

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAP AMERICA, INC.,
Petitioner,

v.

CYANDIA, INC.,
Patent Owner.

IPR2024-01432
Patent 8,751,948

**PETITIONER'S REPLY TO
THE PATENT OWNER PRELIMINARY RESPONSE**

LIST OF EXHIBITS

LIST OF NEWLY FILED EXHIBITS

Exhibits concurrently filed with Petitioner’s Reply To The Patent Owner
Preliminary Response:

No.	Description
1043	N/A
1044	Plaintiff’s Supplemental Preliminary Infringement Contentions Claim Chart for U.S. Patent No. 8,751,948 (Appendix D), <i>Cyandia, Inc. v. SAP America, Inc. et al.</i> , Case No. 2-24-cv-00096 (E.D. Tex.)
1045	Correspondence to Cyandia’s Counsel (dated January 14, 2025) (<i>Sotera</i> stipulation)

LIST OF PREVIOUSLY FILED EXHIBITS

No.	Description
1001	U.S. Patent No. 8,751,948 (“ 948 Patent ”)
1002	File History of U.S. Patent No. 8,751,948
1003	Declaration of Christopher Schmandt, dated September 20, 2024 (“ Schmandt Decl. ”)
1004	<i>IBM Rational Application Developer V6 Portlet Application Development and Portal Tools</i> (August 2005) (“ WebSphere-Portal ”)
1005	Ron Ben-Natan et al., <i>Mastering IBM WebSphere Portal</i> (2004) (“ Ben-Natan ”)
1006	<i>IBM WebSphere Everyplace Access V5 Handbook for Developers and Administrators Volume I: Installation and Administration</i> (May 2005) (“ WebSphere-Everyplace-1 ”)

No.	Description
1007	<i>IBM WebSphere Everyplace Access V5 Handbook for Developers and Administrators Volume II: Application Development</i> (March 2005) (“ WebSphere-Everyplace-2 ”)
1008	<i>IBM WebSphere Everyplace Access V5 Handbook for Developers and Administrators Volume III: E-Mail and Database Synchronization</i> (April 2005) (“ WebSphere-Everyplace-3 ”)
1009	<i>IBM WebSphere Everyplace Access V5 Handbook for Developers and Administrators Volume IV: Advanced Topics</i> (March 2005) (“ WebSphere-Everyplace-4 ”)
1010	U.S. Patent Application Publication No. 2004/0044736 to Austin-Lane et al. (“ Austin-Lane ”)
1011	N/A
1012	N/A
1013	N/A
1014	N/A
1015	U.S. Patent No. 7,376,907 to Santoro et al. (“ Santoro ”)
1016	N/A
1017	<i>Microsoft Computer Dictionary</i> (5th Ed.) (excerpts) (2002)
1018	U.S. Patent No. 5,548,692 (“ Cok ”)
1019	<i>Microsoft Internet Explorer ResourceKit</i> , Microsoft (1998)
1020	U.S. Patent Application Publication No. 2007/0174782 (“ Russo ”)
1021	David Pogue, <i>iPhone The Missing Manual</i> (excerpts) (2007)
1022	David Pogue, <i>Mac OS X Leopard The Missing Manual</i> (excerpts) (2007)
1023	Harry Newton, <i>Newton’s Telecom Dictionary</i> (20th Ed.) (excerpts) (2004)
1024	N/A
1025	Affidavit of Nathaniel Frank-White, Records Request Processor at the Internet Archive

No.	Description
1026	N/A
1027	N/A
1028	Copyright Office Public Catalog: detailed record catalog entry for <i>IBM Rational Application Developer V6, Portlet Application Development and Portal Tools</i> , 1st ed., Registration Number/Date: TX0006234319 / 2005-09-13
1029	Library of Congress Catalog: detailed record catalog entry for <i>IBM Rational Application Developer V6, Portlet Application Development and Portal Tools</i> , LCCN number: 2005284159
1030	Copyright Office Public Catalog: detailed record catalog entry for <i>Mastering IBM WebSphere Portal</i> (2004), Registration Number/Date: TX0006003513 / 2004-08-02
1031	Library of Congress Catalog: detailed record catalog entry for <i>Mastering IBM WebSphere Portal</i> (2004), LCCN number: 2004274459
1032	Copyright Office Public Catalog: detailed record catalog entry for <i>IBM WebSphere Everyplace Access V5 Handbook for Developers and Administrators Volume I: Installation and Administration</i> (May 2005), Registration Number/Date: TX0006244913 / 2005-08-12
1033	Library of Congress Catalog: detailed record catalog entry for <i>IBM WebSphere Everyplace Access V5 Handbook for Developers and Administrators</i> Volumes I-IV, LCCN number: 2005280318
1034	Copyright Office Public Catalog: detailed record catalog entry for <i>IBM WebSphere Everyplace Access V5 Handbook for Developers and Administrators Volume II: Application Development</i> (March 2005), Registration Number/Date: TX0006170514 / 2005-05-20
1035	Copyright Office Public Catalog: detailed record catalog entry for <i>IBM WebSphere Everyplace Access V5 Handbook for Developers and Administrators Volume III: E-Mail and Database Synchronization</i> (April 2005), Registration Number/Date: TX0006169440 / 2005-06-17

