

Google LLC v. EscapeX IP LLC

IPR2025-00337

U.S. Pat. No. 10,474,687

Petitioner Google's Oral Hearing Demonstratives

February 25, 2026

GOOGLE EXHIBIT 1017

Grounds

Ground 1: Claims 1-3, 5-6, 13-15, and 17-18 are obvious over Fuloria in view of Andler;

Ground 2: Claims 11 and 23 are obvious over Fuloria in view of Andler, further in view of WO '100;

Ground 3: Claims 12 and 24 are obvious over Fuloria in view of Andler, further in view of Bartholomew;

Ground 4: Claims 4 and 16 are obvious over Fuloria and Andler, further in view of Kirk; and

Ground 5: Claims 7-10 and 19-22 are obvious in view of Fuloria and Andler, further in view of Cheung.

(Pet., 7)

“Engagement”

A user engagement with content refers to an indication that a user should be distinguished with respect to the content over another user. Such engagement may indicate an interest in the content or may simply indicate that the user wishes to be distinguished with respect to the content from other users (e.g., other users who may have not engaged with the content or have engaged less with the content than the user). As will be described below, each engagement may be

(Ex. 1001, 5:53-55)

(Pet., 11)

'687 Patent

(57)

ABSTRACT

A system and method is disclosed for aggregating networked content, and allowing user to obtain an unlimited number of engagements relating to networked content. The system may publish a ranking of users based on the number of engagements obtained by the users. Such ranking may facilitate highlighting or otherwise setting apart those users who have obtained more engagements relating to content, thereby allowing a user or user's content to be noticed by others, even among a vast number of networked content that is available.

(Ex. 1001, Abstract)

(Pet., 8, 21)

Independent claim 1

1[a]

[1b]

[1c]

[1d]

[1e]

[1f]

[1g]

[1h]

[1i]

[1j]

[1k]

[1l]

1. A system for aggregating content and facilitating uncapped engagement of the content, the system comprising:

a computer system comprising one or more physical processors programmed by computer program instructions to:

obtain a networked content item authored by a user;
generate a user interface that displays a first number of

engagements with the networked content item obtained by a first user, a second number of engagements with the networked content item obtained by a second user, and a display option configured to receive a request to obtain a number of engagements with respect to the networked content item, wherein a single engagement requires an amount of resources and the first number of engagements was obtained in exchange for a first amount of resource from the first user, and the second number of engagement was obtained in exchange for a second amount of resources from the second user;

provide, via a network, the user interface;
receive, via the user interface, an indication to obtain a third number of engagements relating to the networked content item from a third user different from the user that authored the networked content item, the first user, and the second user;

determine a third amount of resources required to obtain the third number of engagements by multiplying the amount of resources required for a single engagement with the third number;

debit the third amount of resources from a user account balance associated with the third user;

store, in a database accessible to the computer system, an association between the third number of engagements and the third user; and

provide, in the user interface, an indication of the third number of engagements.

(Ex. 1001, claim 1)

(Pet., 11)

Independent claims 11 and 12

11. A system for aggregating content and facilitating uncapped engagement of the content, the system comprising:

a computer system comprising one or more physical processors programmed by computer program instructions to:

obtain a networked content item authored by a user;
generate a user interface comprising the networked content item and a display option configured to receive a request to obtain engagements with respect to the networked content item;

provide, via a network, the user interface;

receive, via the user interface, an indication to obtain a first plurality of engagements relating to the networked content item from a first user different from the user that authored the networked content item, wherein the indication to obtain the first plurality of engagements comprises **an indication to obtain the first plurality of engagements together with at least a third user**, different from the user, the first user, and the second user
determine an amount of resources required to obtain the first plurality of engagements;

debit the amount of resources from a user account balance associated with the first user and/or from another user account balance associated with the third user, wherein the user account balance stores an amount of resources available to the first user;

store, in a database accessible to the computer system, an association between the first plurality of engagements and the first user;

obtain, from the database, information indicating a second plurality of engagements with respect to the networked content item from at least a second user different from both the user and the first user; and

provide, via the user interface, an indication of the first plurality of engagements from the first user and the second plurality of engagements from the second user.

