

Summary of verbatim (or nearly verbatim) matches between the ‘537 Petition to Meta’s Petition in the Meta-MDT-IPRs (Ex.2034)

	Petition in the ‘537 IPR by Petitioners	Meta’s Petition in the Meta-MDT-IPRs
1	A person of ordinary skill in the art (“POSITA”) would have had a bachelor’s degree in electrical engineering, computer science, or similar field, with two years of experience in developing and implementing network-based computer systems that interact with mobile devices, such as systems for storing and retrieving information over the Internet or communicating using the Web using wireless mobile devices. 537 IPR Petition, p.4	A person of ordinary skill would have possessed a bachelor’s degree in electrical engineering, computer science, or similar field, with two years of experience in developing and implementing network-based computer systems that interact with mobile devices, such as systems for storing and retrieving information over the Internet or communicating using the Web using wireless mobile devices. Ex.2034, pp.5-6
2	V. Overview of Grounds The challenged claims attempt to lay claim to techniques for allowing users to share information over the Internet with other users via mobile devices. But these techniques were well-known before the ’801 patent. All grounds rely on Neibauer (EX-1003), which describes features of Yahoo!. (EX-1002, ¶¶47.) Neibauer describes a feature called Yahoo! Clubs that allows users to create web-based communities for users to share information through photo sharing and other features. (EX-1002, ¶¶48-58; Neibauer, pp.477-480.) Neibauer also discloses the ability to access Yahoo! services via mobile devices. (EX-1002, ¶¶59; Neibauer, pp.166-174.) Neibauer	A. Overview of Grounds The challenged claims attempt to lay claim to techniques for allowing users to share information over the Internet with other users via mobile devices. But these techniques were well-known before the ’801 patent. All grounds rely on Neibauer (EX1003), which describes features of the popular Yahoo! website and service. (EX1002, ¶¶48-50.) Neibauer discloses a feature called Yahoo! Clubs that allows users to create web-based communities for users to share information through photo sharing, message boards, chat, and other features. (EX1002, ¶¶51, 97-99; Neibauer, pp.477-480.) Neibauer also discloses the ability to access Yahoo! services via mobile devices such as cell

renders obvious the majority of the claim limitations and was relied upon by the PTO in a reexamination that rejected all claims of an earlier patent in the same family as the '801 patent. (EX-1024, 4.) All grounds also cite to Cheng (EX-1005), which additionally demonstrates that it would have been obvious to provide the Yahoo! Clubs features from Neibauer to users via mobile devices. (EX-1002, ¶¶63, 106-07.) Cheng describes a proxy server that can convert any existing (non-mobile) webpage for use on a mobile device. (EX-1002, ¶¶68-74.) Cheng was also cited in the earlier reexamination mentioned above. (EX-1024, 4.) All grounds also cite to Squibbs (EX-1011) for location-based features of the challenged claims. Squibbs discloses a technique for displaying a photo album by showing, on an electronic map, the location of where the photo was taken based on location information provided with the photo. (EX-1002, ¶¶78-86; Squibbs, Figs. 6-7.) The additional references are cited primarily for ancillary features or to account for claim construction positions proposed in the MDT-Meta-Litigation. Miller (EX-1004) is cited for disclosing the ability of a user to create a web-based community and specify the specific features (e.g. message board, etc.) to include. (EX-1002, ¶¶65-66.) Ground 2 is substantially similar to Ground 1, but	phones. (EX1002, ¶56; Neibauer, pp.166-174.) Neibauer is a strong reference that discloses the majority of the claim limitations and, as explained in Part III.C above, was relied upon by the PTO in rejecting all claims of a parent patent to which the '801 patent has been terminally disclaimed. All grounds also cite to Cheng (EX1005), which provides an additional basis for showing that it would have been obvious to provide the Yahoo! Clubs features from Neibauer to users via mobile devices. (EX1002, ¶¶61-62.) Cheng describes a proxy server that can convert any existing (non-mobile) webpage for use on a mobile device. (EX1002, ¶¶63-68, 102-107.) As noted in Part III.C above, Cheng was also cited in the successful reexamination of the earlier '801 patent. All grounds also cite to Squibbs (EX1011), for location-based features of the challenged claims. Squibbs discloses a technique for displaying a photo album by showing, on an electronic map, the location of where the photo was taken based on location information provided with the photo. (EX1002, ¶¶71-79; Squibbs, Figs. 6-7.) The additional references are cited primarily for ancillary features or to account for claim construction positions proposed in the pending litigation. Miller (EX1004) is cited for disclosing the ability of a user to create a web-based community and specify the specific features (e.g. message board, etc.) to include. (EX1002, ¶¶59, 95-96.) Ground
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	adds Harvey (EX-1010), solely to account for a potential construction of “mobile information channel” proposed by Meta in the MDT-Meta-Litigation. If the Board chooses not to adopt that construction here, it need not consider this ground. 537 IPR Petition, pp.9-10	2 is substantially similar to Ground 1, but adds Harvey (EX1010), solely to account for a potential construction of “mobile information channel” proposed by Petitioner in the pending litigation. If the Board chooses not to adopt that construction here, it need not consider this ground. Ex.2034, pp.9-10
3	VI. Ground 1: Claims 1-25 Are Obvious Over Neibauer in View of Miller, Cheng and Squibbs. A. Independent Claim 1 Neibauer discloses features of a Yahoo! service known as Yahoo! Clubs. (Neibauer, pp.473-483.) Neibauer explains that “[a] <i>club</i> is a group of Yahoo! members who share a common interest. Each club has its own message board, chat room, as well as places to share photographs, news, addresses, and links.” (Neubauer, p.473 (italics in original).) Yahoo! members could also create their own clubs. (Neibauer, pp.480-82.) An exemplary club created by a member is shown in Figure 21-13: [image omitted] (Neibauer, p.483, Fig. 21-13.) 537 IPR Petition, pp.10-11	C. Ground 1: Claims 1-25 Are Obvious Over Neibauer In View Of Miller, Cheng and Squibbs. 1. Independent Claim 1 As detailed below, Neibauer discloses features of a Yahoo! service known as Yahoo! Clubs. (Neibauer, pp.473-483.) Neibauer explains that “[a] <i>club</i> is a group of Yahoo! members who share a common interest. Each club has its own message board, chat room, as well as places to share photographs, news, addresses, and links.” (Neubauer, p.473 (italics in original).) Yahoo! members could also create their own clubs, as described in detail for limitation 1[a]. (Neibauer, pp.480-82.) An exemplary club created by a member is shown in Figure 21-13: [image omitted] (Neibauer, p.483, Fig. 21-13.) Ex.2034, pp.11-12
4	As described in detail below, Neibauer discloses a method for managing information content because a club	As described in detail below, Neibauer discloses a method for managing information content because a club founder can manage the information on a

	founder can manage the information on a club. (Neibauer, pp.478-480.) 537 IPR Petition, pp.11-12	club such as messages and photos shared with other members of the club. (Neibauer, pp.478-480.) Ex.2034, p.12
5	The step of “<i>providing an interface</i>” takes place in Neibauer when a web-based interface is provided to a club founder (“<i>a first user</i>”) that allows the founder to create a club. The founder can click “Create Club” to cause a web-based form to appear asking for club information. (Neibauer, pp.480-481.) “Create a Club” is shown in Figure 21-12: [image omitted] (Neibauer, p.481, Fig. 21-12.) 537 IPR Petition, pp.12-13	The step of “providing an interface” takes place in Neibauer when a web-based interface is provided to a club founder (“a first user”) that allows the founder to create a new club. More specifically, a member can click “Create Club” to cause a web-based form to appear asking for information about the new club: [“Creating a Club” steps omitted] (Neibauer, pp.480-481 (bold in original).) Ex.2034, pp.12-13
6	For purposes of claim 1, the “<i>interface</i>” includes the user interface that the club founder (“<i>first user</i>”) uses to create the club as discussed above. This interface also permits the club founder “<i>to control activation of a mobile information channel through which the user can share access to content with a plurality of additional users.</i>” Neibauer discloses three features independently disclosing a <i>mobile information channel</i>. First, Neibauer explains that the club will include a private message board. “A message board can be compared to a bulletin board on an office wall. It’s a place to leave messages to others and to read their replies.” (Neibauer, p.468;	For purposes of claim 1, the “interface” includes the user interface that the club founder (“first user”) uses to create the club as discussed above. This interface also permits the club founder “to control activation of a mobile information channel through which the user can share access to content with a plurality of additional users.” Neibauer discloses three features that each independently discloses a mobile information channel. First, Neibauer explains that the club will include a private message board. “A message board can be compared to a bulletin board on an office wall. It’s a place to leave messages to others and to read their replies.” (Neibauer, p.468.)

