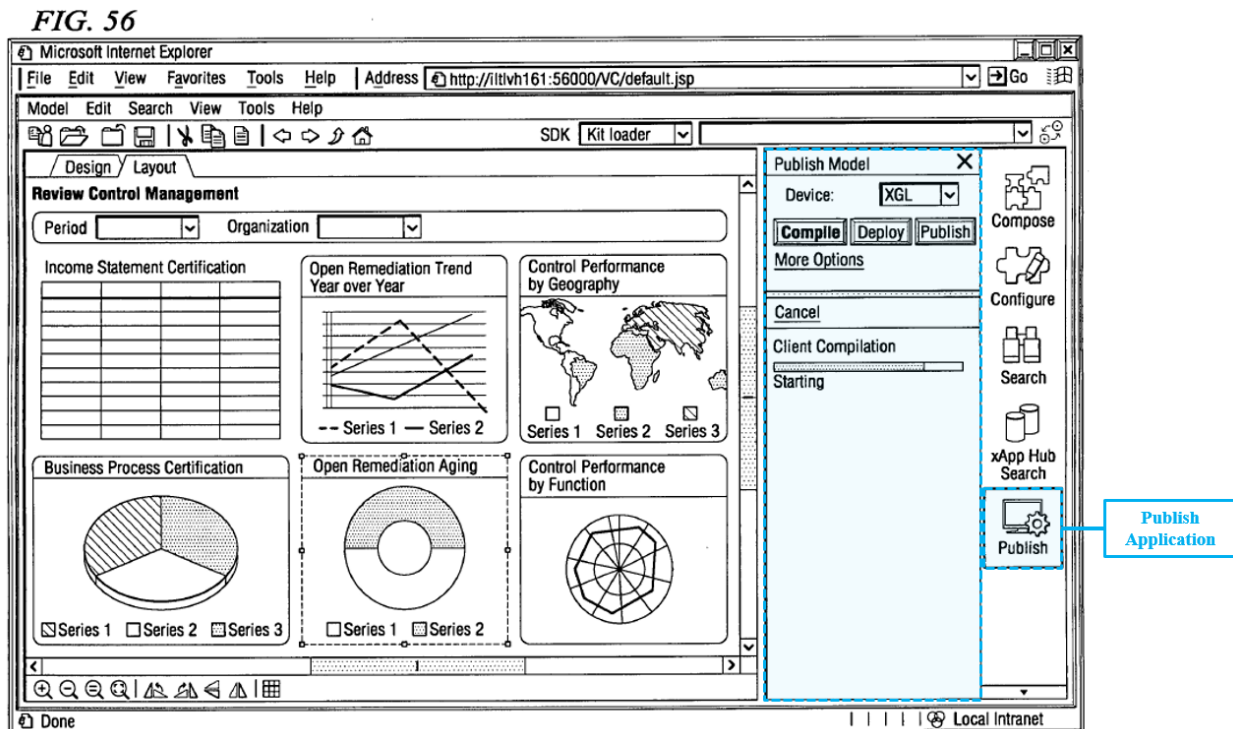
* * *

Accordingly, Rostoker teaches element [1A]. EX1003, ¶188.

3. [1B] “displaying, in response to the selection the at least one interactive chart embedded in a chart box on a second website, wherein the chart box is a web widget”

Rostoker teaches this limitation. EX1003, ¶¶189-203.

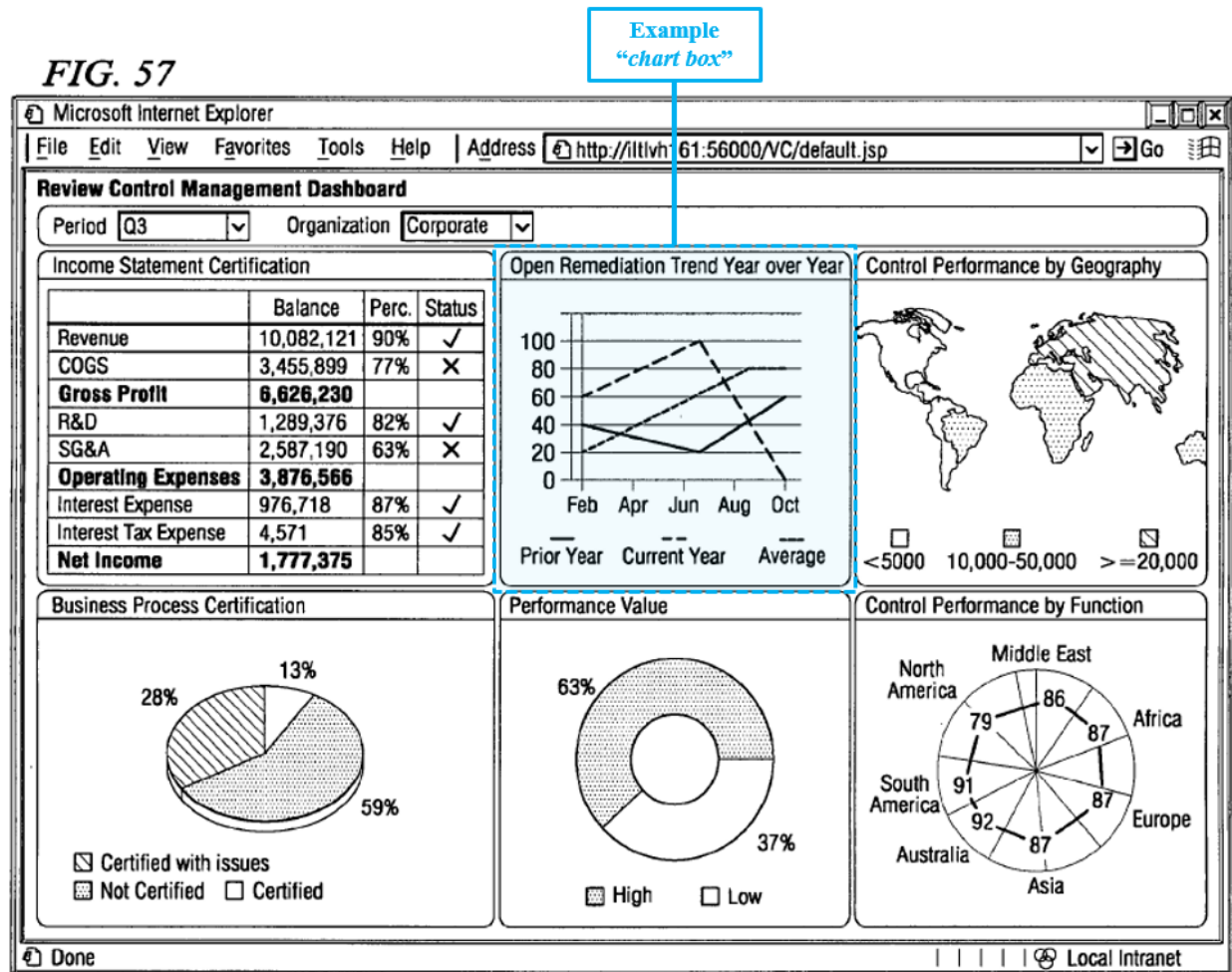
As discussed for [1A], Rostoker teaches “receiving a selection, on a first website, of at least one interactive chart.” *Supra* Section V.A.2; EX1005, ¶67, FIGs. 18, 19. Once charts are selected and added to the current application, Rostoker discloses a “Publish” function that allows the user to publish the “new or modified application,” as illustrated in Figure 56. EX1005, ¶71, FIG. 56; EX1003, ¶190.



EX1005, FIG. 56 (annotated).

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The Publish button “caus[es] each of the xApps included in the new application to be executed.” EX1005, ¶71. “FIG. 57 shows the new or modified application after execution.” EX1005, ¶71; EX1003, ¶191.



EX1005, FIG. 57 (annotated).

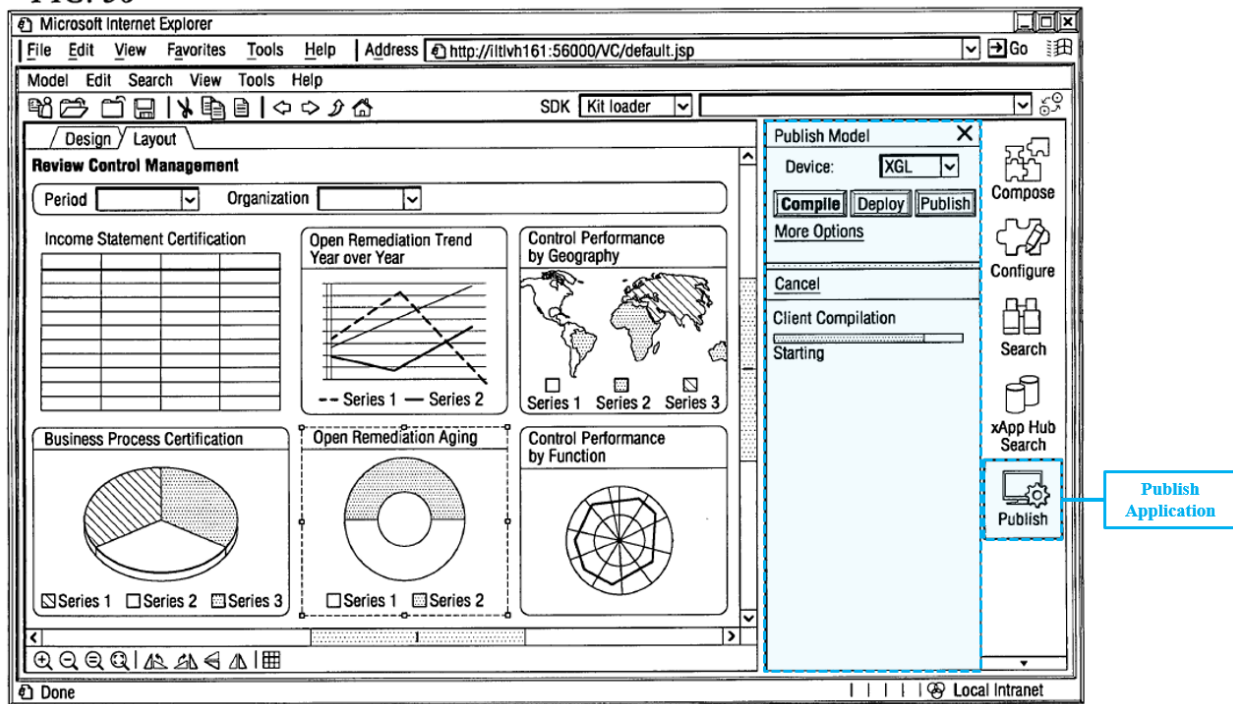
As illustrated in Figure 57, each selected “*interactive chart*” is displayed in a “*chart box*,” for example, the box labeled “Open Remediation Trend Year over Year.” EX1005, FIG. 57; EX1003, ¶192. Rostoker’s chart box is the same as the chart box described in the ’000 patent—i.e., they are both “configured to be

embedded on a website to display one or more interactive charts on that website,” EX1001, 15:52-55, which is the only guidance provided in the ’000 specification. EX1003, ¶193. Thus, Rostoker teaches “*displaying, in response to the selection the at least one interactive chart embedded in a chart box.*”² EX1005, FIG. 57; EX1003, ¶193.

Rostoker also teaches that “*the chart box is a web widget.*” EX1003, ¶194. For example, Rostoker discloses that each “*chart box*” in the application illustrated in Figure 57 is its own “xApp.” EX1005, ¶71 (describing “each of the xApps included in the new application”). As shown in Figure 56, as part of publishing the application and included xApps, the application components are “transformed to XGL [(‘executable GUI language’)] representations.” EX1005, ¶42.

² To the extent argued that element [1B] requires “*displaying ... the at least one interactive chart embedded in a chart box on a second website*” **immediately** following “*selection*” of the chart, Rostoker in view of Strong renders obvious this operation for the reasons discussed for element [1F].

FIG. 56



EX1005, FIG. 56 (annotated).

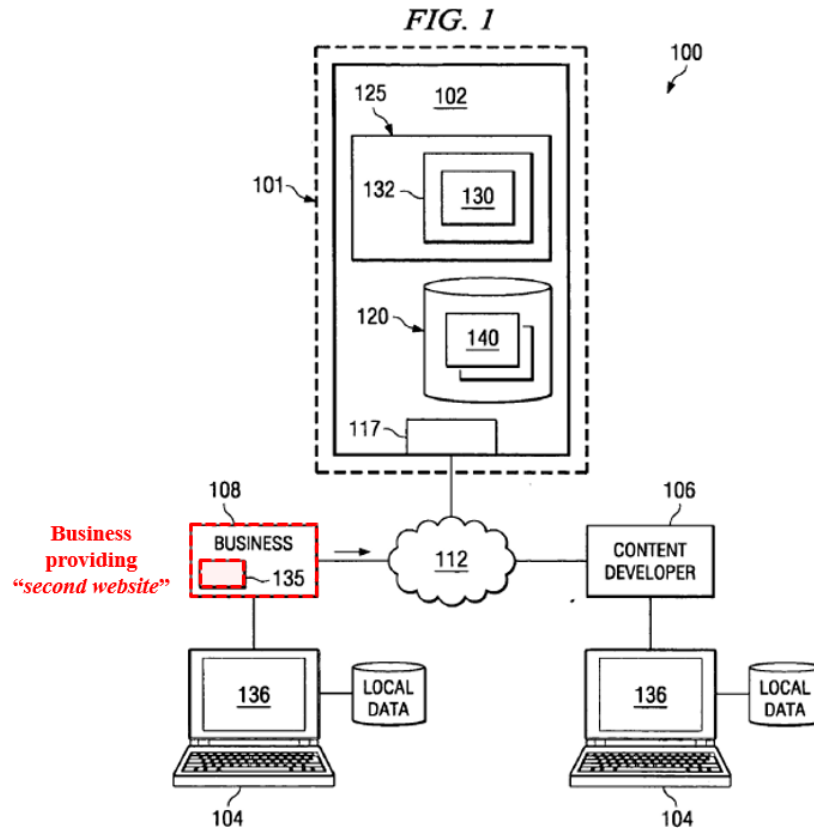
Rostoker discloses that “[t]he XGL representation may be used for generating representations of various different GUIs and supports various GUI features including full windowing and componentization support, rich data visualizations and animations, rich modes of data entry and user interactions, and flexible connectivity to any complex application data services.” EX1005, ¶43. Rostoker further discloses “an XGL-to-Java compiler” to “generate Java code [] for execution by a target device comprising a Java runtime,” and “an XGL-to-Flash compiler” to “generate Flash code [] for execution by a target device comprising a Flash runtime.” EX1005, ¶50. Thus, a POSA would have understood that Rostoker teaches publishing applications and included xApps as Java or Flash “widget[s]”

for display on a website, as illustrated, for example, in Rostoker's Figure 57.

EX1005, ¶50, FIGs. 2A, 50. EX1003, ¶¶194-96. This understanding of a “widget” is consistent with the description in the '000 patent, which describes that “[t]he chart box may be a flash widget.” EX1001, 2:45, 16:1; EX1003, ¶196.

Additionally, Rostoker teaches “*displaying, in response to the selection the at least one interactive chart embedded in a chart box on a second website.*” For example, as described for [1A], Rostoker discloses that a user may select “*at least one interactive chart*” to create an application using “*a first website.*” *Supra* Section V.A.2; *see also* EX1005, ¶¶5-6 (“[T]he user is capable of creating ... a new business application” by “select[ing] a pre-existing application or component and us[ing] the selected component or application without modification....”).

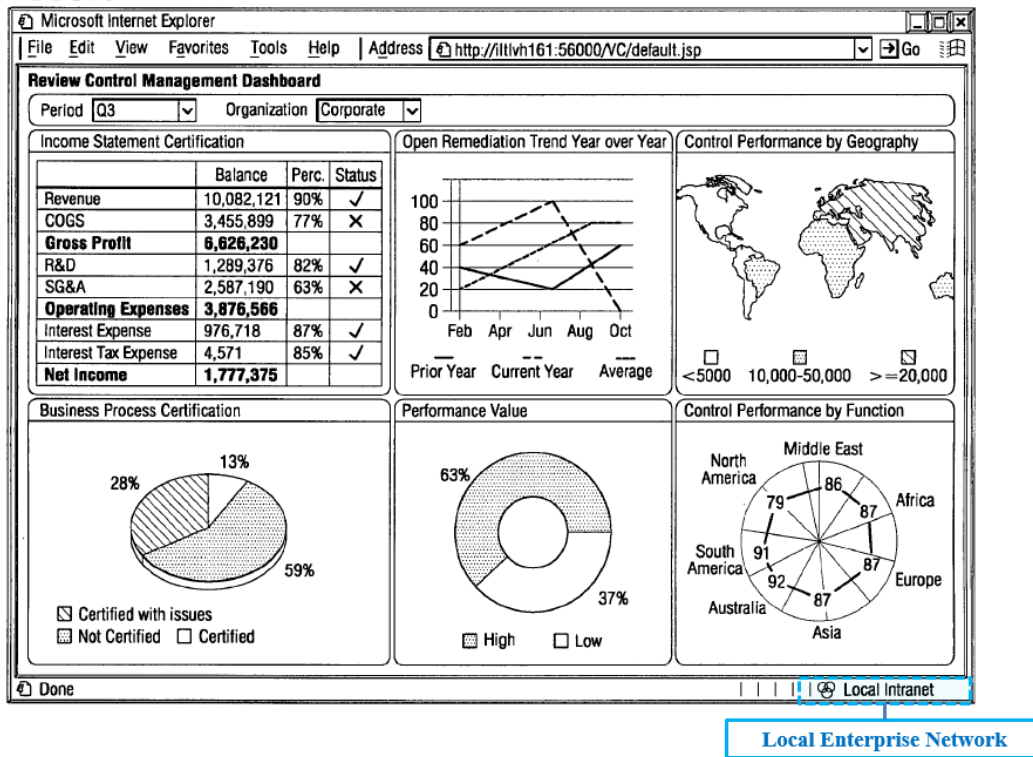
Once an application is created, Rostoker teaches deploying and storing the application within a business environment. EX1003, ¶¶197-98. For example, Figure 1 of Rostoker illustrates a business 108, separate from content provider 101 (which provides the claimed “*first website*”), storing “composite applications 135 (or xApps).” EX1005, ¶¶21-22, FIG. 1; EX1003, ¶198.