12. A system for aggregating content and facilitating uncapped engagement of the content, the system comprising:

a computer system comprising one or more physical processors programmed by computer program instructions to:

obtain a networked content item authored by a user;
generate a user interface comprising the networked content item and a display option configured to receive a request to obtain engagements with respect to the networked content item;

provide, via a network, the user interface;

receive, via the user interface, an indication to obtain a first plurality of engagements relating to the networked content item from a first user different from the user that authored the networked content item;

determine an amount of resources required to obtain the first plurality of engagements;

debit the amount of resources from a user account balance associated with the first user, wherein the user account balance stores an amount of resources available to the first user;

store, in a database accessible to the computer system, an association between the first plurality of engagements and the first user;

obtain, from the database, information indicating a second plurality of engagements with respect to the networked content item from at least a second user different from both the user and the first user; and

provide, via the user interface, an indication of the first plurality of engagements from the first user and the second plurality of engagements from the second user;
obtain a request from at least a third user to **donate an amount of resources** from a second user account balance associated with the third user to the user account balance; and
increment the user account balance based on the request from the third user to **donate the amount of resources** from the second user account balance.

(Ex. 1001, claims 11, 12)

(Pet., 47, 55)

EscapeX's Sur-Reply

resources from the second user,” “receiving an indication from a user of the mobile device that at least one stored value item should be applied against the transaction,”

(Sur-Reply, 2)