	see also Neibauer, p.477 (“Every club has its own private message board.”), pp.469-471.) 537 IPR Petition, p.13	Ex.2034, pp.14-15
7	Each of these club features discloses a “<i>mobile information channel through which the first user can share access to content with a plurality of additional users</i>,” because each feature can be used for sending and receiving messages between club members (including the club founder) such as club message board or chat messages, or photographs. (EX-1002, ¶¶135-39.) Neibauer’s disclosures are consistent with exemplary “<i>mobile information channels</i>” in the ’801 patent. The ’801 patent explains that mobile information channels or “M-channels” permit “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 or portion thereof generated or otherwise managed in the system 10.” (EX-1001, 8:17-23.)³ The ’801 patent identifies several examples of these channels: “discussion forum,” “chat,” and “photo blog” (EX-1001, 8:34-44), which mirror the club message board, chat, and photo sharing features described in Neibauer. Below is a separate discussion explaining why information channels in Neubauer qualify as “<i>mobile</i>” information	Each of these club features discloses a mobile information channel “through which the first user can share access to content with a plurality of additional users,” because each feature can be used for sending and receiving messages between club members (including the club founder) such as club message board or chat messages, or photographs. (EX1002, ¶¶88-92.) Neibauer’s disclosures are consistent with exemplary “mobile information channels” in the ’801 patent. The ’801 patent explains that mobile information channels or “M-channels” permit “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 or portion thereof generated or otherwise managed in the system 10.” (’801, 8:17-23.)² In fact, the ’801 patent expressly identifies, as examples of mobile information channels, “discussion forum,” “chat,” and “photo blog” (’801, 8:34-44), which mirror the club message board, chat, and photo sharing features, respectively, described in Neibauer. Petitioner will provide a separate discussion below as to why the information channels in Neubauer qualify as “mobile” information

channels, based on Neibauer alone or in view of Cheng. The club founder in Neibauer can also “<i>control activation of</i>” the above mobile information channels via the “<i>interface</i>.” After the founder makes the required selections for the club and clicks “Yes! I Accept” on the club creation form, the founder will “see a page that tells [them] the club has been created. The page shows the club name and its Web address.” (Neibauer, p.482.) The founder therefore controls activation of each mobile information channel by taking actions to create a new club using the club-creation interface, which activates the given mobile information channel (e.g., club message board, chat, photo sharing) by making it available through the newly-created club. (EX-1002, ¶¶143-44; <i>see also</i> Neibauer, p.473.) It is unclear if the requirement that the interface permit the first user to “<i>control activation of a mobile information channel</i>” requires that the first user be able to use the interface to selectively choose a particular mobile information channel. In the event it is determined by the Board or argued by Patent Owner that such a requirement exists, it would have been obvious in view of Miller. Miller discloses a system similar to Neibauer for allowing users to create collaborative web-based environments. (Miller, Abstract, 0036:30-0037:12.)	channels, based on Neibauer alone and in view of Cheng. The club founder in Neibauer can also “control activation of” the above mobile information channels via the “interface.” As noted, after the founder makes the required selections for the club and clicks “Yes! I Accept” on the club creation form, the founder will “see a page that tells [them] the club has been created. The page shows the club name and its Web address.” (Neibauer, p.482.) The founder therefore controls activation of each mobile information channel by taking actions to create a new club using the club-creation interface, which activates the given mobile information channel (e.g., club message board, chat, photo sharing) by making it available through the newly-created club. (EX1002, ¶94; <i>see also</i> Neibauer, p.473 (“A <i>club</i> is a group of Yahoo! members who share a common interest. Each club has its own message board, chat room, as well as places to share photographs, news, addresses, and links.”) (italics in original).) Petitioner notes that it is unclear if the requirement that the interface permit the first user to “control activation of a mobile information channel,” requires that the first user be able to use the interface to selectively choose a particular mobile information channel that be included with the club. But in the event it is determined by the Board or argued by Patent Owner that such a
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The process of creating a new environment is similar, in many ways, to the steps outlined in Neibauer. Miller discloses a number of web-based forms that allow the user to (among other things) specify a name and description for the environment (Fig. 13B) identify the members of the environment (Fig. 13C, 14A-C), and select the various communication features (<i>e.g.</i> bulletin board, etc.) that will be available for members (Fig. 16). (Miller, 0043:12-0044:27.) With respect to the selection of communications features, Miller discloses a user interface for allowing the user to select the particular features that will be included in the collaborative environment. (Miller, Fig. 16, 0045:31-0046:9, 0042:29-32.) These selections are then used in creating the environment or group. (Miller, 0041:3-6 (“In step 1104, the environment is created...to permit the group members to activate the functions selected for the group.”); EX-1002, ¶145.) 537 IPR Petition, pp.14-16	requirement exists, it would have been obvious in view of Miller. Miller discloses a system similar to Neibauer for allowing users to create collaborative web-based environments. (Miller, Abstract, 0038:30-0039:12.) The process of creating a new environment is similar, in many ways, to the steps outlined in Neibauer. Miller discloses a number of web-based forms that allow the user to (among other things) specify a name and description for the environment (Fig. 13B) identify the members of the environment (Fig. 13C, 14A-C), and select the various communication features (<i>e.g.</i> bulletin board, etc.) that will be available for members (Fig. 16). (Miller, 0045:12-0046:27.) With respect to the selection of communications features, Miller discloses a user interface for allowing the user to select (from a list) the particular features that will be included in the collaborative environment. (Miller, Fig. 16, 0047:31-0048:9, 0042:29-32 (“The group creator selects from among these functions, preferably by way of an easy-to-use web browser interface, and these choices are stored in a database and associated with the group members.”).) These selections are then used in creating the environment or group. (Miller, 0043:3-6 (“In step 1104, the environment is created... to permit the group members to activate the functions selected for the group.”); EX1002, ¶96.) Ex.2034, pp.16-19
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8	Motivation to Combine Neibauer and Miller. It would have been obvious to combine Neibauer with Miller, predictably resulting in the system and method for creating a club described in Neibauer, but with the “<i>interface</i>” further allowing the club founder to select and activate the particular communication features (including “<i>a mobile information channel</i>”) provided for the club, to the extent this is a requirement of the claim. (EX-1002, ¶¶97.) Neibauer and Miller are analogous references in the same field the same field as the ’801 patent of network-based communication systems and information content management, and would have been reasonably pertinent to problems facing the inventors. (EX-1002, ¶¶89-92.) A POSITA would have been motivated to combine Neibauer with Miller to enhance the customizability of Neibauer’s clubs. For example, it would have been obvious that certain club features available in Neibauer may not have been useful or desirable for some clubs. (EX-1002, ¶95.) Allowing the club founder to select the particular features (<i>e.g.</i>, message board, chat, photo sharing, etc.) for inclusion in the club would have provided the advantage of allowing the club founder to customize the club to meet the needs of members and further the purpose of the club. (<i>Id.</i> .) As a further motivation to combine, Miller discloses many of the same features that Neibauer	<i>Rationale and Motivation to Combine (Neibauer with Miller):</i> It would have been obvious to combine Neibauer with Miller, predictably resulting in the system and method for creating a club described in Neibauer, but with the “interface” further allowing the club founder to select and activate the particular communication features (including “a mobile information channel”) provided for the club, to the extent this is a requirement of the claim. (EX1002, ¶¶97.) Neibauer and Miller are analogous references in the same field the same field as the ’801 patent of networkbased communication systems and information content management, and would have been reasonably pertinent to problems facing the inventors. (EX1002, ¶98.) An ordinarily skilled artisan would have been motivated to combine Neibauer with Miller to enhance the flexibility and customizability of clubs in Neibauer. For example, it would have been obvious that certain club features available in Neibauer may not have been useful or desirable for some clubs. (EX1002, ¶99.) Allowing the club founder to select the particular features (<i>e.g.</i>, message board, chat, photo sharing, etc.) for inclusion in the club would have provided a clear advantage of allowing the club founder to customize and streamline the club to meet the needs of club members and further the purpose of the club. (<i>Id.</i> .) As a further motivation to combine, Miller discloses many of the same features that Neibauer describes as being available for
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	describes as being useful, including message boards (0046:20-33 (“Bulletin boards”)), chat (0050:23-24 (“Chat groups”)), contact list (0047:19-26 (“White pages”)), among others. (EX-1002, ¶100-01, 146.) A POSITA would also have had a reasonable expectation of success and could have implemented the proposed combination using conventional techniques, as the proposed combination involved nothing beyond standard Web programming technologies. (EX-1002, ¶102.) 537 IPR Petition, pp.17-18	clubs, including message boards (0047:20-33 (“Bulletin boards”)), chat (0052:23-24 (“Chat groups”)), contact list (0049:19-26 (“White pages”)), among others. (EX1002, ¶99.) An ordinarily skilled artisan would also have had a reasonable expectation of success and could have implemented the proposed combination using conventional techniques, as the proposed combination involved nothing standard Web programming technologies. (EX1002, ¶100.) Ex.2034, pp.19-20
9	Neibauer itself discloses services such as “Yahoo! Mobile” and “Yahoo! To Go” that enable content from Yahoo! services to be provided to handheld devices such as pagers, cell phones, web phones, and personal digital assistants (PDAs). (Neibauer, pp.166-174.) “Yahoo! To Go lets you receive Yahoo! information on your mobile device.” (Neibauer, p.167.) For example, one option referred to as “Yahoo! On Your PDA” allowed users of browser-enabled PDAs to select particular Yahoo! content that would accessible from their PDA. (Neibauer, pp.171-174.) Although Neibauer does not expressly disclose that the Yahoo! Clubs feature was available on handhelds, it would have been obvious over Neibauer alone to allow user-created clubs to be accessed by handheld devices disclosed elsewhere in Neibauer. This would have been viewed as a logical (and obvious)	And to the extent mobile device were construed as requiring a handheld device, Neibauer itself discloses services such as “Yahoo! Mobile” and “Yahoo! To Go” that enabled content from Yahoo! services to be provided to mobile devices such as pagers, cell phones, web phones, and personal digital assistants (PDAs). (Neibauer, pp.166-174.) “Yahoo! To Go lets you receive Yahoo! information on your mobile device.” (Neibauer, p.167.) For example, one option referred to as “Yahoo! On Your PDA” allowed users of browser-enabled PDAs to select particular Yahoo! content that would accessible from their PDA. (Neibauer, pp.171-174.) Although Neibauer does not expressly disclose that the Yahoo! Clubs feature was one of the Yahoo! features that could be made accessible via mobile devices, it would have been obvious to the extend mobile device functionality in Neibauer to cover that feature, in order to allow user-