EX1005, FIG. 1 (annotated).

A POSA would have understood that businesses, such as business 108 of Rostoker, often provide their own web services to make business applications accessible within the business's local network. EX1003, ¶199. Indeed, Rostoker's "Publish" function allows the user to "Deploy" an application, such as deploying "applications 135" to an enterprise network associated with the business. EX1005, FIG. 56; EX1003, ¶200. And, consistent with Rostoker's "Deploy" functionality, Rostoker's Figure 57 indicates that the published application is accessible via a "Local Intranet," which in the case of a "business application" may be a local enterprise network. EX1005, ¶¶4, 28. EX1003, ¶200.

FIG. 57



EX1005, FIG. 57 (annotated).

A POSA would have been motivated to allow business applications to be deployed to a separate website local to an enterprise to ensure published business applications are not accessible outside of the local enterprise network. EX1003, ¶201. And, in such a case, a POSA would have understood the published application (for example, as shown in Rostoker's Figure 57) to be accessed and displayed on "a second website" provided by the enterprise network. EX1003, ¶201.

In any event, providing Rostoker's published applications "on a second website" would have been a mere design choice resulting in the same function of

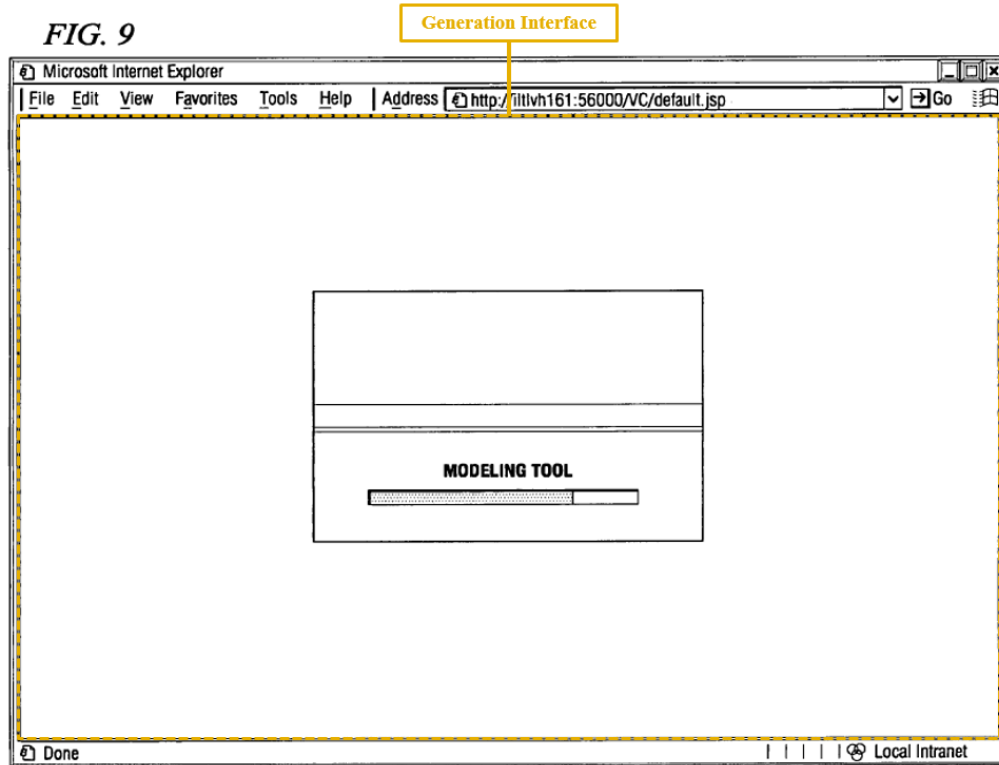
displaying the published application within a web browser. EX1003, ¶202. As the Board has recognized, “design changes that [do] not ‘result in a difference in function or give unexpected results’ [are] ‘no more than obvious variations consistent with the principles known in th[e] art’ of the patent at issue in [the] case.” *Electronic Arts Inc. v. Terminal Reality, Inc.*, IPR2016-00928, FWD, 22-23 (P.T.A.B. Oct. 23, 2017) (citing *Application of Kuhle*, 526 F.2d 553, 555 (C.C.P.A. 1975) (use of an “electrical connection in lieu of those used in the references solves no stated problem and would be an obvious matter of design choice within the skill of the art.”)); *see also Ex parte Spangler*, Appeal No. 2018-003800, Decision on Appeal at 5-6 (Feb. 20, 2019).

Accordingly, Rostoker renders obvious element [1B].

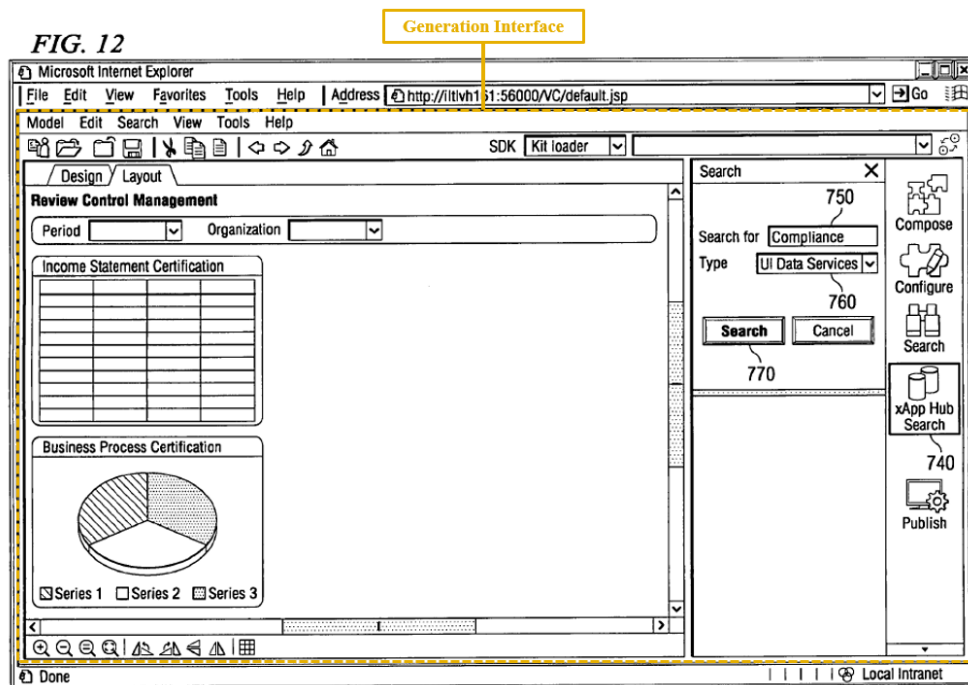
4. [1C] **“wherein the at least one interactive chart is generated on a generation interface configured to allow a user to generate the interactive chart with a chart template from a chart template store.”**

Rostoker teaches this limitation. EX1003, ¶¶204-11.

Rostoker discloses a “*generation interface*” in the form of a “**modeling environment 132.**” EX1005, ¶40. The “modeling environment” is shown throughout Rostoker’s figures, for example in Figures 9 and 12. EX1003, ¶205.



EX1005, FIG. 9 (annotated).

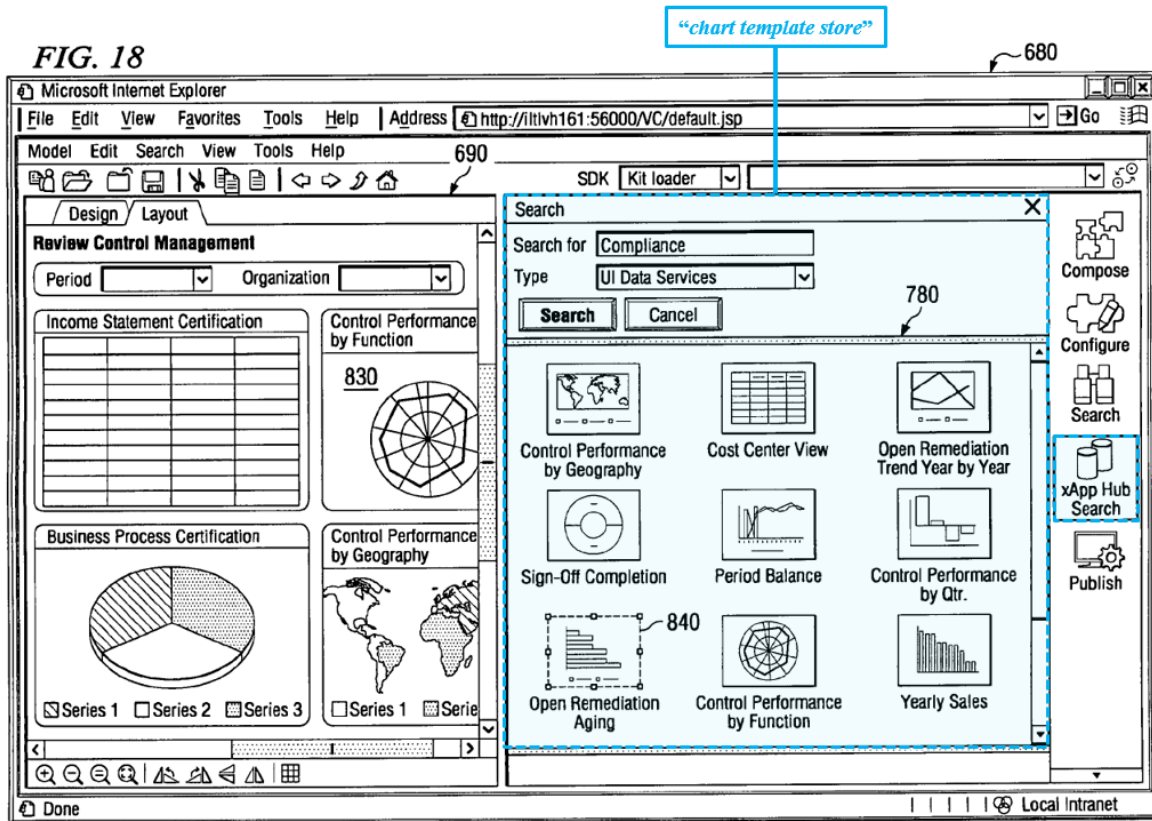


EX1005, FIG. 12 (annotated).

“The modeling environment 132 may be utilized to create, adapt, or configure the data services 140 (available to a user via the component manager 130) for creating a custom application, such as a business application, to fulfill a need of the user,” and “[t]he applications may include applications created by the developers with the modeling environment 132.” EX1040, ¶40. Rostoker further discloses that created components and applications can be made available via Rostoker’s hub/storefront, as discussed for [1A]. EX1003, ¶206. For example, Rostoker discloses that a “user may locate the components by searching the hub,” and “[t]he user may then select a pre-existing application or component....” EX1005, ¶6; EX1003, ¶206. Thus, Rostoker teaches that “*the at least one interactive chart is generated on a generation interface*”—Rostoker’s modeling environment 132. EX1003, ¶206.

Rostoker further teaches that the “*generation interface [is] configured to allow a user to generate the interactive chart with a chart template from a chart template store*” in at least two ways. *First*, Rostoker discloses “a **storefront** having a knowledge base or compilation of software components, applications, or other data services that can easily be modified or integrated into different business analyst and end user tools.” EX1005, ¶6. From Rostoker’s “storefront”/“hub” a “user may [] select a pre-existing application or component and ... **use the component or application as a template**, making modifications in order to create

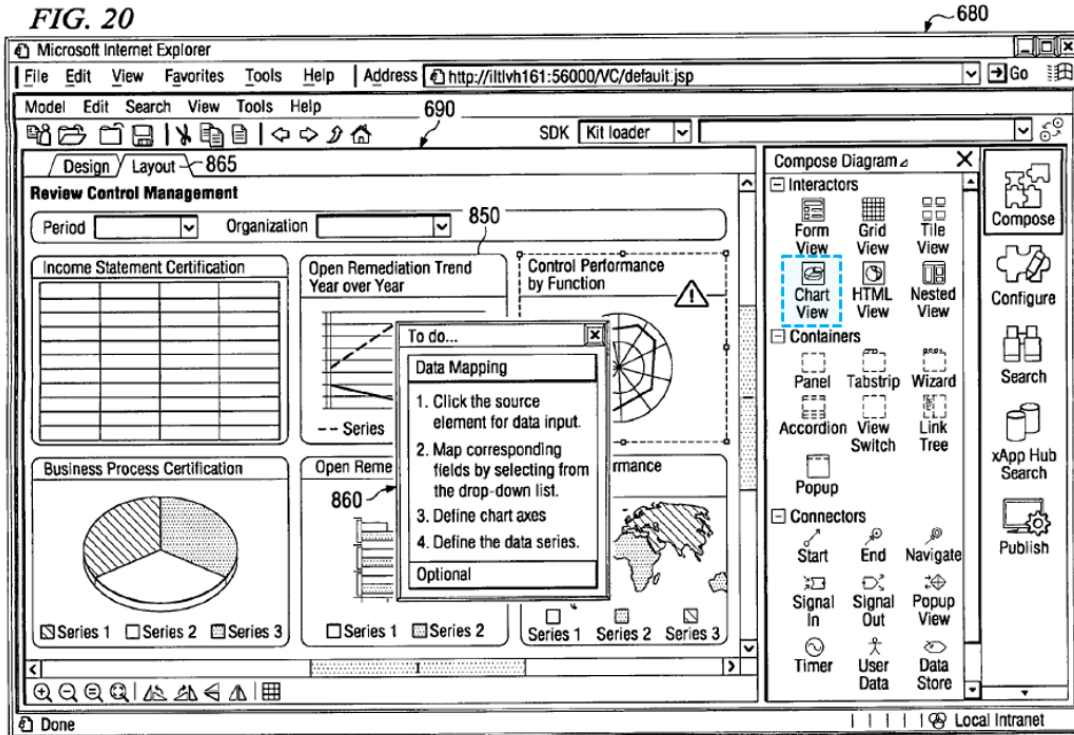
an application to operate in a desired manner.” EX1005, ¶6; EX1003, ¶207. An example of Rostoker’s “storefront”/”hub” (i.e., “*chart template store*”) is shown in Figure 18. EX1003, ¶207.



EX1005, FIG. 18 (annotated).

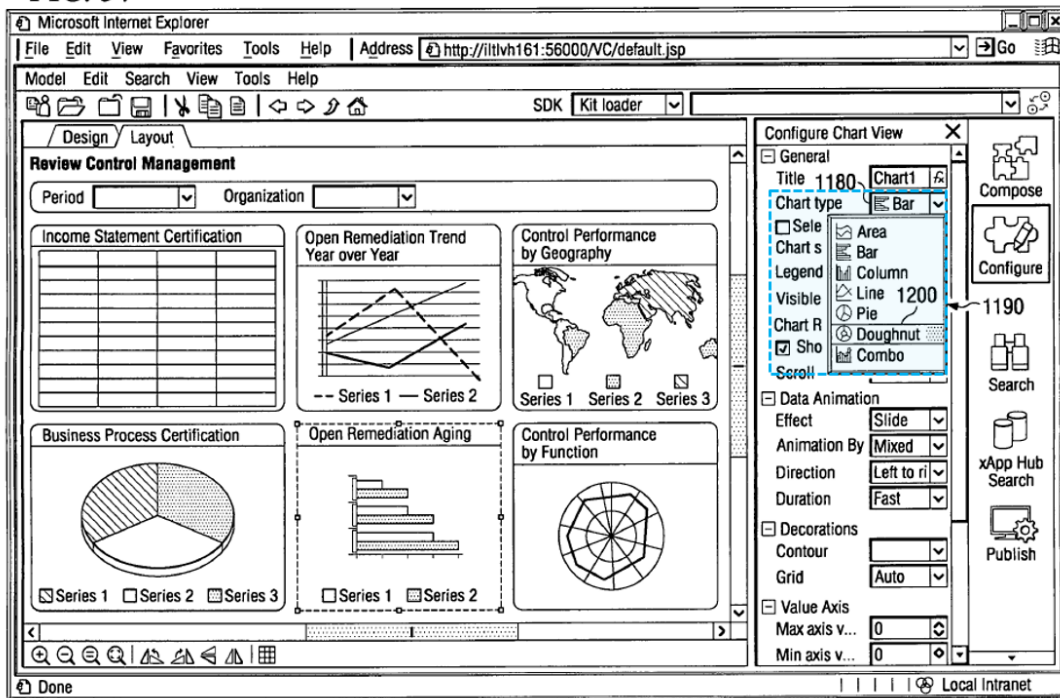
Second, Rostoker teaches selecting a new chart view, using a “[c]hart type” as a template, as illustrated in Figures 20 and 54. EX1003, ¶208.

FIG. 20



EX1005, FIG. 20 (annotated).

FIG. 54



EX1005, FIG. 54 (annotated).

As Rostoker explains: “the chart type drop-down list 1180 is shown and **numerous available graphical representations of chart types 1190 are shown.** Accordingly, the user is able to change the chart type of the selected xApp 840 by merely selecting the desired type 1190 from the list 1180.” EX1005, ¶71. A POSA would have understood that data pertaining to these “chart types” (i.e., “*chart template[s]*”) are stored in memory (i.e., a “*chart template store*”) either at a “central location” or within “local data at the user’s site.” EX1005, ¶¶28, 71; EX1003, ¶¶209-10. Thus, Rostoker also teaches that its “*generation interface [is] configured to allow a user to generate the interactive chart with a chart template from a chart template store*” using a selected “chart type.” EX1005, ¶¶28, 71; EX1003, ¶210.

Therefore, Rostoker teaches [1C].

5. [1D] “wherein the at least one interactive chart, when displayed on the second website in the absence of the generation interface, enables a user to a) render the chart, b) obtain input from a user and c) rerender the chart using the input thereby enabling the interactive chart to retain interactivity.”

Rostoker teaches this limitation. EX1003, ¶¶212-17. Specifically, as explained for [1A], Rostoker teaches that its charts contain “*interactive*” features, such as changing the selection in a drop-down list and clicking buttons that “cause a table included with the application to switch between a table view and a chart view.” *Supra* Section V.A.2; EX1005, ¶75, FIGs. 53, 57, 70-72. These interactive

features “*b) obtain input from a user and c) rerender the chart using the input*”

because the chart is modified in response to the user input, as explained for [1A].