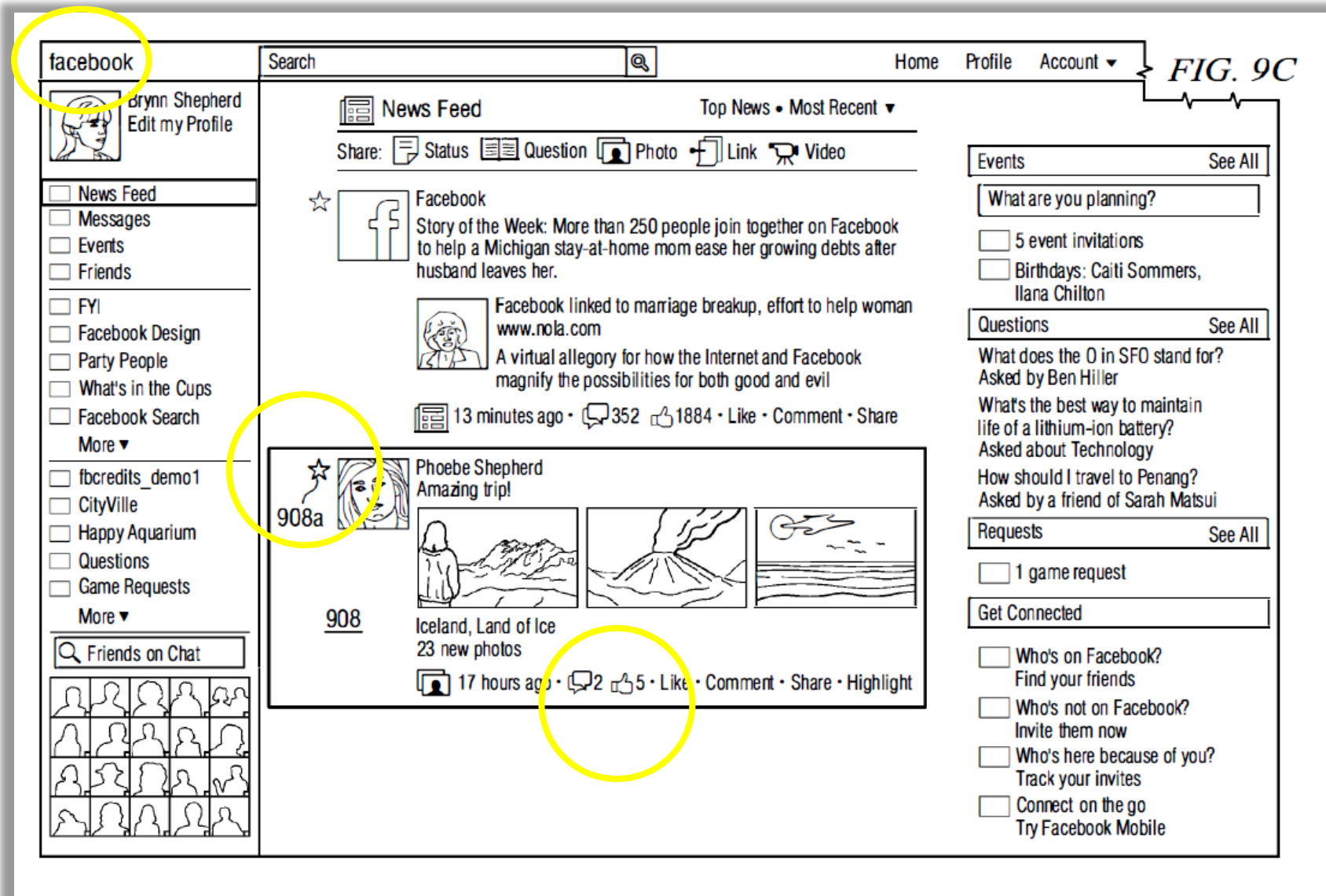
'687 Patent

Social media providers **150** may include, for example, social media platforms (e.g., **FACEBOOK**, TWITTER, INSTAGRAM, FLICKR, YOUTUBE, etc.), and/or other providers that generally distribute content uploaded by users to be consumed by other users. The content may be generated by content sources such as individuals, corporations, and/or other entities that may create content. Users may post social media content to one or more social media providers **150**, from which system **100** may aggregate and facilitate uncapped engagement as described herein.

(Ex. 1001, 7:16-25)

(Pet., 8)

Fuloria (Ex. 1004)



(Ex. 1004, Fig. 9C)

(Pet., 13)

Claim element 1[a] (undisputed)

“1[a]. A system for aggregating content and facilitating uncapped engagement of the content, the system comprising:”

The Petition’s theory

This functionality represents **uncapped engagement** for multiple reasons.

First, a user super-liking content is an **engagement** with that content by that user

24

because the user interacts with the content via the super-like.⁴ The engagement is **uncapped** because Fuloria places *no limitation* on how many times a user can super-like a piece of content (the super-likes expire, Ex. 1004, ¶¶0060-0061), and thus engagement via a super-like is **uncapped**. (Ex. 1002, ¶76). Nor does it place any limitation on how many credits a user can spend to increase the reach of the content. *See* claim elements [1e] and [1f] (discussing exchange of resources for promotion of content). (Ex. 1002, ¶76).

Second, when a user “super-like[s]” or promotes a content item in return for an amount of resources, such as credits, this **facilitate[s]** *other users* **engaging** (e.g., interacting) with that content item by, for example, liking or commenting⁵ on the content. (*See, e.g.*, Ex. 1004, ¶¶0062-0067, 0037-0038, 0008)(Ex. 1002, ¶77).

Fuloria places *no limitation* on the degree to which a content item can be promoted—i.e., the amount of resources that can be paid or the possible reach sought for the content item. (Ex. 1004, ¶¶0038, 0058). Multiple different users can also promote the same content item. (Ex. 1002, ¶77). By allowing users to promote or “super-like” content which also increases engagement with that content by *other users*, Fuloria’s system also **facilitat[es]** **uncapped engagement** with that content. (Ex. 1002, ¶77).

(Pet., 24-26)

Claim element [1d] (conceded)

“[1d] generate a user interface that displays a first number of engagements with the networked content item obtained by a first user, a second number of engagements with the networked content item obtained by a second user,”

Patent owner respectfully submits that although Patent owner admits that *Fuloria* in view of *Andler* renders obvious displaying a “first number of engagements” and a “second number of engagements” as required under claim element [1d], since *Andler* (not *Fuloria*) disclose displaying an engagement score (corresponding to number of engagements). ¶¶ [0163], [0164]. Patent owner does

(Sur-Reply, 6)

Claim element [1e] (disputed)

“[1e] and a display option configured to receive a request to obtain a number of engagements with respect to the networked content item,”

The Petition's theory

This request to “feature” or “super-like” a content item is a **request to obtain a number of engagements with respect to the networked content item**. (Ex. 1002, ¶90). This is first because when a user seeks to promote a content item in this manner, the user is not only engaging with the content item herself, the user is also seeking to increase engagement *by other users* with respect to that content item. (Ex. 1004, ¶¶0037-0039, 0057-0058, 0062-0067, 0008, 0027, Figs. 8-9); *see also* claim element 1[a] (discussing engagements). The super-liked item is prominently

