

Summary of verbatim (or nearly verbatim, strikethrough added) matches between the 00535 petition to the Houh Declaration Ex.1002

Text	Pet. Page	Dec ¶ No.
The '039 patent, filed September 11, 2014, claims priority through 5 continuations to U.S. Patent 7,599,983, filed June 18, 2003, which claims priority to Provisional 60/389,430 filed June 18, 2002. Petitioners do not acquiesce the '039 patent is entitled to priority of the provisional or any priority patent. Regardless, each applied reference was filed or published before June 18, 2002.	1	24
“provides at least one content management site accessible to a system user” including “M-channels” which “allow unsophisticated users to easily and efficiently author message data or other types of information content to be made accessible via a collaborative workspace, a data mailbox, a collaborative community, or other type of mobile site.” (EX-1001, 5:6-7, 8:5-10.) Such mobile sites may be associated with “a group comprising multiple members having a common interest,” (EX-1001, 6:18-20), “an event,” (EX-1001, 6:38-43), “a game,” (EX-1001, 7:18-19), or “a user of IM, SMS, MMS, email or other type of messaging service,” (EX-1001, 7:30-32), among other associations. (EX-1001, 6:18-7:67.)	3-4	28
Sharing Photographs The Photos option in the Our Pages section lets members share photographs and other graphics. Each club is given 5 MB of space to store photographs. The photos are organized into up to 30 albums, each with no more than 24 photos. There are two types of albums: group and personal. Any member can place a photo in a group album and delete photos that he or she added as well. Only the creator of a personal album can add or delete photographs.	10	126
2. In the page that appears, enter either the path and name of the photo on your disk or click Browse to locate the file. You can also click the On The Web link to designate a photograph located on a Web page. 3. Enter a name and description of the photo.	11	127
Proxy server 110 “sits’ between the clients (e.g., the mobile device(s) 108) and the origin web server(s) 102 that provide Web content 104.” (Cheng, 3:31-33.) Proxy server 110 “obtains the code (e.g., HTML) of the user requested web page 104, and	14	150

modifies it at the proxy server 110 (once obtained),” which can include “reformatting and/or converting an entire web site or request specific Web content that is needed from the origin web server 102.” (Cheng, 3:41-48.) Proxy server 110 can also store a device profile for mobile device 108 based on the device and web browser types. (Cheng, 5:20-23.)		
The general operation of proxy server 110 in Cheng is straightforward. As shown in Figure 1, mobile device 108 can issue a request 106 for an original web page 104 using standard HyperText Transport Protocol (HTTP), as was well-known in the art, with the request 106 being received by proxy server 110. (Cheng, Fig. 1, 2:19-21, 3:58-67, 7:65-8:2.) “Upon determining that the requested page 104 resides at the server 102, the proxy server 110 makes a request 112 for the page. As shown, the proxy server 110 and the server 102 are connected via a network 114 such as the Internet.” (Cheng, 3:65-4:2; see also id., 2:21-24.)	14-15	151
Proxy server 110 then converts and/or reformats original web page 104 into reformatted web page 122, which is transmitted to mobile device 108. (Cheng, 2:24-29, 5:46-49, 4:56-60; EX-1002, ¶74.) “The designated HTML content of the retrieved web page 104 is extracted, subsequently and/or converted, and transmitted as a reformatted web page 122 to the mobile device 108.” (Cheng, 5:46-49, 3:22-26.)	15	152
The proxy server can also perform conversion on images on the web page to enable viewing on a mobile device, for example, by scaling and reducing colors and resolution. (Cheng, Fig. 7 (704, 706, 708), 10:60-11:8)	15	152
proposed combination would have been straightforward as Cheng provides “bolt-on” functionality, with the proxy server capable of converting and reformatting any existing HTML-based web page into a format suitable for display on a mobile device. (Cheng, 2:30-32 (“The [reformatting] may be done for at least one of groups of devices, individual devices, web site-specific conversions, or for all web sites.”).) It would have been obvious that proxy server 110 could have been operated by the same or a different entity from the operator of origin web server	16	92
It would have been obvious to combine Neibauer and Cheng with Ausems, predictably resulting in a system further adapted such that the photo uploaded by the club member to the club photo sharing feature would have comprised “ <i>capturing content at the</i>	19	112

