

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.
Petitioners,

v.

MULLEN INDUSTRIES LLC
Patent Owner.

Case No. IPR2025-00021
Patent No. 11,096,039

**PETITION FOR INTER PARTES REVIEW
UNDER 35 U.S.C. §§311-319 AND 37 C.F.R. §42.1 et seq**

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35 U.S.C. § 282(b)	4
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APPENDIX LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 11,096,039 (“the ’039 patent”)
1002	Prosecution History of U.S. Patent No. 11,096,039
1003	Declaration of David H. Williams (“Williams-Decl.”)
1004	Curriculum Vitae of David H. Williams
1005	U.S. Patent No. 7,333,820 (“Sheha”)
1006	U.S. Provisional Patent Application No. 60/305,975 (“Sheha-Prov.”)
1007	U.S. Patent Application Publication No. 2004/0024846 (“Randall”)
1008	International Patent Application Publication No. WO 02/17075 (“Randall-WIPO”)
1009	RESERVED
1010	RESERVED
1011	RESERVED
1012	RESERVED
1013	U.S. Patent No. 6,968,179 (“De-Vries”)
1014	RESERVED
1015	U.S. Patent No. 6,714,791 (“Friedman”)
1016	U.S. Patent Application Publication No. 2002/0145561 (“Sandhu”)
1017	RESERVED
1018	U.S. Patent No. 6,716,101 (“Meadows”)
1019	U.S. Patent No. 7,366,522 (“Thomas”)
1020	RESERVED
1021	RESERVED
1022	International Patent Application Publication No. WO 01/91486 (“Darling”)
1023	U.S. Patent No. 6,084,951 (“Smith”)
1024	U.S. Patent No. 6,714,793 (“Carey”)
1025	U.S. Patent No. 6,415,224 (“Wako”)

Exhibit	Description
1026	RESERVED
1027	Korean Patent Application Publication No. 10-2001-0091381 (“Han”)
1028	U.S. Patent No. 7,080,124 (“Shankar”)
1029	U.S. Patent No. 6,456,854 (“Chern”)
1030	U.S. Patent No. 6,754,665 (“Futagami”)
1031	U.S. Patent No. 6,292,657 (“Laursen”)
1032	U.S. Patent Application Publication No. 2003/0097596 (“Muratov”)
1033	RESERVED
1034	RESERVED
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1036	Civil Docket Report in <i>Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:24-cv-00049 (E.D. Tex.) (last checked October 8, 2024)
1037	Federal Court Management Statistics–Profiles, U.S. District Courts–Combined Civil and Criminal (June 30, 2024) (available at https://www.uscourts.gov/file/78871/download)
1038	Docket Control Order in <i>Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:24-cv-00049 (E.D. Tex.) (June 14, 2024) (Dkt. 30)
1039	Plaintiff’s Disclosure of Asserted Claims and Infringement Contentions in <i>Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.</i> , Case No. 2:24-cv-00049 (E.D. Tex.) (May 15, 2024)
1040	U.S. Patent No. 7,146,407 (“McNulty”)
1041	U.S. Patent Application Publication No. 2003/0074209 (“Tobin”)
1042	U.S. Patent No. 6,813,499 (“McDonnell”)
1043	U.S. Patent No. 6,133,853 (“Obradovich”)
1044	U.S. Patent No. 6,269,369 (“Robertson”)
1045	U.S. Patent Application Publication No. 2002/0169539 (“Menard”)
1046	U.S. Patent No. 7,681,034 (“Lee”)

Exhibit	Description
1047	U.S. Patent No. 6,622,015 (“Himmel”)
1048	U.S. Patent Application Publication No. 2004/0051726 (“Martyn”)
1049	U.S. Patent No. 5,815,412 (“Allard”)
1050	U.S. Patent No. 6,668,173 (“Greene”)

MANDATORY NOTICES

A. Real Party-In-Interest

Google LLC,¹ Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. are the real parties-in-interest.

B. Related Matters

1. United States Patent & Trademark Office

The application from which U.S. Patent No. 11,096,039 (“the ’039 patent”) issued (U.S. Patent Application No. 11/841,750) is a Continuation of U.S. Patent Application No. 10/400,296 (U.S. Patent No. 9,635,540), filed March 25, 2003.

The following applications are also Continuations of U.S. Patent Application No. 10/400,296 (U.S. Patent No. 9,635,540):

- U.S. Patent Application No. 11/387,384 (U.S. Patent No. 8,374,575), filed March 22, 2006;
- U.S. Patent Application No. 11/485,161 (U.S. Patent No. 11,122,418), filed July 12, 2006;
- U.S. Patent Application No. 11/462,201 (U.S. Patent No. 9,204,283), filed August 3, 2006;

¹ Google LLC is a subsidiary of XXVI Holdings Inc., which is a subsidiary of Alphabet Inc. XXVI Holdings Inc. and Alphabet Inc. are not real parties-in-interest to this proceeding.

- U.S. Patent Application No. 11/834,674 (U.S. Patent No. 11,234,117), filed August 6, 2007;
- U.S. Patent Application No. 11/841,734 (U.S. Patent No. 11,109,218), filed August 20, 2007;
- U.S. Patent Application No. 11/841,765 (U.S. Patent No. 11,246,024), filed August 20, 2007;
- U.S. Patent Application No. 17/665,568 (abandoned), filed February 6, 2022.

U.S. Patent No. 11,096,039 also claims priority to U.S. Provisional Application No. 60/367,967, filed March 25, 2002.

2. USPTO Patent Trial and Appeal Board

The '039 patent was at issue in *Apple Inc. v. Mullen Industries LLC*, Case No. IPR2023-00096.

Petitioners have filed the following copending petitions for *inter partes* review of patents listed above:

- IPR2025-00018 challenging U.S. Patent No. 11,122,418;
- IPR2025-00019 challenging U.S. Patent No. 9,204,283.

3. U.S. District Court for the Eastern District of Texas

The '039 patent is currently asserted in *Mullen Industries LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 2:24-cv-00049.

4. U.S. District Court for the Northern District of California

The '039 patent was previously asserted in *Mullen Industries LLC v. Apple Inc.*, Case No. 5:23-cv-00437 (terminated).

5. U.S. District Court for the Western District of Texas

The '039 patent was previously asserted in *Mullen Industries LLC v. Apple Inc.*, Case No. 6:22-cv-00145 (transferred and terminated).

C. Counsel and Service Information - §42.8(b)(3) and (4)

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Powers of attorney are submitted with the Petition. Counsel for Petitioners consent to service of all documents via electronic mail.

Petitioners request *inter partes* review and cancellation of claims 1-19 of the '039 patent (EX1001).

I. INTRODUCTION

The '039 patent is one of eight related patents that Patent Owner (“Mullen”) accuses Petitioners’ products of infringing in pending litigation. Previously, Mullen asserted these patents against Apple Inc., and Apple filed IPRs. Apple’s IPR2023-00096 challenging the '039 patent was instituted and then terminated due to settlement during trial.

This Petition presents two sets of grounds against all claims: one set of grounds based on Sheha, under which the Board previously found a reasonable likelihood of unpatentability (IPR2023-00096, Paper 9 at 46-47); and a new set of grounds based on Randall, which have not previously been before the Board. The '039 patent’s claims are unpatentable under either set of grounds. Declaration of David H. Williams (EX1003, “Williams-Decl.”), [0095].

II. STANDING

Petitioners certify that the '039 patent is available for *inter partes* review and that Petitioners are not barred or estopped from requesting *inter partes* review as to the challenged claims. 37 C.F.R. §42.104(a).

III. GROUNDS FOR UNPATENTABILITY

The challenged claims are unpatentable under 35 U.S.C. §103 as follows:

Ground Number and Reference(s)		Claims
1	Sheha (EX1005), Degnbol (EX1035), McNulty (EX1040)	1-6, 13
2	Sheha, Degnbol, McNulty, Tobin (EX1041)	7-9, 19
3	Sheha, Degnbol, McNulty, McDonnell (EX1042)	10-12
4	Sheha, Degnbol, McNulty, McDonnell, Obradovich (EX1043)	14-18
5	Randall (EX1007), De-Vries (EX1013)	1-8, 10-19
6	Randall, De Vries, Tobin	9

Each reference above is prior art under at least pre-AIA 35 U.S.C. §102(e), even if the claims are entitled to the '039 patent's earliest claimed priority date.

Degnbol and Obradovich are prior art under §102(b).

None of these references were relied on by the Examiner during prosecution of the '039 patent.

IV. THE '039 PATENT

A. Specification Embodiments

The '039 Patent “relates to systems and methods for remotely determining a device’s location.” EX1001, 1:18-20. According to the specification, “any cell phone in network 100 may locate a different cell phone, as long as access to location information is allowed.” EX1001, 4:27-30. “[E]very user may assign

rights (e.g. govern the security) to whom may or may not locate him/her.” EX1001, 4:60-62.

Available location information, “[d]epending on what scope the requesting user has access to...may include, for example, the country, state, city, exact location, or any combination thereof of location information to the user.” EX1001, 7:36-39. A user may select which users may access his or her location information and what information a specific user may access. EX1001, 9:10-26, FIG. 10. A user may also set up alerts depending on the location of other users’ phones. EX1001, 9:27-36, FIGs. 11-12. For example, a user might receive an alert “if the requested user is in a specific city or the same city as the user of display 1100, is within a certain distance, or if a user located the user of display 1100.” EX1001, 9:27-52, FIGs. 11-12.

The ’039 patent also describes a “login feature,” where “user profiles would be used as the locating identifier and the devices into which these profiles are logged into (recognized by) would allow for the user to be located.” EX1001, 9:53-65, 10:12-15.

A cellphone user’s location may be requested by a friend wanting to locate them. EX1001, 11:56-58. “Alternatively, a device may be triggered to request a location of a mobile device when an event occurs.” EX1001, 11:58-60. If the

requestor has access rights, location information is provided to the requestor.

EX1001, 11:64-12:16. Williams-Decl., [0055]-[0062].

B. Person of Ordinary Skill in the Art (“POSA”)

A POSA as of the ’039 patent’s earliest claimed priority date would have had a bachelor’s degree in computer science, computer engineering, electrical engineering, or a similar degree, with one or two years of experience with wireless networks and devices, such as cellphones and personal digital assistants (“PDAs”), as well as wireless positioning technologies, such as GPS or triangulation. More education could compensate for less practical experience, and vice versa.

Williams-Decl., [0050]-[0054].

C. Prosecution History

The ’039 patent’s application was prosecuted over fourteen years, including fourteen office actions. Eventually the Applicant significantly amended the independent claims, adding that location-based events are selectable from at least three types. EX1002, 452-453, 419-420. A notice of allowance followed, which stated no reasons for allowance. EX1002, 466-470. Williams-Decl., [0063]-[0064].

V. CLAIM INTERPRETATION

Claim terms are construed herein using the standard used in civil actions under 35 U.S.C. §282(b), in accordance with the ordinary and customary meaning

as understood by a POSA and the patent’s prosecution history. 37 C.F.R. §42.100(b).

VI. GROUND 1: CLAIMS 1-6, 13 ARE UNPATENTABLE OVER SHEHA+DEGNBOL+MCNULTY

Grounds 1-4 together demonstrate how the challenged claims are unpatentable over Sheha in combinations with Degnbol, McNulty, Tobin, McDonnell, and Obradovich. The Board previously found a reasonable likelihood of unpatentability based on similar combinations of the same references. *See* IPR2023-00096, Paper 9 (granting institution). Mullen’s arguments made in IPR2023-00096 against these references were wrong as discussed in the sections below, and Mullen’s characterizations of Mr. Williams’s deposition testimony were inaccurate as Mr. Williams has explained. Williams-Decl., [0096], [0345]-[0353].

A. Sheha (EX1005)

Sheha claims priority to a provisional application filed July 17, 2001. The provisional’s disclosure (EX1006) is substantively identical to that of Sheha and provides written description for Sheha’s claim 1. Williams-Decl., [0080]-[0085]. Thus, Sheha is prior art under pre-AIA 35 U.S.C. §102(e).

Sheha describes a system and method for providing real-time position information between telephone devices—landline or mobile—via an online database and application server (“ODAS”) as shown in FIG. 3 (below). Sheha,

Abstract, 6:39-47, 7:21-22. The ODAS updates each mobile device with the other's position information as provided to the ODAS. Sheha, 11:20-51, 7:21-22.

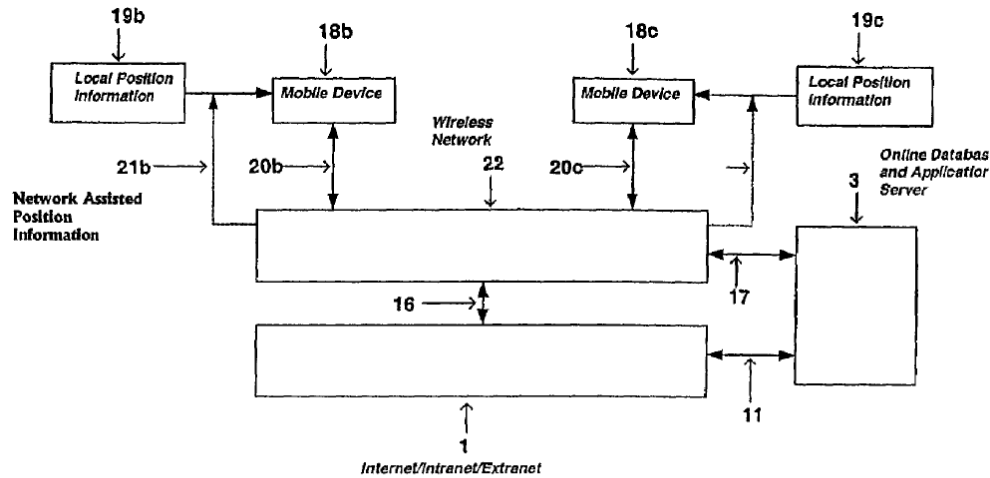


FIG. 3

Every telephone account user has a username and password for the ODAS, by which the ODAS establishes that a user is genuine and verifies the level of authority each user is granted to receive different services (e.g., location services). Sheha, 8:40-50, 11:55-12:7. Users can define specific groups of other users to have access to their location information. Sheha, 11:63-12:7.