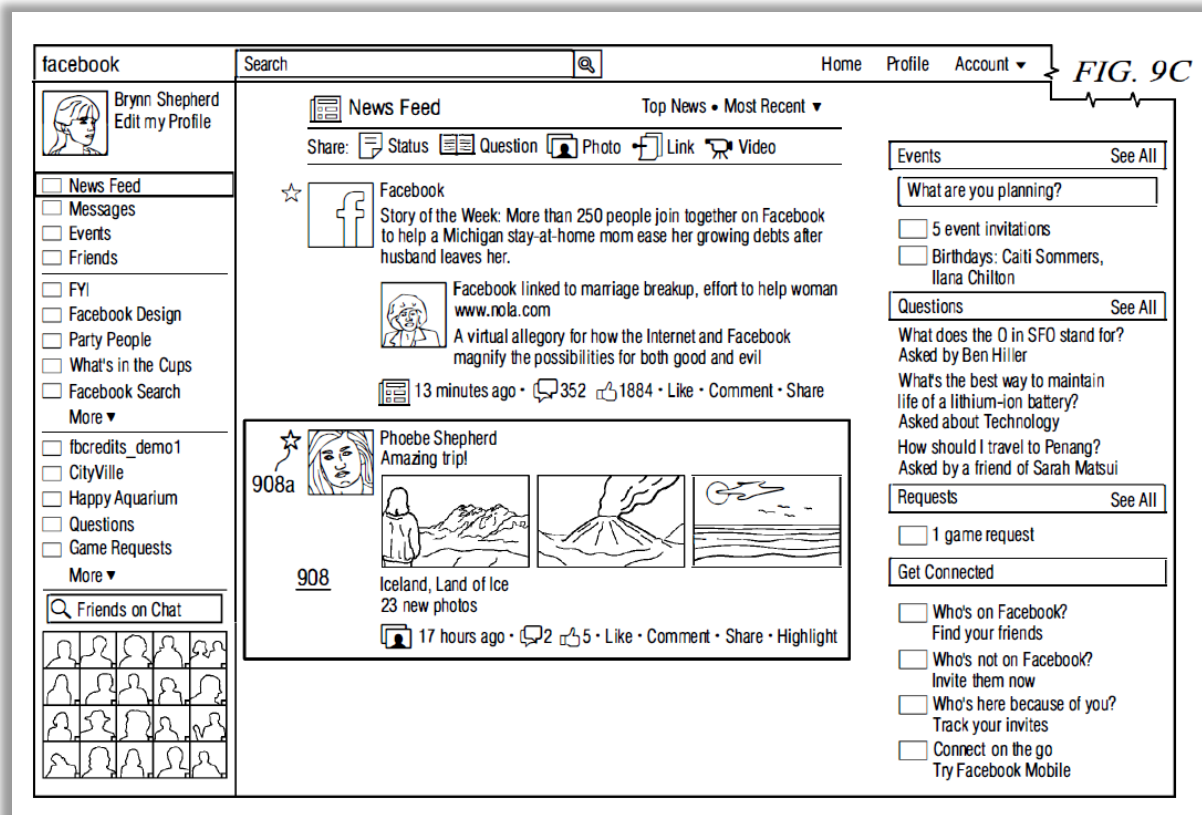
32

displayed to a user's connections, who may then engage with the item by, for example, liking it or commenting on it. (*Id.*). As Fuloria explains, for example, “the present invention allows users to promote their own or their friends['] stories to a sponsored story space, or pin the story to the top of the news feed.” (Ex. 1004, ¶0067). Second, Fuloria teaches that a user can adjust the scope of the “super-like” to last longer or reach more users, thus changing the price (Ex. 1004, ¶¶0038-0039, 0057), and affecting the “number” (quantification) of offered engagements, according to the Patent Owner's understanding of the claims. (Ex. 1001, 13:35-38)(Ex. 1002, ¶90).

(Pet., 32-33)

Claim element [1e] (disputed)

"[1e] and a display option configured to receive a request to obtain a number of engagements with respect to the networked content item,"



[0038] When a user clicks the “super-like” or promotion button, the account associated with the user may be debited a predetermined number of credits. In particular embodiments, credits are equivalent to real-world currency. In particular embodiments, credits are valueless electronic currency that may only be used on the social networking system. In particular embodiments, credits may be utilized for games to purchase virtual goods, for international Voice-over-IP phone calls, for video chats, and the like. In particular embodiments, the credits are deducted after the promoted social networking object is delivered to various users, based on the delivery. For example, the social networking system may deduct the credits based on a cost per impression (CPM), effective cost per impression (eCPM), cost per click (CPC), or cost per action (CPA) pricing model. This disclosure contemplates any suitable payment system for promoting social networking objects.