<i>mobile device,” i.e., a photo captured by a digital camera incorporated into the mobile device.</i> For example, under the combination with Ausems, the club member would have obtained image data using a digital camera of the mobile device, which would have been transmitted for upload to the club for sharing with other club members using Neibauer’s photo sharing features		
The club photo sharing feature is also a “previously established” application-based information channel because it was already established as a feature of the club before the club member chose to upload a new photo to a photo album. (~~EX-1002, ¶145.~~) The club photo album feature also “permit[s] interaction between a user of the mobile device and one or more additional users,” because the club member can upload and share photos with other club members. (Neibauer, 477 (“Any member can place a photo in a group album...”); id. (“For each photo you will see [in Figure 21-10] the title, contributor’s name, the photo’s size, and the date it was posted. Click a photo title to see the photo on your screen. Click View Thumbnails to see miniatures of all of the photographs.”).) The club photo sharing feature thus permits interaction and information exchange between multiple club members. (~~EX-1002, ¶145.~~)	21	
This additional textual information is associated with a “messaging action” because it provides a textual message that would also have been made available to club members through the photo sharing feature. This messaging information is also similarly associated with a “collaboration action” because, for the same reason, the textual message would have allowed club members to identify the photo and collaborate on topics of interest relating to the photo in the album. (~~EX-1002, ¶158.~~) The proposed combination therefore renders obvious “<i>information associated with at least one wireless networking functionality of the mobile device,</i>” in the form of a messaging or collaboration action by which the club member, through their mobile device and over a wireless network, provided messaging content that would have been accessible to club members. (EX-1002, ¶¶156-58, 169.) As noted previously, the mobile device would have communicated wirelessly. (Cheng, <i>e.g.</i>, 2:4-7, 5:33 (“cellular telephone”), 23:44-51 (“... wireless communication (e.g., radio frequency (RF), and	25	158

the like”); <i>see also</i> Neibauer, 171, ¶5 (“GSM Phone”); EX-1002, ¶158.)		
Squibbs describes a technique of recording and displaying data (such as photos) along with the location where the photo was taken. (Squibbs, Abstract.) Squibbs discloses digital cameras including Global Positioning System (GPS) receivers were known in the art, as were systems that displayed the location where the photo was taken on an electronic map. (Squibbs, ¶¶0003-0004.)	26	160
Album program 50 allows the user to “catalogue, manage, and view their photos through a map-based interface, the photos being represented on a displayed map by a marked indicating the location where they were taken.” (Squibbs, ¶0032.) It comprises “five main operating modes 51 to 55,” as shown. (Squibbs, ¶0033.) For example, Load Mode 52 allows the user to download data from camera 3, and Catalog Mode 53 allows the user to manage newly loaded photos using a map-based display, and Map View Mode 54 allows the user to browse the photo album and select photos for viewing. (Squibbs, ¶¶0033, 0035-0036.) Figure 6 shows a display generated by the album program in Catalog Mode 53 (Squibbs, ¶0064):	28	163
Central map area 61 “is sufficient to encompass the locations registered for the newly loaded batch of photos.” (Squibbs, ¶0064.) Thumbnail 63 “of each new photo is shown in one or other of the margin areas 62A, B” and “lead line 65 connects each thumbnail 63 to a corresponding marker 64 showing on the map the location where the photo was taken.” (Squibbs, ¶0064.) Figure 6 also shows an upper control bar with, from left-to-right, Show Photo Control 66 for displaying the photo corresponding to a selected thumbnail 63, Group Control 68 for creating groups and assigning a photo to one or more groups, and Edit Photo Details Control 67 for displaying and editing the details of a selected thumbnail. (Squibbs, ¶¶0065-0068.)	29	165
Figure 7’s Map View mode allows a user to browse the album. (Squibbs, ¶0074.) Squibbs explains “[t]he starting map displayed in the Map View Mode is, for example, a world map or a map encompassing the locations of all the photos recorded in the album; alternatively, the map displayed could be the same map as being used in the Catalogue Mode before transiting to the Map View Mode.” (Squibbs, ¶0075.) Figure 7 shows photos represented “either as thumbnails 81, individual photo icons 80,	30	167

