UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.

Petitioner,

v.

STERLING COMPUTERS CORPORATION

Patent Owner.

Case IPR2025-00430

U.S. Patent No. 7,716,217

PATENT OWNER'S OBJECTIONS TO PETITIONER'S DEMONSTRATIVES

EXHIBIT LIST

Patent Owner's Exhibit No.	Exhibit Description
2001	Declaration of Latifur Khan (March 12, 2025)
2002	Curriculum vitae of Latifur Khan
2003	Declaration of Justin Marston (March 12, 2025)
2004	"BlueSpace Mail Search" Document, Sept. 2, 2004
2005	"The Development of the Mathematical Algorithms," May 12, 2005
2006	"BlueSpace Mail Relevance," June 7, 2005
2007	"BlueSpace Mail Relevance," Aug. 16, 2005
2008	"BlueSpace Mail Relevance," Aug. 17, 2005
2009	"Importance," Sept. 18, 2004
2010	"BlueSpace Mail Relevance," Oct. 6, 2005
2011	"BlueSpace Mail Relevance," Oct. 7, 2005
2012	"BlueSpace Mail Relevance," Oct. 7, 2005
2013	"There are many cognate relevance values that must be calculated," Nov. 9, 2004
2014	Claim Chart for BlueSpace Mail Documents
2015	Supplemental Declaration of Justin Marston (July 8, 2025)
2016	*listing of NATURE article*: Marston, Justin, "Chaos in the Classroom," Jan. 25, 1996, NATURE, *available at* https://www.nature.com/articles/379306b0

Patent Owner's Exhibit No.	Exhibit Description
2017	*excerpt from*: 32nd European Union Contest for Young Scientists (2020-2021) ("Winners 1989-2019")
2018	LinkedIn profile: Justin Marston
2019	Metadata extracted from native of EX2004
2020	Metadata extracted from native of EX2005
2021	Metadata extracted from native of EX2006
2022	Metadata extracted from native of EX2007
2023	Metadata extracted from native of EX2008
2024	Metadata extracted from native of EX2009
2025	Metadata extracted from native of EX2010
2026	Metadata extracted from native of EX2011
2027	Metadata extracted from native of EX2012
2028	Metadata extracted from native of EX2013
2029	Declaration of Latifur Khan (September 10, 2025)
2030	Declaration of Justin Marston (September 9, 2025)
2031	Declaration of Paul Marston (September 9, 2025)
2032	"BlueSpace Mail Relevance," September 21, 2005
2033	"BlueSpace Mail Relevance," October 2, 2005
2034	"BlueSpace Mail Relevance," November 8, 2005
2035	"BlueSpace Mail Relevance," November 12, 2005
2036	"BlueSpace Mail Relevance," November 13, 2005

Patent Owner's Exhibit No.	Exhibit Description
2037	"Frequency analysis stats," August 21, 2005
2038	"Relevance typology 2.bmp," November 13, 2005
2039	"Relevance process flow 2.bmp," November 13, 2005
2040	*intentionally omitted (duplicate)*
2041	Log of BlueSpace documents showing BlueSpace work from June 28, 2005, until January 13, 2006
2042	Log of J. Marston privileged communications with BlueSpace counsel regarding BlueSpace work from June 28, 2005, until January 13, 2006
2043	Version of EX2010/EX1044 showing tracked changes and comments by Justin Marston
2044	Version of EX2010/EX1044 showing tracked changes and comments by Paul Marston
2045	Version of EX2010/EX1044 showing tracked changes and comments by Jon Fernyhough
2046	Redacted (for privilege) correspondence from J. Marston to B. Hoffman, January 12, 2006
2047	"Transmail Relevance Formulae," September 9, 2004
2048	"Notes on Search Document," September 13, 2004
2049	"Pauls Formula Section Sept 17.doc," September 20, 2004
2050	"General Comments," May 17, 2005
2051	"Some Thoughts on the TransMail Relevance/Importance Algorithm," May 17, 2005

Patent Owner's Exhibit No.	Exhibit Description
2052	"2004-09-10 notes on search document.doc," September 10, 2004
2053	"Changes to document_.doc," September 15, 2004
2054	"BlueSpaceMailSearchfor JamesB.doc," September 15, 2004
2055	"Importance 1.1.1.doc," September 18, 2004
2056	"formula.doc," August 17, 2005
2057	"SoftwareImplementation.doc," August 18, 2005
2058	"SoftwareImplementationComment.doc," August 19, 2005
2059	"BlueSpaceRelevancePM250805.doc," August 25, 2005
2060	"BlueSpaceMailRelevancePM250905.doc," September 25, 2005
2061	"BlueSpaceMailRelevancePM270905c.doc," September 28, 2005
2062	"BlueSpaceMailRelevancePM280905.doc," September 28, 2005
2063	"Comments to Jon and Justin 07.doc," October 8, 2005
2064	"Alterations to document.doc," October 8, 2005
2065	"BSMR021005_jfpm2.doc," October 13, 2005
2066	"BSMR021005_jfpm3.doc," October 13, 2005
2067	"BSMR021005_jfpm4.doc," October 13, 2005
2068	"BSMR021005_jfpm5.doc," October 13, 2005