(Ex. 1004, Fig. 9C, ¶0038)(See also Ex. 1002, ¶¶76-77).

(Pet., 25, 32-34)

Claim element [1e] (disputed)

“[1e] and a display option configured to receive a request to obtain a number of engagements with respect to the networked content item,”

Petitioner’s argument that in Fuloria, “when a user seeks to promote a content

19

item in this manner, the user is not only engaging with the content item herself, the user is also seeking to increase engagement by other users with respect to that content item,” only show that “super-liked” promotion may increase other users engagement with respect to that content item (through promote the content item to reach to other users so that they have chance to engage with it). The argument has no nexus with “a number of engagements.”

(POR, 19-20)

Claim element [1e] (disputed)

“[1e] and a display option configured to receive a request to obtain a number of engagements with respect to the networked content item,”

Patent owner admits that Fuloria discloses “a display option configured to receive a request to obtain engagement with respect to the networked content item, but not a request to obtain a number of engagements.

(POR, 16)

Claim element [11d]

generate a user interface comprising the networked content item and a display option configured to receive a request to obtain engagements with respect to the networked content item;

(Ex. 1001, claims 11, 12)

Claim element [12d]

generate a user interface comprising the networked content item and a display option configured to receive a request to obtain engagements with respect to the networked content item;

(POR, 16, 27, 31)

Claim element [1e] (disputed)

“[1e] and a display option configured to receive a request to obtain a number of engagements with respect to the networked content item,”

Patent Owner respectfully submits, that Petitioner construes the term “engagement” as “an indication that a user should be distinguished with respect to the content over another user,” according to the definition in the specification (Ex. 1001, 5:53–55; Pet. 11). Under this construction, “engagement” refers to an indication of a user’s relationship to a content. Each user may have an engagement with respect to the content, and different engagements among different users reflect different relationships between the content and those users. Consequently, the aggregate or “sum” of engagements across multiple users is meaningless because it does not indicate that any particular user is distinguished with respect to the content relative to other users. Therefore, “number of engagements” in element [1e] is a user’s engagement number, not the sum of engagements across multiple users, other users can have different engagement numbers, such that the user is distinguished with respect to the content relative to other users.

(Sur-Reply, 4)

EscapeX's Sur-Reply

Andler discloses “displaying a number of engagements.” But “a display option configured to receive a request to obtain number of engagements” is a way to obtain the number of engagements. *Andler* discloses obtaining the number of engagements with other ways (based on interactions of each of the users with the selected item of content), not by “display option configured to receive a request to obtain a number of engagements.” Therefore, the Petition points to *Fuloria*.

[0206] At step 704, an engagement score for each of one or more first users is determined. Each engagement score is based on interactions of each of the first users with the selected item of content. The engagement score may further based on whether additional users have accessed the item of content based on the interaction of one of the first users, interaction other than consumption of the content (e.g., the creation of a mix that includes or is associated with the item of content), etc. Alternatively or in addition, the engagement score may increase more when additional users have accessed the item of content based on such an interaction compared to an increase of the engagement score resulting from other types of interactions with the item of content.

(Sur-Reply, 6)

(Ex. 1005, ¶0206)

(Pet., 30) (Sur-Reply, 6)

EscapeX's Sur-Reply

Compare

Second, the phrase “**a display option configured to receive a request to obtain** a number of engagements” in Element [1e] indicates that the system provides a display option allowing a user to select a desired number of engagements. When the user makes this selection, the system receives a corresponding request to retrieve that specified number of engagements, which means the desired number of engagements is equal to the number of engagements the system provides. On the

with

elements [11d], [11f], and [11g]. The reply does not argue that *WO '100* teach the element [11d], [11f], and [11g] and only argues that that claims 11 and 23 do not include the claim language “number of engagements.” But in fact, claims 11 and 23 includes similar language such as “obtain engagements.” “a first plurality of engagements.” “a second plurality of engagements.”

(Sur-Reply, 5, 11)