Supra Section V.A.2; EX1003, ¶213.

Additionally, as discussed for [1B], Rostoker teaches “*enable[ing] a user to a) render the chart*” such that it is “*displayed on the second website **in the absence of the generation interface.***” *Supra* Section V.A.3; EX1003, ¶214. In particular, as explained for [1B], Rostoker teaches publishing applications and included xApps as Java or Flash objects “for execution by a target device comprising” either “a Java runtime” or “a Flash runtime.” *Supra* Section V.A.3; EX1005, ¶¶42-43, 50. A POSA would, therefore, have understood that Rostoker’s published applications, including “*interactive chart[s]*” would be displayed “*on the second website*” using the Java or Flash runtime, independent of the interface on the first website used to create the application. EX1003, ¶¶214-17.

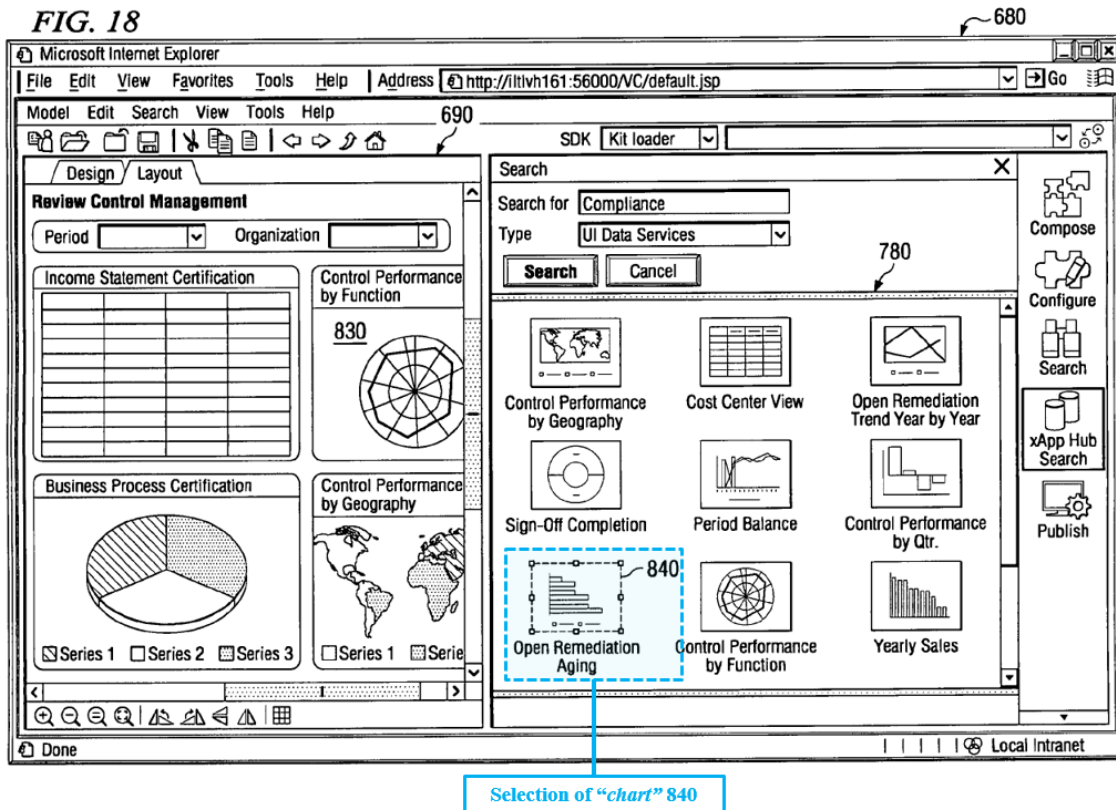
Therefore, Rostoker teaches element [1D].

6. [1E] “**wherein the selection is made by dragging and dropping the at least one interactive chart from the plurality of charts into a chart box folder connected to the chart box such that retrieve code for data feed displays the at least one interactive chart on the first website.**”

Rostoker teaches this limitation. EX1003, ¶¶219-29.

First, Rostoker teaches “*wherein the selection is made by dragging and dropping the at least one interactive chart from the plurality of charts.*” As

discussed for [1A], a user may locate an “*interactive chart*” using Rostoker’s hub, and “[t]he user may then **select a pre-existing application or component**,” as illustrated in Figure 18. EX1005, ¶6; Section V.A.2.

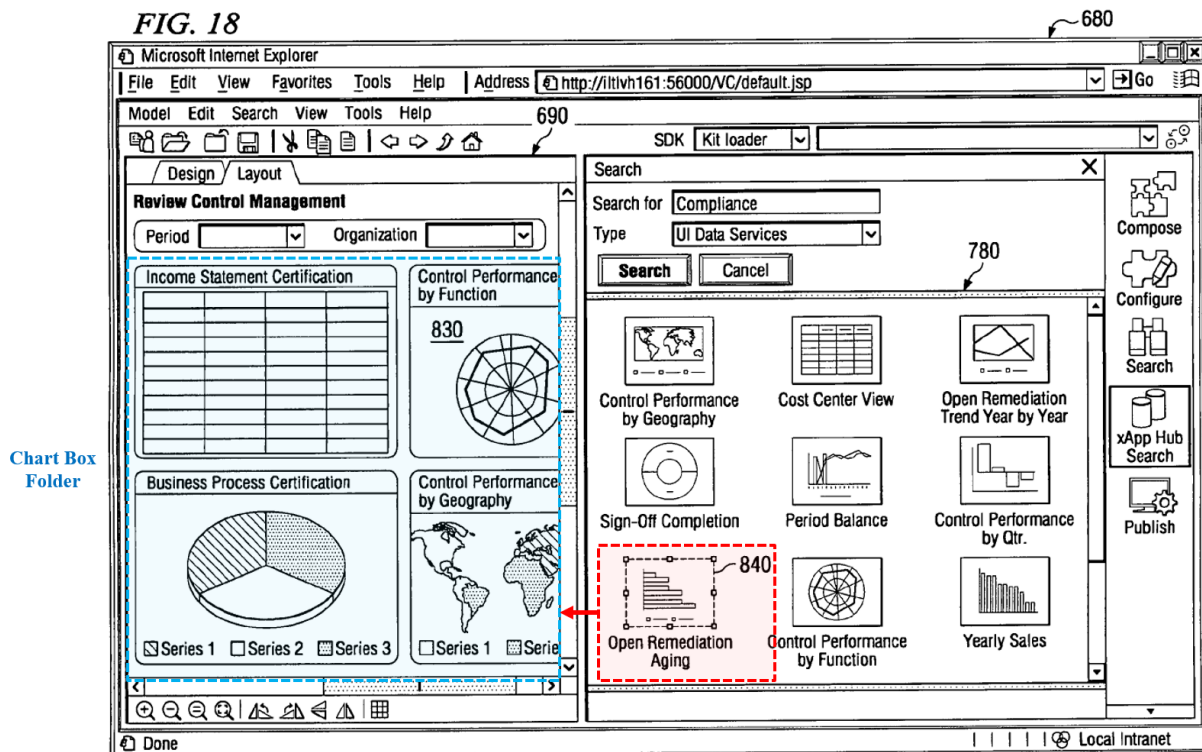


EX1005, FIG. 18 (annotated).

Rostoker further discloses that a user may “**conduct[] a search of the hub contents and select[] a component** corresponding to the need of the new application.” EX1005, ¶61. “**The new component, object, or feature may be dragged and dropped or otherwise imported into the application.**” EX1005, ¶61; *see also* EX1005, ¶59 (“[T]he user may utilize the analytics workbench to modify or otherwise configure the selected xApp by, for example, **dragging and dropping**

desired features or pre-constructed objects from a toolbar onto the UI of the xApp.”). Thus, Rostoker teaches that the “*the selection is made by dragging and dropping.*” EX1003, ¶220-21.

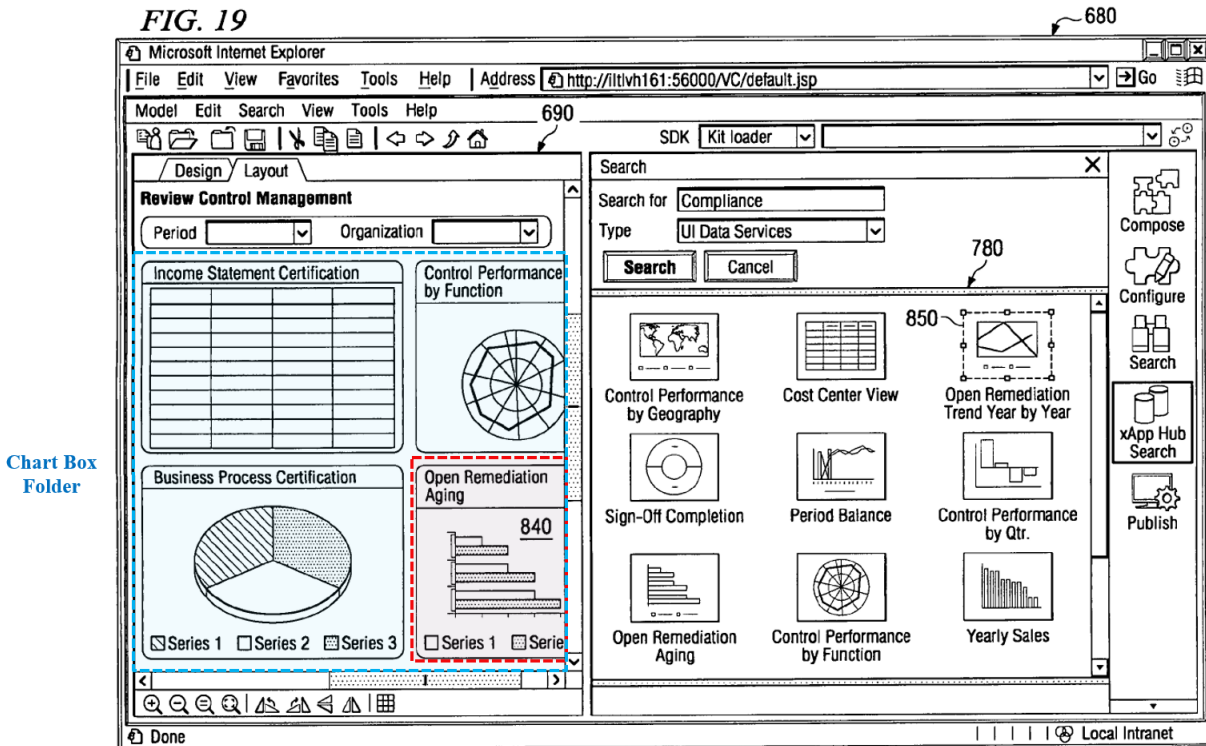
Second, Rostoker teaches that “*the selection is made by dragging and dropping the at least one interactive chart from the plurality of charts into a chart box folder connected to the chart box.*” For example, the Layout tab of an application in Rostoker’s modeling environment provides a “*chart box folder*” associated with the application, as illustrated in Figure 18. EX1003, ¶222.



EX1005, FIG. 18 (annotated).

As shown above, the “*chart box folder*” contains “*interactive chart[s]*” that are part of the current application. EX1003, ¶223. When chart 840 (“Open

Remediation Aging”) is dragged and dropped into Rostoker’s “*chart box folder*,”
for example, the chart is added to the folder, as illustrated in Figure 19. EX1003,
¶223.

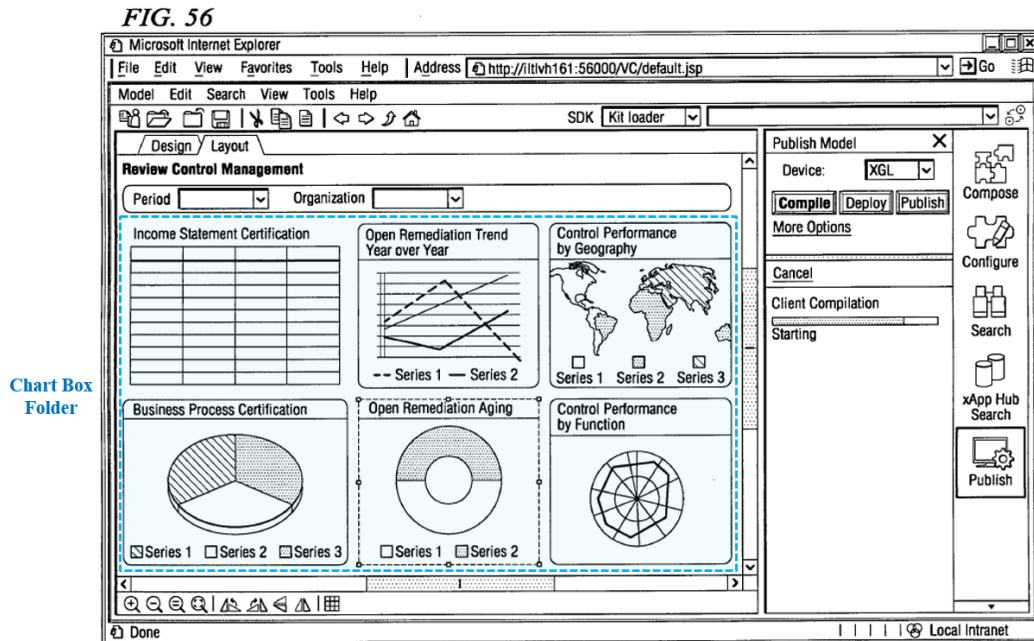


EX1005, FIG. 19 (annotated).

A POSA would have also understood that the “*chart box folder [is]*
connected to the chart box” because, when published and executed, the application
will display the charts contained in the “*chart box folder*” within “*chart box[es]*” in
the executed application. EX1003, ¶224. For instance, as illustrated in Figures 56
and 57, each chart placed into the “*chart box folder*” for an application within
Rostoker’s modeling environment (as depicted in Figure 56) is displayed within a
“*chart box*” of the published and executed application (as depicted in Figure 57).

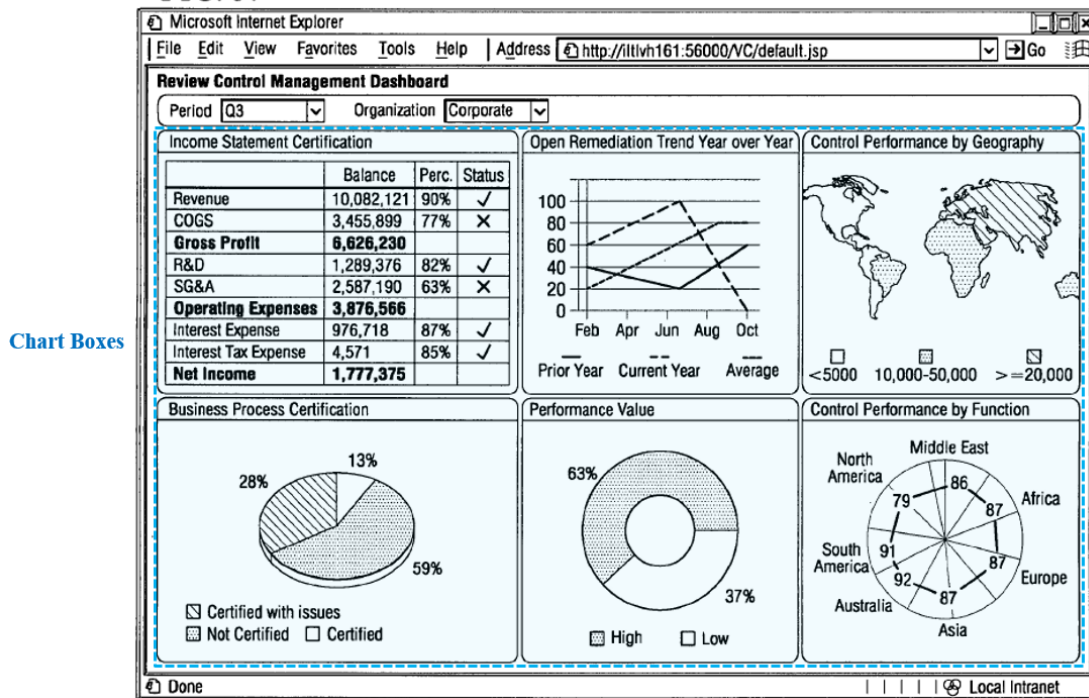
EX1005, ¶71 (“In FIG. 56, the Publish button 1210 is selected, causing each of the xApps included in the new application to be executed or otherwise prototyped.

FIG. 57 shows the new or modified application after execution.”); EX1003, ¶224.



EX1005, FIG. 56 (annotated) (showing interface for creating application).