Notifications can be displayed, including maps and directions. E.g., Sheha, FIG. 5 (below). A Caller-ID notification window can display map information including the location of each device. Sheha, 9:4-28. Williams-Decl., [0097]-[0102].

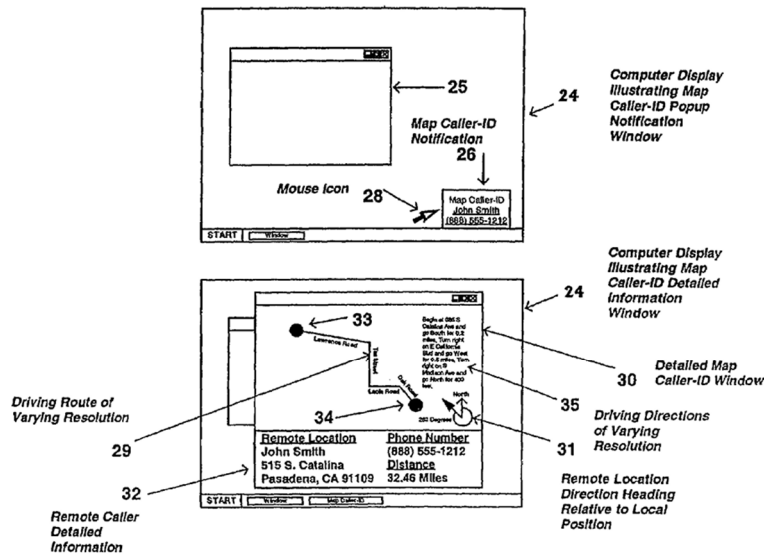


FIG. 5

B. Degnbol (EX1035)

Degnbol describes notifying a user when another pre-selected user enters a pre-determined area or into proximity to a particular location. Degnbol, Abstract, FIG. 1 (below). Users can establish various alert parameters. For example, a user can establish a distance preference specifying that alerts be generated when a buddy enters a predetermined range. Degnbol, 11:5-11. The predetermined range “may be associated with a geographic area, such as a continent, country, district, city, co-ordinate range or a street” or correspond to a distance. Degnbol, 6:6-17. Williams-Decl., [0103]-[0104].

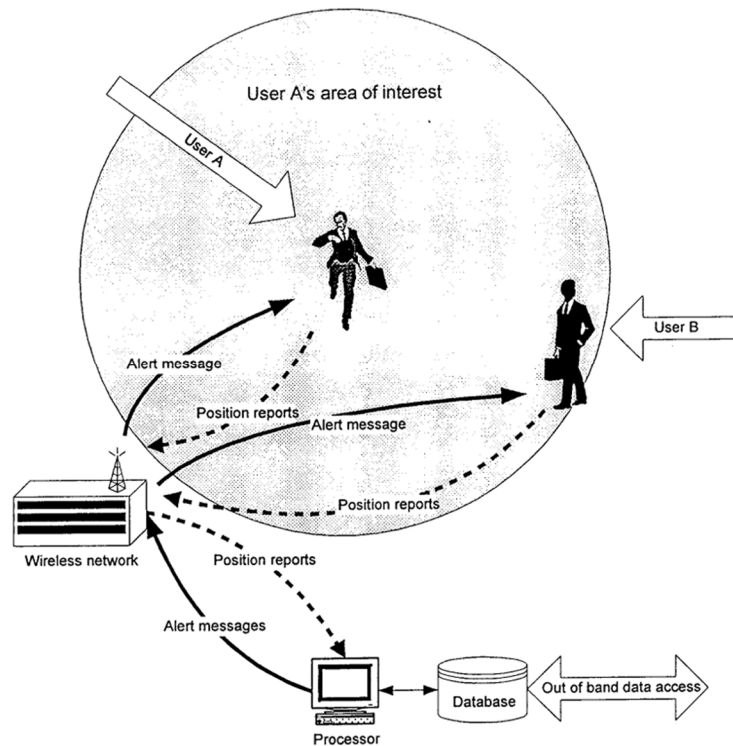
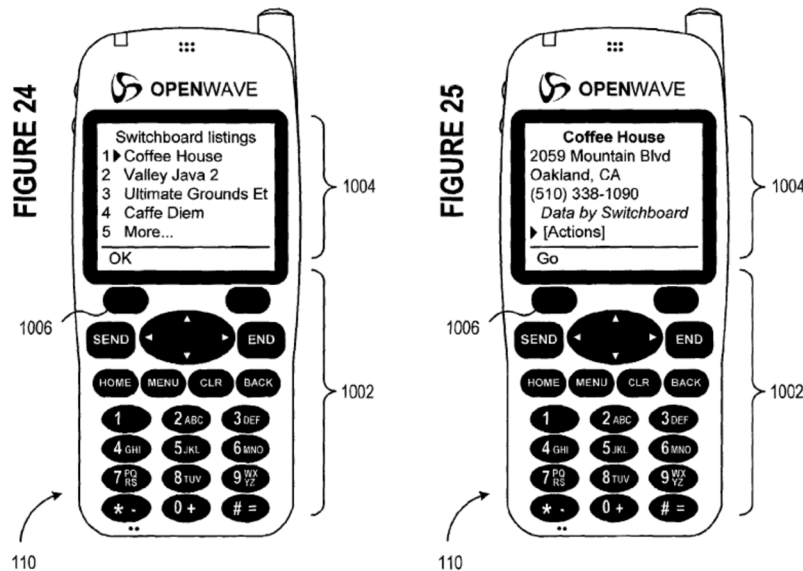


Fig. 1

C. McNulty (EX1040)

McNulty describes a system that organizes information stored on a server for access through a mobile device, such as a wireless telephone. McNulty, 2:19-23. The system displays a list of data objects that can be accessed through the mobile device using user-interface gestures such as pressing a key. McNulty, 2:38-44.

Various display interfaces are disclosed, many of which relate to selecting an item from a list, which causes display of location information. E.g., McNulty, FIGs. 24-25. Williams-Decl., [0105]-[0106].



D. Sheha-Degnbol-McNulty Combination

As discussed *supra* §VI.A, Sheha's system provides location sharing between wireless devices, including configuring location access and providing displayable location information. Williams-Decl., [0107]. To the extent certain features of the challenged claims may not be explicitly disclosed in Sheha, such conventional and well-known features would have been obvious additions to Sheha's system. Williams-Decl., [0107], [0071]-[0079].

Sheha's system provides user location information, as well as related notifications. *See, e.g.*, Sheha, 11:40-51, FIG. 4. A POSA, when considering when to send a location-related notification, would have looked to references such

as Degnbol to identify such triggers. Williams-Decl., [0108]. POSAs would have reasonably expected success applying such alerts because Sheha's system already identifies and shares location information and Degnbol illustrates additional examples of when and how to do so, which would easily be applied using Sheha's hardware with at most minor software modifications. Williams-Decl., [0108].

A POSA would further have been motivated to enhance Sheha's system by displaying configuration options selectable via user interface, as described in McNulty. Williams-Decl., [0109]. Displaying user-selectable listed options was well-known, and POSAs would have expected some way of accepting user input to configure the alert rules, and would have understood selection via user interface to be an obvious choice. Williams-Decl., [0109]. Because such functionalities were well-known, POSAs would have reasonably expected success incorporating them into Sheha's wireless devices. Williams-Decl., [0109].

E. Mapping to Challenged Claims

1. Claim 1: [1PRE] A system comprising:

Sheha discloses “a *system* and method for providing real-time position information.” Sheha, Abstract;² Williams-Decl., [0110]-[0112].

² All emphases herein are added unless indicated otherwise.

a. **[1A] a remote system,**

Sheha's system includes an "online database and application server (ODAS)" which is *remote* from wireless telephones. Sheha, 7:20-23, FIG. 3; Williams-Decl., [0113]-[0114].

b. **[1B] wherein user information is operable to be identified from a plurality of different user information by receiving at least a manually entered login from a first wireless device associated with said user information and a manually entered password associated with said login,**

Sheha describes identifying *user information* via *login* and *password*.

"[E]very telephone account user has a *username and password* for the ODAS," which "correlates both the origin and destination telephone *users' identifications* to verify if the user is signed-on to the ODAS." Sheha, 8:40-50. POSAs would have understood that this information would generally be *manually entered* via the *first wireless device*. Williams-Decl., [0115]. POSAs would have known that manual input on the wireless device was a typical, obvious, and predictable way with reasonable expectation of success for such a username and password to be submitted to the server by the user of the wireless device. Williams-Decl., [0115]-[0119] (citing corroborating EX1024 ("Carey"), FIG. 8, 7:67-8:10; EX1031 ("Laursen"), 8:55-9:5, 9:52-66, 11:37-43); EX1032 ("Muratov"), [0016], [0038], [0104]. Moreover, McNulty explicitly discloses manual entry of user information. *See* McNulty, 11:54-59, FIG. 10B; Williams-Decl., [0120].

In IPR2023-00096 (Paper 7 at 49-50), Mullen argued that Sheha does not identify *user information from a plurality of different user information*. Mullen was incorrect. As the Board recognized for institution purposes (IPR2023-00096, Paper 9 at 41-42), Sheha teaches that “**every telephone account number** has a username and password” (Sheha, 8:40-42), which means there are *a plurality of different user information* besides the *first wireless device* user’s. Williams-Decl., [0121]. The ODAS “**correlates**” the “users’ identifications to verify if the user is signed-on...using authentication and authorization protocols [that] establish that a user is genuine” (Sheha, 8:42-50), which means the ODAS determines which of the many users of Sheha’s system the username and password belong to (i.e., *identifies the first wireless device’s user information from a plurality of different user information* using the *login* and *password*). Williams-Decl., [0121].

In IPR2023-00096 (Paper 7 at 50), Mullen further argued that Sheha at 8:40-50 describes “a landline-to-landline embodiment” and therefore Sheha does not disclose “any embodiment where the ODAS receives a ‘login’ from a ‘first wireless device.’” *See also id.* at 12-19 (arguing that Sheha discloses four “discrete” embodiments: landline-to-landline phone calls, landline-to-mobile phone calls, mobile-to-mobile phone calls, and no phone calls). Mullen was incorrect.

As the Board recognized for institution purposes (IPR2023-00096, Paper 9 at 42), Sheha teaches using “authorization and authentication protocols to identify users that are permitted to access” other users’ position information, and that “using the authorization and authentication protocols a user can request the position of a mobile device, similarly to requesting the position of a landline device.” Sheha, 11:58-12:7. When a *first wireless device*’s location is being accessed by another *device* user, “the ODAS...verifies, by using authorization and authentication protocols, if the user of *both*” devices “are signed-on to the system.” Sheha, 9:50-10:4. Sheha teaches that the ODAS uses the authorization and authentication protocols to verify that both users are signed on to access the ODAS’s various services, including in mobile-to-mobile embodiments. Sheha, 8:25-53 (ODAS uses “authentication and authorization protocols” that verify “username and password”), 11:20-23 (ODAS receives “users’ account information...for both mobile devices” in mobile-to-mobile embodiment as in landline-to-landline embodiment), 11:55-12:7; Williams-Decl., [0122]-[0123].

- c. **[1C] a location of said first wireless device is operable to be recorded on said remote system after said user information has been identified on said first wireless device and said location is associated with said user information and provided by said first wireless device to said remote system,**

In Sheha’s system, before the *first wireless device*’s user signs on to the ODAS, the user “is logged on to [the] wireless...device.” Sheha, 5:26-29. “The

remote user that is logged on to [the] wireless...device” is then “verified by the networked server’s authentication and authorization protocol procedures.” Sheha, 5:26-29. Therefore, “*said user information has been identified on said first wireless device*” before the user signs on to the ODAS and interacts with “*said remote system*,” and the further actions discussed below occur “*after said user information has been identified on said first wireless device*.” Williams-Decl., [0124].

Sheha’s *first wireless device* determines its *location* and provides it to the ODAS in association with *said user information*. Sheha, 10:5-6 (“The location of the mobile device is typically calculated by the mobile device...”), 11:15-20 (same), 10:48-50 (“the mobile device...continually sends updated position information to the ODAS”), 11:23-37 (same), 2:25-29 (“Each remote unit...has access to its current position information” and “responds to a request for position information from a centralized server.”), 4:66-5:2 (“the system would request the position information from the remote mobile device”), 6:57-59 (“mobile telephone...obtain[s]” its own “local device’s position information”), 8:31-52 (“accompanying information, such as user identification information associated with each telephone number is also sent to the ODAS” for the “authentication and authorization protocols”), 9:61-10:4 (“Once the ODAS 3 has been notified of all the appropriate information, the system verifies, by using authorization and

authentication protocols, if the user” is “signed-on to the system” and can “request the location of the mobile device”); Williams-Decl., [0125].

In this manner, “the position information of each device can be updated *in the ODAS.*” Sheha, 11:3-8. Thus, the “*location of said first wireless device is operable to be recorded on said remote system after*” the above-discussed actions are performed, meeting [1C]. Williams-Decl., [0126]. See IPR2023-00096, Paper 9 at 43-44 (Board agreeing, for institution purposes).

Additionally, Degnbol illustrates how a “database” at a “central location[.]” like Sheha’s ODAS can record “status information on active units, including their latest reported position” which is “dynamically updated” like in Sheha, for purposes of sharing the position information with other user[s]. Degnbol, 22:10-18, 14:9-10 (“central locations (databases)”), FIG. 1 (showing “Database” at network server remote from users’ wireless devices), Table 2 (highlighted below); Williams-Decl., [0127].

Unit ID	User Name	Update Time	Position	Alerted Users	Change In- dicator
jsmith@ domain. com	JohnS	1755:0 5	lat:long	JulieS	Yes

5

Table 2. POSITION Data

POSAs would have had motivation and reasonable expectation of success based on Degnbol’s teachings to implement Sheha’s similar central server (ODAS)

to “recei[ve] a position report message from the wireless” device, “check[] to see if the unit is associated with a user of the system” based on the identified *user information*, and “update[]” the “user’s record” in the ODAS’s database to “reflect[] the reported unit position.” Degnbol, 23:13-23; Williams-Decl., [0128]-[0129].