No.	Description
1036	Copyright Office Public Catalog: detailed record catalog entry for <i>IBM WebSphere Everyplace Access V5 Handbook for Developers and Administrators Volume IV: Advanced Topics</i> (March 2005), Registration Number/Date: TX0006170517 / 2005-05-20
1037	U.S. Patent Application Publication No. 2007/0283020 to Chowdary et al.
1038	U.S. Patent Application Publication No. 2007/0033251 to Mandalia et al.
1039	Claims Listing
1040	WSRP standard 1.0 specification
1041	WSRP standard 2.0 specification
1042	U.S. Patent Application Publication No. 2005/0159823

Pursuant to the Board email of January 28, 2025, Petitioner SAP America, Inc. submits this Reply to the POPR (Paper 7).

I. THE POPR’S IMPLIED CLAIM CONSTRUCTIONS ARE WRONG AND THE PRIOR ART RENDERS THE CLAIMS OBVIOUS¹

The POPR tries to distinguish the Petition’s prior art by importing limitations into three claim elements and alleging that certain prior art *examples* do not teach the elements under these overly narrow constructions. The claim elements are not this narrow. Even if they were, the prior art discloses examples that teach them.

A. “a matrix of ... channels through which the user ... interacts with ... secure user-centric information” (EX1001, claims 1, 35, 36)

1. The POPR’s Implied Constructions Are Wrong And The Petition Explains Why The Prior Art Teaches This Element

“Interacts” and “user-centric”: While the patent describes a “channel” as including a static and generic icon, which, when clicked, launches a separate display (e.g., launches the associated application), the POPR assumes a narrower definition excluding this embodiment. According to the POPR, the visual component of a channel cannot “be the same for any user of the system” (Paper 7 at 26) and must allow for some kind of interaction “within the matrix” (*id.*, 20; *see also id.*, 21, 26-27) other than a selection (e.g., click) that opens a “separate display” (*id.*, 25). This

¹ While the boundary of several of the claim terms is unclear, that indefiniteness does not prevent comparing the asserted prior art teachings to the challenged claims.

implied construction is wrong at least because it is inconsistent with the intrinsic evidence and Patent Owner's infringement contentions.

Nothing in the claims requires the system respond to user input (e.g., a click) within the matrix, without opening a separate display. The specification describes just the opposite: "a touchlet ... may serve as an icon to launch the associated channel application ... to full screen mode." EX1001, 12:2-4; *see also id.*, 9:52-61, 11:4-10. For example, the user interacts with home security and currency trading channels by clicking the respective touchlet to launch the associated channel application. *Id.*, 21:37-42, 23:64-24:3. Similarly, the user clicks on an icon or touchlet to launch a separate display appearing on top of the channel grid framework. *Id.*, 25:32-35, FIG. 15, 28:30-33, FIG. 25. The 2008 provisional the POPR cites in support of its implied construction (Paper 7 at 20) confirms that channels include clickable icons that "launch an application." EX2010, 18. Patent Owner's infringement contentions similarly point to clickable "links" that "launch the corresponding apps." (EX1044, 12; *see also id.*, 13).

The patent also does not require that the channels display *user-specific* information within the matrix. Rather, the "visual component [of a channel] may be any text and/or graphic element" (EX1001, 9:30-31; *see also id.*, 12:45-48), including static, generic icons. *E.g., id.*, FIGS. 3, 8 (showing, e.g., generic controller and headphone icons), FIGS. 22-24 (showing, e.g., a generic building icon). The

2008 provisional confirms that channels “can be represented as static icons” (EX2010, 11; *see also id.*, 19-21) and can be generic (*id.*, 19, 27, 56). The infringement contentions similarly point to links that “always look the same.” EX1044, 13.

“*Secure*”: While the patent describes “secure user-centric information” as including public information, such as stock prices and news articles, that is displayed after a user login (e.g., a single sign-on (SSO)), the POPR assumes a narrower definition excluding these embodiments. *See* Paper 7 at 14, 24-25, 30-32. The POPR wrongly argues that the term requires more than “[s]imply logging into a system.” *Id.*, 31. To be “secure,” the POPR alleges, the information must be “sensitive or otherwise confidential” (*id.*, 30) and “sent from a secure server” (*id.*, 25). The specification refutes this implied construction by expressly disclosing that the secure user-centric information includes the same types of information (e.g., stock information and news information) that the POPR alleges are not secure. EX1001, 24:4-28:47 (describing news articles in a Latest News touchlet 316A and public stock information in a Stock Watch touchlet 316B), FIGS. 22-24.