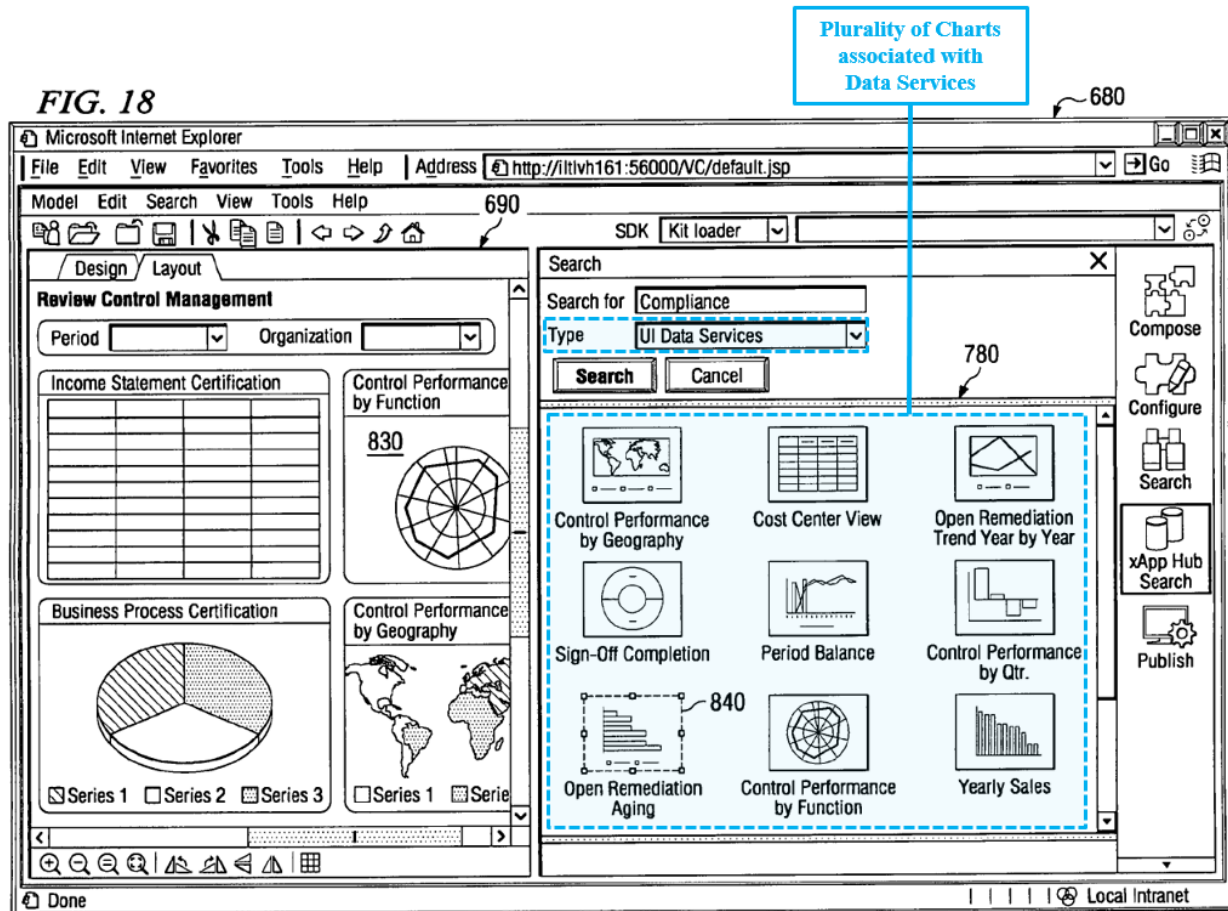
FIG. 57



EX1005, FIG. 57 (annotated) (showing execution of published application).

Third, Rostoker teaches “such that retrieve code for data feed displays the at least one interactive chart on the first website.” Rostoker discloses that its charts can be associated with “data services”: “Generally, the content provider 101 uses a component manager 130, or other similar information hub of enterprise knowledge and components, to **present a plurality of data services 140** to businesses 108, or their individual users, as well as other companies and users in the network.”

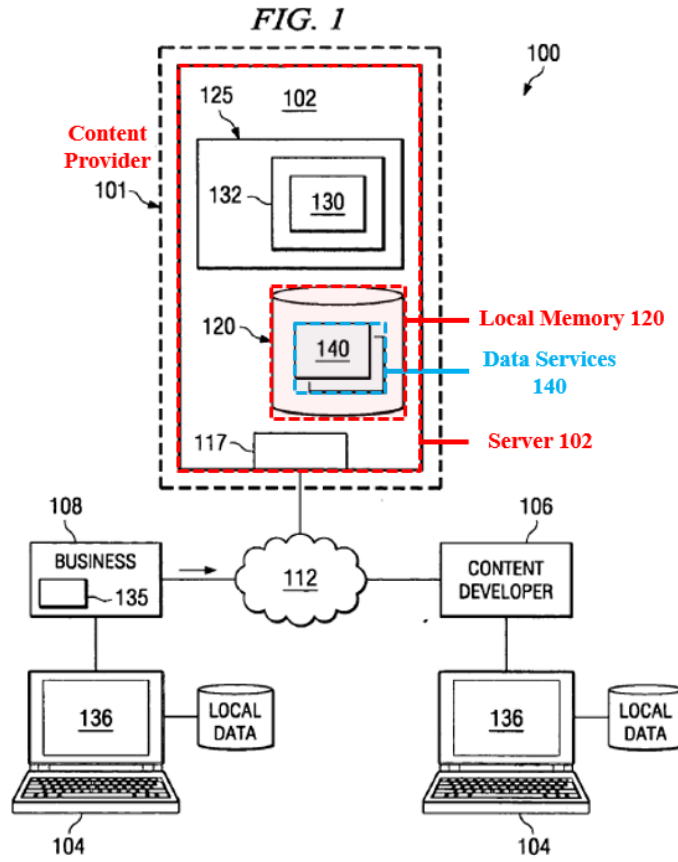
EX1005, ¶19; EX1003, ¶225.



EX1005, FIG. 18 (annotated).

Rostoker discloses, “[d]ata services 140 (and their accompanying information) may be stored in one or more logical or physical repositories.”

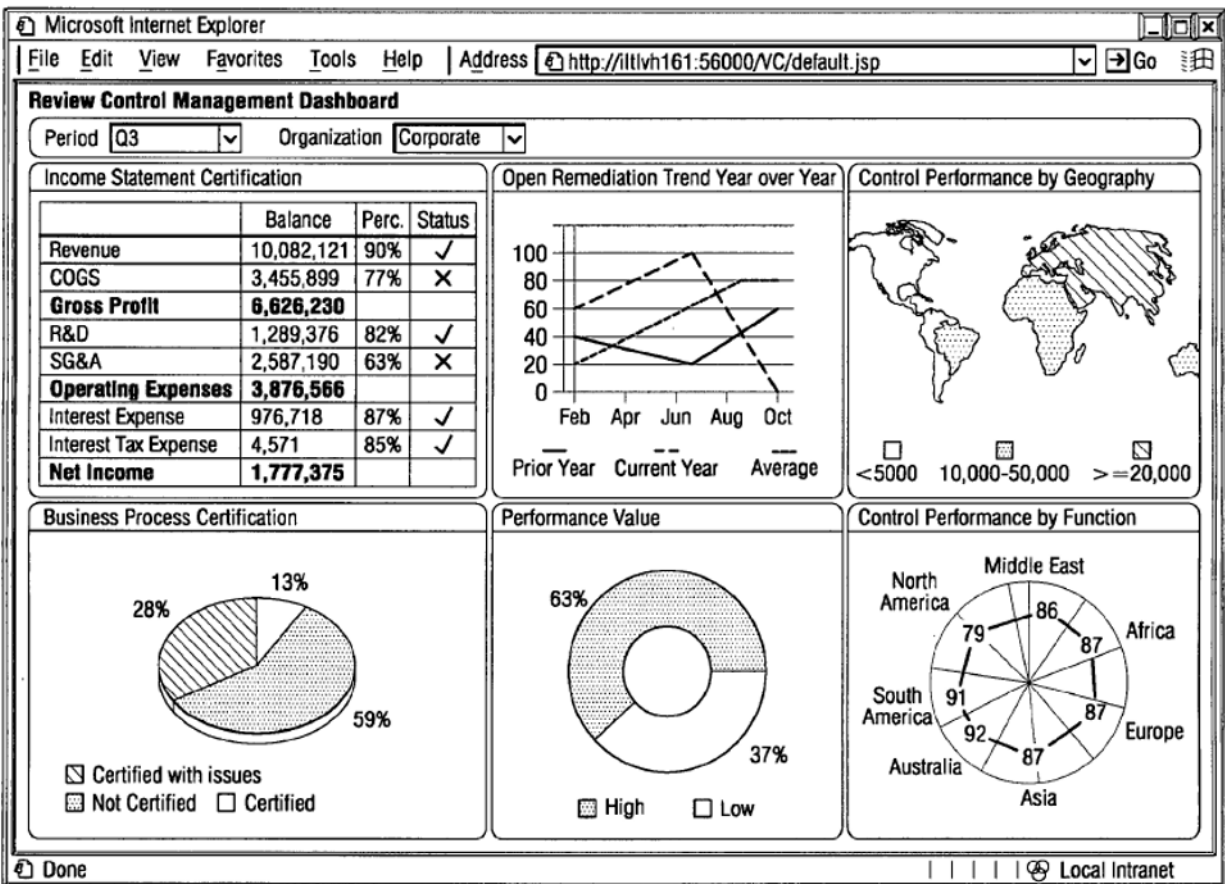
EX1005, ¶32. As illustrated in Figure 1 of Rostoker, the data services may be stored within “local memory 120” of server 102. EX1005, ¶30; EX1003, ¶226.



EX1005, FIG. 1 (annotated).

As illustrated in Figure 57, the “*interactive chart[s]*” included in the application retrieve and display data from the associated data service. EX1005, ¶39 (“**Real-time dashboards** often provide table and **graph information on the current state of the data, which may be supplemented by data services 140.**”); EX1003, ¶227.

FIG. 57



EX1005, FIG. 57.

A POSA would have thus understood that Rostoker’s “*interactive chart[s]*” contain “*retrieve code for [a] data feed,*” i.e., code for retrieving real-time data from the data service, which is then used to “*display[] the at least one interactive chart,*” as illustrated in Figure 57. EX1003, ¶228. Therefore, Rostoker teaches that “*retrieve code for data feed displays the at least one interactive chart on the first website.*” EX1003, ¶228.

Accordingly, Rostoker teaches element [1E].

7. [1F] “wherein the at least one interactive chart is automatically displayed on the second website using a data feed from the first website to the second website upon the dragging and dropping selection.”

The combination of Rostoker and Strong teaches this limitation. EX1003, ¶¶230-43.

As discussed for [1E], Rostoker teaches “*wherein the selection is made by dragging and dropping the at least one interactive chart from the plurality of charts into a chart box folder.*” *Supra* Section V.A.6; EX1003, ¶231. As discussed for [1B], “*upon the dragging and dropping selection,*” the application may be published and deployed to “*the second website,*” e.g., a website provided by a business’s enterprise network. *Supra* Section V.A.3; EX1003, ¶231. Rostoker does not expressly disclose that “*the at least one interactive chart is automatically displayed on the second website ... upon the dragging and dropping selection.*”

However, a POSA would have understood that automatically publishing applications upon modification (e.g., selecting a new chart) would reduce the burden on developers to publish updated applications, as well as ensure users of Rostoker’s application are always viewing the latest version. These motivations would have led a POSA to a reference like Strong. EX1003, ¶231.

Strong provides techniques for “synchronizing a data object amongst the clients.” EX1067, ¶26. Particularly, Strong discloses publishing a data object to sharing clients upon a change/update to the data object: “[C]hanges or updates 30

from a sharing client 34 will be sent to the synchronization engine 32 which will forward or update a copy of a data object on each of the clients listed as part of the plurality of sharing clients 34 in order to synchronize that data object with other sharing clients.” *Id.* For example, “**if changes are made by one of the sharing clients 34 to a particular data object**, an update message 30 is sent from the particular sharing client to the synchronization engine 32.” *Id.*, ¶27. “**The synchronization engine, in turn, will** make the particular adjustment to the original or copy of the data object on the server and **distribute the data object out to each of the sharing clients 34.**” *Id.*; EX1003, ¶¶232-33.

Although Strong describes its techniques primarily in the context of “[f]ile sharing,” EX1067, ¶3, a POSA would have recognized that Strong’s techniques would apply to distribution of any data object, including Rostoker’s applications. EX1003, ¶234. Applying Strong’s techniques to Rostoker’s application publishing process would enable applications to be automatically published and deployed upon detection of a change, such as dragging and dropping a chart into the application (i.e., “*the at least one interactive chart is automatically displayed on the second website ... upon the dragging and dropping selection*”). *Supra* Section V.A.6; EX1003, ¶¶234-35. And, as mentioned above, a POSA would have been motivated to do so to reduce the burden on developers to publish updated applications, as well as ensure users of Rostoker’s application are always viewing

the latest version. EX1003, ¶235. At a minimum, publishing applications upon detection of a change would have been an obvious variant of Rostoker's operation, automatically publishing an application rather than waiting for a user to expressly click the publish button. EX1003, ¶236. *Terminal Reality*, IPR2016-00928, FWD, 22-23; *Kuhle*, 526 F.2d at 555.

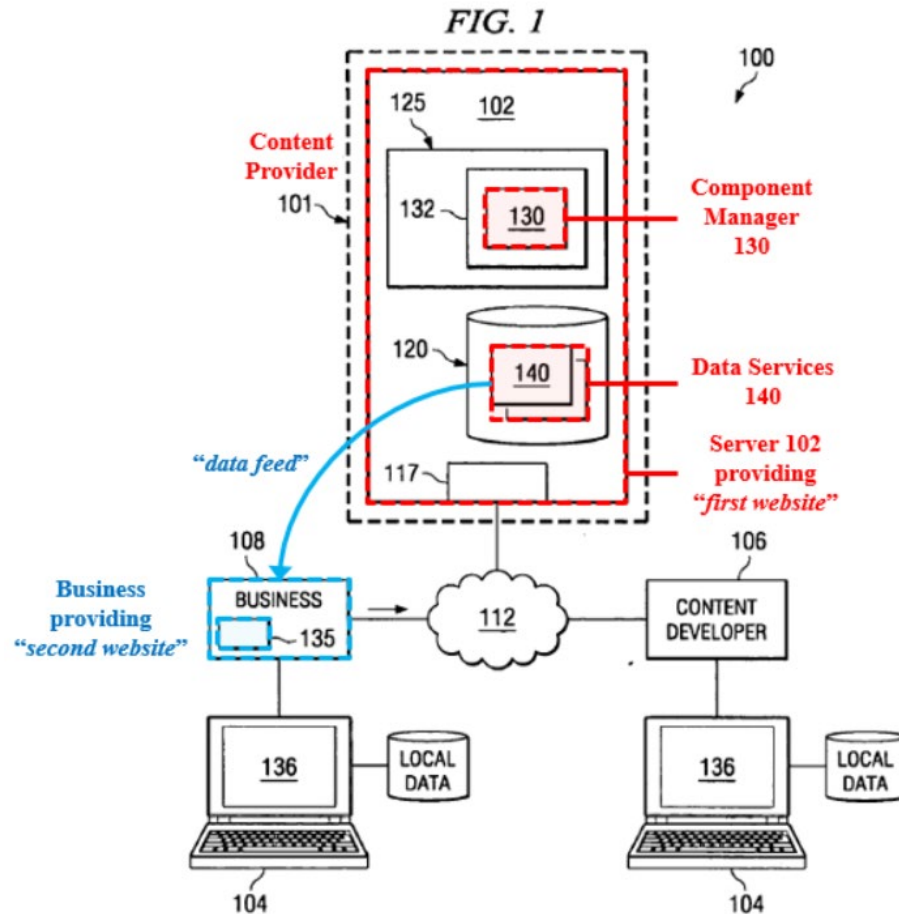
The combination, therefore, would have been nothing more than using a known technique (distribution of a data object upon modification) to improve a similar device (Rostoker's application development and publishing system). EX1003, ¶237. A POSA also would have had a reasonable expectation of success incorporating Strong's automatic distribution techniques. Similar to Strong, Rostoker already discloses a server 102 for publishing and distributing applications to businesses, such as business 108, as discussed for element [1B]. *Supra* Section V.A.3; EX1003, ¶237. And since server 102 provides Rostoker's "modeling environment," Rostoker's system is already configured to detect modifications to applications as they are developed. EX1005, ¶¶19, 40; EX1003, ¶238. Therefore, Rostoker in view of Strong renders obvious "*wherein the at least one interactive chart is automatically displayed on the second website ... upon the dragging and dropping selection.*" EX1003, ¶239.

Additionally, iCharts asserts in its amended infringement contentions that the "*interactive chart is automatically displayed on the second website*" after

clicking a “Publish” button. EX1058, 0061 (“The Tableau Accused Products allow ‘publishing’ charts”; “The interactive chart created in the example below can be published by clicking on the ‘Publish’ button....”); 0079 (asserting that after an alleged “Drag & Drop” operation, “[t]he interactive chart created in the example above can be published by clicking on the ‘Publish’ button.”). EX1003, ¶240. To the extent such operation satisfies the claim language (to which Petitioner does not acquiesce), Rostoker alone teaches “*wherein the at least one interactive chart is automatically displayed on the second website ... upon the dragging and dropping selection*” under iCharts’ interpretation. EX1003, ¶240. Specifically, Rostoker discloses the same operation iCharts accuses in its amended infringement contentions: After dragging and dropping the “*interactive chart*” and clicking a publish button, “*the at least one interactive chart is automatically displayed on the second website.*” *Supra* Sections V.A.6, V.A.3; EX1003, ¶240.

Rostoker also teaches that “*the at least one interactive chart is automatically displayed on the second website using a data feed from the first website to the second website.*” As discussed for [1A], Rostoker’s content provider 101 and server 102 provide a “*first website*” from which users may select and create applications. *Supra* Section V.A.2; EX1005, ¶¶8, 18, 29, 67; EX1003, ¶241. And, as discussed for [1E], server 102 provides access to data services 140 through the same “*first website*,” which are “stored in one or more logical or physical

repositories” within server 102. *Supra* Section V.A.6; EX1005, ¶¶19, 28 (“[T]he component manager 130 is a hosted solution on a remote server 102 providing an easy-to-use interface for disparate data services 140 to at least one business 108 or user”), 32, 39; EX1003, ¶241.



EX1005, FIG. 1 (annotated).

A POSA would have therefore understood that applications deployed to business 108 (providing “the second website”) would rely on a “data feed” to associated data services 140 provided by server 102 (providing “the first website”), as shown in Rostoker’s Figure 1 above. EX1003, ¶242. Thus, the combination of

Rostoker and Strong teaches that “*the at least one interactive chart is automatically displayed on the second website using a data feed from the first website to the second website,*” as illustrated in the above annotated figure.

EX1003, ¶242.

Therefore, the combination of Rostoker and Strong renders obvious element [1F].

B. Claim 2

Claim 2 depends from claim 1 and recites “*wherein the web widget is a flash widget.*” Rostoker teaches this limitation for the reasons discussed for elements [1B] and [1D]. *Supra* Sections V.A.3, V.A.5; EX1003, ¶244.