Patent Owner's Exhibit No.	Exhibit Description
2069	"BSMR021005_jfpm6.doc," October 14, 2005
2070	"Jon & Juistin 14.10.05.doc," October 14, 2005
2071	"Comments to Justin and Jon Oct 15th.doc," October 15, 2005
2072	"BlueSpaceMailRelevanceJM06,11,05.doc," November 10, 2005
2073	"BlueSpace Mail Relevance," August 21, 2005
2074	"BlueSpace Mail Relevance," November 12, 2005
2075	Paul Marston LinkedIn Profile
2076	Paul Marston employment history (1968-2024) (from teachers' pensions employment history)
2077	Article: "Farewell after almost 50 years: Paul Marston, Senior Lecturer in Mathematics."
2078	Letter appointing P. Marston as lecturer at Nazarene Theological College, July 25, 2005
2079	"Twitter's Recommendation Algorithm," X Blog, March 31, 2023
2080	"Twitter Revenue and Usage Statistics (2025)," Business of Apps, Sept. 2, 2025
2081	"Twitter Is Changing Your Timeline: What You Need to Know," ABC News, Feb. 10, 2016
2082	"News Feeds, Old Content: A Brief History of Algorithmically Curated Feeds on Facebook and Twitter," Medium, April 29, 2019

Patent Owner's Exhibit No.	Exhibit Description
2083	"You Can Finally Switch Your Instagram Feed to a Chronological Timeline. Here's How," Business Insider, Mar. 24, 2022
2084	Complaint, *Sterling v. X Corp.*, Case No. 1:24-cv-00552 (W.D. Texas)
2085	Complaint, *Sterling v. Meta*, Case No. 1:24-cv-00551 (W.D. Texas)
2086	"Our Approach to Facebook Feed Ranking," Meta, June 11, 2025
2087	"Facebook Feed AI System," Meta, June 4, 2025
2088	"Meta Reports Fourth Quarter and Full Year 2024 Results," Meta, Jan. 29, 2025

Patent Owner respectfully objects to the following slides in Petitioner's demonstratives:

- Slide 44 (first bullet) & Slide 48 (heading): Statement that "PO bypasses Bieganski teachings and only attacks the Rose-Bieganski combination."
    - Basis for Objection: Patent Owner objects to this statement because it does not appear in Petitioner's briefing. In fact, Petitioner argued the opposite. Reply, at 11 (arguing that, by addressing Bieganski, Patent Owner "improperly attacks the references individually").
- Slide 46: Argument that Paragraph 42 of Dr. Fox's Supplemental Declaration shows that "Bieganski optimizes Rose" (see heading).
    - Basis for Objection: Petitioner's papers do not cite Paragraph No. 42 of Dr. Fox's Supplemental Declaration to argue that "Bieganski optimizes Rose." The **only** citation to Paragraph 42 in Petitioner's briefing is when Petitioner argues "expectation of success." *See* Reply, at 12 (citing *FoxSupp*., ¶¶41-45).
- Slide 46: Argument that Paragraph Nos. 44 and 45 of Dr. Fox's Supplemental Declaration shows that "Bieganski optimizes Rose" (see heading).
    - Basis for Objection: Petitioner's papers do not cite Paragraph Nos. 44 or 45 of Dr. Fox's Supplemental Declaration to argue that "Bieganski optimizes Rose." The **only** citation to these two paragraphs in

Petitioner's briefing is when Petitioner argues "expectation of success." *See* Reply, at 12 (citing *FoxSupp*., ¶¶41-45).

- Slide 60: Citation to *Ikorongo* case (for substantive argument regarding corroboration).
    - Basis for Objection: This case citation does not appear in the Petition or Reply, and an evidentiary motion is not a proper place to make new substantive arguments.
- Slide 72: Argument that Paragraph 40 of Dumais shows that "Dumais ranks content based on inputs from similar users"
    - Basis for Objection: The argument that Paragraph 40 of Dumais has to do with "inputs from similar users" does not appear in Petitioner's papers. The section of the Petition that discusses "*cognate*"/similar users (Pet., at 31-32) does not cite to Paragraph 40 of Dumais at all.
- Slide 74: Argument that Paragraph Nos. 21 and 52 of Dumais teach or suggest "identify[ing]" a relationship between the first user and some other "user(s)" in the system.
    - Basis for Objection: The argument that Paragraph Nos. 21 and 52 of Dumais teach or suggest this – i.e., "identify[ing]" a relationship between the first user and some other "user(s)" in the system – does not appear in Petitioner's papers.

- Slide 75 (left side):
    - (1) Use of Fig. 4 in Dumais for the "*cognate*" limitation.
        - Basis for Objection: Petitioner's papers do not cite Fig. 4 of Dumais for the "*cognate*" limitation. *See* Pet., at 31-32.
    - (2) Illustration depicting a combined Fig. 4 and Fig. 5 from Dumais.
        - Basis for Objection: Petitioner's papers do not combine Figures 4 and 5 as depicted on this slide.

Respectfully submitted,

Dated: May 12, 2026

By: /Devan Padmanabhan/

Devan Padmanabhan
Lead Attorney for Patent Owner
Reg. No. 38,262
PADMANABHAN & DAWSON PLLC
9800 Shelard Parkway, Suite 120
Minneapolis, Minnesota 55441
Telephone: 612-444-3377
Email: devan@paddalawgroup.com

Attorney for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. 42.6(e), I certify that on this 12th day of May, 2026, a true and correct copy of the foregoing **Patent Owner's Objections to Petitioner's Demonstratives** was served by electronic mail on Petitioner's lead and backup counsel at the following addresses:

PERKINS COIE LLP
Jessica Kaiser
Sarah Fowler
Meta-Sterling@perkinscoie.com
kaiser-ptab@perkinscoie.com
stahnke-ptab@perkinscoie.com

By: /Devan Padmanabhan/

Devan Padmanabhan (Reg. No. 38,262)
devan@paddalawgroup.com
Padmanabhan & Dawson, PLLC
9800 Shelard Parkway, Suite 120
Minneapolis, Minnesota 55441
Telephone: 612-444-3377