group icons (see current-abode group icon 85), or concentration icons (see icon 82).” (Squibbs, ¶0075.) Squibbs also discloses the ability to display a full-size image of a photo selected from the Map View Mode. (Squibbs, ¶0091, Fig. 8.)		
Squibbs teaches a number of ways in which a photo can be associated with location data. In the example in Figure 3, the digital camera itself has a built-in GPS receiver. In another embodiment of Figure 11, digital camera 90 transmits the photo image data to cell phone 20, which in turn uploads the image data over a cellular connection to service system 40 for storage on network store 43. (Squibbs, ¶0101, Fig. 11 (showing transfer 105); ¶0031 (noting the photo store can be “external”).) The cell phone, when uploading photo image data, also transmits location information. (Squibbs, ¶0101.) Squibbs explains the cell phone can determine location information in a number of ways, including from “a location server of the mobile radio infrastructure,” or using “a GPS system built into the cell phone.” (Squibbs, ¶0098; ¶0101.)	31	168
Squibbs, predictably resulting in the system and method for accessing clubs using the club photo sharing feature, further adapted to receive “ <i>information associated with at least one wireless networking functionality of the mobile device,</i> ” i.e., the location information associated with a photo taken and uploaded by the club member. (EX-1002, ¶117.) For example, under the proposed combination, when a club member uploads a photo using the club photo sharing feature, the mobile device would not only upload the photo image data (for example, obtained from a digital camera), but also transmit geographic location associated with the photo.	31-32	117
A POSITA would have been motivated to combine in order to improve the user experience of club members who use the photo sharing feature. (EX-1002, ¶120.) The ability to associate a location with a digital photo would have provided a clear benefit by improving the classification and enjoyment of uploaded photos. (<i>Id.</i>) Squibbs explains that classification of photos “has long been a problem due to the effort involved in maintaining any organisation of the photos.” (Squibbs, ¶0002.) Geographic location would have provided a clear way to classify digital photos, allowing club members to better understand the context behind the photo and identify objects in it. (EX-1002, ¶120-21.)	32-33	120-121

Neibauer provides a further ~~suggestion~~ to combine with Squibbs by disclosing a Yahoo! Maps feature that allows users to request and view electronic maps. (Neibauer, 222-224.) Neibauer further describes how a user can annotate a map to identify objects of interest on the map, such as the user's house and the location of an upcoming event. (Neibauer, 226-228, Fig. 10-5 (showing "My House" and "The picnic is here").) The annotation described in Neibauer is similar to the functionality in Squibbs, and in any case, the fact that Neibauer already discloses the ability to display electronic maps – and suggests annotating those maps to show location of objects and events within the map – confirms Neibauer and Squibbs are naturally combinable and that a skilled artisan would have been motivated to do so. (~~EX-1002, ¶122.~~)	33	122
PO interprets the scope of its patent too narrowly. (~~EX-1002, ¶174.~~) The '039 patent explains the " <i>wireless network</i> " need not be separate and distinct from the Internet. The patent states,	34	174
This interpretation of network is consistent with the plain meaning and consistent with how it is disclosed in the combination of Neibauer and Cheng. (~~EX-1002, ¶174.~~)	35	174
Cheng, for example, discloses a "local area network," which is a well-known network that can be established independent of the internet (<i>e.g.</i> , Cheng 24:4-9), and such a local area network could be used to implement all functionalities of Neibauer. (~~EX-1002, ¶176.~~)	35-36	176
geotracking data is well-known to be used via satellite channels, not the internet. (~~EX-1002, ¶177.~~) . . . location information of the mobile device and a way for said mobile device to obtain its location information using a built-in GPS receiver. . . . (Squibbs, ¶¶0004 ("digital camera 3 equipped with a GPS receiver for determining camera location using signals <u>from satellites 2</u> ").) It would have been obvious to a POSITA that obtaining location information of the mobile device through GPS was a wireless networking functionality independent of the internet, as the location information was obtained by using GPS signals, wirelessly received by the device from satellites, to calculate the device's current location. (EX-1002, ¶177.) Receiving and processing GPS signals from satellites to determine a device's location is a " <i>wireless networking functionality</i> " that is independent of the internet. (~~EX-1002, ¶177.~~)	36	177