C. Claim 3

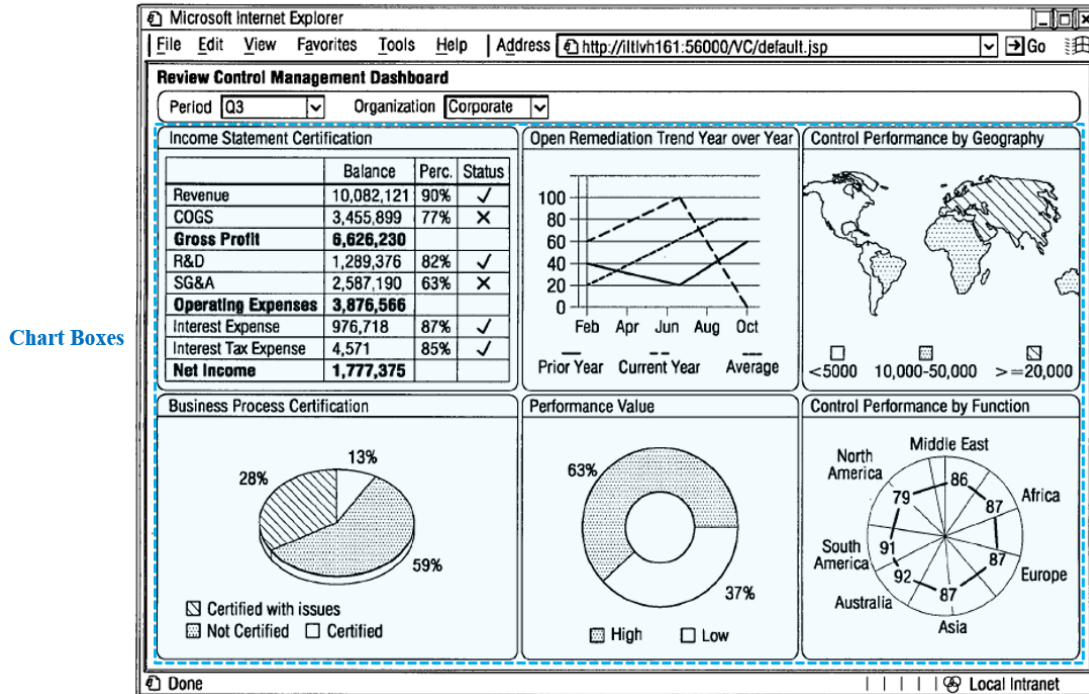
Claim 3 depends from claim 1 and recites “*displaying one or more of the plurality of interactive charts in the chart box on the second website.*” Rostoker, alone or in view of Strong, teaches this limitation for the reasons discussed for [1B]. *Supra* Section V.A.3; EX1003, ¶245.

D. Claim 4

Claim 4 depends from claim 1 and recites “*displaying a plurality of interactive charts embedded in a plurality of chart boxes on the second website.*” Rostoker, alone or in view of Strong, teaches this limitation for the reasons discussed for [1B]. *Supra* Section V.A.3; EX1003, ¶246.

For example, as illustrated in Figure 57, each “*interactive chart*” of an executed application is displayed in a “*chart box*.” EX1003, ¶193.

FIG. 57



EX1005, FIG. 57 (annotated).

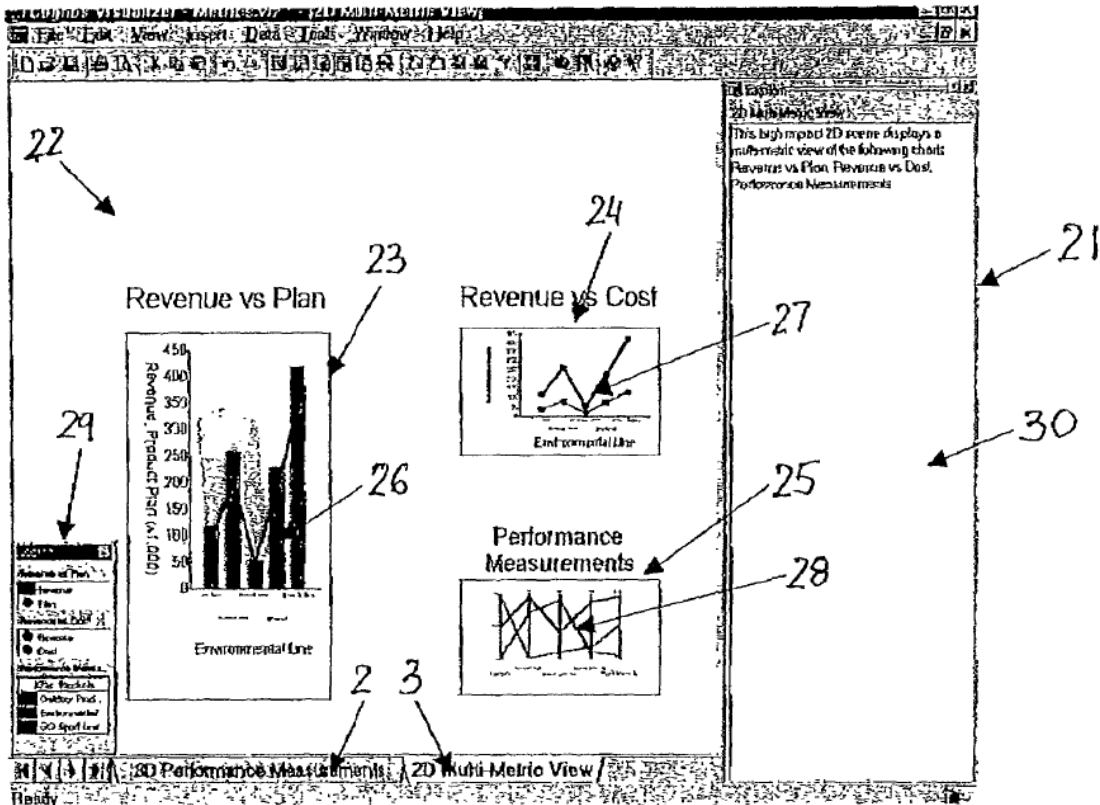
Therefore, Rostoker teaches “*displaying a plurality of interactive charts embedded in a plurality of chart boxes on the second website.*” Moreover, “[i]t is well settled that the mere duplication of parts has no patentable significance unless a new and unexpected result is produced.” *Application of Harza*, 274 F.2d 669, 671 (C.C.P.A. 1960). Here, claim 4 merely duplicates, without producing any new or unexpected result, the claimed “*interactive chart*” and “*chart box*” of claim 1, reciting instead “*a plurality of interactive charts embedded in a plurality of chart boxes.*”

Accordingly, Rostoker, alone or in view of Strong, renders obvious claim 4.

**VI. GROUND 2: ROSTOKER AND STRONG IN VIEW OF JOU
RENDERS OBVIOUS CLAIMS 1-4.**

As discussed for Ground 1, Rostoker renders obvious “*at least one interactive chart,*” as recited in [1A], and “*wherein the at least one interactive chart, when displayed on the second website in the absence of the generation interface, enables a user to a) render the chart, b) obtain input from a user and c) rerender the chart using the input thereby enabling the interactive chart to retain interactivity,*” as recited in [1D]. *Supra* Sections V.A.2, V.A.5. However, to the extent argued that Rostoker does not expressly disclose the recited “*interactive*” features of the ’000 patent, Jou discloses such “*interactive*” features, which a POSA would have found useful with Rostoker’s charts. EX1003, ¶248.

Jou “provides an interactive system for visualizing business data.” EX1007, ¶10. “A visualization ... can be built in a number of manners, such as starting from a blank visualization and adding manually various visualization elements, in any order, or importing them from an existing visualization.” EX1007, ¶13. Like Rostoker, Jou discloses “provid[ing] the user with a large variety of predefined types of two- and three-dimensional charts, such as line, bar, surface, pie, swatch, and map charts,” as illustrated below. EX1007, ¶¶14, 36; EX1003, ¶249. Jou further discloses that a user can interact with its charts using “standard input and output devices, such as a mouse and a keyboard.” EX1007, ¶34.



EX1007, FIG. 2B.

Jou's charts include multiple “interactive” features. For example, Jou discloses various “filter[s],” only showing a subset of data. EX1007, ¶¶38-41; EX1003, ¶250. For instance, Jou discloses check, radio, and range filters allowing a user to select data visible in a chart. EX1007, ¶¶38-41; EX1003, ¶250.

Jou also discloses drill-down features, “allow[ing] **drilling on the dimension axis of charts**, by moving either up or down the hierarchy of categories of a dimension ... to obtain a more (down) or less (up) detailed view of the data.” EX1007, ¶44; EX1003, ¶251. “[T]his is achieved by double-clicking an axis label, with the direction of the drilling indicated by the form of the cursor.” EX1007, ¶44.

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U.S. Patent No. 8,520,000*

Jou further discloses a zoom feature for charts. EX1003, ¶251. For example, “the user can obtain a closer area view of a map or layer (**zooming in**), [or] obtain a wider area view of a map or layer (**zooming out**)....” EX1007, ¶49; EX1003, ¶251.

Jou’s “*interactive*” features are consistent with the ’000 patent’s description of “interactive features that allow a user to interact with the chart,” providing examples such as “a zoom feature, a data mouse-over pop-up window, a data hide/share feature, an audio playback feature, a drill down feature, a data gliding feature and the like.” EX1001, 9:9-16. Jou, therefore, expressly discloses “*at least one interactive chart*” ([1A]), “*wherein the at least one interactive chart, when displayed ... in the absence of the generation interface, enables a user to a) render the chart, b) obtain input from a user and c) rerender the chart using the input thereby enabling the interactive chart to retain interactivity*” ([1D]). EX1003, ¶252.

A POSA would have been motivated to incorporate Jou’s additional “*interactive*” features into Rostoker-Strong’s system to enable users to better visualize and explore business data. EX1003, ¶253. As Jou explains, “[t]he vast amounts of warehoused or otherwise collected business data would be useless without software tools for its analysis.” EX1007, ¶8. “[T]ools for visualizing business data are of particular importance,” and “[b]y interacting with person's sight, they became means of choice for consolidating and presenting vast amounts

of complex information, in the manner which facilitates pattern recognition in the presented data and invites data exploration.” EX1007, ¶9. Rostoker is specifically concerned with development of “business application[s],” EX1005, ¶4, and a POSA would have understood that Jou’s data filtering, drill-down, and zoom features improve a user’s ability to parse and visualize large amount of business data. EX1003, ¶253.

A POSA also would have had a reasonable expectation of success incorporating Jou’s additional interactive features into Rostoker-Strong’s system because, as Mr. Schmandt explained, Flash and Java enable the types of interactions discussed by Jou. EX1003, ¶254; EX1005, ¶50, FIG. 2A. Indeed, Rostoker discloses other interactive features that are executable within a “Flash runtime” or “Java runtime,” as discussed for elements [1A] and [1B] in Ground 1. EX1003, ¶254. Therefore, a POSA would not have experienced any unreasonable technical hurdles in providing Jou’s interactive features within Rostoker’s system, and the combination would yield predictable results (e.g., incorporation of additional interactive chart features into Rostoker’s existing system). EX1003, ¶254.

For these reasons, and the reasons discussed in Ground 1, the combination of Rostoker, Strong, and Jou also render obvious claims 1-4.

**VII. GROUND 3: ROSTOKER AND STRONG IN VIEW OF CLARK
RENDERS OBVIOUS CLAIMS 1-4.**

As discussed for Ground 1, Rostoker, alone or in combination with Strong, renders obvious “*displaying, in response to the selection the at least one interactive chart embedded in a chart box on a second website,*” as recited in [1B]. However, to the extent argued that Rostoker does not expressly disclose that its “*interactive chart*” is displayed “*on a **second** website,*” Clark also provides such teaching.

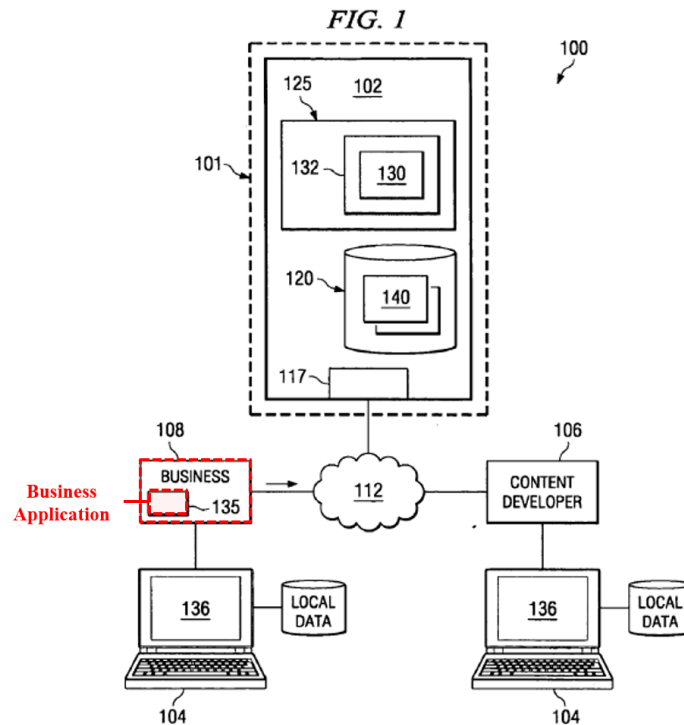
Clark is directed to “business data visualization and publishing systems.” EX1010, ¶3. Like Rostoker, Clark provides a system “that generates rich charts, graphs, and maps for enhanced visualization,” allowing users “**to build web sites, portals, and dashboard[s]** using a drag-n-drop interface.” EX1010, ¶¶28-29. Clark’s “data visualization and publishing system 100 provides a streamlined and intuitive interface for **users with ordinary browsers to rapidly access data sources, visualize information, and publish results.**” EX1010, ¶41. For example, “[t]o generate attractive charts and map graphics, The B3 system 200 can use the POPCHART and Optimap products sold by Corda.” EX1010, ¶52; *see also* EX1010, ¶47 (“POPCHART is described by Corda as a server-based suite of tools for creating sophisticated interactive charts and graphs in Macromedia® FLASH...”). Thus, similar to Rostoker, Clark provides a “web-based” interface

for “creating and publishing business dashboards.” EX1010, ¶52; EX1003, ¶¶257-59.

Clark further discloses that users can “publish” charts for display on “*a second website*,” e.g., within an “enterprise portal”: “The system 200 can **publish standalone dashboards, portals, or web pages**, as well as components **to be integrated into groupware or enterprise portals**.” EX1010, ¶49; *see also* EX1010, ¶117 (“Publishing—**create web pages, dashboards, and portals, or publish content to groupware and external portals**”); EX1003, ¶260. And Clark describes this “enterprise portal” which resides, for example, “on a company’s intranet,” separate from the “web-based” interface for “creating and publishing business dashboards.” EX1010, ¶52, ¶137 (“[A dashboard] could also be **published on the company’s intranet** to enhance collaboration between employees”). Therefore, Clark teaches publishing and displaying interactive charts “*on a second website*.” EX1003, ¶261.

A POSA would have been motivated to incorporate Clark’s techniques of publishing interactive charts to a business’s intranet to enable Rostoker’s applications to be “integrated into ... enterprise portals,” as Clark teaches. EX1010, ¶49; EX1003, ¶262. Like Clark, Rostoker is specifically directed to “configuring an analytical application or dashboard to create a new business application and, thus, quickly respond to changing business needs with a low associated cost.”

EX1005, ¶5. Indeed, Rostoker teaches that its system may be used “in a dedicated enterprise environment” and illustrates a business 108 storing “composite applications 135 (or xApps).” EX1005, ¶¶21-22, 28, FIG. 1; EX1003, ¶262.



EX1005, FIG. 1 (annotated).

Clark’s techniques would thus enable a business to internally host and present business applications created using Rostoker-Strong’s system. EX1003, ¶262. A POSA also would have had a reasonable expectation of success incorporating Clark’s techniques because such incorporation would amount to nothing more than incorporating well-known content-publishing techniques into Rostoker-Strong’s known system. EX1003, ¶263. Both Rostoker and Clark teach publishing content for execution in a “Flash runtime.” EX1005, ¶50; EX1010, ¶52;

EX1003, ¶263. And Rostoker already discloses a “Publish” function that allows a user to “deploy a ready-to-use analytics application.” EX1005, ¶¶27, 71, FIGs. 56, 57. Therefore, a POSA would not have experienced any unreasonable technical hurdles incorporating Clark’s publishing techniques within Rostoker-Strong’s system, and the combination would yield predictable results (e.g., publishing Rostoker’s interactive charts to a business website). EX1003, ¶264.

VIII. GROUND 4: THE QLIKVIEW MANUALS IN VIEW OF BALES RENDER OBVIOUS CLAIMS 1, 3, AND 4.

A. A POSA would have been motivated to combine the QlikView Manuals.

A POSA would have combined the QlikView Reference Manual (EX1008) and the QlikView Server Reference Manual (EX1009) because they describe the same product suite. EX1008, 0019; EX1015-EX1017; EX1003, ¶267. Both describe the same product version (8.50). EX1008, 0001; EX1009, 0001. Additionally, a POSA would have interpreted the manuals’ teachings collectively because the QlikView Manuals themselves tell the POSA to cross reference one another. EX1008, 0033; EX1009, 0026, 0114; EX1003, ¶267.