extension to the existing features described in Neibauer. (EX-1002, ¶111, 155.) Additionally, Cheng relies on an already-known technology known as “proxy servers,” which were commonly used to provide security and interoperability between devices. (EX-1002, ¶72.) Cheng relies on this proxy server concept to convert non-mobile webpages into a format accessible by mobile devices. Figure 1 illustrates one embodiment: [image omitted] Figure 1 above shows an origin web server 102 that contains original web page 104. (Cheng, 3:36-37.) “The web page 104 is typically an HTML file with references to any component .wav, .mov, and/or Joint Photographic Experts Group (JPEG) files, which together comprise the web page 104.” (Cheng, 4:10-13.) “It is envisioned that each instance of web content 104 each have associated therewith a URL.” (Cheng, 3:56-57.) Web page 104 could have been any web page in HTML format reachable via the Internet, such as any web page from the Yahoo! website as described in Neibauer. (EX-1002, ¶¶70, 118.) Figure 1 further shows a mobile device 108 connected to proxy server 110, optionally through gateway 109. (Cheng, 3:33-36.) “Mobile devices 108 generally come in a variety of different	created clubs to be accessed by users via mobile devices. This would have been viewed as a logical (and obvious) extension to the existing mobile features described in Neibauer. (EX1002, ¶111.) Information channels that are “mobile” would also have been obvious over Neibauer and in further view of Cheng. Cheng relies on an already-known technology known as “proxy servers,” which were commonly used to provide security and interoperability between devices. (EX1002, ¶66.) Cheng relies on this proxy server concept to convert non-mobile webpages into a format accessible by mobile devices. Figure 1 illustrates one embodiment: [image omitted] (Cheng, Fig. 1 (color annotation added).) The right side of Figure 1 above shows an origin web server 102 that contains original web page 104. (Cheng, 3:36-37.) “The web page 104 is typically an HTML file with references to any component .wav, .mov, and/or Joint Photographic Experts Group (JPEG) files, which together comprise the web page 104.” (Cheng, 4:10-13.) “It is envisioned that each instance of web content 104 each have associated therewith a URL.” (Cheng, 3:56-57.) Web page 104 in Cheng could have been any web page in HTML format reachable via the Internet, such as any web page from the Yahoo! website as described in Neibauer. (EX1002, ¶103.)
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sizes and have a variety of different screen interfaces... [T]he present invention provides the ability to uniquely tailor web page 104 content for specific mobile devices 108.” (Cheng, 5:11-15.) Cheng explains that, in one example, mobile device 108 could be a mobile device with a Palm operating system that includes a web browser. (Cheng, 5:17-23, 2:8-15.) The middle of Figure 1 shows proxy server 110 – Cheng’s key feature. 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 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,	The left shows a mobile device 108 connected to proxy server 110, optionally through gateway 109. (Cheng, 3:33-36.) “Mobile devices 108 generally come in a variety of different sizes and have a variety of different screen interfaces... [T]he present invention provides the ability to uniquely tailor web page 104 content for specific mobile devices 108.” (Cheng, 5:11-15.) Cheng explains that, in one example, mobile device 108 could be a mobile device with a Palm operating system that includes a web browser. (Cheng, 5:17-23, 2:8-15.) The middle of Figure 1 shows proxy server 110 – the key feature of Cheng here. 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.) Cheng explains that proxy server 110 “obtains the code (e.g., HTML) of the user requested web page 104, and 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
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	3:58-67, 7:65-8:2; EX-1002, ¶74.) “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; <i>see also id.</i>, 2:21-24.) 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.) “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; <i>see also id.</i>, 3:22-26.) 537 IPR Petition, pp.19-22	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; EX1002, ¶68.) “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; <i>see also id.</i>, 2:21-24.) Proxy server 110 then converts and/or reformats original web page 104 into reformatted web page 122 (shown in Figure 1), which is transmitted to mobile device 108. (Cheng, <i>e.g.</i>, 2:24-29, 5:46-49, 4:56-60.) “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; <i>see also id.</i>, 3:22-26.) Ex.2034, pp.20-24
10	Motivation to Combine Neibauer, Miller, and Cheng: It would have been obvious to combine Neibauer and Miller with Cheng, predictably resulting in the club features relied upon in Neibauer being made available to mobile devices over the Internet. Under the proposed combination, client-side users would interface with the server via Cheng’s proxy server, ensuring that the web pages in	<i>Rationale and Motivation to Combine (Neibauer and Miller with Cheng):</i> It would have been obvious to combine Neibauer and Miller with Cheng, predictably resulting in the club features relied upon in Neibauer being made available to mobile devices over the Internet. Under the proposed combination, the web pages in Neibauer relied upon for claim 1, including the club creation page and form, home page,