- d. **[1D] a location-based event is operable to be provided based, at least in part, on said location of said first wireless device, wherein said location-based event is operable to be manually pre-selected from a list of at least three types of location-based events on a device,**

Degnbol describes at least three types of location-based events that can be selected on a device. Degnbol describes “automatic notification of a user ‘A’” (i.e., at *a device*) “of the entry of pre-selected user ‘B’” (i.e., of a *first wireless device*) “into a pre-determined area (or proximity to a particular location),” where “[t]he location of users ‘A’ and ‘B’ is determined by reference to the position of their personal wireless communication unit, such as a mobile telephone.”

Degnbol, Abstract, 1:7-13. This notification is “*a location-based event...operable to be provided based, at least in part, on said location of said first wireless device.*” Williams-Decl., [0130].

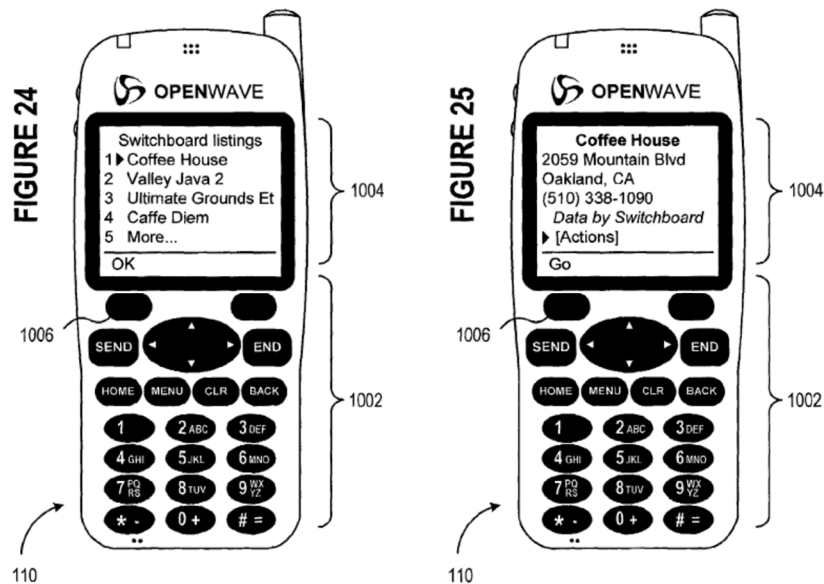
Degnbol teaches that the user of the *device* can “set[] various preferences...directly from the handset of the user[’]s cellular phone” with respect to “a ‘Buddy List’” of “users whose location and/or movements the user wishes to

be notified of.” Degnbol, 9:32-10:3, 11:1-3. “Preferences can be configured on an individual Buddy basis” and “may include an ability to specify to be alerted only when certain criteria relating to distance, location, time or date are met.” Degnbol, 10:17-11:3, 18:5-7. The *device* user can “select[]” a “geographic area, such as a continent, country, district, city, co-ordinate range or a street,” to be notified when the *first wireless device* enters that area. Degnbol, 6:1-8; Williams-Decl., [0131]. For example, the user can “request to be alerted of the[ir] spouse’s arrival at a given area on his/her regular route home.” Degnbol, 13:17-21. Or the *device* user can “indicate[]” a “direct distance,” to be notified when the *first wireless device* comes within that distance of the *device*. Degnbol, 6:10-17, 11:5-8; Williams-Decl., [0131]. Either device can also be alerted that it was located by the other device. Degnbol, 21:5-6.

Thus, Degnbol describes more than three different types of location-based events, including whether the buddy (i.e., *first wireless device*) (1) is in a certain geographic area, (2) is within a certain distance of the device, (3) is in the same continent, (4) is in the same country, (5) is in the same district, (6) is within a co-ordinate range, (7) on a street, and (8) whether the user has been the subject of an alert to another user. Williams-Decl., [0132]. Degnbol also describes configuring preferences for these events “directly from the handset of the user[’s] cellular phone.” Degnbol, 11:1-3; Williams-Decl., [0132]. It would have been obvious to

combine Degnbol's disclosure of both selection of location-based events and manual entry using the handset of the phone with Sheha, to improve user ease, given that such techniques were well-known and conventional to POSAs at the time of alleged invention. Williams-Decl., [0132].

Manually selecting items from a list was well-known at the time of the alleged invention. Williams-Decl., [0133]. For example, McNulty describes various interfaces that a user can interact with to manually select items from a list of at least three selections. In one example, as shown in FIGs. 24-25 (below), a list of several coffee shops is displayed, and a user can select one of the coffee shops. McNulty, 16:44-56; Williams-Decl., [0133].



And McNulty describes the wireless telephone accepting “manually entered” input. McNulty, 11:54-59; Williams-Decl., [0133].

As discussed *supra* §VI.D, POSAs would have had motivation and reasonable expectation of success to enhance Sheha’s system by displaying configuration options in a list from which each option is selectable via user interface, per McNulty, and incorporating various location alert settings as those options, per Degnbol, in order to more effectively provide location data. Williams-Decl., [0134].

In IPR2023-00096 (Paper 7 at 36-40; Paper 13 at 25-36), Mullen argued that Degnbol only discloses distance-based alerts and therefore only one *type of location-based event*. As the Board recognized for institution purposes (IPR2023-00096, Paper 9 at 37-38), Mullen was incorrect. Degnbol explicitly teaches that alerting a user when another user is within a specified distance of the user is just one set of available options, while other options alert the user when the other user is in a specified geographic area, and others alert the user when his location has caused an alert to another user. *See* Degnbol, 12:10-12 (“notification allows the user to...selectively (choose to) communicate with users in his area (***or another designated area***)”), 3:11-15 (“alert user ‘A’s’ communication device when a user ‘B’ enters a pre-defined area (***or*** proximity to a particular location)”), 3:23-27 (alerting user “A” when user “B” enters “the defined location(s) or area(s)...enable[s] user ‘A’ to know in advance the proximity ***or*** approximate whereabouts of user ‘B’”), 6:6-8 (“Each predetermined range may be associated

with a geographic area, such as a continent, country, district, city, co-ordinate range or a street. The geographical area may be selected by the user.”), 12:4-6 (“matching criteria based on unit locations *or* proximity”), 19:1-3 (same), 18:5-8 (“specify to be alerted only when certain criteria relating to distance, *location*, time or date are met”), 21:4-6 (alerting user “that he has been the subject of an alert to another user”); Williams-Decl., [0135].

For example, a user can “request to be alerted of the[ir] spouse’s arrival *at a given area on his/her regular route home*,” which is a particular specified geographic area rather than simply a distance from the user. Degnbol, 13:17-21; Williams-Decl., [0136]. Degnbol provides a further specific example in Table 1 (highlighted below), where “JohnS has two profiles.... The first will alert him of any user with specified interests in a nearby area; the second will alert him of a specific user *reaching a particular map point*” specified as “City: Street.” Degnbol, 22:1-8:

User Name	Unit ID	Altering Times	Geo Area	Users	Interests	Permissions
JohnS	jsmith@domain.com	1000-1400	Proximity < 2km	Any	Sports: Bball: NBA: Bulls	Any
	555-234-5678	1700-2000	City: Street	JulieS	-	JulieS

Table 1. PROFILES Data

Degnbol thus teaches pre-selecting from *at least three types of location-based events on a device*, as claimed. Williams-Decl., [0136]-[0137].

- e. **[1E] a location-based event notification is operable to be provided on said device as a result of, at least in part, location access rights of said device from said first wireless device,**

Sheha describes ways for a *first wireless device* to provide *rights* to another *device* to *access* its *location*. Williams-Decl., [0138]. For example, the Sheha system can determine the target mobile device’s “permission settings” (Sheha, 5:3-20)—by which the device can specify “allowance of position information transfers...only with the device owner’s permission.” Sheha, 5:21-46, 4:59-66, 10:17-26; Williams-Decl., [0138]. The target mobile device’s permissions settings information can include “a group database and authorization and authentication protocols” by which the target device’s user “can define a group of specific users that have *access* to” the target device’s location information. Sheha, 11:55-12:7, 4:59-5:20; *see also* 13:65-14:2, 14:54-61, 19:9-13; Williams-Decl., [0138]-[0139]. The ODAS uses this permissions information to determine whether the target device has authorized the requesting device—i.e., has given the requesting device *access rights*—to obtain its *location* information. Sheha, 3:4-14, 3:22-28, 4:8-18, 5:21-46, 8:42-53, 9:59-10-4; Williams-Decl., [0138]. Because this occurs before any location access in Sheha, the *access rights* govern whether the *device* receives

location-based event notifications for the *first wireless device*'s location in the Sheha-Degnbol combination. Williams-Decl., [0138]-[0139].

In IPR2023-00096 (Paper 13 at 3-9), Mullen argued that “*location access rights of said device from said first wireless device*” “should be construed to mean location access rights given exclusively to the device by the first wireless device.” Mullen’s argument fails because [1E] nowhere recites “exclusively” or anything similar, and the plain meaning of access rights “*of said device*” does not exclude the same access rights applying to other devices. Mullen’s specification arguments (*id.* at 5-9) also fail, because they improperly attempt to import limitations from a specification embodiment into claims that do not recite those limitations. The Federal Circuit has “repeatedly warned against confining the claims to those embodiments” in the specification, even if it “describes only a single embodiment.” *Phillips v. AWH Corp.*, 415 F.3d 1303, 1323 (Fed. Cir. 2005) (*en banc*). Further, the ’039 patent itself explicitly states that “a user may organize his/her user list into **groups** and **assign access rights to that group**,” just as Sheha does. EX1001, 13:9-12, 3:23-25; Williams-Decl., [0140].

Alternatively, even if claim 1 required providing a permission specific to an individual second-device user, Sheha renders this obvious because POSAs would have known that “defin[ing] a group” of authorized users (Sheha, 11:63-65) can include defining a group having only one member, even if other defined groups

have multiple members. Williams-Decl., [0141]. Alternatively, allowing a target device's user to provide permissions specific to individuals in addition to groups would have been an obvious variation because doing so was well-known as a beneficial option with reasonable expectation of success in a system like Sheha's. Williams-Decl., [0142]-[0144] (citing corroborating EX1007 ("Randall"), [0052], [0070], [0136], [0144]-[0146]; EX1015 ("Friedman"), 12:60-13:21).

Mullen separately argued in IPR2023-00096 (Paper 7 at 56) that Sheha's description of "defin[ing] a group of specific users that have access" is about "landline-to-landline position requests" and is "not relevant." Mullen was incorrect. As the Board recognized for institution purposes, Sheha discloses that the mobile embodiment may employ the same "authorization and authentication protocols...similarly to" the landline embodiment. Sheha, 12:4-7; *see* IPR2023-00096, Paper 9 at 42. This is further corroborated by Sheha's claims which recite "determining whether the first user is a member of the authorized user group" as part of "accessing privacy information" for the location of a "mobile telephone." Sheha, 18:45-19:46. Williams-Decl., [0145].

Alternatively, even if Sheha did not explicitly disclose using the group database in the mobile-to-mobile and no-call embodiments, doing so would have been an obvious variation because allowing a mobile user to specify a group of other mobile users to have access to the user's location (or to provide access on an

individual-user basis) without initiating a phone call was well-known as a beneficial option with reasonable expectation of success in a system like Sheha's. Williams-Decl., [0146]-[0149] (citing corroborating EX1016 ("Sandhu"), [0024]; EX1007 ("Randall"), [0052], [0070], [0136], [0144]-[0148]).

Also, Degnbol teaches to condition *location-based event notifications* on *location access rights* in a mobile-to-mobile scenario, and teaches to allow a *first wireless device* to give *location access rights* exclusively to a *device*, as an alternative to providing rights at a group level. Degnbol, 1:11-13 ("users 'A' and 'B'" each have "mobile telephone"), 10:9-11 (user may "group Buddies into different categories"), 11:13-14 ("All preferences can be configured on a *per-buddy basis*, [or] on a per-category basis...."), 10:17-18 ("Preferences can be configured *on an individual Buddy basis*"), 12:4-8 ("matching criteria based on unit locations or proximity,...as well as alerting *permissions*"), 20:23-32 ("User B's profile includes a *permission to notify User A* of his whereabouts."), 21:23-29 ("database...includes *permission* information that determines whether other users may be notified of the user's activity"), 22:1-8 ("JohnS has set permissions that allow his position information to be provided to certain other users selected by him."); Williams-Decl., [0150]. POSAs would have had motivation and reasonable expectation of success, based on Degnbol's teachings, to implement the *location access rights* in the Sheha-Degnbol-McNulty system in this way.

Williams-Decl., [0150]. Degnbol teaches that this beneficially and successfully makes “[u]se of the system build[] on mutual consent.” Degnbol, 11:16-18, 14:4-6.

Degnbol teaches to provide the *location-based event notification* as “text” or “graphics,” such as “a map or diagram with a pointer showing the location of the user,” by “SMS message or a synthesized voice call.” Degnbol, 5:16-20, 12:6-8. Degnbol thus teaches that “*a location-based event notification is operable to be provided on said device.*” Williams-Decl., [0151]. And as discussed above (*supra* §VI.D), it would have been obvious to provide a location-based event notification, as described in Degnbol, based on access rights, as described in both Sheha and Degnbol, and a POSA would have been motivated to do so to provide the location in a user-friendly manner. Williams-Decl., [0151]-[0152].

- f. [1F] wherein a first one of said at least three types of location-based events is, at least in part, region-based, and a second one of said at least three types of location-based events is, at least in part, distance-based.**

Degnbol describes region-based events such as “user ‘A’ configures the system so that he only receives alerts when he is not within a specific geographical area...from user ‘B,’” as well as a user selecting “a geographic area, such as a continent, country, district, city, co-ordinate range or a street” to trigger an alert. Degnbol, 10:31-33, 6:6-8, 8:18-20, 22:1-6 (Table 1: “Geo Area”=“City: Street”);

see also id., 13:19-20 (alert of user’s “arrival at a given area”); Williams-Decl., [0153].

And Degnbol describes distance-based events such as choosing “to configure the system so that he only receives alerts when a Buddy comes within the range of 500 meters.” Degnbol, 11:5-11, 6:10-17, 8:22-29; Williams-Decl., [0154]. As discussed *supra* §VI.D, a POSA would have been motivated to provide location information as described in Sheha via alerts as described in Degnbol to more effectively provide the location data. Williams-Decl., [0154]-[0155].