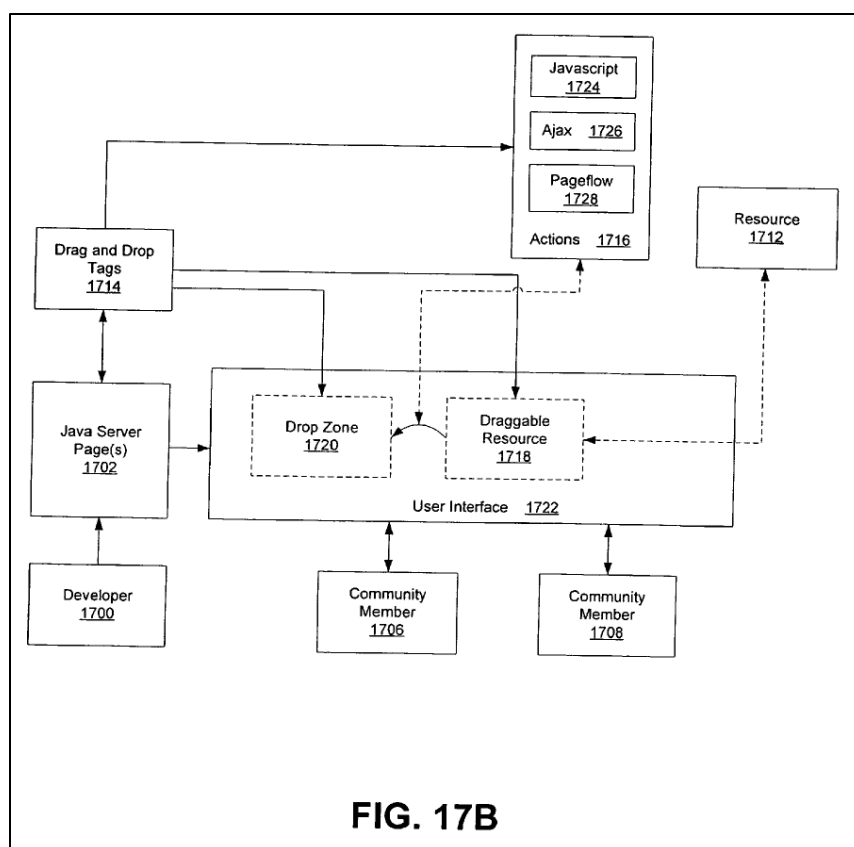
Combining the QlikView Manuals would have combined prior-art elements (QlikView and QlikView Server) according to known methods (server-client interactions) to yield predictable results. EX1003, ¶268. Moreover, a POSA would

have had a reasonable expectation of success when combining the QlikView Manuals because they were already combined in QlikView. EX1003, ¶268.

B. A POSA would have been motivated to combine the QlikView Manuals and Bales.

The QlikView Manuals explain how developers publish QlikView objects (e.g. charts) online. EX1009, 0134-36, 0144-49, 0156-58. A POSA would have understood that dynamically updating these published charts would further QlikView’s “major design goals” of “enhanc[ing] user collaboration.” EX1009, 0013; EX1003, ¶269. A POSA would have therefore searched for references explaining how to update published content dynamically. EX1003, ¶269. This would have led the POSA to Bales, which discloses a system that updates content on a website dynamically upon drag-and-drop operations. EX1003, ¶269.

Bales discloses a system that selects web content by dragging a draggable resource 1716 into a drop zone 1720 (e.g. a folder), shown below in Figure 17B. EX1006, ¶168. Upon dropping the content into the drop zone, an action 1716 is performed. EX1006, ¶168. “This action can be specified in the drag and drop tag and can take the form of a Javascriptfunction (1724), an AJAX call (1726) or a page flow action (1728).” EX1006, ¶168.



EX1006, FIG. 17B.

Additionally, “a dynamic content call can be made to a remote server....”

EX1006, ¶168. As Bales explains, the dynamic content calls can update a second website automatically using AJAX. EX1006, ¶¶138, 147; EX1003, ¶271.

A POSA would have been motivated to use Bales’s drag-and-drop approach because it is “a more abstract, dynamic and user-friendly approach, one that would provide a more fluid and adaptable system of collaboration between users over a distributed computing environment.” EX1006, ¶21; EX1003, ¶272. As Bales explains, “[t]he drag and drop library can provide for a highly user-friendly and fluid interface.” EX1006, ¶161.

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A POSA would have also been motivated to use Bales's drag-and-drop approach to update the second website dynamically. EX1003, ¶273. As Bales explains, updating a portion of a website instead of the entire browser allows for "a much more responsive user interface and data exchange." EX1006, ¶125.

A POSA would have also been motivated to use Bales's drag-and-drop approach to reduce server workload. EX1003, ¶274. As Bales explains, "[a]nother advantage can be reduced server workload because the server is not burdened with re-running security on every portlet, re-rendering all HTML for the entire page and re-downloading all of the Javascript everytime [sic] that a communication occurs." EX1006, ¶125. With AJAX, the system can update only the portion of the website when the content changes instead of the entire website. EX1003, ¶¶117, 274. "[A] granular and preemptive updating process is achieved, yet requiring very little or no user interaction." EX1006, ¶147.

Adding Bales's drag-and-drop approach to the QlikView Manuals would have also combined prior art elements (JavaScript/AJAX, drag-and-drop, drop zones) according to known methods (basic web development) to yield predictable results (updating content on a website). EX1003, ¶275. By early 2009, JavaScript and AJAX were well-known web development tools that were used commonly to publish and update content online. EX1003, ¶¶115-17, 275. Drag-and-drop was also ubiquitous in the industry. EX1003, ¶¶103-07, 118-24, 275. Because

JavaScript, AJAX, and drag-and-drop were well known, a POSA would have known how to predictably implement them within a data visualization tool. EX1003, ¶275.

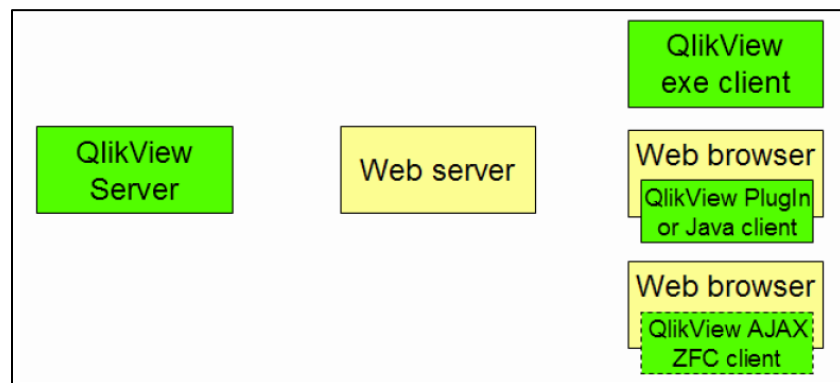
Adding Bales's drag-and-drop approach to QlikView would have used a known technique (drag-and-drop) to improve similar devices (AJAX/Java-based website development tools) in the same way. EX1003, ¶276. QlikView and Bales both use JavaScript and AJAX to publish and update content online. EX1009, 0134-36, 0144-49, 0156-58; EX1006, ¶¶97-99, 122, 124-25, 131, 147, 158, 162-68, 176. Because QlikView (like Bales) also stores its website content server side, a POSA would have known how to update the published content automatically in the same way. EX1003, ¶276. As Bales explains, clients would ping the server every so often to update the published content automatically. EX1006, ¶¶139-49.

Additionally, a POSA would have had a reasonable expectation of success because JavaScript, AJAX, and drag-and-drop were all mature technologies. EX1003, ¶¶115-24, 277. There would have been no technical hurdles that a POSA would have been unable to overcome. EX1003, ¶277. Indeed, Bales provides ample technical details (including sample code) to predictably implement this known functionality. EX1003, ¶277; EX1006, ¶¶131, 162-63, 166.

C. Independent Claim 1

1. [1P] “A computer-implemented method.”

The QlikView Manuals teach the preamble. EX1003, ¶¶279-82. Particularly, the QlikView Manuals describe methods implemented on a computer system having a QlikView Server, a Web Server, and Clients. EX1009, 0095. “This interaction can potentially involve multiple computers and multiple network connections.” EX1009, 0095; *see also* EX1008, 1326-27 (system requirements).



EX1009, 0095; *see also* EX1009, 0098.

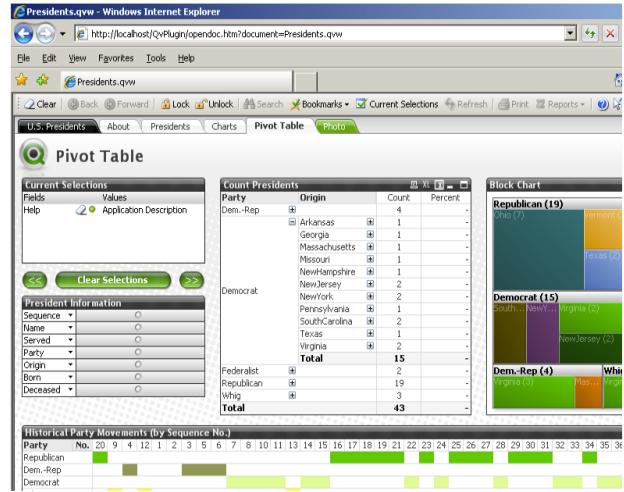
2. [1A] “receiving a selection, on a first website, of at least one interactive chart from a plurality of interactive charts.”

The QlikView Manuals disclose this limitation. EX1003, ¶¶283-99. Shown below, “*a first website*” has a plurality of sheet objects, including charts. EX1003, ¶¶284-88; EX1008, 0880.

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QlikView Java client in Internet Explorer.



QlikView plug-in client in Internet Explorer.

EX1009, 0129, 0139; *see also* EX1009, 0097 (different web clients).

The charts on the first website are “interactive.” EX1003, ¶¶289-94; EX1008, 0013 (charts “dynamic”). For example, “[s]elections in field data can be made directly in most of QlikView’s charts and tables by means of clicking or painting with the mouse.” EX1008, 0154-55, 0881. The charts have pop-up labels. EX1008, 0919. Other interactive features are available, like “drop-down select,” “slider object[s],” “buttons, “interactive search feedback,” etc. EX1008, 0035-36, 0154, 0583, 0668-69, 0881, 0895, 0899-900, 0919, 1306-07; EX1009, 0016-19, 0057, 0133. These interactive features are mutually or reciprocally active and provide real-time feedback to users to further modify the charts. EX1003, ¶293.

The interactive features in the QlikView Manuals are consistent with those in the ’000 patent. EX1003, ¶294. The ’000 patent describes “interactive features that allow a user to interact with the chart to, for example, modify or change their view of the chart, learn more about the chart data, and the like.” EX1001, 9:9-13.

And the '000 patent discloses that these “interactive features” can include “a zoom feature, a data mouse-over pop-up window, a data hide/share feature, an audio playback feature, a drill down feature, a data gliding feature and the like.” EX1001, 9:13-16. As discussed above, QlikView’s interactive options provide similar “interactive features.” EX1003, ¶¶289-94.

Once generated, QlikView can “*receiv[e] a selection*” of one of the charts. EX1003, ¶¶295-98. For example, a user can select a chart by right clicking the chart, which opens the object menu. EX1008, 0090, 0624, 0668, 1014-18. QlikView also allows users to select individual charts to publish them online EX1009, 0009-10, 0134-36, 0156-57; EX1008, 0807-08. A user can also select a chart when sharing it with other QlikView users. EX1009, 0140; EX1003, ¶288.

The QlikView Manuals therefore disclose [1A]. EX1003, ¶¶283-99.

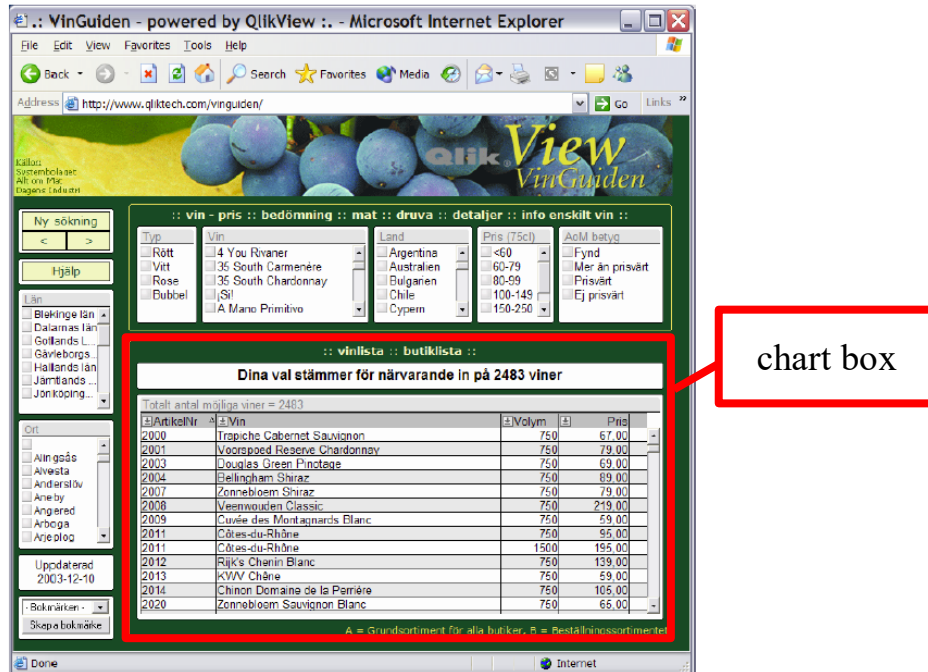
3. [1B] “displaying, in response to the selection the at least one interactive chart embedded in a chart box on a second website, wherein the chart box is a web widget”

The QlikView Manuals disclose this limitation. EX1003, ¶¶300-13.

In response to the selection of an interactive chart (see [1.A]), QlikView displays the chart embedded in a chart box on a second website, as shown below. EX1003, ¶301. As the QlikView Manuals explain, “[t]he QlikView Objects Clients (Java Objects, QlikX, and AJAX) are based on the concept of placing individual

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sheet objects from a QlikView document in an HTML environment.” EX1009,
0009.



QlikView Java Objects client in Internet Explorer.

EX1009, 0133 (annotated).

The second website is different than the first website because it uses a different web client and a different URL. *See* EX1009, 0123 (“Any combination of client types is allowed”); EX1009, 0134, 0144, 0157 (user defining the URL where the second website is run); EX1003, ¶302. For example, as shown above, the “second website” has a different URL than the “first website” in [1A]. *Compare* EX1009, 0133 (“http://www.qliktech.com/vingulden”), *with* Section VIII.C.2 (“http://localhost/QvJava...” and “http://localhost/QvPlugin...”).

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The chart box is a “web widget” because embed code for the chart box is pasted into the second website’s HTML code. EX1003, ¶303. Below is sample code for embedding an interactive chart in a chart box. EX1009, 0136. In this example, QlikView objects are embedded into a second website using HTML and a server-side script. EX1003, ¶¶303-04 (citing EX1009, 0133-36). The code defines four chart boxes (two rows <tr>, each row having two cells <td>). EX1003, ¶304. A different QlikView object from the QlikView file (qwt_objects.qvw) is embedded in each chart box. EX1003, ¶304.

```
<!--#INCLUDE Virtual="/QvJava/Servers/QlikWebObjects/Qlik-
Web.asp"-->
<html>
<head>
  <title>.: QlikWeb Objects :.</title>
</head>
<body>
  <% setDocument("qwt_objects.qvw") %>
  <table border="0" cellspacing="0" cellpadding="0">
    <tr>
      <td>
        <% addOb-
          ject("qwt_objects.qvw", "LB01", 140, 80) %>
      </td>
      <td>
        <% addOb-
          ject("qwt_objects.qvw", "LB02", 250, 100) %>
      </td>
    </tr>
    <tr>
      <td>
        <% addOb-
          ject("qwt_objects.qvw", "LB03", 140, 140) %>
      </td>
      <td>
        <% addOb-
          ject("qwt_objects.qvw", "CH01", 250, 150) %>
      </td>
    </tr>
  </table>
</body>
</html>
```

EX1009, 0136; *see also* EX1009, 0146-49 (sheet object display code for QlikX).

Chart boxes can also be defined within a Java applet (a “web widget”):

```
<applet code='com.qt.qw.QlikApplet.class'  
  archive='/QvJava/QlikView.jar' height=700 width=1000  
  MAYSCRIPT>  
  <param name='DOCUMENT' value='Presidents.qvw'>  
  <param name='PORT' value='4747'>  
  <param name='ISAPI' value='/scripts/QVSTunnel.dll'>  
  <param name='HEIGHT' value='700'>  
  <param name='WIDTH' value='1000'>  
  <param name='LANGUAGE' value='English'>  
</applet>
```

EX1009, 0130; *see also* EX1009, 0135 (disclosing an applet for each object).

The published charts remain interactive. EX1003, ¶¶308-14; EX1009, 0133 (Java Objects Client example). The charts include “drop-down select,” “slider object[s],” “buttons,” “interactive search feedback,” etc. EX1009, 0016-17; EX1008, 0035-36. “Java client users [can also] change certain column sizes in Multi Box and table/chart objects.” EX1009, 0057. Additionally, the charts published to an AJAX client remain interactive. EX1009, 0156-57; EX1008, 0807-08. Indeed, AJAX, “[s]hort hand for ‘Asynchronous JavaScript and XML,’ is a development technique for creating **interactive** web applications.” EX1008, 1312.

The QlikView Manuals therefore disclose [1B]. EX1003, ¶¶300-15.

4. [1C] “wherein the at least one interactive chart is generated on a generation interface configured to allow a user to generate the interactive chart with a chart template from a chart template store.”

The QlikView Manuals disclose this limitation. EX1003, ¶¶316-24.

In QlikView, “[c]harts are created by choosing New Sheet Object from the Layout menu, or by pressing the Create Chart button....” EX1008, 0667; *see also* EX1009, 0140. “This opens a wizard that will help you create the chart.” EX1008, 0667. The Chart Wizard’s UI (the “*generation interface*”), shown below has multiple tabs that allow users to customize the chart.