The web browsers on the mobile devices ~~also~~ comprise “<i>personalized content applications</i>.” This is consistent with the plain and ordinary meaning of “application” in this context, which simply refers to a software program for carrying out a particular task. (~~EX-1002, ¶190~~; EX-1021, 31 (“application <i>n.</i> A program designed to assist in the performance of a specific task, such as word processing, accounting, or inventory management.”) (bold and italics in original).) Under the proposed combination, each club member would have used Clubs to upload/download personalized content, e.g., photographs, using the club photo album feature. (EX-1002, ¶191-92; Neibauer, 477-479.) For example, each club member can create their own “personal photo album.” (Neibauer, 477.) Neibauer discloses numerous other club features that enable a member to create and view personalized content, including personalized messages using the private message board. (Neibauer, 483, Fig. 21-13 (showing personalized “Welcome” message posted by club founder).) A club member can also engage in online chat with other club members. (Neibauer, 479.)	40-41	190-192
As explained for limitation [1A], the application-based information channel can include, for example, a club message board, club photo sharing feature, or club chat. Each “<i>comprises a collaborative workspace</i>,” because each allows club members to communicate and collaborate on topics of interest. (~~EX-1002, ¶¶193.~~)	41	193
As explained for limitation [1C], the information associated with at least one wireless networking functionality can comprise “<i>at least one messaging action</i>” or “<i>at least one collaboration action</i>,” both of which would have been implemented over the wireless network, ~~as recited in claims 8-9. (EX-1002, ¶¶158, 195.)~~ And the ~~Neibauer-Cheng-Ausems-Squibbs~~ combination likewise discloses a “wireless network” under any proposed construction for the same reasons it discloses “wireless networking functionality” under either PO’s or Meta’s proposed construction. (~~EX-1002, ¶¶168, 196.~~)	42	195
~~It would have been obvious that the steps of claim 1 would have been carried out by software code executed by “a processing element of the mobile device,” such as at least one processor or CPU for carrying out software program instructions. (EX-1002, ¶199; Ausems, 7:53-60 (“PDA engine 290 is illustrated in further~~	44	199

detail and includes central processing unit (CPU) 305, random access memory (RAM) 310, read only memory (ROM) 315, electrically erasable programmable read only memory (EEPROM) 320...CPU 305 processes information received at PDA engine 290.”.) ~~It would also have been obvious software used to carry out the functions of claim 1~~ would have been stored on at least one non-transitory computer-readable storage medium, such as a ~~hard drive or random access memory (RAM)~~. (EX-1002, ¶199; Ausems, 7:63-64 (“ROM 315 is coupled to CPU 305. ROM 315 stores the operating system for PDA telephone 100.”); Ausems 8:2-6 (“operating system may include a web browser in order to facilitate Internet access for a PDA telephone 100. EEPROM 320 is also coupled to CPU 305 and may be used to store application software.”).)		
It would have been ~~obvious~~ that the mobile device comprises “<i>at least one processing element comprising a processor coupled to a memory,</i>” as these are basic components the mobile device would have needed to function. (EX-1002, ¶¶201; <i>see</i> Ausems, 5:49-54 (“PDA telephone 100 includes a wireless phone engine 210...and PDA engine 290”); Ausems, 7:53-57 (“PDA engine 290... includes central processing unit (CPU) 305, random access memory (RAM) 310, read only memory (ROM) 315, electrically erasable programmable read only memory (EEPROM) 320)...); Ausems, 7:60-64 (“RAM 310 is coupled to CPU 305 and is used as a temporary storage area for data processed by CPU 305. ROM 315 is coupled to CPU 305. ROM 315 stores the operating system for PDA telephone 100.”).)	45-46	201
Under the proposed combination in view of Squibbs, when a club member uploads a photo via their mobile device to the club photo sharing feature, the mobile device would have “<i>obtain[ed] location information</i>” (e.g. via GPS or mobile radio infrastructure) of the mobile device used to upload the photo. (EX-1002, ¶210; Squibbs, ¶¶0101, 0098.) The proposed combination, moreover, would have resulted in “<i>inserting additional content into the previously established application-based information channel based on the obtained location information,</i>” because the club photo sharing feature would have ~~inserted~~ an electronic map or other location information (“<i>additional content</i>”) based on the location information, for display into the album provided by club photo sharing feature (“<i>application-based information channel</i>”). (<i>Id.</i>)	53	110