2. Claim 2

a. [2A]

As discussed *supra* §VI.E.1.d ([1D]), Degnbol’s teachings in Sheha-Degnbol-McNulty provide *a location-based event (e.g., alert) based, at least in part, on a location of said wireless telephonic device*. Degnbol teaches to provide the alert as “a map or diagram with a pointer showing the location of the user.” Degnbol, 5:16-20. Once this map is provided to the *device*, POSAs would have been motivated and reasonably expected success to keep it updated by updating the location as the *wireless telephonic device* moves, based on Sheha’s teachings to receive “continually...updated position information” from the target device for updating its “real-time position[]” on a map. Sheha, 10:44-65; Williams-Decl., [0158]. Sheha teaches that either the mobile device automatically sends the

information, or “the ODAS 3 requests position information from the destination mobile device.” Sheha, 11:23-35. By requesting updated location information to update the alert map once the alert is provided, the ODAS (*remote system*) is *operable to perform a trigger of a request of location information of the wireless telephonic device for the device at the occurrence of the location-based event*, meeting [2A]. Williams-Decl., [0156]-[0159].

b. [2B]-[2C]

See supra §§VI.E.1.d-VI.E.1.e ([1D]-[1E]). Williams-Decl., [0160]-[0163].

c. [2D]

For the reasons discussed *supra* §VI.E.1.e ([1E]), Sheha-Degnbol-McNulty provides *a location-based event notification on said device as a result of, at least in part, said trigger*—e.g., when the *wireless telephonic device* enters a specified geographic area or distance from the *device*. Williams-Decl., [0164].

McNulty discloses multiple display screens, including a first display screen for selecting an item from a list, and *a second display screen* for displaying location information. McNulty, FIGs. 24-25; 16:44-56; *supra* §VI.E.1.c ([1C]); Williams-Decl., [0165]. It would have been obvious to provide *a location-based event notification* based on *access rights*, as described in the combination of Sheha’s and Degnbol’s teachings, via *a second display screen*, as described in McNulty. *See supra* §VI.D; Williams-Decl., [0165]-[0166].

d. [2E]

See supra §VI.E.1.f ([1F]). Williams-Decl., [0167].

3. **Claim 3: The system of claim 1, further comprising a second device, wherein said second device is a second wireless device, said second device includes a global positioning system and a second location is provided by said global positioning system and said second location is stored on said remote system.**

POSAs would have understood that more than two wireless devices can use Sheha's system; this is why, for example, "a mobile device user" must "specif[y] a telephone number" to identify which other mobile device's position is being requested. Sheha, 4:59-5:3; Williams-Decl., [0168]. Sheha teaches that any of the mobile devices can include an "onboard" *global positioning system* (GPS) for providing its location. Sheha, 10:5-16; Williams-Decl., [0168]. Degnbol also teaches tracking locations of "five or more buddies" using wireless devices having GPS for determining their location. Degnbol, 9:25-30, 1:11-13, 1:29-31, 4:27-31, 5:7-11, 10:7-9, 13:32-14:2. Thus, the combination includes a *second wireless device* that includes a *global positioning system* that provides a *second location* of the second wireless device, based on Sheha's and Degnbol's teachings. The location is stored on the ODAS, a *remote system*. Sheha, 11:3-8, 3:50-61, FIG. 3; Williams-Decl., [0168]-[0169]; *see supra* §VI.E.1.c ([1C]).

4. **Claim 4: said first wireless device includes a first global positioning system that is operable to provide said location and a second device is provided that includes a second global positioning system that is operable to provide a second location, wherein said second location is stored on said remote system.**

See supra §VI.E.3 (claim 3). Williams-Decl., [0170].

5. **Claim 5: said access rights are associated with a second user information, and...are operable to be manually selected on a display screen from a list of at least four different user information.**

As discussed *supra* §VI.E.1.e ([1E]), Sheha and Degnbol in combination allow a user to select which other individual users have access rights to the user's location information. Sheha, 11:64-12:1; Degnbol, 9:34-10:3, 10:17-18, 11:13-26; Williams-Decl., [0171]. Degnbol teaches that a user can select "five or more" such buddies. Degnbol, 9:25-30, 13:32-14:2.

McNulty describes and illustrates various examples of user selection of information from a list on a display screen. McNulty, FIGs. 23-25, 11:54-59, 16:44-56, 15:45-54; Williams-Decl., [0172]. For example, McNulty teaches how a wireless device user can select another user to provide that user access to a "data object," by selecting that other user from a list of contacts on the device's display screen. McNulty, 17:5-15. The device's "[u]ser configuration" can include "data fields" identifying "friends 416," who are other users "with whom the subject user is likely to share information." McNulty, 5:59-64, 6:51-58. When the user wants

to share one of his/her “data objects” with someone, “the subject user is *presented with a list of people* identified by friends 416,” and “[t]he user *selects from the list*” to specify the “destination person.” McNulty, 17:7-15. McNulty also describes manual selection of user information. McNulty, 11:54-59; Williams-Decl., [0172].

Given Sheha’s and Degnbol’s disclosure of user configuration of access rights (as discussed *supra* §VI.E.1.e ([1E])), it would have been obvious to implement this via an interface where the user selects another user to receive the access rights from a list of the user’s friends/contacts, as disclosed in McNulty. Williams-Decl., [0173]. In the combination with Degnbol where the user has “five or more” buddies (Degnbol, 9:25-30, 13:32-14:2), the displayed list includes “*at least four different user information*” representing at least four users. Williams-Decl., [0173]-[0174].

6. Claim 6: [Claim 5] and a user name associated of said user information is displayed on and selectable from said display screen.

Claim 6 repeats claim 5’s language, which is met as discussed *supra* §VI.E.5.

As discussed *supra* §VI.E.5 (claim 5) McNulty’s teachings in the Sheha-Degnbol-McNulty combination display *a user name selectable from said display screen*. McNulty, 17:5-15 (“[T]he subject user is presented with a list of people....

The user selects from the list.”); Williams-Decl., [0175]-[0176]. Additionally, including the user’s own user name was an obvious known design choice. Williams-Decl., [0176]-[0177] (citing EX1028 (“Shankar”), FIG. 4, 6:56-7:55); *see infra* §X.D.6.

7. Claim 13: said first wireless device is a first wireless telephonic device and said device is a telephonic device.

Sheha discloses the devices being wireless telephonic devices. Sheha, 4:3-7; Williams-Decl., [0178]-[0179].

VII. GROUND 2: CLAIMS 7-9, 19 ARE UNPATENTABLE OVER SHEHA+DEGNBOL+MCNULTY+TOBIN

A. Tobin (EX1041)

Tobin describes a user device using GPS position to determine relative positions of the device and a service vendor. Tobin, Abstract, [0018]. A display screen can display a map with distance and time information such as an estimated remaining travel time to reach the service vendor. Tobin, [0028]. Tobin also teaches to provide display screens for selecting the target location for which to display the map. Tobin, FIG. 1B, [0023]-[0027]. Williams-Decl., [0180].

B. Sheha-Degnbol-McNulty-Tobin Combination

A POSA would have been motivated to provide a display screen for selecting a target location, and to display a map to the target location with an estimated travel time, as both were typical navigation information in POSAs’ background knowledge and described in Tobin. Williams-Decl., [0181]. Sheha

discloses displaying user locations and maps with directions to travel between the locations. *See, e.g.*, Sheha, FIGs. 4-5. A POSA would have been motivated to include routine and conventional information related to location, such as selection screens, directions, and travel time as described in Tobin. Because such functionalities were typical, POSAs would have reasonably expected success in incorporating such functionality into Sheha's wireless devices. Williams-Decl., [0181].

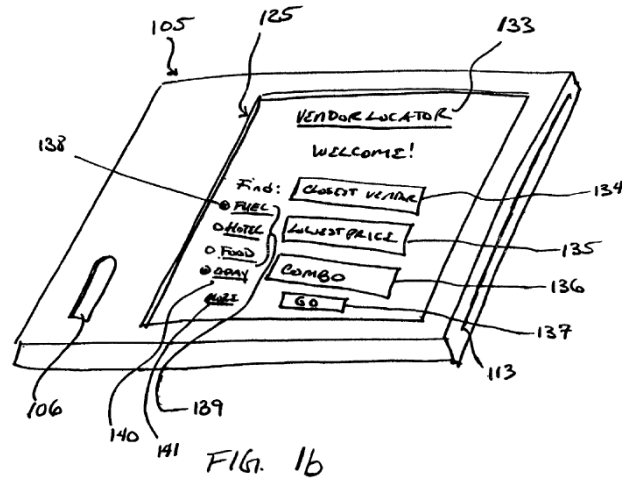
C. Mapping to Challenged Claims

1. Claim 7

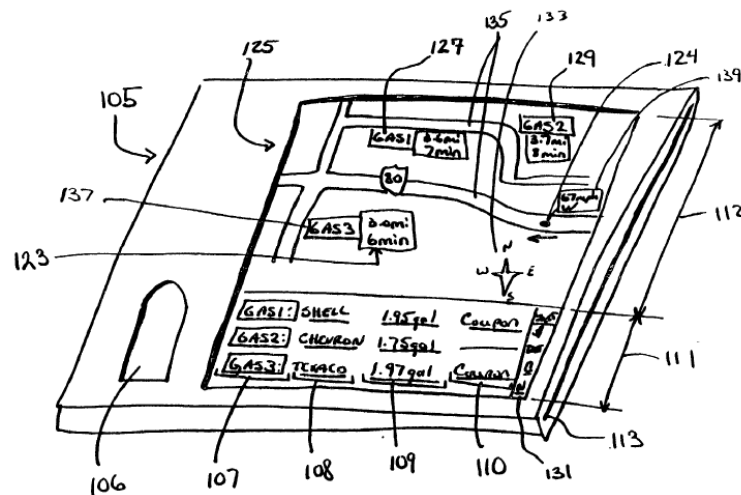
As discussed *supra* §VI.E.3 (claim 3), Sheha and Degnbol disclose obtaining locations of multiple users (via their devices). Williams-Decl., [0182]. Sheha and Degnbol also disclose providing maps displaying the target device's location, after identifying the *user information* of the user requesting the location. Sheha, FIG. 5, 8:42-46; 9:4-28; Degnbol, 5:16-18; Williams-Decl., [0182]. *See supra* §VI.E.1.c ([1C], discussing providing location information after identifying user information).

Tobin discloses providing a display screen including selectable options for providing multiple maps of multiple target locations. Williams-Decl., [0183]. In Tobin's FIG. 1B (below), a display screen includes buttons 134-136 and 138 that a user can interact with to configure different vendors to locate. Tobin, FIG. 1B,

[0023]-[0027]. The user first selects one or more of buttons 134-136 and then selects “Go.” *Id.*:



Based on one configuration, the “Go” button 137 will initiate display of a first map showing a first location (e.g., based on selecting a first button 134), and the map will also include the user’s own device location 124. Tobin, [0023]-[0028], FIG. 1C (showing the map):



Based on another configuration, e.g., selecting a second button 135 associated with second information, the “Go” button 137 will initiate display of a second map showing a second location of a target destination, and so forth. *Id.* Williams-Decl., [0184]-[0185].

As discussed *supra* §VII.B, it would have been obvious to include such selectable options to display maps of multiple locations, including the user’s own location, in Sheha’s system to improve the flexibility and delivery of location information. Williams-Decl., [0186]. For example, it would have been obvious to provide first, second, third, and more user-selectable options to provide respective maps of locations. Williams-Decl., [0186]-[0187].

2. Claim 8

See supra §VII.C.1 (claim 7). Williams-Decl., [0188].

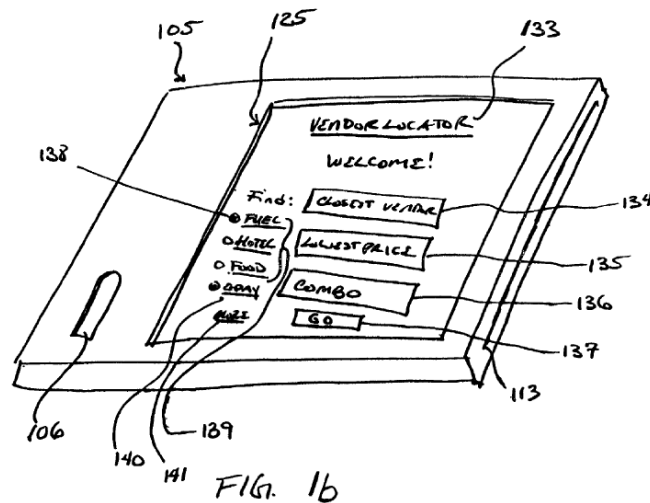
3. Claim 9

As discussed *supra* §VII.C.1 (claim 7), Sheha discloses a wireless device providing locations of other wireless devices after identifying user information. Williams-Decl., [0189]. Tobin discloses providing an “estimated remaining *travel time*” to a target location. Tobin, [0028]; Williams-Decl., [0189]. As discussed *supra* §VII.B, it would have been obvious to *provide a travel time* on the *first wireless device* between that device’s location and a *third location* of a *third user’s*

device in Sheha's system to assist the users in meeting up. Williams-Decl., [0189]-[0190].

4. Claim 19

As discussed *supra* §VII.C.1 (claim 7), Tobin teaches to provide a separate display screen (*third display screen*) with *selectable options* for selecting which location to map, where the user can configure parameters to display different locations on a map on a subsequent screen. Tobin, FIG. 1B:



As shown in FIG. 1C (annotated below), this includes the ability to display a map showing one or more target locations 127, 129, 137 (i.e., *providing a first map associated with said location information, which is based on said access rights in the combination as discussed supra* §VI.E.1.e ([1E])—Sheha, 11:55-12:7; Degnbol, 11:16-26). Tobin, FIG. 1C, [0028]. This also includes the ability to display a map showing the location 124 of the user device 105 (i.e., *providing a*

second map associated with second location information associated with said device). *Id.*; Williams-Decl., [0191]-[0193].