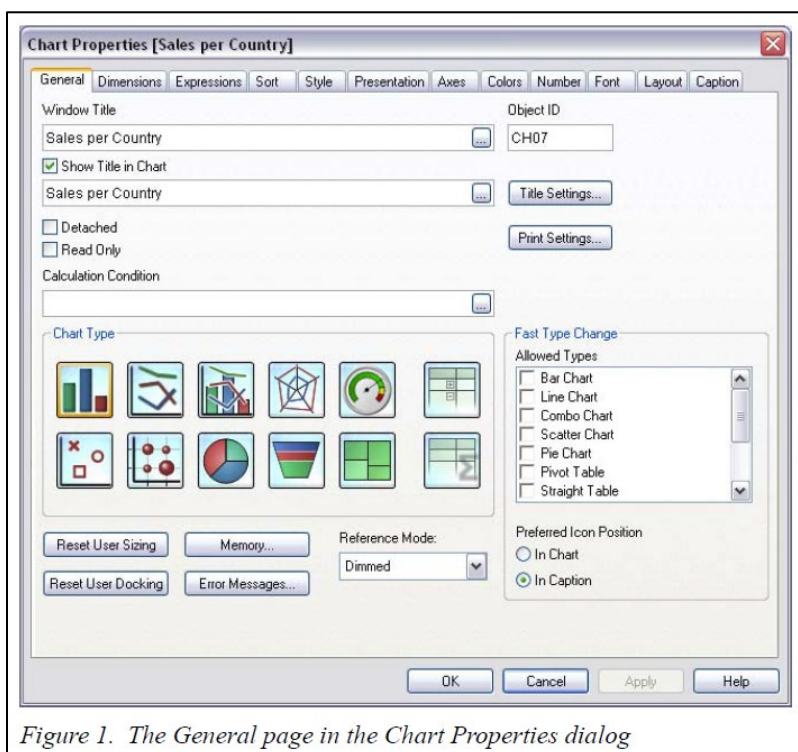


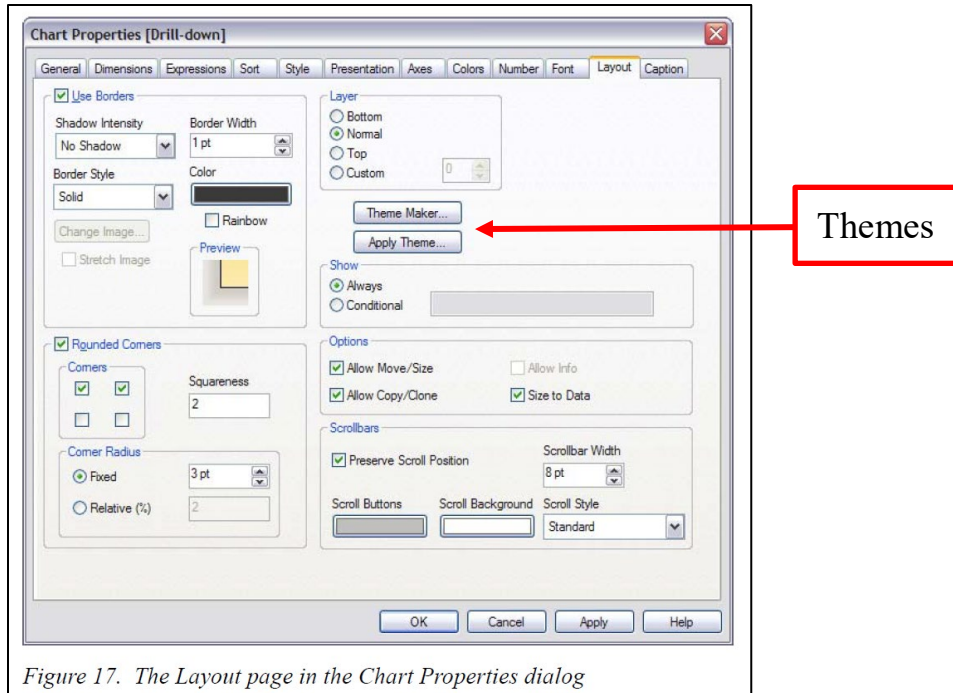
Figure 1. The General page in the Chart Properties dialog

EX1008, 0882; *see also* EX1008, 0085, 0880, 0890, 1104-14.

As discussed for [1A], the generated charts are “*interactive*.” EX1003, ¶318; EX1008, 0013 (charts “dynamic”). For example, “[s]elections in field data can be made directly in most of QlikView’s charts and tables by means of clicking or painting with the mouse.” EX1008, 0154-55, 0881. The charts have pop-up labels. EX1008, 0919. Other interactive features include “drop-down select,” “slider

object[s],” “buttons,” “interactive search feedback,” etc. EX1008, 0035-36, 0154, 0583, 0668-69, 0881, 0895, 0899-900, 0919, 1306-07; EX1009, 0016-19, 0057, 0133. These interactive features are mutually or reciprocally active and provide real-time feedback to users to further modify the charts. EX1003, ¶318.

The Chart Wizard’s UI (the “*generation interface*”) is “*configured to allow a user to generate the interactive chart with a chart template from a chart template store.*” EX1003, ¶¶319-22. Shown below, the UI’s “Layout” tab allows users to apply a chart theme. EX1003, ¶319; EX1008, 0942. A theme is “[a] file containing the properties and look and feel of a document, sheet or object.” EX1008, 1323; *see also* EX1008, 0795-805 (themes are used to create charts with the same look and feel); EX1001, 12:31-33 (“Chart templates allow the users to create interactive charts in the future that have the same look and feel as the generated chart 1700.”). Indeed, QlikView calls its chart themes “templates.” EX1008, 0799.



EX1008, 0939 (annotated).

The selected theme (the “*chart template*”) is “*from a chart template store*” because the chart themes/templates are in a dedicated theme folder:

Theme files are coded in xml and normally kept in a special QlikView theme folder under Windows’ Application Data folder for the active user.

EX1008, 0795; *see also* EX1008, 0799.

The QlikView Manuals therefore disclose [1C]. EX1003, ¶¶316-24.

5. [1D] “wherein the at least one interactive chart, when displayed on the second website in the absence of the generation interface, enables a user to a) render the chart, b) obtain input from a user and c) rerender the chart using

the input thereby enabling the interactive chart to retain interactivity.”

The QlikView Manuals disclose this limitation. EX1003, ¶¶325-32.

As explained for [1B], the QlikView Manuals disclose a system that displays the interactive chart on a second website. The interactive chart is displayed on the second website “*in the absence of the generation interface*” because the second website is self-contained and independent from the first website.

Java programs which are **self-contained applications** written in Java as opposed to e.g. VB or VC++.

EX1009, 0199.

The JRE is a plug-in to an internet browser which creates a “sand-box” for running applets written in Java inside the browser.

EX1009, 0199.

The fourth and final major theme of QlikView 8 is the introduction of the possibility to **change certain field values without running the script.**

EX1008, 0023. The second website can also be hosted on a separate server than the server hosting the first website and the generation interface. *See* EX1009, 0098-99.

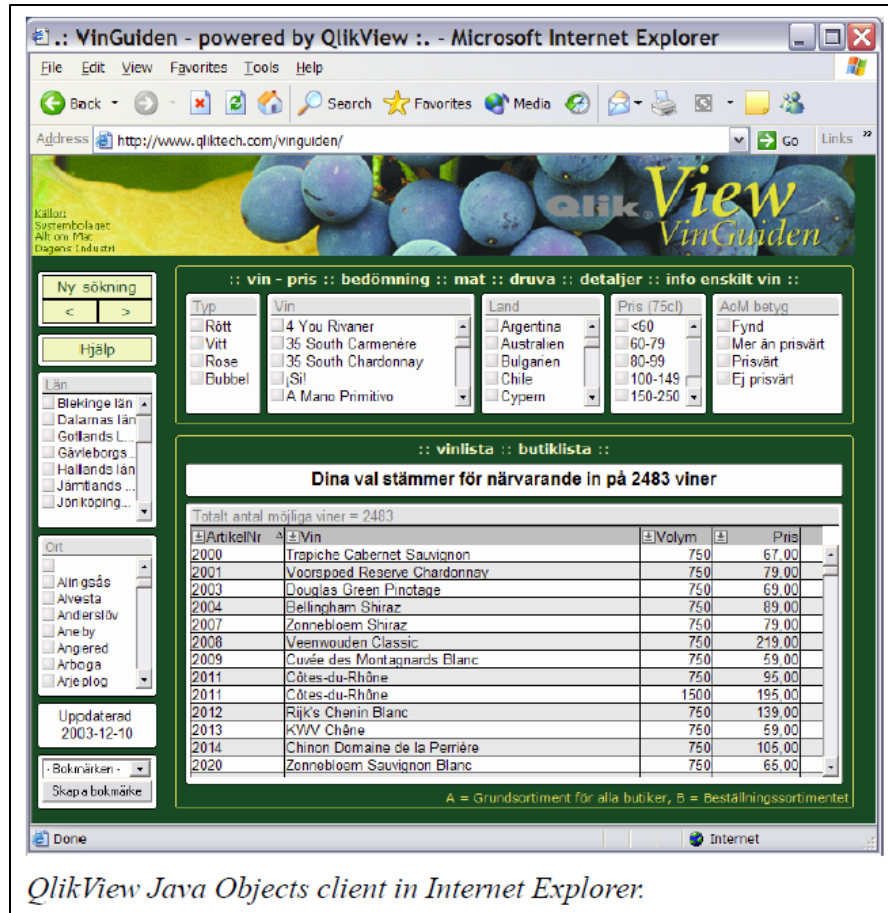
As the QlikView Manuals explain, an end user can open, view, and interact with the chart on a web client without the Chart Wizard’s UI (the “*generation interface*”). EX1003, ¶328. For example, an end user with QlikView Analyzer can

view and interact with the chart, independent of QlikView Professional/Developer, which enables users to generate new charts. EX1003, ¶328; EX1008, 0016.

Additionally, as explained for [1B], the second website is displayed on a different client using a different URL, which provides additional reasons why the second website is displayed in the absence of the generation interface. EX1003, ¶302.

When displayed on the second website in the absence of the Chart Wizard's UI ("*the generation interface*"), the interactive chart retains interactivity. EX1003, ¶¶329-30. For example, when the interactive chart is opened in an applet on an Internet browser outside of QlikView Professional/Developer, the web client enables a user to render the chart and provide input (e.g. mouse clicks). EX1008, 0013, 0015, 0881; EX1009, 0133, 0155-56, 0204. Once the second website with the interactive chart is rendered, the client and chart can obtain input from the user via "drop-down select in tables," "slider object[s]," "buttons," "interactive search feedback," etc. *E.g.*, EX1009, 0016-19. As shown below, data can also be sorted and edited within a chart. EX1009, 0012, 0019, 0133.

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EX1009, 0133; *see also* EX1009, 0155-56 (interact with charts via AJAX).

Using the user's input (e.g. mouse clicks), the client rerenders the chart using the input, thereby enabling the interactive chart to retain interactivity.

EX1003, ¶¶329-30. Indeed, a main advantage of QlikView's web clients is "the inherent asynchronous update capability to provide quick, incremental updates to the user interface, without requiring a browser page refresh." EX1009, 0155-56; *see also* EX1009, 0012, 0014; EX1008, 0689.

The QlikView Manuals therefore disclose [1D]. EX1003, ¶¶325-32.

6. [1E] “wherein the selection is made by dragging and dropping the at least one interactive chart from the plurality of charts into a chart box folder connected to the chart box such that retrieve code for data feed displays the at least one interactive chart on the first website.”

The QlikView Manuals in view of Bales disclose this limitation. EX1003, ¶¶333-45. As discussed for [1A], a user of QlikView selects an interactive chart from the plurality of charts. Once selected, QlikView saves the charts in a “*folder*”:

Target folder for pages: Specifies the folder where the generated pages will be saved. Each page variant (for different client types) will be saved in a separate sub-folder in the specified location.

EX1009, 0134. The chart box folders for each client are defaulted as:

Client	Directory Folder
Java Objects	C:\Program Files\QlikView\Webpages\JavaObjects
QlikX	C:\Program Files\QlikView\Webpages\Plugin
AJAX Zero Footprint	C:\Program Files\QlikView\Webpages\AjaxZFC

EX1009, 0134, 0144, 0157.

But users can select different destinations for the chart box folders. *See* EX1008, 0807-08; EX1009, 0134, 0136, 0144, 0145, 0148, 0157; EX1003, ¶336.

Each chart box folder, wherever stored, is “*connected to the chart box*” because connector code connects the folders (and the QlikView objects contained within) to the chart boxes on the second website. *See* EX1009, 0021; EX1003,

¶¶337-38. The following code snippets show connector code that connects a chart box folder (and the objects within) to chart boxes. EX1003, ¶¶337-38.

```
<!--#INCLUDE Virtual="/QvJava/Servers/QlikWebObjects/Qlik-  
Web.asp"-->  
<html>  
<head>  
  <title>.: QlikWeb Objects :.</title>  
</head>  
<body>  
  <% setDocument("qwt_objects.qvw") %>  
  <table border="0" cellspacing="0" cellpadding="0">  
    <tr>  
      <td>  
        <% addOb-  
          ject("qwt_objects.qvw", "LB01", 140, 80) %>  
      </td>  
      <td>  
        <% addOb-  
          ject("qwt_objects.qvw", "LB02", 250, 100) %>  
      </td>  
    </tr>  
    <tr>  
      <td>  
        <% addOb-  
          ject("qwt_objects.qvw", "LB03", 140, 140) %>  
      </td>  
      <td>  
        <% addOb-  
          ject("qwt_objects.qvw", "CH01", 250, 150) %>  
      </td>  
    </tr>  
  </table>  
</body>  
</html>
```

Connector Code

EX1009, 0136 (annotated).

```
<html>  
<head>  
  <title>QlixTest</title>  
  <meta name="vs targetSchema"  
    content="http://schemas.microsoft.com/intel-  
    lisen/ie5">  
  <script type="text/javascript">  
    function ClearAll()  
    {  
      QVPID1.ActiveDocument.ClearAll();  
    }  
  </script>  
</head>  
<body>  
  <OBJECT id="QVPID1"  
    height="1"  
    width="1"  
    classid="CLSID:74DC8438-E36A-40a0-B750-  
    4E2257FA2E41">  
    <PARAM  
      NAME="SRC"  
      VALUE="qvp://extra.qliktech.ideon.se/  
      MyQvApp.qvw">  
    <PARAM  
      NAME="AutoScan"  
      VALUE="-1">  
  </OBJECT>  
  <OBJECT id="Qlix1"  
    height="122"  
    width="102"  
    classid="CLSID:54D93DE9-7DA5-4477-A3DA-  
    869ADB41CBBB" >  
    <PARAM NAME="ObjectID" VALUE="LB01">  
    <PARAM NAME="QvPluginID" VALUE="QVPID1">  
  </OBJECT>  
  <OBJECT  
    id="Qlix2"  
    height="288"  
    width="448"  
    classid="CLSID:54D93DE9-7DA5-4477-A3DA-  
    869ADB41CBBB" >  
    <PARAM NAME="ObjectID" VALUE="CH01">  
    <PARAM NAME="QvPluginID" VALUE="QVPID1">  
  </OBJECT>  
</body>  
</html>
```