Neibauer delivered to mobile devices, such as smartphones, are properly formatted. (EX-1002, ¶107.) The 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. (EX-1002, ¶108; 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, under the proposed combination, could have been operated by the same or a different entity from the operator of the origin web server. (EX-1002, ¶108.) In any case, combining Neibauer, Miller, and Cheng would not have affected the underlying functionality in Neibauer, further motivating the combination. (EX-1002, ¶110.) Cheng is an analogous reference in the field of network-based communications systems and mobile devices, and would have been reasonably pertinent to problems facing the inventors including how to implement a system for making information content available to mobile devices. (EX-1002, ¶104.) A POSITA would have been motivated to combine Neibauer, Miller, and Cheng. Neibauer expressly motivates the combination by disclosing services such as “Yahoo! Mobile” and “Yahoo!	and additional pages that provide the claimed mobile information channels (<i>e.g.</i> club message board, chat, photo sharing) would have been converted and delivered to mobile devices using the techniques in Cheng. (EX1002, ¶108.) The proposed combination would have been exceedingly 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. (EX1002, ¶¶109, 113-114; Cheng, <i>e.g.</i>, 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, under the proposed combination, could have been operated by the same or a different entity from the operator of the origin web server. (EX1002, ¶109.) In any case, the proposed combination would not have required changing the underlying functionality in Neibauer – a feature that provides a further motivation to combine as discussed below. (EX1002, ¶¶109, 113-114.) Cheng is an analogous reference in the field of network-based communications systems and mobile devices, and would have been reasonably pertinent to problems facing the inventors including how to implement a system for making information content available to mobile devices. (EX1002, ¶110.)
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To Go” that enabled content from Yahoo! services to be provided to mobile devices. (Neibauer, pp.166-174.) A POSITA would also have been motivated to make the club features available to handheld devices to take advantage of growing popularity of such devices. (EX-1002, ¶¶105-07, 113-14.) Cheng emphasizes that “users of wireless devices now demand that businesses deliver web content for viewing on desktop, or mobile/portable (e.g., handheld) devices.” (Cheng, 1:18-22.) The ’801 patent also admits that “[o]ne of the most rapidly expanding aspects of wireless networking involves the accessing of information content over wireless networks via web- enabled mobile devices,” such as “mobile telephones, personal digital assistants (PDAs), palmtop computers, etc.” (EX-1001, 1:34-40.) Market forces would thus have motivated a POSITA to combine Neibauer with Cheng in order to provide the club functionalities to handheld users. (EX-1002, ¶¶114-15.) Cheng further motivates the combination, explaining that the proxy server conversion method provides a “create-once, deliver anywhere approach” that eliminates the need to build and maintain separate web pages for different types of mobile devices and browsers. (Cheng, 2:8-19.) This would have provided a clear technological advantage by obviating the need to generate multiple different mobile versions of club-related pages.	An ordinarily skilled artisan would have been motivated to combine. As noted, Neibauer itself expressly suggests the proposed combination by disclosing services such as “Yahoo! Mobile” and “Yahoo! To Go” that enabled content from Yahoo! services to be provided to mobile devices. (Neibauer, pp.166-174.) A skilled artisan would also have been motivated to make the club features available to mobile devices to take advantage of growing popularity of mobile computing and mobile devices. (EX1002, ¶¶111-112.) Cheng explains that “users of wireless devices now demand that businesses deliver web content for viewing on desktop, or mobile/portable (e.g., handheld) devices.” (Cheng, 1:18-22.) The ’801 patent itself admits that “[o]ne of the most rapidly expanding aspects of wireless networking involves the accessing of information content over wireless networks via web-enabled mobile devices,” such as “mobile telephones, personal digital assistants (PDAs), palmtop computers, etc.” (’801, 1:34-40.) Market forces would thus have motivated a skilled artisan to combine Neibauer with Cheng in order to provide the club functionalities described above to users of mobile devices. (EX1002, ¶112.) Cheng provides a further express motivation to combine by explaining that the proxy server conversion method provides a “create-once, deliver anywhere approach” that eliminates the need to build and maintain separate web
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	(EX-1002, ¶118.) Furthermore, Cheng’s proxy server techniques were well-known and deployed for the very purpose of converting web page content into formats suitable for mobile devices. (EX-1002, ¶117.) A POSITA would also have had a reasonable expectation of success as Cheng relies on known and industry-standard technologies. (EX-1002, ¶120.) 537 IPR Petition, pp.24-26	pages for different types of mobile devices and browsers. (Cheng, 2:8-19.) This would have provided a clear technological advantage by obviating the need to generate multiple different mobile versions of club-related pages, thus simplifying the implementation. (EX1002, ¶113.) As a further motivation to combine, the proxy server techniques in Cheng were already well-known and already deployed for the very purpose of converting web page content into formats suitable for mobile devices. (EX1002, ¶114.) A skilled artisan would also have had a reasonable expectation of success as Cheng relies on known and industry-standard technologies. (EX1002, ¶115.) Ex.2034, pp.24-26
11	This limitation was largely covered by limitation [1A]. After the club founder makes the required selections for the club and clicks “Yes! I Accept” on the club creation form (“<i>via the interface</i>”), the founder will “see a page that tells [them] the club has been created. The page shows the club name and its Web address.” (Neibauer, p.482.) The system therefore activates the “<i>mobile information channel</i>” responsive to input received by the club creator via the club creation interface (“<i>responsive to input received from the first user via the interface</i>”), by making it available for use by the founder and other club members. (Neibauer, p.473 (“A <i>club</i> is a group of Yahoo! members who share a common interest. Each club has its own message board, chat room, as well	This limitation was largely covered by limitation 1[a] above. As discussed, after the club founder makes the required selections for the club and clicks “Yes! I Accept” on the club creation form (“via the interface”), the founder will “see a page that tells [them] the club has been created. The page shows the club name and its Web address.” (Neibauer, p.482.) The system therefore activates the mobile information channel responsive to input received by the club creator via the club creation interface (“responsive to input received from the first user via the interface”), by making it available for use by the founder and other club members. (Neibauer, p.473 (“A <i>club</i> is a group of Yahoo! members who share a common interest. Each club has its own message board, chat room, as

	as places to share photographs, news, addresses, and links.”) (italics in original).) Under the further combination with Miller, the input by the club founder would have further included selection of the particular mobile information channel(s) to include in the club, to the extent required by the claim, and this input under the proposed combination would also have been received via the claimed interface. (EX-1002, ¶¶97, 160.) 537 IPR Petition, pp.26-27	well as places to share photographs, news, addresses, and links.”) (italics in original).) Under the further combination with Miller, the input by the club founder would have further included selection of the particular mobile information channel(s) to include in the club, to the extent required by the claim, and this input under the proposed combination would also have been received via the claimed interface. (EX1002, ¶¶97, 118.) Ex.2034, p.29
12	As explained for limitation [1A], each of the club message board, chat and photo sharing features described in Neibauer under the proposed combination (“<i>the mobile information channel</i>”) supports messaging between the founder (“<i>the first user</i>”) and the other club members. The “<i>content</i>” thus corresponds to the first user providing textual messages (with respect to the club message board and club chat mobile information channels), and photographs (with respect to the photo sharing mobile information channel). (EX-1002, ¶161.) For example, for the club message board mobile information channel, a club member (including the club founder) can post a new message by replying to a message in an existing message thread. (Neibauer, pp.470-472.) Figure 21-5 shows a user interface for allowing a club member to add a message to a message thread:	As explained for limitation 1[a], each of the club message board, chat and photo sharing features described in Neibauer under the proposed combination (“the mobile information channel”) supports messaging between the founder (“the first user”) and the other club members. The “content” thus corresponds to the first user providing textual messages (with respect to the club message board and club chat mobile information channels), and photographs (with respect to the photo sharing mobile information channel). (EX1002, ¶119.) For example, for the club message board mobile information channel, a club member (including the club founder) can post a new message by replying to a message in an existing message thread. (Neibauer, pp.470-472.) Figure 21-5 shows a user interface for allowing a club member to add a message to a message thread: [image omitted]