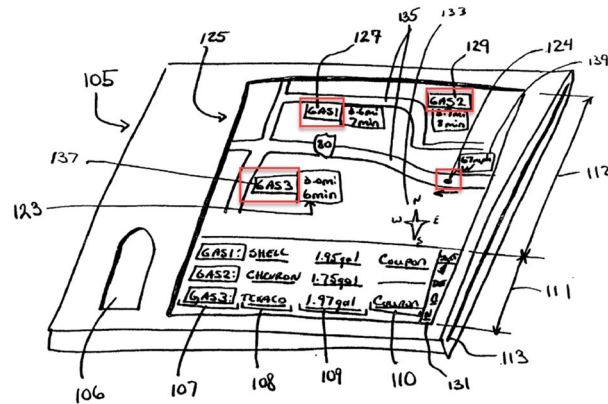


FIG. 1c

VIII. GROUND 3: CLAIMS 10-12 ARE UNPATENTABLE OVER SHEHA+DEGNBOL+MCNULTY+MCDONNELL

A. McDonnell (EX1042)

McDonnell teaches “obscuring the location of a mobile entity to a specified accuracy level.” McDonnell, Abstract. A “user of a mobile entity can limit the accuracy of location data provided.” McDonnell, 8:5-7. For example, “the accuracy of the location data is decreased” if it was originally “higher than the specified accuracy limit.” McDonnell, 9:24-36. Williams-Decl., [0194].

B. Sheha-Degnbol-McNulty-McDonnell Combination

McDonnell explains that, in some cases, “because of privacy concerns, the user of the mobile entity does not want the service system to know his/her location with a high degree of accuracy and accordingly specifies an accuracy limit.”

McDonnell, 8:30-36. A POSA would have been motivated to allow for protecting privacy by filtering the location resolution before providing it to another device, such as by filtering by geographic region and/or exact location, to enhance Sheha’s location sharing, with reasonable expectation of success based on McDonnell’s teachings. Williams-Decl., [0195].

C. Mapping to Claims 10-12

Claims 10-12 recite filtering location by different *types of geographic region, state and city, or exact location*.

Sheha discloses that “each device has privacy settings that allow the device to prevent or *limit* other calling devices from obtaining position information.”

Sheha, 5:38-46. Sheha’s system can provide “*position-specific information*, such as latitude and longitude coordinates” (e.g., *an exact location*), “address information, and/or *map information of varying size and resolution*.” Sheha, 3:50-55. In some cases, the provided location “is one of *a metropolitan area, a state within the United States of America*, and an *international political territory*”—i.e., the location can be provided according to various different *types of geographic region*—where “the caller information is received from a wireless communication device.” Sheha, claims 22-24; Williams-Decl., [0196]-[0197].

Degnbol also teaches that location notifications “work[] at many levels of precision” that can differ from “exact co-ordinates.” Degnbol, 12:14-16, 19:14-16;

Williams-Decl., [0198]. Providing location at different precision levels from coarse (e.g., state) to medium (e.g., city) to fine (e.g., exact location) was well known. Williams-Decl., [0198] (citing corroborating EX1050 (“Greene”), 4:40-5:14).

Further, McDonnell describes a way for a *first wireless device* to limit how other devices obtain its position information, by “obscuring the location...to a specified accuracy level.” McDonnell, Abstract. Based on an accuracy limit established on the *first wireless device*, the location data may or may not be “modified to make it less reliable,” e.g., *filtered*. McDonnell, 9:20-35, 1:18-22; *see also* FIG. 16, 11:38-44; Williams-Decl., [0199]. The location data “with accuracy limited to the level specified by the...parameter set by the mobile entity is then returned to the service system.” McDonnell, 9:36-39.

As discussed *supra* §VIII.B, a POSA would have been motivated to look to McDonnell for techniques with reasonable expectation of success for protecting privacy by filtering the location information to adjust the resolution before providing it to the other device, such as by filtering an exact location to different other levels of precision, including different *types of geographic regions* (e.g., city or state), or providing the *exact location* unfiltered, as described in Degnbol, Sheha, and the POSA’s background knowledge. Williams-Decl., [0200].

The location is provided to the ODAS (and from there to a *third user information* who has access rights and requests it) *after said identifying of said user information on said first wireless device* as discussed *supra* §VI.E.1.c ([1C]). Williams-Decl., [0201].

Thus, Sheha-Degnbol-McNulty-McDonnell satisfies each of claims 10-12. Williams-Decl., [0202]-[0204].

IX. GROUND 4: CLAIMS 14-18 ARE UNPATENTABLE OVER SHEHA+DEGNBOL+MCNULTY+MCDONNELL+OBRADOVICH

A. Obradovich (EX1043)

Obradovich discloses a “system for communicating and retrieving position and position related data.” Obradovich, 1:16-17. To control information sent to remote parties, Obradovich teaches allowing the user to assign a security level index to requesting individuals and to provide specific restrictions on what information about the user is shared with each security level, including information about the user’s location. Obradovich, 26:29-27:10. Williams-Decl., [0203]-[0205].

B. Sheha-Degnbol-McNulty-McDonnell-Obradovich Combination

A POSA, in view of Sheha’s, Degnbol’s, and McDonnell’s teachings of providing location information at various levels of accuracy such as exact location or just geographic region, would have been motivated to allow a user to select which users are allowed to access which levels, as taught by Obradovich.

Williams-Decl., [0206]. POSAs would have reasonably expected success in using routine and conventional programming to integrate this functionality into Sheha’s authentication and authorization process. Williams-Decl., [0206].

C. Mapping to Challenged Claims

1. Claim 14

Obradovich teaches a “security level index” for providing different location-related information, which can be configured by a user. Obradovich, 26:37-46; Williams-Decl., [0207]-[0208]. For example, an individual assigned a security index level of seven could only obtain a user’s general office number, whereas an individual assigned a security index level of six could obtain the user’s direct dial number. Obradovich, 26:45-56.

A POSA would have been motivated to also display a set of options in a menu list for selecting access rules, as POSAs would have known that *selection from a list* is a typical and obvious way for a device user to select among such a set of available options, such as to facilitate access rule configuration in Sheha’s system. Williams-Decl., [0209]-[0213] (citing corroborating EX1044 (“Robertson”), FIG. 9, 8:11-14; EX1045 (“Menard”), FIG. 10, [0067]-[0068]; EX1046 (“Lee”), FIG. 2D, 16:1-25; EX1013 (“De-Vries”), FIG. 11, 8:60-67). Given that Sheha describes user configuration of alert rules, a POSA would have been motivated to consider known design choices for accepting user input to

configure the alert rules. Williams-Decl., [02014]. Because such functionalities were standard, POSAs would have reasonably expected success incorporating such functionality into Sheha's wireless devices. Williams-Decl., [0214]. As discussed *supra* §IX.B, it would have been obvious to modify Sheha's system to limit access to location information using access levels and selectable options, as taught by Obradovich. Williams-Decl., [0214]. In the combination, the selectable access-level options include *access to a type of geographic region or an exact location*, as discussed *supra* §VI.E.1.e ([1E]), §VIII.C (claim 12). Williams-Decl., [0214]-[0215].

2. Claim 15

See supra §VIII.C (claim 10), §IX.C.1 (claim 14). Williams-Decl., [0216].

3. Claim 16

See supra §VIII.C (claim 10), §§IX.C.1-IX.C.2 (claims 14-15). Williams-Decl., [0217].

4. Claim 17

See supra §VIII.C (claim 10) (discussing three *access options* (types of geographic regions)), §§IX.C.1-IX.C.3 (claims 14-16). Williams-Decl., [0218].

5. Claim 18

See supra §VIII.C (claims 10-12) (discussing *four access options*: three types of geographic regions plus exact location), §§IX.C.1-IX.C.4 (claims 14-17). Williams-Decl., [0219].

X. GROUND 5: CLAIMS 1-8, 10-19 ARE UNPATENTABLE OVER RANDALL+DE-VRIES

A. Randall (EX1007)

Randall is an international (PCT) application filed August 22, 2001, and published in the international stage as EX1008 (in English, designating the United States) and in the U.S. national stage as EX1007. Randall is thus prior art under pre-AIA 35 U.S.C. §102(e). Citations herein are to the U.S. publication (EX1007); the identical description is present in the international publication (EX1008). Williams-Decl., [0086]-[0088] (mapping paragraph numbers of EX1007 to page numbers of EX1008).

Randall relates to “enabling a wireless information device to access data services,” using “an extensible framework which handles data passing to and from several applications resident on the device, the framework being shared by each of the applications.” Randall, [0002], [0006]. The wireless devices can be “radio telephones, smart phones,” etc., which “can access information on” “internet servers hosting extensible databases.” Randall, [0002], [0029]. Examples of applications on a wireless device that can all access the same server-based database framework and coordinate to provide services include “a directory application (which contains a user’s contacts list...)” and “a location application (which gives a user’s location and includes digital maps).” Randall, [0009], [0012], [0025],

[0028] (“applications...share information”), [0080]-[0081], [0086], [0085]-[0115]; Williams-Decl., [0220]-[0223].

“As an example,...a user might choose to subscribe to a service which allowed others to track his or her location—location could be a new attribute” stored in the “database” as “information relating to [the] individual.” Randall, [0021]. “The user’s friends or parents etc who wish to track the users location...could add a ‘map’ application to their own devices, which could show their position on digital maps and also, by using the location attribute of the user’s data object, it could also show the position of the user.” Randall, [0021]. In this example, the “personal information...and location based information” is “handled by contacts...and map type applications” coordinating together to provide the service. Randall, [0021]-[0022], [0025]; Williams-Decl., [0224]-[0226].

Randall’s system further provides “[a]ccess control...which allows a user to define which entities have read/write access to any given field in a database of information relevant to that entity.” Randall, [0066]. One such field in a user’s database is their device’s “GPS location.” Randall, [0505], Table 1; Williams-Decl., [0227]-[0228]. When a wireless user Bob requests access to such data belonging to a user Alice, “the server recognis[es] Bob’s device” via “ID number” and “PIN” or other password, “and determin[es] the database access rights which Alice has given him.” Randall, [0067]. “Once authenticated, the server passes to

Bob's device the information it requests." Randall, [0067]. One way the server provides Alice's location information to Bob's device is by "alert[ing] Bob when [Alice] happens to be within a defined proximity (e.g. Bob and Alice are both in the same foreign city and didn't know it)." Randall, p. 24 (Table 4, "Old buddy finder").

B. De-Vries (EX1013)

De-Vries relates to "notifications to inform when certain people (e.g., friends, family, business contacts, etc.) are nearby" based on "devices carried by the people" such as "cell phone[s]." De-Vries, Abstract, 2:21-26. A device's "user can set rules and/or parameters to control when notifications are generated"— "[f]or example, a user may set a proximity parameter designating that notifications are provided only when the other users on his or her buddy list are within a certain proximity." De-Vries, 2:52-59. "This proximity parameter can have the form of a geographic distance threshold" or "same city/town/neighborhood," etc. De-Vries, 9:1-18. "This applies both the degree to which a user discloses their location to others, and the relevance of another's location relative to the user." De-Vries, 9:19-22. "[T]he user can segregate" their contacts "into separate subsets, such as subsets of family, friends, business contacts, co-workers, etc." and "set the rules and/or parameters that control notifications to also be based on the subset of the other user who moved." De-Vries, 3:5-14. Williams-Decl., [0229].

C. Randall-De-Vries Combination

Randall, like De-Vries, provides notifications via wireless devices when certain contacts are nearby, including via an “Old buddy finder” service that, e.g., “alerts Bob when a contact happens to be within a defined proximity (e.g. Bob and Alice are both in the same foreign city and didn’t know it).” Randall, p. 24 (Table 4). To the extent that Randall does not specify that the user receiving these location alerts (e.g., Bob) or the user whose location is the subject of an alert (e.g., Alice) can set the rules/parameters for receiving them and choose among various ways of defining what level of proximity triggers notifications with respect to particular other device users, a POSA would have been motivated to implement Randall’s service that way based on De-Vries’s teachings, to provide the user with control over what alerts they receive and trigger, about whom, and in what circumstances. Williams-Decl., [0230]. POSAs would have reasonably expected success based on De-Vries’s teachings of successfully implementing such functionality in a system similar to Randall’s where wireless device users are accessing each other’s locations. Williams-Decl., [0230].

D. Mapping to Challenged Claims

1. Claim 1: [1PRE]

Randall teaches a “*system*” that allows “wireless applications to access and share information.” Randall, [0028], [0052]-[0053], [0071]. As demonstrated

below, Randall’s system meets or renders obvious all elements of claim 1.

Williams-Decl., [0231]-[0233].

a. [1A]

Randall’s system includes an “internet server[]” (“i-server”)—a “server on the Internet”—which POSAs would have known is a *remote system*. Randall, [0029], [0046], [0503], [0053], [0030] (“**remote**, extensible database”), FIG. 4 (showing the system’s servers located remotely from wireless devices); Williams-Decl., [0234]-[0235].

b. [1B]

Randall’s system includes “**wireless** information **device**[s],” which can be “radio telephones, smart phones,” etc. Randall, [0002]. Randall discusses some examples involving Alice and Bob, who are both users of wireless information devices. Randall, [0053], [0491] (“Bob’s...mobile phone”), [0505] (“Alice’s mobile device”); Williams-Decl., [0236]. Alice’s device is an exemplary *first wireless device* (as is Bob’s, because POSAs would have understood that Randall presents Alice and Bob as arbitrary examples illustrating functionality that is equally available to any wireless information device in Randall’s system). Williams-Decl., [0236]; *see, e.g.*, Randall, [0053] (“Consider Alice...and Bob”—language introducing Alice and Bob as generic examples), [0510] (“Bob’s details” are downloaded to “Alice’s...device” just as “Alice’s contact” is provided to

“Bob’s device[.]”), [0144] (“The user” (generic to Alice or Bob) “must be able to switch location information on for a person or group of people”). Even if Randall had not explicitly taught this, it would have been an obvious implementation option to allow any wireless device users to subscribe to the same functionality (including contacts functionality and location functionality) in Randall’s system. Williams-Decl., [0236]-[0237].

Randall teaches that “an entity seeking information,” such as Bob seeking Alice’s location, must be “[a]uthenticat[ed] (i.e. identif[ied]...)” by “the server recognising Bob’s device and determining the database access rights which Alice has given him.” Randall, [0067]. The user “Bob (as opposed merely to Bob’s device)” may be “authenticated” by inputting “a PIN” or “select[ing] [his] favourite colour/restaurant/recent film etc.[.]”, with the server only authenticating Bob when he answers correctly.” Randall, [0067]. In some examples, this can be “relevant...where Bob borrows someone else’s wireless information device or uses a public device” to access both “his own personal information” and information of his contacts, including Alice. Randall, [0067]; Williams-Decl., [0238].