[I]t would have been obvious the functionalities of Yahoo! Clubs would have been carried out by software code executed by “<i>a processing element of the server</i>,” such as at least one processor or CPU for carrying out software program instructions. (EX-1002, ¶212; Cheng, <i>e.g.</i>, 23:16-20 (“Although computer system 1100 is illustrated having a single processor, a single hard disk drive and a single local memory, the system 1100 is optionally suitably equipped with any multitude or combination of processors or storage devices.”), 23:29-31 (“CPU 1204 is the central <u>processing unit</u> of the system, <u>performing calculations and logic operations required to execute a program</u>.”).)	53-54	212
software . . . would have been stored on at least one non-transitory computer-readable storage medium, such as a hard drive or random-access memory (RAM). (EX-1002, ¶213; Cheng, <i>e.g.</i>, 23:64-24:4 (explaining that instructions may be stored in random access memory or hard disk storage until required by the computer system).)	54	213
“<i>processing element</i>” to origin web server 102 and proxy server 110 is consistent with the ‘039 patent, which makes clear that a processing element or server can comprise multiple servers. (~~EX-1002, ¶¶214-15.~~) And even if the claim required that the “<i>processing element</i>” be contained within a single physical unit (it does not), as explained, it would have been obvious to combine proxy server 110 and origin server 102 into a single ~~device~~. (EX-1002, ¶215.)	54-55	214-215
It would also have been obvious that the server would have included at least one “<i>network interface</i>.” As noted, the server as described in limitation [19A] is accessible over the Internet. (Cheng, 3:67-4:2 (“As shown [in Figure 1], the proxy server 110 and the server 102 are connected via a network 114 such as the Internet.”); Neibauer, 4 (explaining Yahoo! members need access to an Internet connection), 473 (“Access Yahoo! clubs by clicking Clubs on the Yahoo! home page or by going directly to http://clubs.yahoo.com to open the page shown in Figure 21-6.”), 64 (“http:// This is the prefix for the standard type of Internet Web site. The letters stand for Hypertext Transfer Protocol.”) (bold in original).)	56	218
It ~~therefore~~ would have been obvious that the server of claim 19 would have included “<i>a network interface</i>,” a basic and well-known component that allows a computer to communicate with	56-57	

other devices over a network such as the Internet. (EX-1002, ¶218-19.) For example, Cheng discloses the computer system that carries out the proxy server techniques is coupled to a communication port that facilitates communication with other devices, such as through a wireless network. (Cheng, 23:44-51 (“Communications with external devices, for example, the other components of the system described herein, occur utilizing communication port 1516. For example, optical fibers and/or electrical cables and/or conductors and/or optical communication (e.g., infrared, and the like) and/or wireless communication (e.g., radio frequency (RF), and the like) can be used as the transport medium between the external devices and communication port 1516.”).) Alternatively, the “<i>network interface</i>” can also correspond to gateway 109, which in this scenario, would have been part of the claimed “server” and would have provided an interface between mobile devices and proxy server 110. (EX-1002, ¶219; Cheng, 3:33-36 (“If necessary, a gateway 109 may optionally be provided that interfaces between, for example, the mobile device 108 and the proxy server 110.”).) Under either theory, the claimed server would have included “<i>a network interface.</i>” (EX-1002, ¶219.)		
Bandera discloses a ... ~~for selecting and delivering advertisements to an Internet user based on the physical location of their mobile device. In one embodiment, a mobile device can, in response to a request for a web page, obtain and provide to the web server the location of the mobile device (for example using GPS, a cellular base station, or other known techniques of determining geographic location). (Bandera, 2:41-47, 4:46-60, 6:46-7:8.) The web server, in response, generates a requested web page that includes an advertising object. (Bandera, 4:61-5:17, 7:17-30.) The web server selects the advertising object “based on a user location and/or on the time of day. Exemplary advertising objects may include text files, audio files, video files, image files, and the like.” (Bandera, 5:21-25.) As explained in Bandera:~~ As an example of this aspect of the present invention, a user requests a Web page from a Web server via a mobile Web client. The Web server utilizes user location information transmitted with the Web page request to select an advertisement object that presents information about something that is physically near the user’s present location. For example, information relating to the	63	230