[image omitted] (Neibauer, p.472, Fig. 21-5; <i>see also id.</i>, p.470 (“To add your own comments to the thread, click the Reply button. Doing so opens the form in Figure 21-5.”).) A club member can also start a new topic which “brings up a form similar to the one that is used to post a reply,” and which allows the user to input the topic heading and text of the first message in the thread. (Neibauer, p.471.) It would have been obvious that the content provided by the club founder (“<i>content</i>”) would have been “<i>insert[ed]... into the mobile information channel,</i>” as it would have been available through the club message board. (EX-1002, ¶162; Neibauer, p.472, Fig. 21-4; <i>see also id.</i>, p.483, Fig. 21-13 (exemplary club page posted by club founder longportalan: “Welcome to the Yahoo! Message Board for Alan and Barbara’s Clubhouse”).) A similar analysis applies to the club photo sharing feature. As noted, a club member (such as the club founder) can add a photo to a photo album by selecting a photo for upload. (Neibauer, pp.477-478.) It would have been obvious that the photo provided by the club member (“<i>content</i>”) would have been “<i>insert[ed]... into the mobile information channel,</i>” as it would have been available through the club photo	(Neibauer, p.472, Fig. 21-5; <i>see also id.</i>, p.470 (“To add your own comments to the thread, click the Reply button. Doing so opens the form in Figure 21-5.”).) A club member can also start a new topic which “brings up a form similar to the one that is used to post a reply,” and which allows the user to input the topic heading and text of the first message in the thread. (Neibauer, p.471) It would have been obvious that the content provided by the club founder (“content”) would have been “insert[ed]... into the mobile information channel,” as it would have been available through the club message board. (EX1002, ¶120.) (Neibauer, p.472, Fig. 21-4; <i>see also id.</i>, p.483, Fig. 21-13 (exemplary club page posted by club founder longportalan: “Welcome to the Yahoo! Message Board for Alan and Barbara’s Clubhouse”).)) A similar analysis applies to the club photo sharing feature. As noted, a club member (such as the club founder) can add a photo to a photo album by selecting a photo for upload. (Neibauer, pp.477-478.) It would have been obvious that the photo provided by the club member (“content”) would have been “insert[ed]... into the mobile information channel,” as it would have been available through the club photo sharing feature. (EX1002, ¶121; Neibauer, p.477, ¶1 (“If you are viewing the Photo Albums page, click Add Photo on the right side of the name of the
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sharing feature. (EX-1002, ¶163; Neibauer, p.477, ¶1 (“If you are viewing the Photo Albums page, click Add Photo on the right side of the name of the album where you want to insert the photo.”).) The same analysis applies to the club chat mobile information channel, because a club member (including the club founder) who is engaged in a private club chat can type in a message that will appear in the chat. (Neibauer, p.479.) It would have been obvious that the message provided by the club member (“<i>content</i>”) would have been “<i>insert[ed]... into the mobile information channel,</i>” as it would have been available through the club chat. (EX-1002, ¶164; Neibauer, p.458 (“To enter a [chat] message, type it in the Chat text box and then press ENTER or click the Send button. Your name and message appears in the conversation box.”).) Finally, it would have been obvious that the “<i>content</i>” under each of the examples above would have been provided “<i>by the first user,</i>” <i>i.e.</i>, the club founder, because the club founder, as with other club members, would have been permitted to provide content through the club message board, club photo sharing feature, or chat features using the techniques described above. (EX-1002, ¶165.) 537 IPR Petition, pp.27-30	album where you want to insert the photo.”).) And the same analysis applies to the club chat mobile information channel, because a club member (including the club founder) who is engaged in a private club chat can type in a message that will appear in the chat. (Neibauer, p.479.) It would have been obvious that the message provided by the club member (“content”) would have been “insert[ed]... into the mobile information channel,” as it would have been available through the club chat. (Neibauer, p.458 (“To enter a [chat] message, type it in the Chat text box and then press ENTER or click the Send button. Your name and message appears in the conversation box.”).) Finally, it would have been obvious that the “content” under each of the examples above would have been provided “by the first user,” <i>i.e.</i>, the club founder, because the club founder, as with other club members, would have been permitted to provide content through the club message board, club photo sharing feature, or chat features using the techniques described above. (EX1002, ¶123.) Ex.2034, pp.30-33
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13	The first part of limitation [1D] is largely redundant of [1C]. As explained, the club message board, club photo sharing and chat features allow receipt of additional content from other club members beyond the club founder (“<i>one or more of said additional users</i>”). (EX-1002, ¶166.) It would also have been obvious that the club members would have provided content relating to the mobile information channel “<i>via one or more respective mobile devices associated with at least one wireless network,</i>” under the proposed combination, because club members would have accessed the club and its features (including the ability to add content) via mobile devices associated with a wireless network. For example, Neibauer discloses in connection with the Yahoo! Mobile service that a mobile PDA could have included a “GSM Phone” modem. (Neibauer, p.171, ¶5.) GSM, which stands for Global System for Mobile Communication, was a dominant wireless (cellular) mobile network in widespread use in the United States the early 2000s. (EX-1002, ¶168.) Cheng similarly discloses wireless network device connectivity. (Cheng, <i>e.g.</i>, 2:4-7, 5:33 (“a cellular telephone”), 23:44-51 (“... wireless communication (e.g., radio frequency (RF), and the like)”)). It would have been obvious that the additional content would have been received via mobile devices associated	The first part of limitation 1[d] is largely redundant of 1[c]. As explained, the club message board, club photo sharing and chat features allow receipt of additional content from other club members beyond the club founder (“one or more of said additional users”). (EX1002, ¶¶120-124.) It would also have been obvious that the club members would have provided content relating to the mobile information channel “via one or more respective mobile devices associated with at least one wireless network,” under the proposed combination, because club members would have accessed the club and its features (including the ability to add content) via mobile devices associated with a wireless network. For example, Neibauer discloses in connection with the Yahoo! Mobile service that a mobile PDA could have included a “GSM Phone” modem. (Neibauer, p.171, ¶5.) GSM, which stands for Global System for Mobile Communication, was a dominant wireless (cellular) mobile network in widespread use in the United States the early 2000s. (EX1002, ¶125.) Cheng similarly discloses wireless network device connectivity. (Cheng, <i>e.g.</i>, 2:4-7, 5:33 (“a cellular telephone”), 23:44-51 (“... wireless communication (e.g., radio frequency (RF), and the like)”)). It would have been obvious that the additional content would have been received via mobile devices associated with a wireless network, such as a
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	with a wireless network, such as a known cellular communications network (like GSM). (EX-1002, ¶170.) A POSITA would have been motivated to allow mobile devices to provide content over a wireless network to take advantage of the growing popularity of mobile and wireless computing. (<i>Id.</i>) 537 IPR Petition, pp.30-31	known cellular communications network (like GSM). (EX1002, ¶125.) A skilled artisan would have been motivated to allow mobile devices to provide content over a wireless network to take advantage of the growing popularity of mobile and wireless computing. (EX1002, ¶¶125, 112.) Ex.2034, pp.33-34
14	Limitation [1E] is largely redundant of [1C], as the content provided by other club members (“<i>the additional content</i>”) would also have been inserted into the club message board, club photo sharing feature, or club chat, in the same way as content provided by the founder. All of the content insertion techniques described for limitation [1C] apply to both the club founder (“<i>the first user</i>”) and other club members (“<i>said additional users</i>”). (EX-1002, ¶¶178.) 537 IPR Petition, p.33	For our purposes here, limitation 1[e] is largely redundant of 1[c], as the content provided by other club members (“the additional content”) would also have been inserted into the club message board, club photo sharing feature, or club chat, in the same way as content provided by the founder. All of the content insertion techniques described for limitation 1[c] apply to both the club founder (“the first user”) and other club members (“said additional users”). (EX1002, ¶¶126, 120-122.) Ex.2034, p.34
15	The ’801 patent does not define “<i>information associated with at least one wireless networking functionality of said at least one wireless network,</i>” but provides examples. Dependent claim 7 states that the claimed information associated at least one wireless networking functionality comprises “<i>one or more messaging actions implementable over the wireless network.</i>” Claim 8 is similar but recites “<i>one or more collaboration actions implementable over the wireless network.</i>” And dependent claim 2 recites that the information	The ’801 patent does not define “information associated with at least one wireless networking functionality of said at least one wireless network,” but provides examples. Dependent claim 7 states that the claimed information associated at least one wireless networking functionality comprises “one or more messaging actions implementable over the wireless network.” Claim 8 is similar but recites “one or more collaboration actions implementable over the wireless network.” And dependent claim 2 recites that the information comprises