Because Bob can be authenticated as “Bob the person, rather than Bob’s device,” even when using “someone else’s” device or “a public device,” POSAs would have understood Randall to teach that Bob inputs a *login* (i.e., an identifier “identifying an entity seeking information” as purporting to be “Bob the person”)

on the *first wireless device* he is using, from which the server receives it. Randall, [0067]; Williams-Decl., [0239]. The “PIN” or “select[ed] answer[] from a multiple choice” is a *password* that, if it “correctly” matches what the server has stored as Bob’s “PIN” or “favourite colour/restaurant/recent film” (Randall, [0067]) *associated with said login*, authenticates that the user is truly Bob. Williams-Decl., [0239]; Randall, [0380] (“[t]he authentication can use...a basic WID and password/passphrase”). POSAs would have understood that *manually entering* on the wireless device was a typical and obvious way for such identifier and PIN or answer word to be submitted to the server by a person who is using the wireless device. Williams-Decl., [0239]-[0242] (citing corroborating EX1024 (“Carey”), FIG. 8, 7:67-8:10; EX1031 (“Laursen”), 8:55-9:5, 9:52-66, 11:37-43); EX1032 (“Muratov”), [0016], [0038], [0104]). Randall’s “authentication” can be used for access control “both locally and on the server” (Randall, [0380]), corroborating that it is input locally on the wireless device and then received by the server. Williams-Decl., [0239].

Alternatively, even if Randall had not explicitly taught *receiving at least a manually entered login from a first wireless device* and if Randall’s PIN or selected answer were not considered *a manually entered password associated with said login*, it would have been obvious to modify Randall to receive these inputs on Bob’s device to authenticate Bob. Using these inputs to authenticate a device user

seeking another user's information (including location) was well-known in POSAs' background knowledge as a beneficial and commonly used option that would have been merely simple substitution of one known element for another. Williams-Decl., [0243]-[0249] (citing corroborating EX1024 ("Carey"), FIG. 8; EX1019 ("Thomas"), 1:15-55, 2:58-3:6, 5:49-54, 6:53-7:49, 6:53-7:3, 7:27-40; EX1029 ("Chern"), 6:55-7:20; EX1016 ("Sandhu"), [0023]-[0024]; EX1030 ("Futagami"), 8:56-67, 10:9-17; EX1022 ("Darling"), 2:1-12, 8:32-34); *KSR v. Teleflex*, 550 U.S. 398, 416-18 (2007).

Randall teaches that the same "need for authentication of the user" applies "when they access their data" (Randall, [0380]), such as when Alice is using her *first wireless device* to access "Alice's i-Data" on the i-server (Randall, [0503]-[0505]). POSAs would have understood that Randall's i-server receives a *manually entered login and password* to authenticate Alice and update her i-Data via her *first wireless device* in the same way it receives the same type of authentication information from Bob's device to authenticate Bob. Williams-Decl., [0250].

Randall's system can have many users (e.g., Alice, Bob, John, Charles, Peter). Randall, [0511]-[0512] (Table 2). As such, the i-server's "database contains **information** from or relating to many different entities," including "individual[s]." Randall, [0046]. By using Bob's login and password to identify

that the user is “Bob (as opposed merely to Bob’s device)” and allow Bob to access “his own personal information” in the database (Randall, [0067]-[0068]), Randall’s system *identifies* Bob’s user information from a plurality of different user information. Williams-Decl., [0251]. And by using Alice’s login and password to identify that the *first wireless device* user is Alice with access to her personal information (Randall, [0503]-[0505]), Randall’s system *identifies* Alice’s user information from a plurality of different user information. Williams-Decl., [0251]-[0252].

c. [1C]

Randall’s “authentication” can be used for access control “both *locally* and on the server.” Randall, [0380]. Thus, Alice’s user information is *identified* locally on her *first wireless device* before she uses her device to access and update her i-Data on the i-server, and the further actions discussed below including updating Alice’s location on the i-server occur “*after said user information has been identified on said first wireless device.*” Williams-Decl., [0253].

“[R]esident on the wireless information device” is a “location application (which gives a user’s location and includes digital maps).” Randall, [0009], [0021]. “That location data can be obtained via a GPS wireless information device, which transmits location information to the i-server.” Randall, p. 24 (Table 4, “People tracking”). By Alice’s wireless device presenting Alice’s GPS location

to the i-server in association with Alice, *said location is associated with said user information and provided by said first wireless device to said remote system.*

Williams-Decl., [0254].

For example, “Alice stores her data on a server on the Internet.” Randall, [0053]. As shown in Table 1 (annotated below), one of the fields in Alice’s “i-Data” (“Identity”) database on the i-server is her device’s “GPS location.” Randall, [0503]-[0512], [0116]-[0136] (“Identity” used for sharing “Location information”); Williams-Decl., [0255].

TABLE 1

<u>Alice's iData</u>			
Field/Attribute	Category	Details	i-Groups
First name	personal	Alice	all
Family name	personal	Edwards	all
Title	work	European Marketing Manager	all

TABLE 1-continued

<u>Alice's iData</u>			
Field/Attribute	Category	Details	i-Groups
Company Name	work	Wireless Information Device gets R Us	all
Company Address	work	1 Science Park Rd, London, N1	all
Company E-mail	work	alice.edwards@Wireless Information Device getsrus.com	business 1
Company switchboard	work	0207 200 2000	all
Company Direct	work	0207 200 2012	business 1
Mobile Phone	work	0840 1234 567	business 1, friends
Home Phone 1	work	0208 341 1234	friends, family
Home Address	work	25 The Gables, Hampstead, London, NW3	family
My photo	photos		friends
Childhood photo	photos		family
Home note	notice	Sorry about dinner ☹	partner
Work note	notice	In a meeting with Tim till 7pm	work 1
My mood now	mood	Very tired	all
Tel Call Subject		"Dinner Tonight"	
Bluetooth	location	Bluetooth pods 1000–1020 ... Sentinel room 2 ...	
GPS	location	London W1, Seymour St.	partner
Hobby	preferences	Photography, travel	friends
Book	preferences	Maverick	friends
AlbumOfTheWeek	InstaPoll		friends

Thus, a location of said first wireless device is operable to be recorded on said remote system. Williams-Decl., [0256].

d. [1D]

Randall's system provides an "Old buddy finder" service wherein Bob's "[w]ireless information device alerts Bob when a contact happens to be within a defined proximity (e.g. Bob and Alice are both in the same foreign city and didn't know it)." Randall, p. 24 (Table 4). The alert is a *location-based event* provided based in part on Alice's *first wireless device's* location (and in part on Bob's location). Williams-Decl., [0257].

De-Vries concerns the same type of proximity-based *location-based events* as Randall. De-Vries, Abstract ("notifications to inform when certain people...are nearby" as "tracked by positioning equipment based on personal communications/computing devices carried by the people"), 2:18-35 ("mobile personal information devices such as cell phone"), 4:39-44, 4:60-65, 5:20-62 (wireless device GPS locations are "stored in the people/place database" on the server to "provide alerts" to other users' devices); Williams-Decl., [0258]. In that context, De-Vries teaches to provide *at least three types* of such *location-based events*. One type is distance-based: a "parameter sets a proximity threshold within which people...are to be considered proximate to the user...for purposes of...providing notifications. This proximity parameter can have the form of a geographic distance threshold, e.g., a radius in miles or kilometers, within which the people...must be located to be considered in proximity to the user." De-Vries,

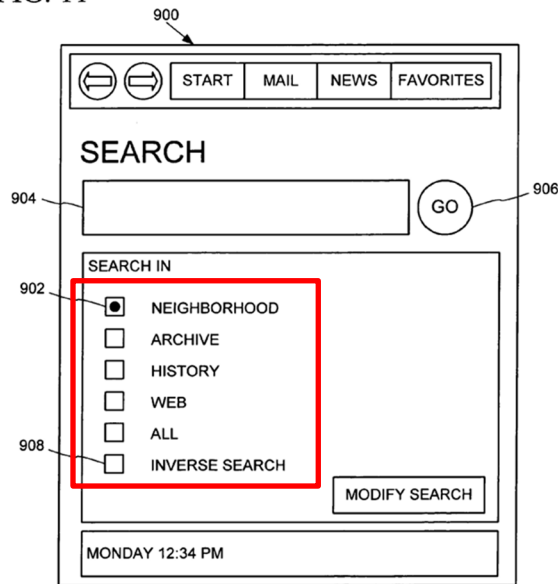
9:1-8. Another type is region-based: “proximity parameters, such as same city/town/neighborhood.” De-Vries, 9:8-13. Other types include “same building, same room,” etc. De-Vries, 9:13-14. Still further types are based on one or both users’ “place context,” which is “place-specific information” beyond simply the “location”—e.g., whether the place the user is currently located is their “home or place of work” or a “public place[,]” or whether in “a movie theatre” vs. “a shopping mall or library.” De-Vries, 6:4-7:12, 7:44-54, 8:41-67, 9:63-10:11. Further types of *location-based events* are additionally based on “times of the day or week.” De-Vries, 9:63-10:19. De-Vries thus teaches *at least three types of location-based events*. Williams-Decl., [0258].

Thus, in the Randall-De-Vries combination discussed *supra* §X.C, *at least three types of location-based events are operable to be provided*—e.g., Bob can be alerted when Alice’s *first wireless device* is “within a defined proximity” (Randall, p. 24) defined in “the form of a geographic distance threshold” (De-Vries, 9:5-8), or when Alice’s device in the “same foreign city” (Randall, p. 24) or “town/neighborhood” (De-Vries, 9:12-13), when Alice’s device is in the “same building, same room,” etc. (De-Vries, 9:13), when Alice/Bob is at home or work or in a social place, and at specified times of the day or week (De-Vries, 6:4-7:12, 7:44-54, 8:41-67, 9:63-10:19). Williams-Decl., [0259].

In the Randall-De-Vries combination, based on obvious implementations of De-Vries's teachings, Bob can *manually pre-select from a list* on his *device* what type of *location-based event* to receive about Alice's *first wireless device's* location. Williams-Decl., [0260]. De-Vries teaches that "parameters can be designated explicitly by the user," who can set them so that "different people have different proximity thresholds." De-Vries, 8:41-46, 9:19-20. For example, "a user may only be interested in notification of the location of a person they see frequently if that person is within a block or so" (i.e., a distance-based event), "whereas they may wish to be notified if a close friend who lives in another country happens to be in the same city as the one they currently find themselves in" (i.e., a region-based event). De-Vries, 9:26-31; Williams-Decl., [0260].

De-Vries teaches that parameter settings can be part of "a graphical user interface...for accessing the information service from a client device." De-Vries, 8:60-67; Williams-Decl., [0261]. And in FIG. 11 (annotated below), De-Vries illustrates a typical graphical user interface (GUI) for the device user to select among a set of available options, by *manually pre-selecting* one of the options from a *list*. Williams-Decl., [0261].

FIG. 11



Although the specific example in FIG. 11 is illustrating a GUI for submitting a search query (De-Vries, 16:34-44), POSAs would have known that this form of GUI was typical and common for user selection among available options. POSAs would, therefore, have had motivation and reasonable expectation of success in implementing Bob's pre-selection of a type of *location-based event* to receive about Alice's location in this way, by *manually pre-selecting from a list* of the available *at least three types of location-based events* on Bob's device. Williams-Decl., [0262]-[0263].

e. [1E]

Randall's system provides a *location-based event notification* on Bob's device when that "device alerts Bob when a contact happens to be within a defined proximity (e.g. Bob and Alice are both in the same foreign city and didn't know

it).” Randall, p. 24 (Table 4, “Old buddy finder”); *see supra* §X.D.1.d ([1D]); Williams-Decl., [0264].

Randall further teaches that Bob’s device can only access Alice’s location (as is necessary for alerting Bob that Alice is located nearby) if Alice has provided Bob’s “device” sufficient “*location access rights*” from Alice’s “*first wireless device*.” Williams-Decl., [0264]. Randall’s “server recognis[es] Bob’s device and determin[es] the database *access rights* which Alice has given him.” Randall, [0067]. “The database can define which entities can read different fields: Alice can therefore give Bob rights to read only certain fields in her database.” Randall, [0047]. As discussed *supra* §X.D.1.c ([1C]) and shown in Table 1 (excerpted and highlighted below), one of the fields in Alice’s database is information about her device’s “GPS *location*,” and she has designated that field as only being accessible to users whom she has designated as part of the “i-Group” called “partner.” Randall, [0503]-[0512]; Williams-Decl., [0265].

TABLE 1			
Alice's iData			
Field/Attribute	Category	Details	i-Groups
First name	personal	Alice	all
Family name	personal	Edwards	all
Title	work	European Marketing Manager	all
[...]			
GPS	location	London W1, Seymour St.	partner
Hobby	preferences	Photography, travel	friends
Book	preferences	Maverick	friends
AlbumOfTheWeek	InstaPoll		friends

“[S]ensitive information is only available to people in certain iGroups; allowing Alice to control what data they see.” Randall, [0509], [0136] (“Location information” is “[v]isible to specific people (or groups)”). Randall teaches that “whenever Alice wishes to, she can change the level of *access* of a current contact—perhaps promoting Bob from ‘business’ to ‘friend.’” Randall, [0509]. This is a “method[] of making contacts into members of a particular i-Group,” which Alice can use via her *first wireless device* to provide *location access rights* of Bob’s *device* to access information about her device’s location. Randall, [0509], [0495]; Williams-Decl., [0266]. “*Access rights* can be associated with individual entities, and can also be associated with groups of entities.” Randall, [0070], [0052], [0146] (“users will be prepared to allow specific people access to more of their data than others”). Thus, in one example, if Alice assigns Bob to the “partner” i-Group having access to Alice’s GPS location and Alice has only one partner, then Alice is assigning *location access rights* exclusively to Bob (and his device). Williams-Decl., [0266]; Randall, Table 1.

Thus, Randall’s “Old buddy finder” alert provides *a location-based event notification* on Bob’s device *as a result of location access rights of said device from Alice’s first wireless device*. Williams-Decl., [0267].