nearest store in a national chain of stores can be presented within an advertising object displayed within a Web page.		
Motivation to Combine Ground 1 Prior Art and Bandera: It would have been obvious to combine the Ground 1 prior art with Bandera, predictably resulting in the method described for claim 20 in which the “ <i>additional content</i> ” <i>not only</i> comprised the electronic map or other location-identifying information as described for claim 20, but <i>further</i> comprised advertising based on the location of the mobile device. Under the proposed combination, therefore, the “ <i>additional content</i> ” that would have been inserted into and displayed by the club photo sharing feature would have <i>also</i> included advertising content based on the location of the mobile device. (~~EX-1002, ¶235.~~)	64	235
This would have been easy to implement, as placing advertising content on webpages was well-known long before the ’039 patent. (EX-1002, ¶236.) In one exemplary implementation, after the club member uploaded a photo with location information, and then viewed the photo on a webpage of the photo sharing feature that included an electronic map or the photo sharing feature that included an electronic map or other location-identifying information, as described for claim 20, that same web page would also have included the location-based advertising content. (<i>Id.</i>) The excerpt of Bandera’s Figure 2, for example, shows display of the selected advertising object 32 on the same page along with as the remaining content objects 34 of the page, which a POSITA would have recognized as a typical implementation of a common web banner advertisement. (Bandera, 1:66-2:10.)	64-65	236
the photo sharing feature described in Neibauer would have been further adapted to insert “ <i>additional content</i> ” comprising both the location information associated with the photo uploaded by the club member (as described for claim 20), and a location-based advertisement. (~~EX-1002, ¶237.~~) This combination is entirely consistent with Neibauer, which shows an exemplary club page with an advertisement placed on it:	65	237
Bandera is an analogous reference in the same field as the ’039 patent of network-based communication systems and information content management on such systems, and would have been reasonably pertinent to problems facing the patent inventors, including how to insert advertising content based on the obtained	66	238

location of the mobile device, as recited in claim 21. (~~EX-1002, ¶238.~~)		
A POSITA would have been motivated to combine to increase revenue. (~~EX-1002, ¶239.~~) As noted above, Neibauer discloses the ability to place advertisements on club pages. (Neibauer, 475, Fig. 21-8.) The techniques of Bandera would have provided a clear benefit by allowing the club photo sharing webpage to display advertisements based on the current location of the user, which would have resulted in advertisements that were more relevant to the user and their current location. (~~EX-1002, ¶239.~~) Bandera provides an express motivation to combine by explaining that targeting users on the basis of location can enhance the effectiveness of advertising and targeting of users. (Bandera, 3:38-42; ~~EX-1002, ¶239.~~) A POSITA would also have had a reasonable expectation of success, and could have implemented the proposed combination using conventional techniques. (~~EX-1002, ¶240.~~)	66	239-240
The “ <i>content management site</i> ,” as explained for Ground 1, corresponds to the website for creating and managing a new club based on the proposed combination, and the “ <i>mobile website</i> ” to the club website made available to club members via mobile devices, under the proposed combination. (EX-1002, ¶242.) With respect to the requirement that the “ <i>content management site</i> ” permit the user to add “ <i>user-authored content</i> ,” to the extent not already obvious over Neibauer, this would have been obvious in further view of Harvey. With respect to all other claim limitations in the challenged claims, the Ground 1 analysis applies.	67	242
The key feature of Harvey ~~here~~ is the ability of a community creator to ~~author~~ content for a community <u>before</u> the community is created and launched. (EX-1002, ¶244.) As noted, Harvey explains that “[t]he community creating module permits the creator to create a community, and <u>designate applications and content presented</u> in the community by a user interface.” (Harvey, 4:28-30.) More specifically, a user can access a creating module 165 in order to create a new community, which may include web-based community creation. (Harvey, 7:49-56, 8:49-50.) “At step 202, a creator provides community identification information,” such as a community name. (Harvey, 7:58-61.) “At step 210,” Harvey explains, “a configuration editor is presented to a creator. A configuration editor may allow a user to build a community, <u>designate content</u> and application objects, subscribe to	68	244

subscription objects, and <u>add other information associated with the community.</u> ” (Harvey, 8:63-67; <i>see also id.</i> , 9:41-47.) Later, “[a]t step 230, a creator may launch a community.” (Harvey, 12:67-13:1.) ~~Harvey therefore discloses the ability to add content to a community using the community creation tool, before the community is created. (EX-1002, ¶244.)~~ A user can establish a connection with a community, among other ways, “through browser access to an appropriate website.” (Harvey, 29:59-62.)		
Motivation to Combine with Harvey: It would have been obvious to combine the prior art cited for Grounds 1-2 with Harvey, predictably resulting in the club creation user interface in Neibauer with the <i>further</i> ability to allow the club founder to add content to one or more mobile information channels	69	245