comprises “<i>location information</i>” of a mobile device. These same examples are also mentioned in the written description. (EX-1001, 5:63-6:8.) The proposed combination discloses multiple examples of information associated with at least one wireless networking functionality that track the examples in the patent and satisfy limitation [1F]. Messaging or Collaboration Action: The patent places few if any restrictions on messaging or collaboration actions, and makes clear they include members posting and sharing information to facilitate collaboration. (’801, <i>e.g.</i>, 6:38-42 (“For example, the site can be used to generate messages, using instant messaging (IM), SMS, MMS, pages, emails, voice-over-IP (VoIP) calls, cellular telephone calls, or any other suitable messaging format, that are sent to organization members over the wireless network.”), 6:46-49 (“Organization members can easily and efficiently post information and generate messages to other members so as to facilitate collaboration and other types of interaction.”).) As shown in the discussion of limitations [1C]-[1E], any other club member can contribute additional new messages, photos and chat messages for the club message board, club photo sharing feature, and private chat (“<i>the mobile information channel</i>”), respectively. This additional	“location information” of a mobile device. These same examples are also mentioned in the written description. (’801, 5:63-6:8.) The proposed combination discloses multiple examples of information associated with at least one wireless networking functionality that track the examples in the patent and satisfy limitation 1 [f]. <i>Messaging or Collaboration Action:</i> The patent places few if any restrictions on messaging or collaboration actions, and makes clear they include members posting and sharing information to facilitate collaboration. (’801, <i>e.g.</i>, 6:38-42 (“For example, the site can be used to generate messages, using instant messaging (IM), SMS, MMS, pages, emails, voice-over-IP (VoIP) calls, cellular telephone calls, or any other suitable messaging format, that are sent to organization members over the wireless network.”), 6:46-49 (“Organization members can easily and efficiently post information and generate messages to other members so as to facilitate collaboration and other types of interaction.”).) As shown in the discussion of limitations 1 [c]-[e], any other club member can contribute additional new messages, photos and chat messages for the club message board, club photo sharing feature, and private chat (“the mobile information channel”), respectively. This additional information is associated with a “messaging action” and “collaboration action” because it
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information is associated with a “messaging action” and “collaboration action” because it provides messaging content and makes that content available to the founder and other members, allowing them to collaborate on topics of interest. The proposed combination thus renders obvious <i>“integrating into the mobile information channel,” i.e., the club message board, photo sharing feature, or chat, “information associated with at least one wireless networking functionality of said at least one wireless network,” i.e., a messaging or collaboration action by which another one or more club members (through their mobile device and over a wireless network) provide messaging content to other club members via the club.</i> (EX-1002, ¶181.) Mobile Device Location Information: As noted, the ’801 claims and written description also cover information specifying location information of a mobile device from which content was provided, which is obvious in view of Squibbs. Squibbs describes a technique of recording and displaying data (such as photos) along with the location where the photo was taken. (Squibbs, Abstract.) Squibbs explains that digital cameras that included Global Positioning System (GPS) receivers were known in the art, as were systems that could display the location where	provides messaging content and makes that content available to the founder and other members, allowing them to collaborate on topics of interest. The proposed combination thus renders obvious “integrating into the mobile information channel,” i.e., the club message board, photo sharing feature, or chat, “information associated with at least one wireless networking functionality of said at least one wireless network,” i.e., a messaging or collaboration action by which another one or more club members (through their mobile device and over a wireless network) provide messaging content to other club members via the club. (EX1002, ¶129.) Mobile Device Location Information: As noted, the ’801 claims and written description also cover information specifying location information of a mobile device from which content was provided, which is obvious in view of Squibbs. Squibbs describes a technique of recording and displaying data (such as photos) along with the location where the photo was taken. (Squibbs, Abstract.) Squibbs explains that digital cameras that included Global Positioning System (GPS) receivers were known in the art, as were systems that could display the location where the photo was taken on an electronic map. (Squibbs, ¶¶0003-0004.) Squibbs discloses a photo album system that allows a user to capture and record
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the photo was taken on an electronic map. (Squibbs, ¶¶0003-0004.) Squibbs discloses a photo album system that allows a user to capture and record digital images, which can be associated with the physical location where they were taken. An overview of the system is shown in Figure 3: [image omitted] As further explained in Squibbs, with reference to Figure 3: [block quote omitted] (Squibbs, ¶0031.) 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 marker 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):	digital images, which can be associated with the physical location where they were taken. An overview of the system is shown in Figure 3: [image omitted] (Squibbs, Fig. 3.) As further explained in Squibbs, with reference to Figure 3: [block quote omitted] (Squibbs, ¶0031.) 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 marker 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): [image omitted] (Squibbs, Fig. 6.)
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[image omitted] Figure 6 shows a central map area 61 which “is sufficient to encompass the locations registered for the newly loaded batch of photos.” (Squibbs, ¶0064.) “A thumbnail 63 of each new photo is shown in one or other of the margin areas 62A, B and a 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.) Figure 7 shows a display generated by the album program in Map View 54 (Squibbs, ¶0074): [image omitted] The Map View mode in Figure 7 allows a user to browse the album. (Squibbs, ¶0074.) Squibbs explains that “[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	Figure 6 shows a central map area 61 which “is sufficient to encompass the locations registered for the newly loaded batch of photos.” (Squibbs, ¶0064.) “A thumbnail 63 of each new photo is shown in one or other of the margin areas 62A, B and a 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.) Figure 7 shows a display generated by the album program in Map View 54 (Squibbs, ¶0074): [image omitted] (Squibbs, Fig. 7.) The Map View mode in Figure 7 allows a user to browse the album. (Squibbs, ¶0074.) Squibbs explains that “[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.)
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before transiting to the Map View Mode.” (Squibbs, ¶0075.) Figure 7 shows photos represented “either as thumbnails 81, individual photo icons 80, group icons (see current-abode group icon 85), or concentration icons (see icon 82).” (Squibbs, ¶0075.) Squibbs also discloses (in Figure 8) the ability to display a full-size image of a photo selected from the Map View Mode. (Squibbs, ¶0091, Fig. 8.) Squibbs discloses 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, a digital camera 90 transmits the photo image data to a 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); <i>see also</i> Squibbs, ¶0031 (noting that the photo store can be “external”).) The cell phone, when uploading photo image data, also transmits location information. (Squibbs, ¶0101.) Squibbs explains that 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; <i>see also id.</i>, ¶0101.) Motivation to Combine Neibauer, Miller, Cheng, and Squibbs: It would have been obvious to combine	Figure 7 shows photos represented “either as thumbnails 81, individual photo icons 80, group icons (see current-abode group icon 85), or concentration icons (see icon 82).” (Squibbs, ¶0075.) Squibbs also discloses (in Figure 8) the ability to display a full-size image of a photo selected from the Map View Mode. (Squibbs, ¶0091, Fig. 8.) Squibbs discloses 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, a digital camera 90 transmits the photo image data to a 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); <i>see also id.</i>, ¶0031 (noting that the photo store can be “external”).) The cell phone, when uploading photo image data, also transmits location information. (Squibbs, ¶0101.) Squibbs explains that 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; <i>see also id.</i>, ¶0101.) <i>Rationale and Motivation to Combine (Neibauer, Miller and Cheng, with Squibbs):</i> It would have been obvious to combine Neibauer, Miller and Cheng with Squibbs, predictably resulting in the system and method for creating a club
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Neibauer, Miller and Cheng with Squibbs, predictably resulting in the system and method for creating a club described above, but with the claimed <i>“mobile information channel”</i> integrating <i>“information associated with at least wireless networking functionality of at least one wireless network,” i.e.,</i> the location information associated with a photo taken and uploaded by a club member. (EX-1002, ¶¶121, 192.) For example, under the proposed combination, when a club member uploads a photo using the club photo sharing feature in Neibauer, 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.⁶ (EX-1002, ¶121.) Although claim 1 does not recite any specifics for how <i>“integrating”</i> wireless network functionality information into a mobile information channel must take place, under the proposed combination, it would have been obvious to adapt the club photo sharing feature to also display location information associated with photos uploaded by club members, for example, via a map-based user interface similar to the one described in Figures 6-7 of Squibbs discussed above. (EX-1002, ¶122.) Under the proposed combination, therefore, the club photo sharing feature would have been further adapted to display location information (for example on an electronic map), in	described above, but with the claimed “mobile information channel” integrating “information associated with at least wireless networking functionality of at least one wireless network,” i.e., the location information associated with a photo taken and uploaded by a club member. (EX1002, ¶139.) For example, under the proposed combination, when a club member uploads a photo using the club photo sharing feature in Neibauer, 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.³ (EX1002, ¶139.) Although claim 1 does not recite any specifics for how “integrating” wireless network functionality information into a mobile information channel must take place, under the proposed combination, it would have been obvious to adapt the club photo sharing feature to also display location information associated with photos uploaded by club members, for example, via a map-based user interface similar to the one described in Figures 6-7 of Squibbs discussed above. (EX1002, ¶140.) Under the proposed combination, therefore, the club photo sharing feature would have been further adapted to display location information (for example on an electronic map), in association with the photos. This would also have been seen as a natural extension of map features already disclosed in Neibauer, as discussed
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association with the photos. This would also have been seen as a natural extension of map features already disclosed in Neibauer, as discussed below. (EX-1002, ¶¶122.) Squibbs is an analogous reference in the same field as the '801 patent and would have been reasonably pertinent to problems facing the patent inventors, including how to obtain location information and integrate it into a mobile information channel. (EX-1002, ¶123.) 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, ¶124.) 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. 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, ¶125.) 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, pp.222-224.) Neibauer further describes how a user can annotate a map to identify objects	below. (EX1002, ¶¶140, 142.) Squibbs is an analogous reference in the same field as the '801 patent and would have been reasonably pertinent to problems facing the patent inventors, including how to obtain location information and integrate it into a mobile information channel. (EX1002, ¶141.) An ordinarily skilled artisan would have been motivated to combine in order to improve the user experience of club members who use the photo sharing feature. (EX1002, ¶142.) 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. 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. (EX1002, ¶142.) 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, pp.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, pp.226-228, Fig. 10-5 (showing “My House” and “The picnic is here”).) The
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	of interest on the map, such as the user's house and the location of an upcoming event. (Neibauer, pp.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 that Neibauer and Squibbs are naturally combinable and that a POSITA would have been motivated to do so. (EX-1002, ¶126.) A POSITA would also have had a reasonable expectation of success, as Squibbs relies on existing technologies and could have been implemented using conventional techniques. (EX-1002, ¶128.) 537 IPR Petition, pp.33-43	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 that Neibauer and Squibbs are naturally combinable and that a skilled artisan would have been motivated to do so. (EX1002, ¶142.) A skilled artisan would also have had a reasonable expectation of success, as Squibbs relies on existing technologies and could have been implemented using conventional techniques. (EX1002, ¶143.) Ex.2034, pp.34-44
16	When a club member uploads a photo via their mobile device ("<i>the additional content</i>") to the club photo sharing feature in Neibauer, the location from where the photo was received would also have been provided. (EX-1002, ¶200.) 537 IPR Petition, p.43	As just explained, under the proposed combination in view of Squibbs, when a club member uploads a photo via their mobile device ("the additional content") to the club photo sharing feature in Neibauer, the location from where the photo was received would also have been provided. Ex.2034, p.44
17	Claim 3 was also covered in the discussion of limitation [1F]. When a club member uploads a photo via their mobile device to the club photo sharing feature in Neibauer, the mobile device would have "<i>obtain[ed] location</i>	Claim 3 was also covered in the discussion of limitation 1[f]. 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 in Neibauer, the