Additionally, as discussed *supra* §X.D.1.d ([1D]), De-Vries similarly teaches to provide such *location-based event notifications on said device*. De-

Vries, Abstract (“service provides...*notifications* to inform when certain people ... are nearby...via the user’s personal communications/computing *device*”), 8:27-39 (“the information service...transmits a *notification* message...to the user’s personal mobile data communications *device*”); Williams-Decl., [0268]. And De-Vries teaches to provide such *location-based event notifications* as a result of *location access rights of said device from said first wireless device*. De-Vries, 9:32-45 (a user like Alice can “set the visibility parameters to be either visible or not visible to a particular user” like Bob “or group of users,” such that “by setting the visibility parameter for different groups of people, the person could elect to have the information service inform some groups of his or her contacts about his or her proximity, while not informing others”); Williams-Decl., [0268].

Thus, POSAs would have had motivation and reasonable expectation of success to implement the Randall-De-Vries combination to provide *a location-based event notification on said device as a result of location access rights of said device from said first wireless device*, in view of both Randall’s and De-Vries’s teachings of successfully doing so. Williams-Decl., [0269]-[0270].

f. [1F]

As discussed *supra* §X.D.1.d ([1D]), in the Randall-De-Vries combination, *a first one of the types of location-based events is region-based* (“same foreign city” (Randall, p. 24) or “town/neighborhood” (De-Vries, 9:12-13)), and *a second one of*

the *types of location-based events* is *distance-based* (“within a defined proximity” (Randall, p. 24) defined in “the form of a geographic distance threshold, e.g., a radius in miles or kilometers” (De-Vries, 9:5-8)). Williams-Decl., [0271]-[0272].

2. Claim 2

a. [2A]

See supra §X.D.1.a ([1A]) (“*remote system*”), §X.D.1.c ([1C]).

Once Bob’s “device alerts Bob” that Alice is “in the same foreign city” (Randall, p. 24, “Old buddy finder”), it would have been obvious to request updates of Alice’s location as she moves and “[t]he I-server is up-dated with [her] location” (Randall, p. 24, “People tracking”). Williams-Decl., [0273]-[0276]. Thus, the i-server (*remote system*) is *operable to perform a trigger of a request of location information of the wireless telephonic device for the device at the occurrence of the location-based event*, meeting [2A]. Williams-Decl., [0276].

b. [2B]-[2C]

See supra §§X.D.1.d-X.D.1.e ([1D]-[1E]). Williams-Decl., [0277]-[0278].

c. [2D]

See supra §X.D.1.e ([1E]). It would have been obvious to provide the alert on a separate *display screen* from the specification of alerts of interest, which occurs before alerts are provided. Williams-Decl., [0279]-[0280].

d. [2E]

See supra §X.D.1.f ([1F]). Williams-Decl., [0281].

3. Claim 3

Randall's *remote system* (i-server) serves multiple users having wireless devices. Williams-Decl., [0282]. For example, Table 2 (below) show's Alice's "contacts database" that includes contacts named John, Charles, Peter, etc. Randall, [0511].

TABLE 2		
<u>ALICES UNIVERSE</u>		
NAME	DETAILS	i-GROUP
Aardvark plumbers	Number, email, address etc . . .	contractors
Bently, John	Number, email, address etc . . .	friend
Coppermill Corp	Number, email, address etc . . .	contractors
Davies, Charles	Number, email, address etc . . .	work 1
Entwistle, Peter	Number, email, address etc . . .	partner, friend
Greenfield Ventures	Number, email, address etc . . .	business 1

Randall teaches that any "of the people in the list above" can view data "using an application on their...wireless information devices." Randall, [0512]-[0513]. Thus, Randall's system includes (more than) *a second wireless device*. Williams-Decl., [0283].

Randall teaches that any wireless device can use the "People tracking" service discussed *supra* §X.D.1.c ([1C]) by which "[t]he I-server is up-dated with the location of a person" as "obtained via a GPS wireless information device, which transmits location information to the i-server." Randall, p. 24 (Table 4); *see also supra* §X.D.1.b ([1B]) (explaining any wireless device can use any of Randall's functionality). Thus, *said second device includes a global positioning*

system that provides a second location that is stored on said remote system.

Williams-Decl., [0284]-[0285].

4. Claim 4

See supra §X.D.1.c ([1C]) (*first wireless device* limitations), §X.D.3 (claim 3) (*second device* limitations). Williams-Decl., [0286].

5. Claim 5

As discussed *supra* §X.D.1.b ([1B]), Bob’s *second user information* is associated with the “information from or relating to” Bob in the “database” on Randall’s i-server. Randall, [0046]; Williams-Decl., [0287]. “The database can define which entities can read different fields: Alice can therefore give Bob *rights* to read only certain fields in her database.” Randall, [0047]. As discussed *supra* §X.D.1.e ([1E]), these include the claimed *access rights*. Williams-Decl., [0287]. Thus, *said access rights are associated with Bob’s second user information*. Williams-Decl., [0287].

Each of Randall’s wireless devices can have “a directory application” that “contains a user’s contacts list.” Randall, [0009]. A user’s “contacts database”—called their “Universe”—“is the list of all the entities known to an entity and to whom access to more private data is to be given.” Randall, [0511]. “Table 2” is “an example” of “Alice’s Universe.” Randall, [0511]. Williams-Decl., [0288].

TABLE 2

<u>ALICES UNIVERSE</u>		
NAME	DETAILS	i-GROUP
Aardvark plumbers	Number, email, address etc . . .	contractors
Bently, John	Number, email, address etc . . .	friend
Coppermill Corp	Number, email, address etc . . .	contractors
Davies, Charles	Number, email, address etc . . .	work 1
Entwistle, Peter	Number, email, address etc . . .	partner, friend
Greenfield Ventures	Number, email, address etc . . .	business 1

As Table 2 shows, Alice’s Universe can include *a list of at least four different user information* (e.g., user information for John, Charles, Peter, Greenfield, etc.). Williams-Decl., [0289]. The Universe contacts database is both “stored on the i-server” and “cached on” the user’s “wireless information device[.]” Randall, p. 23 Table 4 (“Auto-entering address book”), [0062]-[0063], [0069]. Like other server-stored data, the copy of Alice’s contacts list on her wireless device is for “*display* in an appropriate application,” and thus is *on a display screen*. Randall, [0013], [0021], [0179], [0222], [0400]; Williams-Decl., [0289].

Randall teaches that “whenever Alice wishes to, she can change the level of access of a current contact—perhaps promoting Bob from ‘business’ to ‘friend.’” Randall, [0509]. As discussed *supra* §X.D.1.e ([1E]), this is a “method[.] of making contacts into members of a particular i-Group,” which Alice can use to select Bob’s *access rights* to her location. Randall, [0509], [0495]; Williams-

Decl., [0290]. Alice is “able to switch location information on for a person” (e.g., Bob), “i.e. being able to *select the person* and allow *access*.” Randall, [0144], [0012] (“user could click on” data displayed on wireless device “to perform...actions”), [0146]-[0151] (user can take “action” on a “specific contact” in “their buddy list”); Williams-Decl., [0290].

Randall thus teaches, or at minimum renders obvious, allowing Alice to *manually select* Bob’s level of *access rights* on the *display screen* from the *list* of Alice’s contacts (e.g., by selecting Bob from the list and allowing him access). Williams-Decl., [0291]; Randall, [0144]. Manually selecting another user from a displayed contacts list was well-known in POSAs’ background knowledge as a suitable option with reasonable expectation of success for performing an action in relation to that user. Williams-Decl., [0291]-[0297] (citing corroborating EX1023 (“Smith”), FIGs. 14-16; EX1027 (“Han”), [0033]; EX1018 (“Meadows”), FIG. 4a, 5:30-47; EX1022 (“Darling”), 41:1-15).

6. Claim 6

Claim 6 repeats language from claim 5 that is met as discussed *supra* §X.D.5.

Randall’s wireless device also displays its own user’s “i-Data” for the user to interact with. Randall, [0505], [0176]. Thus, Randall renders obvious making Alice’s *user name associated of said user information displayed on and selectable*

from said display screen to access her data. Williams-Decl., [0298]-[0299].

Additionally, implementing Randall's contacts list to display an entry for the wireless device's own user in addition to that user's contacts would have been an obvious known design choice to provide the user a convenient way of accessing the user's own shared data by selecting the user's own entry from the display in the same contacts list where the user can select other contacts to access their shared data. Williams-Decl., [0299]-[0304] (citing EX1028 ("Shankar"), FIG. 4, 6:56-7:55, corroborating POSAs' background knowledge in this regard).

7. Claim 7

Randall's system provides a "Your map and then some" application/function, where "[a]t the touch of a button, your phone can display a map of the area you are standing in." Randall, p. 29. On Alice's *first wireless device*, this "touch of a button" is *a first selectable option (on a display screen provided on said first wireless device) for providing a first map associated with said location*. Williams-Decl., [0305].

Separately, Randall's system provides another application/function where "a user might choose to subscribe to a service which allowed other users to track his or her location. ... Once the user has subscribed to the location service, then the friends/parents could add a 'map' application to their own devices, which could show their position on digital maps and...could also show the position of the user."

Randall, [0021]. On Alice's *first wireless device* this application/function provides *a second map associated with a third location of a third user information* of another user (perhaps Peter or John in Alice's contacts in Randall's Table 2) who is allowing Alice to track his location. Williams-Decl., [0306].

Both applications/functions are "*provided on said first wireless device after said identifying of said user information on said first wireless device*" because, as discussed *supra* §X.D.1.c ([1C]), Randall teaches that Alice logs in and is authenticated "locally" before using her device and before accessing others' locations. Randall, [0380], [0067]; Williams-Decl., [0307].

It would have been obvious to POSAs to provide a *second selectable option* for accessing the location tracking application/function on the same *display screen* with the *first selectable option* for accessing the "Your map and then some" application/function, because providing a menu of selectable options for applications/functions available on the wireless device (e.g., a home screen or main menu screen) was well-known and commonplace in POSAs' background knowledge as typical for wireless devices. Williams-Decl., [0308]-[0312] (citing corroborating EX1047 ("Himmel"), FIG. 6A, 6:57-7:7; EX1048 ("Martyn"), FIG. 1, [0016]; EX1049 ("Allard"), FIG. 4).

8. Claim 8

See supra §X.D.7 (claim 7). Additionally, claim 8 does not require the two “*selectable option[s]*” of claim 7, and it would have been obvious to POSAs to implement Randall’s location-tracking application (Randall, [0021]) to split Alice’s location and the other user’s location into two maps when the locations are too far apart to fit well on the same map. Williams-Decl., [0313]-[0316] (citing EX1043 (“Obradovich”), FIG. 11, 12:6-14, corroborating POSAs’ background knowledge).

9. Claim 10

As discussed *supra* §X.D.1.c ([1C]), Randall teaches that Alice’s *first wireless device* provides its location to the i-server (and from there to other users such as *a third user information*) *after said identifying of said user information on said first wireless device*. Williams-Decl., [0317].

Randall teaches that Alice “allow[s] others to track...her location...using the location attribute of [Alice’s] data object.” Randall, [0021]. The location attribute can be “at different levels of granularity—for example, location might be defined in very approximate terms...no better than a given city,” or as “enriched location information” that is exact “to within a few meters.” Randall, [0024]. “[S]ince the objects can be sent between users,...*access control*” is “invoked to ensure that access to enriched data is only provided to those entitled.” Randall, [0023].

Randall thus teaches that Alice's *first wireless device* can provide its location to a *third user* as *filtered by a first type of geographic region* (e.g., city) or a *second type of geographic region* (e.g., the nearest few meters). Williams-Decl., [0318].

Additionally, De-Vries teaches to allow the *first wireless device* user to control the granularity at which the “user discloses their location to others,” such that the “user may provide very accurate information to trusted individuals (e.g. location to 10 meter resolution to family members) and less accurate data to others (e.g. simply the city where one is located to a co-worker).” De-Vries, 9:19-26; Williams-Decl., [0319].

Thus, POSAs would have had motivation and reasonable expectation of success to implement the Randall-De-Vries combination such that Alice's *first wireless device* provides its location to a *third user* as *filtered by a first type of geographic region* (e.g., city) or a *second type of geographic region* (e.g., the nearest few meters), in view of both Randall's and De-Vries's teachings of successfully doing so. Williams-Decl., [0320]-[0321].

10. Claim 11

See supra §X.D.9 (claim 10). De-Vries teaches to allow a user to “disclose[] their location to others” using “different proximity thresholds” for accuracy of the location, and that “proximity parameters” span a wide variety, “such as same city/town/neighborhood, same venue, same building, same room, and the like.”

De-Vries, 9:8-26; Williams-Decl., [0322]. Thus, one *geographic region is a city*, and it would have been obvious to POSAs to provide another *geographic region* as a *state*, given De-Vries’s suggestion of “the like” and given that state is a next-level geographic region in the neighborhood-town-city sequence. Williams-Decl., [0322]-[0325] (citing corroborating EX1005 (“Sheha”), claim 24; EX1050 (“Greene”), 4:40-5:14).

11. Claim 12

See supra §X.D.9 (claim 10), where a city is *a first type of geographic region* and accuracy to within a few meters is *an exact location*. De-Vries, 9:19-26 (“10 meter resolution” is “very accurate”); Williams-Decl., [0326].

12. Claim 13

Randall’s “*wireless* information *device[s]*”—including Alice’s and Bob’s—can be “radio *telephones*” or “smart *phones*.” Randall, [0002], [0491] (“Bob’s...mobile *phone*”), [0495] (“Alice’s *phone*”); Williams-Decl., [0327]-[0328].

13. Claim 14

Randall and De-Vries teach that *said access rights* can be *selected from selectable options including access to a type of geographic region or an exact location*. *See supra* §X.D.11 (claim 12). Randall teaches that “whenever Alice wishes to, she can change the level of access of a current contact.” Randall, [0509]. As discussed *supra* §X.D.1.d ([1D]), De-Vries teaches, and POSAs would

have known, that *selection from a list* is a typical and obvious way for the device user to select among such a set of available options. Williams-Decl., [0329]-[0333] (citing corroborating EX1044 (“Robertson”), FIG. 9, 8:11-14; EX1045 (“Menard”), FIG. 10, [0067]-[0068]; EX1046 (“Lee”), FIG. 2D, 16:1-25).

14. Claim 15

See supra §X.D.9 (claim 10) (two *types of geographic regions*), §X.D.13 (claim 14) (*list of selectable options*). Williams-Decl., [0334].

15. Claim 16

See supra §X.D.9 (claim 10), §X.D.13 (claim 14). Williams-Decl., [0335].