Connector Code

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```
type="button"
value="ClearAll"
onclick="ClearAll()"
id=button2
name=button2>
</body>
</html>
```

EX1009, 0148-49 (annotated).

The Java applets also connect a chart box folder/objects to chart boxes. *See* EX1009, 0130, 0135; EX1003, ¶338.

The QlikView Manuals therefore disclose “*a chart box folder connected to the chart box.*” EX1003, ¶339. Although QlikView users select an interactive chart and save it in “*a chart box folder connected to the chart box,*” the QlikView Manuals do not explicitly disclose making the selection by “*dragging and dropping*” the interactive chart into the chart box folder. Nor do the QlikView Manuals explicitly disclose “*retrieve code for data feed [that] displays the at least one interactive chart on the first website.*” Bales cures these deficiencies.

Bales discloses selecting content by “*dragging and dropping*” it from one folder to another folder, as shown below. EX1006, ¶¶158-61; EX1003, ¶340.

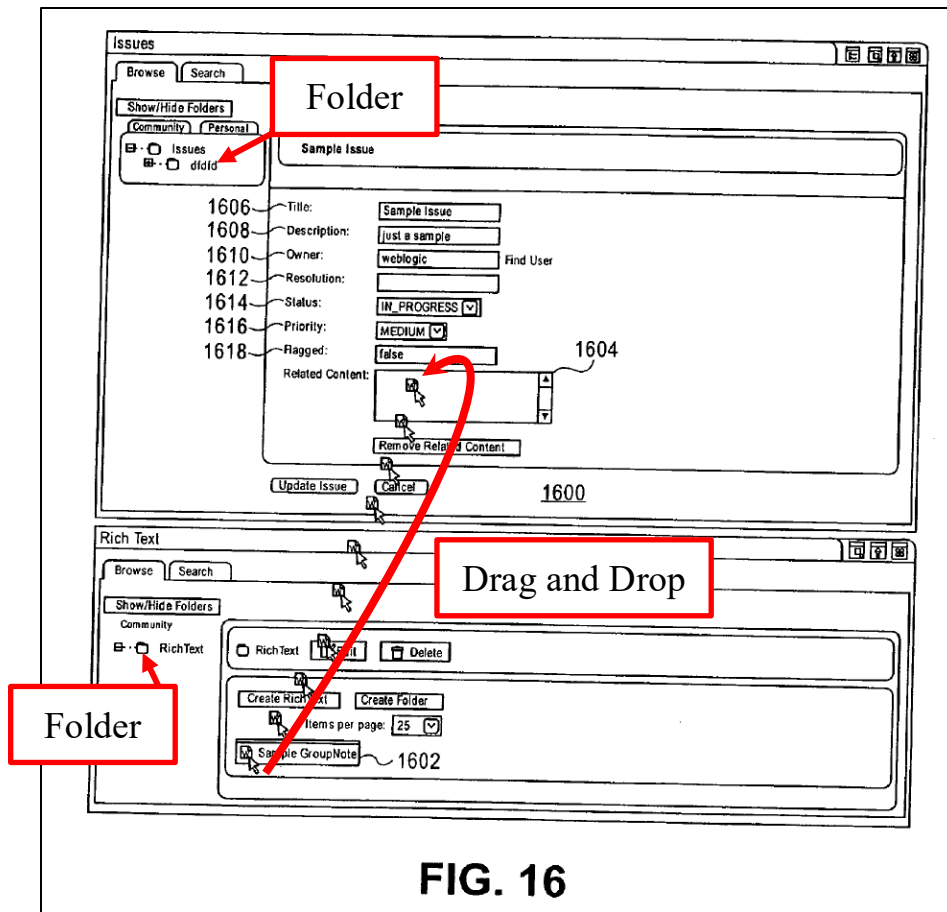
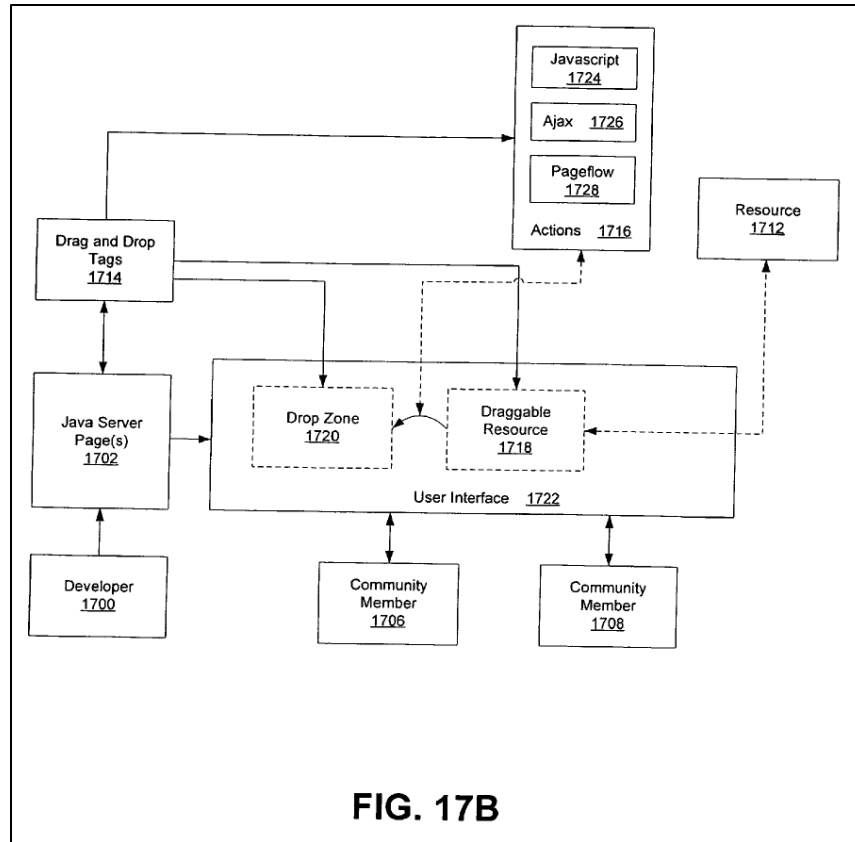


FIG. 16

EX1006, FIG. 16 (annotated).

Bales also discloses dragging-and-dropping selections on Java server pages. EX1006, ¶168. Shown below, a draggable resource 1718 on the user interface 1722 is dropped into drop zone 1720. EX1006, ¶168. When combined with the QlikView Manuals, see Section VIII.B, the drop zone 1720 would be QlikView's chart box folder, which would still be connected to the chart box. EX1003, ¶342.

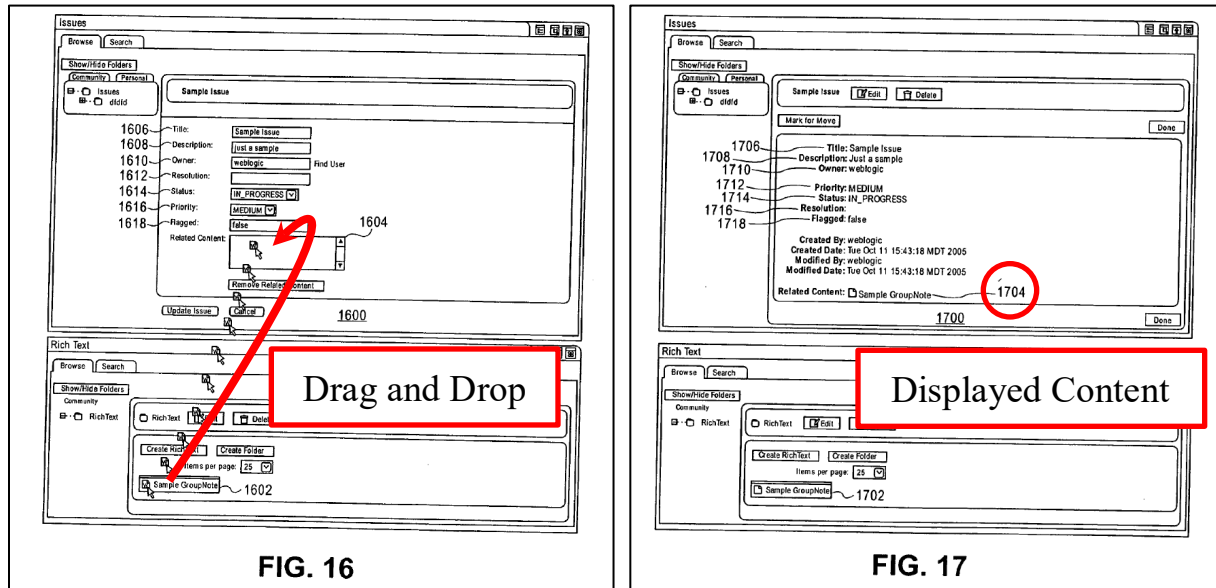


EX1006, FIG. 17B.

Additionally, the QlikView Manuals in view of Bales disclose “*retrieve code for data feed [that] displays the at least one interactive chart on the first website.*”

As Bales explains, “[u]pon the user ... selecting the draggable resource (1718) and dragging and dropping the resource into the resource drop zone, an action (1716) can be performed by the system.” EX1006, ¶168. “This action can be specified in the drag and drop tag and can take the form of a Javascriptfunction (1724), an AJAX call (1726) or a page flow action (1728).” EX1006, ¶168; *see also* EX1006, ¶158. As Bales shows in Figures 16-17 (below), the action displays the dragged content on the first website. EX1003, ¶341; EX1006, ¶160. When combined with

the QlikView Manuals, the Javascriptfunction, AJAX call, or page flow action would include “*retrieve code for data feed*” and the dragged content displayed on the website would be the interactive chart. EX1003, ¶344. *Supra* Section VIII.B.



EX1006, FIGs. 16, 17 (annotated).

The QlikView Manuals in view of Bales disclose [1E]. EX1003, ¶¶333-45.

7. [1F] “wherein the at least one interactive chart is automatically displayed on the second website using a data feed from the first website to the second website upon the dragging and dropping selection.”

The QlikView Manuals in view of Bales disclose [1F]. EX1003, ¶¶346-55.

A POSA would have understood that the connector code for QlikView’s clients, Section VIII.C.6 ([1E]), is part of “*a data feed from the first website to the second website*” that displays the interactive chart in a chart box on the second website. EX1003, ¶347. Additionally, as explained for [1B] and [1D], the charts

remain interactive when published. A POSA would have therefore understood the QlikView Manuals to disclose “*wherein the at least one interactive chart is ... displayed on the second website using a data feed from the first website to the second website.*” EX1003, ¶347.

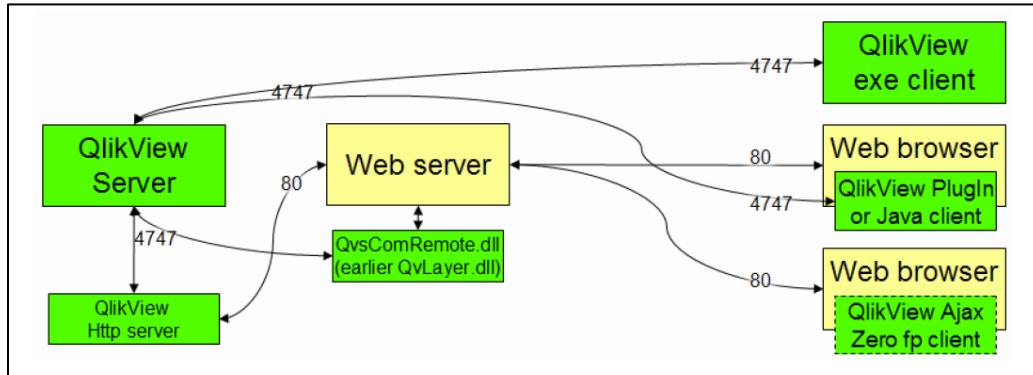
The AJAX embodiment discloses this claim element for an additional reason—for AJAX clients, the server sends dynamic updates to charts (e.g. updated data) displayed on the second website:

One of the main advantages of the AJAX architecture is the inherent asynchronous update capability to provide quick, incremental updates to the user interface, without requiring a browser page refresh. The QlikView AJAX ZFC provides the environment for the QlikView Server to produce and send Dynamic HTML (DHTML) pages and XML data to the browser running on the client computer and also receive feedback from the user clicking in those pages.

EX1009, 0155-56; *see also* EX1008, 0020-21; EX1009, 0012, 0014 (AJAX provides updates). And with AJAX, QlikView “**automatically** generate[s] AJAX ZFC pages....” EX1009, 0016. Indeed, as a POSA would have understood, automatically displaying updates using a data feed from the developer website to the client website and vice versa was a core feature of AJAX. EX1003, ¶249.

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The QlikView Manuals show data feeds that display an interactive chart upon selection of the chart for publication. EX1003, ¶350. Shown below, the QlikView Server communicates with web clients via port 4747 and the HTTP Server communicates with AJAX clients via port 80. EX1009, 0098.



EX1009, 0098.

For these additional reasons, the QlikView Manuals disclose “*wherein the at least one interactive chart is ... displayed on the second website using a data feed from the first website to the second website.*” EX1003, ¶351. However, the QlikView Manuals do not explicitly disclose an automatic display “*upon [a] dragging and dropping selection.*” Bales cures this deficiency.

As discussed for [1E], Bales discloses a drag-and-drop selection. EX1006, ¶¶158-68, FIGs. 16-17B. Upon making the drag-and drop selection in Bales, the content is “*automatically displayed on the second website using a data feed from the first website to the second website.*” EX1003, ¶¶352-53. As Bales explains, “when a [user] drops the draggable resource onto a drop zone, a dynamic content

call can be made to a remote server, for updating the drop zone area of the user interface with an HTML fragment.” EX1006, ¶168. The dynamic content call can be “an AJAX call.” EX1006, ¶168. This AJAX call uses a data feed to automatically display updates on a second website. EX1006, ¶¶139, 147.

With AJAX, a data feed from a first website to a second website automatically displays updates upon the drag-and-drop selection. EX1003, ¶353. For example, Bales uses AJAX to update stock market data within a dynamic portion on a second website. EX1006, ¶¶122, 125, 146; EX1003, ¶353. At the time Bales was published (2007), stock prices were commonly displayed in line graphs (charts) that were updated throughout the day. EX1003, ¶353. Accordingly, a POSA would have understood that dropping an updated stock-price chart in Bales’s drop zone would automatically display the updated chart on the second website using a data feed from the first website to the second website. EX1006, ¶¶125, 128, 139-40, 146-47, 158, 168; EX1003, ¶353. Bales makes clear that it uses a data feed to display updated content on the second website “automatically”:

In step 1412, the server can then return the relevant information back to the original pinging member_A. For example, the notifications manager can **update the user interface portion of member_A’s desktop automatically to display the updated information,** without requiring any input from member_A. The notifications manager can be AJAX based.

EX1006, ¶147.

The QlikView Manuals in view of Bales disclose [1F]. EX1003, ¶¶346-55.

* * *

The QlikView Manuals in view of Bales disclose every element of claim 1, and a POSA would have been motivated to combine the references with a reasonable expectation of success. EX1003, ¶¶266-355. Claim 1 was obvious.

D. Claim 3

Claim 3 depends from claim 1 and recites “*displaying one or more of the plurality of interactive charts in the chart box on the second website.*” The QlikView Manuals disclose this limitation for the same reasons they disclose [1B]. EX1003, ¶¶356-58. For these reasons and the reasons provided for claim 1, the QlikView Manuals in view of Bales render obvious claim 3.

E. Claim 4

Claim 4 depends from claim 1 and recites “*displaying a plurality of interactive charts embedded in a plurality of chart boxes on the second website.*” The QlikView Manuals disclose this limitation. EX1003, ¶¶359-62.

As discussed for [1B], QlikView displays an interactive chart embedded in a chart box on a second website. QlikView is not limited to a single interactive chart embedded in a single chart box. EX1003, ¶360. As the script shows below, multiple QlikView objects (e.g. charts) are displayed in multiple chart boxes. In

this example, the code defines four chart boxes (two rows <tr>, each row having two cells <td>). EX1003, ¶360. A different QlikView object from the QlikView file (qwt_objects.qvw) is embedded in each chart box. EX1003, ¶360.

```
<!--#INCLUDE Virtual="/QvJava/Servers/QlikWebObjects/Qlik-  
Web.asp"-->  
<html>  
<head>  
  <title>.: QlikWeb Objects :.</title>  
</head>  
<body>  
  <% setDocument("qwt_objects.qvw") %>  
  <table border="0" cellspacing="0" cellpadding="0">  
    <tr>  
      <td>  
        <% addOb-  
          ject("qwt_objects.qvw", "LB01",140,80) %>  
      </td>  
      <td>  
        <% addOb-  
          ject("qwt_objects.qvw", "LB02",250,100) %>  
      </td>  
    </tr>  
    <tr>  
      <td>  
        <% addOb-  
          ject("qwt_objects.qvw", "LB03",140,140) %>  
      </td>  
      <td>  
        <% addOb-  
          ject("qwt_objects.qvw", "CH01",250,150) %>  
      </td>  
    </tr>  
  </table>  
</body>  
</html>
```

EX1009, 0136; *see also* EX1009, 0147-49 (displaying multiple QlikView objects).

As a POSA would have understood, the other web clients are also not limited to displaying a single interactive chart embedded in a single chart box. EX1003, ¶361. Rather, the clients can display multiple charts using multiple chart boxes. EX1003, ¶¶360-61; EX1009, 0129-66. Moreover, performing the same function (displaying an interactive chart) twice instead of once is not patentable. “It is well settled that the mere duplication of parts has no patentable significance unless a new and unexpected result is produced.” *Harza*, 274 F.2d at 671.

For these reasons and the reasons provided for claim 1, the QlikView Manuals in view of Bales render obvious claim 4.

IX. NO OBJECTIVE INDICIA OF PATENTABILITY

Tableau is unaware of any objective indicia of non-obviousness. If iCharts alleges objective indicia, Tableau requests an opportunity to respond.

X. DISCRETIONARY DENIAL IS NOT APPROPRIATE

A. *Advanced Bionics* strongly favors institution.

Applying the two-part framework from *Advanced Bionics* demonstrates that denial under §325(d) is not appropriate. IPR2019-01469, Paper 6 at 8-9 (P.T.A.B. Feb. 13, 2020) (precedential). Under part one, the same or substantially the same art or arguments were *not* previously presented to the Office, ending the inquiry in favor of institution. During prosecution, neither the Applicant nor the examiner cited or applied Rostoker, Strong, Jou, Clark, the QlikView Manuals, or Bales. Additionally, the primary references in the Grounds—Rostoker and the QlikView Manuals—are non-cumulative art because they disclose elements the Applicant argued were not in the prior art: dragging and dropping a chart into a chart box folder, and displaying the chart on a second website after a selection. EX1002, 0306. Therefore, the “new, noncumulative prior art asserted in the Petition” strongly favors IPR. *Oticon Medical AB v. Cochlear Ltd.*, IPR2019-00975, Paper 15 at 20 (P.T.A.B. Oct. 16, 2019) (§§II.B and II.C precedential).

Should iCharts attempt to analogize any previously-considered art or arguments to those presented here, Tableau reserves the right to respond.

B. The Board should not deny institution in view of parallel district court litigation.

If the Board institutes this IPR, Petitioner will not raise in district court any grounds raised or that reasonably could have been raised in the Petition. *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020).

XI. MANDATORY NOTICES

A. Real Parties in Interest

Petitioner Tableau Software, LLC identifies the following real parties-in-interest: Salesforce, Inc.

B. Related Matters

iCharts asserted the '000 patent in the Western District of Texas (Case No. 1-23-cv-01225). The district court case was entered on October 10, 2023 and involves the following three patents: (1) U.S. Patent No. 8,271,892; (2) U.S. Patent No. 8,520,000; and (3) U.S. Patent No. 9,712,595. The case was transferred to the Northern District of California on May 21, 2024 (Case No. 3-24-cv-03157).

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XII. GROUNDS FOR STANDING

Tableau certifies the '000 patent is available for IPR and that it is not barred or estopped from requesting IPR of the '000 patent challenging the patent claims on the grounds identified in this Petition.

XIII. CONCLUSION

Based on the grounds specified above, *inter partes* review and cancellation of the challenged claims is respectfully requested.

Respectfully submitted,

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APPENDIX A: CHALLENGED CLAIMS

1. [1P] A computer-implemented method comprising:

[1A] receiving a selection, on a first website, of at least one interactive chart from a plurality of interactive charts; and

[1B] displaying, in response to the selection the at least one interactive chart embedded in a chart box on a second website, wherein the chart box is a web widget,

[1C] wherein the at least one interactive chart is generated on a generation interface configured to allow a user to generate the interactive chart with a chart template from a chart template store,

[1D] wherein the at least one interactive chart, when displayed on the second website in the absence of the generation interface, enables a user to a) render the chart, b) obtain input from a user and c) rerender the chart using the input thereby enabling the interactive chart to retain interactivity,

[1E] wherein the selection is made by dragging and dropping the at least one interactive chart from the plurality of charts into a chart box folder connected to the chart box such that retrieve code for data feed displays the at least one interactive chart on the first website, and

[1F] wherein the at least one interactive chart is automatically displayed on the second website using a data feed from the first website to the second website upon the dragging and dropping selection.

2. The method of claim 1, wherein the web widget is a flash widget.
3. The method of claim 1, further comprising displaying one or more of the plurality of interactive charts in the chart box on the second website.
4. The method of claim 1, comprising displaying a plurality of interactive charts embedded in a plurality of chart boxes on the second website.

**CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME
LIMITATION, TYPEFACE REQUIREMENTS, AND TYPE STYLE
REQUIREMENTS**

1. This Petition complies with the type-volume limitation of 14,000 words, comprising 13,838 words, excluding the parts exempted by 37 C.F.R. § 42.24(a).

2. This Petition complies with the general format requirements of 37 C.F.R. § 42.6(a) and has been prepared using Microsoft® Word 2010 in 14-point Times New Roman.

Respectfully submitted,

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*Petition for Inter Partes Review of
U.S. Patent No. 8,520,000*

CERTIFICATION OF SERVICE (37 C.F.R. §§ 42.6(e), 42.105(a))

The undersigned hereby certifies that the above-captioned **PETITION FOR
INTER PARTES REVIEW OF U.S. PATENT NO. 8,520,000** and all supporting
exhibits were served via U.S.P.S. Priority Express Mail on September 26, 2024, in
their entirety on the following:

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