	<i>information</i>” of the uploading handheld. (Squibbs, ¶¶0101, 0098.) The combination, moreover, would have resulted in “<i>inserting content into the mobile information channel based on the obtained location information</i>,” because the mobile information channel would have displayed a map-based view (“<i>content</i>”) showing the location, as explained for limitation [1F]. (EX-1002, ¶201.) 537 IPR Petition, p.44	mobile device would have “obtain[ed] location information” (e.g. via GPS or mobile radio infrastructure) of the mobile device that is used to upload the photo. (Squibbs, ¶¶0101, 0098.) The proposed combination, moreover, would have resulted in “inserting content into the mobile information channel based on the obtained location information,” because the mobile information channel would have displayed a map-based view (“content”) based on the mobile device location, as described in Squibbs and fully explained for limitation 1[f]. Ex.2034, pp.44-45
18	As noted, the ’801 patent explains that information associated with at least one wireless networking functionality can comprise a “messaging action” or “collaboration action” implemented over a wireless network. (EX-1001, 5:63-6:8, Claims 7 & 8.) Claim 4 is obvious in view of the Yahoo! Classifieds feature in Neibauer, and the bulletin board in Miller. First, Yahoo! Classifieds, described in the same chapter of Neibauer as Yahoo! Clubs, provides a feature for allowing users to post messages about items for sale. (Neibauer, p.491.) This is shown in Figure 21-20: [image omitted] (Neibauer, p.491, Fig. 21-20.) As shown, a user posts an advertisement by entering product-identifying	As noted, the ’801 patent makes clear that information associated with at least one wireless networking functionality can comprise a “messaging action” or “collaboration action” implemented over a wireless network. (’801, 5:63-6:8, Claims 7 & 8.) Claim 4 is obvious in view of the Yahoo! Classifieds feature in Neibauer, and the bulletin board in Miller. First, Yahoo! Classifieds, described in the same chapter of Neibauer as Yahoo! Clubs, provides a feature for allowing users to post messages about items they wish to sell or purchase. (Neibauer, p.491.) This is shown in Figure 21-20 [image omitted] (Neibauer, p.491, Fig. 21-20.) As shown, a user posts an advertisement by entering product-identifying information such as in the ad title or description. (<i>Id.</i>)

information. (Neibauer, p.491, Fig. 21-20.) It would have been obvious to apply the Yahoo! Classifieds teachings to the club message board feature, predictably resulting in the club message board being used to post messages offering items for sale. (EX-1002, ¶¶203-04.) <i>See also Boston Scientific Scimed, Inc. v. Cordis Corp.</i>, 554 F.3d 982, 991 (Fed. Cir. 2009) (“Combining two embodiments disclosed adjacent to each other in a prior art [reference] does not require a leap of inventiveness.”). Moreover, use of a club message board to post advertisements is suggested by Miller, which discloses a similar bulletin board for selling goods. (Miller, Fig. 2, 0046:20-33.) “A bulletin board...lists notices posted by group members, which may be offers to buy or sell, but need not be limited to such offers.” (Miller, 0046:20-22.) It thus would have been obvious that messages posted in the club message board (“<i>the mobile information channel</i>”) would include information identifying a product for purchase or sale (“<i>product-identifying information</i>”). (EX-1002, ¶¶203-04.) This information would have been obtained “<i>over said at least one wireless network</i>,” because it would have been obtained from the club member posting the listing via a mobile device connected the wireless network. The proposed combination would also	It would have been obvious to apply the Yahoo! Classifieds teachings to the club message board feature, predictably resulting in the club message board being used by club members to post messages relating to items they are offering for sale. (EX1002, ¶¶147-148.) <i>See also Boston Scientific Scimed, Inc. v. Cordis Corp.</i>, 554 F.3d 982, 991 (Fed. Cir. 2009) (“Combining two embodiments disclosed adjacent to each other in a prior art [reference] does not require a leap of inventiveness.”). Moreover, use of the club message board to post advertisements is expressly suggested by Miller, which discloses a bulletin board with substantially similar functionality to the club message board. (Miller, Fig. 2, 0048:20-33.) “A bulletin board... lists notices posted by group members, which may be offers to buy or sell, but need not be limited to such offers.” (Miller, 0048:20-22.) It thus would have been obvious that one or more messages posted in the club message board (“the mobile information channel”) could have included information identifying a product being offered for purchase or sale (“product-identifying information”). (EX1002, ¶¶147-148.) This information would have been obtained “over said at least one wireless network,” because it would have been obtained from the club member posting the listing via a mobile device connected the wireless network. The proposed combination would also
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	have resulted in “<i>inserting content into the mobile information channel based on the obtained product-identifying information</i>,” because the product-identifying information would have been included in the title and/or body of the message, which would have been available through the club message board. (EX-1002, ¶204.) 537 IPR Petition, pp.45-47	have resulted in “inserting content into the mobile information channel based on the obtained product-identifying information,” because the product-identifying information would have been included in the title and/or body of the message, which would have been available through the club message board. (EX1002, ¶148.) Ex.2034, pp.45-47
19	As explained for claim 4, the inserted content would also have comprised pricing and sales conditions information (“<i>product ordering</i>”) and warranty information from the seller (“<i>product purchase support</i>”). (Neibauer, p.491, Fig. 21-20.) It would have been obvious that other well-known types of product ordering and support could have been provided, including information on returns, payment, and shipping, among others. (EX-1002, ¶205.) 537 IPR Petition, p.47	As explained for claim 4, the inserted content would also have comprised pricing and sales conditions information (“product ordering”) and warranty information from the seller (“product purchase support”). (Neibauer, p.491 (“Complete the form by describing the item and your sales conditions, and then click Submit Entry.”), Fig. 21-20 (Condition, Price, and Warranty information).) It would have been apparent and obvious that many other well-known types of product ordering or purchase support information could have been provided, including whether the seller accepted returns or all sales were final, who payment and delivery/shipping were to be effectuated, among others. (EX1002, ¶149.) Ex.2034, pp.47-48
20	As explained for limitation [1F], the information associated with at least one wireless networking functionality would have comprised location-based service information. (Squibbs, ¶¶0098, 0101; EX-1002, ¶206.) 537 IPR Petition, pp.47-48	As fully explained for limitation 1[f], the information associated with at least one wireless networking functionality would have comprised location-based service information, e.g., the location of the user as obtained either through the mobile radio infrastructure or via GPS. (Squibbs, ¶¶0098, 0101.)

		Ex.2034, p.48
21	As explained for limitation [1F], the information associated with at least one wireless networking functionality can comprise either “<i>one or more messaging actions</i>” or “<i>one or more collaboration actions</i>,” both of which would have been implemented over the wireless network, as recited in claims 7 and 8. (EX-1002, ¶207.) 537 IPR Petition, p.48	As fully explained for limitation 1[f], the information associated with at least one wireless networking functionality can comprise either “one or more messaging actions” or “one or more collaboration actions,” both of which would have been implemented over the wireless network, as recited in claims 7-8. Ex.2034, p.48
22	The option to specify a maximum image file size discussed for claim 9, for example, allows the user to specify that images greater than a certain size will not be transmitted to mobile devices. (Cheng, <i>e.g.</i>, 11:15-19, 12:48-50.) Cheng explains that maximum image file size “can be based on the type of Internet connection the mobile device 108 uses. For example, if the mobile device 108 has a slow connection, the conversion engine 118 can be configured to omit images over a specified size. If the mobile device 108 has a faster connection, larger file size value can be specified.” (Cheng, 12:50-55.) This option is thus based in part on the wireless networking functionalities of the members’ handheld devices. (EX-1002, ¶210.) It would have been obvious that the same rationale would have applied to the other content integration options, including image resizing as disclosed in Neibauer, as well as image scaling, color reduction, resolution reduction,	The option to specify a maximum image file size discussed for claim 9, for example, allows the user to specify that images greater than a certain size will not be transmitted to mobile devices. (Cheng, <i>e.g.</i>, 11:15-19, 12:48-50.) Cheng explains that maximum image file size “can be based on the type of Internet connection the mobile device 108 uses. For example, if the mobile device 108 has a slow connection, the conversion engine 118 can be configured to omit images over a specified size. If the mobile device 108 has a faster connection, larger file size value can be specified.” (Cheng, 12:50-55.) This content integration option is thus based in part on the wireless networking functionalities of the wireless devices of the club founder and the other club members. (EX1002, ¶154.) It would have been obvious that the same rationale would have applied to the other content integration options, including image resizing as disclosed in Neibauer, as well as image scaling, color reduction,