Indeed, the only portion of the specification the POPR cites in support of its construction refutes the POPR’s construction. EX1001, 15:57-16:7 (cited by Paper 7 at 6, 22, 30). It describes a single sign-on process in which a user enters a single set of login credentials to view all their accounts. EX1001, 15:57-16:7. Patent

Owner's infringement contentions point to a similar single sign-on mechanism in the accused product. EX1044, 2 (citing page 64 of SAP Fiori tutorialspoint, <https://pdfcoffee.com/sap-fiori-pdf-free.html> (When launching the SAP Fiori app, the "server uses the authentication and single sign-on (SSO) mechanisms provided by SAP Netweaver.")).)

Thus, the POPR's implied constructions of this claim element are wrong, and the prior art teaches this claim element for at least the reasons explained in the Petition. *E.g.*, Paper 1 at 38-41, 47-58.

2. Prior Art Teaches Element Under POPR's Construction

"User-centric": As explained in the Petition (Paper 1), the WebSphere references' channels (portlets) are user-specific at least because each user's preferences and access rights determine which channels are displayed in the channel grid and which information is displayed within each channel. *E.g.*, Paper 1 at 38-41, 54, 59-62. "Personalization enables the portal to deliver user-specific information targeting a user based on their unique information." EX1004, 2 (quoted by Paper 1 at 38). "Base customization, such as choosing which portlets are desired on a page, is accomplished by the user via administration functionality. Advanced personalization via rules engines, user preferences and profiles is accomplished by the provided personalization services." EX1004, 16 (cited by Paper 1 at 60); *see also* EX1005, 11, 163-177 (cited by Paper 1 at 23, 60).

“Interacts”: The WebSphere references describe interacting with channels (portlets) within the matrix in more ways than just clicking a link or icon to open a separate display. The stock portlet allows the user to interact with dynamic stock information within the matrix by entering a specific stock in a search box and selecting a “Get Quote” button. EX1005, 276 (cited by Paper 1 at 19); EX1006, 43 (cited by Paper 1 at 23). A poll portlet allows a user to interact with dynamic poll information within the matrix by voting for one or more poll options and viewing the results of the poll. EX1005, 276 (cited by Paper 1 at 19), 277 (cited by Paper 1 at 48, 51-53). Each portlet also displays an edit icon that allows the user to configure the portlet (e.g., set the city from which they receive dynamic weather information). EX1004, 50 (cited by Paper 1 at 62); EX1005, 245 (cited by Paper 1 at 48).²

Each channel is further interactive in that it responds to user input to another channel within the matrix. “In ‘live’ portals ... the user is presented with one portlet on a page that presents a choice of data, a list of stocks for example, and choosing

² Reliance on these portlets is permissible because 1) the Petition cites to the pages where these portlets are disclosed, 2) they are part of the same embodiment (portlets on a portal page) relied on in the Petition, 3) they are raised in direct response to the POPR’s new claim construction arguments, and 4) Cyandia can respond. *Cf. Axonics, Inc. v. Medtronic, Inc.*, 75 F.4th 1374, 1379, 1384 (Fed. Cir. 2023).

from the list causes another portlet to be updated with the details of the choice.” EX1004, 152 (cited by Paper 1 at 38, 47, 51-52, 60); *see also id.*, 39 (“One of the most significant advantages of the Portlet architecture is the portlets’ ability to communicate with one another to create dynamic, interactive applications.”) (cited by Paper 1 at 54, 82), 118, 152, 226; EX1005, 21-22.

“*Secure*”: The channels display sensitive or confidential information sent from a secure server. The channels display internal (non-public) company news, such as “Your Co Cafeteria Serving 64oz Diet Coke for 99 cents,” after a user has logged in as indicated by the URL. EX1004, 49 (quoted by Paper 1 at 49). The channels also include a user’s secure email account, notes, calendar, and contacts. Paper 1 at 38, 40 (citing, e.g., EX1005, 141). The channels also allow user interaction with bank accounts (EX1004, 418-419, 632)³ and other non-public information, including human resources (HR), enterprise resource planning (ERP), and customer relationship management (CRM) information. EX1004, 4, 41 (cited by Paper 1 at, e.g., 38); EX1005, xxv, 392-397, 439, 462-463, 469. This information is sent from a secure server (e.g., a producer portal server) that is authenticated using a certificate. EX1004, 899-900 (cited by Paper 1 at 38, 41, 53, 54).