16. Claim 17

See supra §X.D.9 (claim 10), §X.D.10 (claim 11), §X.D.13 (claim 14), where city/town/neighborhood, venue, building, room, and nearest few meters are more than *three access options*. De-Vries, 9:8-26; Randall, [0023]-[0024], p. 24 (“New buddy finder” providing other user’s location in a “club”); Williams-Decl., [0336].

17. Claim 18

See supra §X.D.16 (claim 17) (*listing at least four access options*). Williams-Decl., [0337].

18. Claim 19

Claim 19’s recitations are met for the same reasons as claim 7’s (*supra* §X.D.7), because as discussed *supra* §X.D.1.b ([1B]), all services in Randall’s

system that are available to Alice’s device are equally available to Bob’s *device*, and Bob’s ability to map Alice’s *location information* is *based on said access rights* (*supra* §X.D.1.e ([1E])). Williams-Decl., [0338]. For the reasons discussed *supra* §X.D.7 (claim 7), it would have been obvious to provide on Bob’s *device* a menu screen (*third display screen*) of *selectable options* for providing a *first map* showing Alice’s location or a *second map* showing Bob’s location. Williams-Decl., [0338].

XI. GROUND 6: CLAIM 9 IS UNPATENTABLE OVER RANDALL+DE-VRIES+TOBIN

A. Randall-De-Vries-Tobin Combination

Randall provides a “Route finder” service, “similar to GPS tracking in cars, but for mobile phones. You identify where you want to go, the phone knows where you are already. It can therefore give you step by step instructions on how to get there.” Randall, p. 29. Randall also provides a “Rendezvous” service “on your mobile phone to help you meet friends and family in crowded or unfamiliar places. Temporarily you can elect to have your location visible to others—so using your phones everyone in your group can tell precisely where the others are.” Randall, p. 29. POSAs would have understood and found it obvious from these disclosures that another user’s position can be “where you want to go” in Randall’s “Route finder,” which can “give you step by step instructions on how to get there” (Randall, p. 29). Williams-Decl., [0339].

As discussed *supra* §§VII.A-VII.B, Tobin teaches beneficial features for “navigation systems,” including “display[ing] the estimated remaining travel time” to a target destination. Tobin, [0005], [0028]; Williams-Decl., [0340]. POSAs would have had motivation and expectation of success to incorporate Tobin’s disclosed feature to provide useful information in Randall’s navigation functionality. Williams-Decl., [0340].

B. Mapping to Claim 9

As discussed *supra* §XI.A, it would have been apparent to POSAs from Randall’s disclosures that another user’s location (e.g., a *third user*’s location), which is displayed on a map, may be one of the disclosed places “where you want to go” that Randall’s “Route finder” can provide directions to on Alice’s *first wireless device*. Randall, [0021], p. 29; Williams-Decl., [0341]. In the Randall-De-Vries-Tobin combination, a *travel time* between Alice’s *location* and the *third user*’s location is provided based on Tobin’s teachings. Tobin, [0028]; Williams-Decl., [0341]. Because travel time was known to be an important piece of navigational information that a user of Randall’s “Route finder” would have expected to see when reviewing directions to a destination, a POSA would have found it obvious to incorporate Tobin’s travel time teachings into Randall’s “Route finder.” Williams-Decl., [0341]-[0342] (citing corroborating EX1025 (“Wako”), 9:18-22, FIG. 7).

This service is provided “*after said identifying of said user information on said first wireless device*” because, as discussed *supra* §X.D.1.c ([1C]), Randall teaches that each wireless device user logs in and is authenticated “locally” before using her device and before accessing others’ locations. Randall, [0380], [0067]; Williams-Decl., [0343]-[0344].

XII. NO BASIS EXISTS FOR DISCRETIONARY DENIAL

A. Section 314(a)

1. *Fintiv*

This Petition presents “compelling evidence of unpatentability,” which should end the *Fintiv* analysis. Director’s Interim Procedure for Discretionary Denials, 5 (June 21, 2022) (“Interim Procedure”) (discussing *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 (Mar. 20, 2020) (precedential)).

If considered, the *Fintiv* factors weigh against denial.

a. Stay Potential

Currently this factor is neutral. *Sand Revolution II, LLC, v. Cont’l Intermodal Group–Trucking LLC*, IPR2019-01393, Paper 24 at 7 (June 16, 2020) (informative).

b. Trial Timing

A motion is pending to transfer the district-court proceeding to the Northern District of California (EX1036 at 8), where the median time-to-trial is 48.9 months (EX1037 at 66). Even the current District Court’s scheduled trial date of

November 3, 2025, is only about five months before likely FWD, favoring institution. *See Zynga Inc. v. IGT*, IPR2022-00368, Paper 7 at 8-15 (Jul. 8, 2022).

c. Litigation Investment

The district-court parties have invested little in invalidity-related issues, the scheduled *Markman* hearing is over seven months away (EX1038 at 3), and “a significant portion of work remains to be done” including “fact and expert discovery and dispositive motions.” *Protect Animals With Satellites LLC v. OnPoint Sys., LLC*, IPR2021-01483, Paper 11 at 14-15 (Mar. 4, 2022).

Moreover, Petitioners’ diligence weighs strongly against denial. Mullen’s district-court complaint asserted nine patents, collectively including 378 claims. Mullen’s infringement contentions assert 272 of those claims. EX1039. Nevertheless, Petitioners filed this Petition less than five months after receiving Mullen’s infringement contentions and about four months before any statutory bar. *See Samsung Elects Co., Ltd. v. Mojo Mobility Inc.*, IPR2023-01089, Paper 11 at 19 (Jan. 11, 2024).

d. Issue Overlap

This Petition challenges all nineteen claims of the ’039 patent, only six of which are asserted. EX1039 at 2. This weighs against denial. *Markforged Inc. v. Continuous Composites*, IPR2022-00679, Paper 7 at 32-33 (Oct. 25, 2022).

e. Litigation Defendants

This factor is neutral. *Id.* at 33.

f. Other Circumstances

The Petition’s “strong showing on the merits” weighs against denial. Interim Procedure, 3-5.

2. General Plastic

Discretionary denial under *General Plastic Indus. Co., Ltd. v. Canon Kabushiki Kaisha*, IPR2016-01357, Paper 19 (Sept. 6, 2017) (precedential as to §II.B.4.i) “is not justified” where, as here, first and second petitioners “do not have a significant relationship.” *Videndum Production Sols., Inc. v. Rotolight Ltd.*, IPR2023-01218, Paper 12 at 7 (Apr. 19, 2024) (“*Videndum*”) (director review). “Petitioner’s reliance on [an] earlier-filed” IPR, “even as a menu and roadmap, is not sufficient to create a significant relationship that favors denial.” *Id.* at 5 (internal quotation marks and citations omitted).

This “Petition is the first filed by Petitioner[s] against the” ’039 patent. *Id.* Petitioners have “different allegedly infringing products and in different district court proceedings” than Apple (petitioner in prior IPR2023-00096), have not coordinated with Apple regarding the ’039 patent, and thus have no “significant relationship” with Apple. *Ford Motor Co. v. Neo Wireless LLC*, IPR2023-00763, Paper 28 at 7 & 10 (Mar. 22, 2024) (director review).

Moreover, this Petition presents new Randall-based Grounds 5-6 developed subsequent to Apple’s IPR.

Discretionary denial “is not justified.” *Videndum* at 7.

B. Section 325(d)

None of the references combined in this Petition’s grounds were of record during prosecution of the ’039 patent. Meadows and Chern were of record, but are used herein only as corroborating background references, different from any application in prosecution.

Apple’s IPR2023-00096 “was terminated after institution but before a final written decision was issued,” so §325(d) is “not implicated,” and the references in that IPR are not considered “presented to the Office pursuant to § 325(d).” *BMW of North America, LLC v. Michigan Motor Techs., LLC*, IPR2023-01032, Paper 14 at 16 (Jan. 29, 2024).

Furthermore, Grounds 5-6 based on Randall, which was not of record in prosecution or IPR2023-00096, warrant institution regardless of the status of Sheha-based Grounds 1-4. *Current Lighting Sols., LLC v. Jiaxing Super Lighting Electric Appliance Co., Ltd.*, IPR2023-00270, Paper 18 at 51 (Aug. 16, 2023).

XIII. CONCLUSION

The Board should institute review and cancel claims 1-19.

Dated: 2024-10-08

Respectfully submitted,

/Elisabeth Hunt/

Elisabeth Hunt, Reg. #67,336

CERTIFICATE OF WORD COUNT

Pursuant to 37 C.F.R. §42.24, the undersigned certifies that the foregoing Petition for *Inter Partes* Review contains 13,995 words excluding a table of contents, a table of authorities, Mandatory Notices under §42.8, a certificate of service or word count, or appendix of exhibits or claim listing. Petitioner has relied on the word count feature of the word processing system used to create this paper in making this certification.

Date: October 8, 2024

/Dara Del Rosario/
Dara Del Rosario
Paralegal
WOLF, GREENFIELD & SACKS, P.C.

CERTIFICATE OF SERVICE UNDER 37 C.F.R. §42.6 (E)(4)

I certify that on October 8, 2024, I will cause a copy of the foregoing document, including any exhibits or appendices filed therewith, to be served via Overnight FedEx at the following correspondence address of record for the patent:

Mintz Levin/New York Office
One Financial Center
Boston, MA 02111

Date: October 8, 2024

/Dara Del Rosario/
Dara Del Rosario
Paralegal
WOLF, GREENFIELD & SACKS, P.C.

XIV. CLAIM LISTING

The following claim listing assigns labels (e.g., [1A], [1B], etc.) to certain claim elements for ease of reference.

Claim 1
[1PRE] A system comprising:
[1A] a remote system,
[1B] wherein user information is operable to be identified from a plurality of different user information by receiving at least a manually entered login from a first wireless device associated with said user information and a manually entered password associated with said login,
[1C] a location of said first wireless device is operable to be recorded on said remote system after said user information has been identified on said first wireless device and said location is associated with said user information and provided by said first wireless device to said remote system, ³
[1D] a location-based event is operable to be provided based, at least in part, on said location of said first wireless device, wherein said location-based event ⁴ is operable to be manually pre-selected from a list of at least three types of location-based events on a device,
[1E] a location-based event notification is operable to be provided on said device as a result of, at least in part, location access rights of said device from said first wireless device,
[1F] wherein a first one of said at least three types of location-based events is, at least in part, region-based, and a second one of said at least three types of location-based events is, at least in part, distance-based.

³ [1C] originally recited “said remove server,” and was changed by Certificate of Correction to recite “said remote system.” EX1002 at 492.

⁴ [1D] originally recited “located-based event,” and was changed by Certificate of Correction to recite “location-based event.” EX1002 at 492.

Claim 2

[2PRE] A system comprising:

[2A] a remote system operable to perform a trigger of a request of location information of a wireless telephonic device for a device at an occurrence of a location-based event based, at least in part, on a location of said wireless telephonic device,

[2B] wherein said located-based event is operable to be manually pre-selected from a plurality of located-based events on a first screen of said device from a list of at least three types of location-based events,

[2C] access rights are operable to be obtained for said device that are associated with accessing said location information of said first wireless device as a result of said trigger of said trigger

[2D] a location-based event notification is operable to be provided on said device on a second display screen as a result of, at least in part, said trigger and said access rights,

[2E] and a first one of said at least three types of location-based events is, at least in part, region-based, and a second one of said at least three types of location-based events is, at least in part, distance-based.

Claim 3

The system of claim 1, further comprising a second device, wherein said second device is a second wireless device, said second device includes a global positioning system and a second location is provided by said global positioning system and said second location is stored on said remote system.

Claim 4

The system of claim 1, wherein said first wireless device includes a first global positioning system that is operable to provide said location and a second device is provided that includes a second global positioning system that is operable to provide a second location, wherein said second location is stored on said remote system.

Claim 5

The system of claim 1, wherein said access rights are associated with a second user information, and said access rights for said second user information are operable to be manually selected on a display screen from a list of at least four different user information.

Claim 6

The system of claim 1, wherein said access rights are associated with a second user information, and said access rights for said second user information are operable to be manually selected on a display screen from a list of at least four different user information and a user name associated of said user information is displayed on and selectable from said display screen.

Claim 7

The system of claim 1, wherein a display screen is provided on said first wireless device after said identifying of said user information on said first wireless device that includes a first selectable option for providing a first map associated with said location and a second selectable option for providing a second map associated with a third location of a third user information.

Claim 8

The system of claim 1, wherein said first wireless device is operable after said identifying of said user information on said first wireless device to provide a first map associated with said location and a second map associated with a third location of a third user information.

Claim 9

The system of claim 1, wherein said first wireless device is operable after said identifying of said user information on said first wireless device to provide a travel time between said location associated with said first user information and a third location associated with a third user information.

Claim 10

The system of claim 1, wherein said first wireless device is operable after said identifying of said user information on said first wireless device to provide said location to a third user information filtered by a first type of geographic region or a second type of geographic region.

Claim 11

The system of claim 1, wherein said first wireless device is operable after said identifying of said user information on said first wireless device to provide said location to a third user information filtered to by a first type of geographic region or a second type of geographic region, said first geographic region is a state and said second geographic region is a city.

Claim 12

The system of claim 1, wherein said first wireless device is operable after said identifying of said user information on said first wireless device to provide said location to a third user information filtered by a first type of geographic region or an exact location.

Claim 13

The system of claim 1, wherein said first wireless device is a first wireless telephonic device and said device is a telephonic device.

Claim 14

The system of claim 2, wherein said access rights are operable to be selected from a list of selectable options including access to a type of geographic region or an exact location.

Claim 15

The system of claim 2, wherein said access rights are operable to be selected from a list of selectable options including access to a first type of geographic region or a second type of geographic region.

Claim 16

The system of claim 2, wherein said access rights are operable to be selected from a list of selectable options including at least two access options.

Claim 17

The system of claim 2, wherein said access rights are operable to be selected from a list of selectable options including at least three access options.

Claim 18

The system of claim 2, wherein said access rights are operable to be selected from include a list of selectable options including at least four access options.

Claim 19

The system of claim 2, wherein a third display screen is operable to be provided on said device with a selectable option for providing a first map associated with said location information based on said access rights or a second map associated with second location information associated with said device.