B. “authorized channels” (EX1001, claims 1, 35, 36)

³ *See supra* fn. 2 (explaining why reliance on this disclosure is permissible).

1. The POPR's Implied Construction Is Wrong And The Petition Explains Why The Prior Art Teaches This Element

Although the claims recite only that the channels are “authorized,” the POPR wrongly implies that the channels must be authorized before a user logs in and views the channels. Paper 7 at 32-33. The claims have no such requirement, and the Petition explains why the prior art teaches this claim element. Paper 1 at 47-58.

2. Prior Art Teaches Element Under POPR's Construction

The WebSphere references disclose that the portal engine/server authenticates the user during a single sign-on process using a credential vault and determines which channels (portlets) are authorized based on the user's access rights (which are based on the user's role, set by an administrator). Paper 1 at 38, 41, 54-57 (citing, e.g., EX1004, 34, 630; EX1005, 15-16, 191-193, 195-196, 385-401). A POSITA at least would have found it obvious that the portal engine/server determines which channels are authorized before displaying them in the matrix because the user “can ... view ... only those resources for which [they] have access rights” (EX1005, 191 (cited by Paper 1 at 54)) and the user is able to interact with the channels (e.g., poll portlet) after a single sign-on without further authentication (*Supra* Section I.A.2).

The user's credentials also are specific to each portlet, as are the user's access rights. *E.g.*, EX1004, 630-631; EX1005, 191-193. “In order to provide a single sign-on user experience, portlets ... must be able to store and retrieve user credentials for their particular associated application and use those credentials to log in on behalf

of the user.” EX1004, 630 (cited by Paper 1 at, e.g., 41, 54). “A user’s authorization for a particular ... portlet is handled by the portal engine.” EX1005, 16 (cited by Paper 1 at 38); *see also id.*, 15 (The portal engine controls access to portlets by “checking access rights during page aggregation.”) (cited by Paper 1 at 54).

C. “service support instructions that determine how the secure user-centric information behaves” (EX1001, claims 1, 35, 36)

1. The POPR’s Implied Construction Is Wrong And The Petition Explains Why The Prior Art Teaches This Element

Although the patent never mentions “service support instructions” outside the claims, the POPR alleges that this element requires some sort of “intelligence” that “combin[es], screen[s], or synthesiz[es]” the secure user-centric information and that excludes providing a consistent look and feel across devices, as disclosed by the WebSphere references. Paper 7 at 37; *see also id.*, 36. Nothing in the specification requires this. Further, Patent Owner’s infringement contentions refute this construction by pointing to “instructions allowing the user to have the same or personalized experience (such as same design) across all the devices he is using.” EX1044, 14. The POPR cites several portions of the specification for alleged support, but these portions instead relate to personalization of content based on, e.g., user preferences, many of which the POPR cites in support its argument that the “user-centric information” is personalized. *Compare* Paper 7 at 23-24 (quoting EX1001, 12:24-26, 12:41-44, 11:59-63) *with* Paper 7 at 37 (citing same). Thus, the

POPR's construction is wrong, and the prior art teaches this claim element for at least the reasons explained in the Petition. *E.g.*, Paper 1 at 59-63.

2. Prior Art Teaches Element Under POPR's Construction

Even under the POPR's improper construction, the WebSphere references still teach this claim element. The POPR is wrong that the WebSphere references' page aggregation does not have intelligence that combines, screens, or synthesizes information. This is exactly what page aggregation does. "Page aggregation is the process that collects information about the user's choices, the device being used and the selected portlets, then takes that information and combines it to create a display that is appropriate for the device." EX1004, 27 (cited and partially quoted by Paper 1 at 62). Moreover, as explained in the Petition and above in Section I.A.2, the information delivered to the user is screened based on the user's role / access rights (*e.g.*, Paper 1 at 26, 54-58) and preferences (*supra* Section I.A.2. (citing Paper 1 at 38-41, 54, 60)). Channels also behave dynamically in response to user inputs to other channels. *Supra* Section I.A.2. (citing, *e.g.*, EX1004, 39, 152 (cited by Paper 1)).

II. CONCLUSION

Patent Owner's arguments should be rejected and trial instituted.

Dated: February 11, 2025 Respectfully submitted,

/Roy Chamcharas/
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CERTIFICATE OF SERVICE
IN COMPLIANCE WITH 37 C.F.R. § 42.6(e)(4)

The undersigned certifies that on February 11, 2025, Petitioner emailed copies of **Petitioner's Reply To The Patent Owner Preliminary Response and Exhibits 1044 and 1045** to the following email addresses, which Patent Owner has agreed constitutes service. *See* Paper 5 (Patent Owner's Mandatory Notices).

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