	and reducing the quality of the JPEG image conversion in Cheng. (EX-1002, ¶211.) Each of these options allows members to tailor their uploaded content based on bandwidth limitations of their handhelds, thus advantageously conserving network bandwidth, improving performance, and optimizing overall experience. (<i>Id.</i>) 537 IPR Petition, pp.50-51	resolution reduction, and reducing the quality of the JPEG image conversion in Cheng. (EX1002, ¶155.) Each of these options would have allowed the club founder and other club members to tailor their uploaded content based on the bandwidth limitations of their mobile devices, thus conserving network bandwidth, improving performance, and overall enhancing the user’s experience. (EX1002, ¶155.) Ex.2034, pp.50-51
23	Neibauer discloses multiple examples where “<i>additional content</i>” is associated through a user-activatable control mechanism, including a hyperlink. As to a “<i>mobile information channel</i>” of a club message board, a club member can write a new message and “[c]lick the Post Message button” to add it to the message board. (Neibauer, p.471, ¶4.) Clicking on this button (<i>i.e.</i> a “<i>user-activatable control mechanism</i>”) adds (“<i>associates</i>”) the new message (“<i>the additional content</i>”) with the club message board (“<i>the mobile information channel</i>”). 537 IPR Petition, pp.51-52	Neibauer discloses multiple examples where content provided by other club members (“the additional content”) is associated through a user-activatable control mechanism such as a hyperlink. With respect to the example of a “mobile information channel” of a club message board, a club member can write a new message and “[c]lick the Post Message button” to add it to the message board. (Neibauer, p.471, ¶4.) Clicking on this button (<i>i.e.</i> a “user-activatable control mechanism”) adds (“associates”) the new message (“the additional content”) with the club message board (“the mobile information channel”). Ex.2034, p.52
24	Neibauer explains that “[a] <i>hypertext link</i>, better known as a <i>hyperlink</i>, is a graphic or line of text that you can click to move to another Web location.” (Neibauer, p.116 (italics in original).) This statement is consistent with how a POSITA would have understood “<i>hyperlink</i>” in claim 12. (EX-1002, ¶216.)	Neibauer explains that [a] <i>hypertext link</i>, better known as a <i>hyperlink</i>, is a graphic or line of text that you can click to move to another Web location.” (Neibauer, p.116 (italics in original).) This statement is consistent with how a skilled artisan would have understood “hyperlink” as recited in claim 12, and

	537 IPR Petition, p.52	each of the mechanisms discussed above qualifies as a hyperlink. (EX1002, ¶160.) Ex.2034, p.53
25	Neibauer discloses that a club can also be used to distribute advertising content under two theories. First, Neibauer discloses displaying advertising on club pages: [image omitted] (Neibauer, p.475, Fig. 21-8 (red box added).) As shown in the red box, an advertisement shows that the club was sponsored. The advertising content is also shown accompanying the club message board (“<i>mobile information channel</i>”). (EX-1002, ¶217.) This is consistent with Miller, which confirms that it would have been obvious to include advertising content on a web page, which was well known. (Miller, 0047:1-5.; EX-1002, ¶218.) Second, claim 13 is obvious for the same reasons as claim 4, as it would have been obvious for messages posted in the club message board to have included advertising content, such as offers to buy or sell items. (EX-1002, ¶¶219-20.) Neibauer discloses a classified ads system for such messages. (Neibauer, p.491; EX-1002, ¶219.) In both cases, the advertising content would have been inserted “<i>along with said portion of the additional content.</i>” In the first example of Figure 21-8 of	Neibauer discloses that a club can also be used to distribute advertising content to other club members, along with user-provided content, under two theories. First, Neibauer discloses displaying advertising on club pages: [image omitted] (Neibauer, p.475, Fig. 21-8 (red box added).) As shown in the red box, an advertisement shows that the club was sponsored. The advertising content is also shown accompanying the club message board (“mobile information channel”). This is consistent with Miller, which confirms that it would have been obvious to include advertising content on a web page. (Miller, 0049:1-5.) Distributing advertising content via a web page was a well-known. (EX1002, ¶162.) Second, claim 13 is obvious for the same reasons as claim 4, as it would have been obvious for messages posted in the club message board to have included advertising content posted by the founder or other club members, such as offers to buy or sell items. (EX1002, ¶¶146-148, 163.) Neibauer, as noted, discloses a classified ads system for such messages. (Neibauer, p.491; EX1002, ¶147.) In both cases, the advertising content would have been inserted “along with

	Neibauer, the sponsorship advertisement appearing on the club page (“<i>advertising content</i>”) was inserted alongside messaging content. In the second, advertising messages appear along with other messages. Each discloses advertising content being inserted “<i>along with said portion of the additional content.</i>” (EX-1002, ¶220.) 537 IPR Petition, pp.53-54	said portion of the additional content.” In the first example of Figure 21-8 of Neibauer, the sponsorship advertisement appearing on the club page (“advertising content”) was inserted alongside messaging content in the club message board. In the second example described above, advertising messages by club members would have appeared along with other messages on the club message board. Each of these two examples thus discloses advertising content being inserted “along with said portion of the additional content,” <i>i.e.</i>, along with other messages in the club message board posted by other club members. (EX1002, ¶164.) Ex.2034, pp.54-55
26	It would have been obvious that the additional content would have been obtained from a “<i>device-captured data source of the given user</i>” that includes at least a source of “<i>device-captured location coordinates.</i>”⁷ As noted for claim 1, Neibauer discloses a photo sharing feature for uploading and sharing photos. (Neibauer, pp.477-479.) Under the proposed combination with Squibbs, as explained for limitation [1F], photos uploaded by the user would have included location coordinates associated with the photo. (EX-1002, ¶221; Squibbs, Fig. 4, ¶0049) These coordinates are captured by the mobile device. (Squibbs, ¶0098.) 537 IPR Petition, pp.54-55	It would have been obvious that the additional content would have been obtained from a “device-captured data source of the given user” that includes at least a source of “device-captured location coordinates.”⁴ As noted for claim 1, Neibauer discloses a photo sharing feature for uploading and sharing photos. (Neibauer, pp.477-479.) Under the proposed combination with Squibbs, as explained for limitation 1[f], photos uploaded by the user would have included location coordinates associated with the photo. (Squibbs, Fig. 4 (showing “LOCATION COORD” field for photo), ¶0049 (referring to “the coordinates provided by the location data”).) These coordinates are “device-captured” because they were captured by the mobile device. (Squibbs, ¶0098.)

		Ex.2034, pp.55-56
27	As explained for claim 1, one of the steps for creating a club involves the club founder (“<i>the first user</i>”) providing a title or name for the club. (Neibauer, <i>e.g.</i>, p.481, ¶4 (“Enter a name for the club.”).) This name is then used as the title for the club page containing the mobile information channels: [image omitted] (Neibauer, p.483, Fig. 21-13.) “Figure 21-13 shows an example of a personal club page. The page contains all of the elements found on other club pages.” (Neibauer, p.482.) The title of the club page in this example is “Alan and Barbara’s Clubhouse,” which serves as a title for all the club’s “<i>mobile information channels</i>.” 537 IPR Petition, pp.56-57	As fully explained for claim 1, one of the steps for creating a club involves the club founder (“the first user”) providing a title or name for the club. (Neibauer, <i>e.g.</i>, p.481, ¶4 (“Enter a name for the club.”).) This name is then used as the title for the club page containing the mobile information channels: [image omitted] (Neibauer, p.483, Fig. 21-13.) “Figure 21-13 shows an example of a personal club page. The page contains all of the elements found on other club pages.” (Neibauer, p.482.) As shown, the title of the club page in this example is “Alan and Barbara’s Clubhouse,” which serves as a title for the club and thus all of its mobile information channels. As shown in Figure 21-13, this title also serves as the title for the club message board information channel itself, shown on the club home page. Ex.2034, pp.56-57
28	It would have been obvious that a mobile information channel could have been associated with an entertainment-related entity, such as a club devoted to a particular movie or movie series. (EX-1002, ¶226.) Figure 21-8 of Neibauer shows a club relating to James Bond: [image omitted] (Neibauer, p.475, Fig. 21-8.) The left side of the page shows links shown	It would have been obvious that a mobile information channel could have been associated with an entertainment-related entity, such as a club devoted to a particular movie or movie series. (EX1002, ¶170.) Figure 21-8 of Neibauer shows a screenshot of a club relating to James Bond movies: [image omitted] (Neibauer, p.475, Fig. 21-8.) The left side of the page shows links shown

	under “Our Pages,” for the club message board (“Messages”), club photo sharing feature (“Photos”), and club chat (“Chat”), among others. This discloses multiple examples of mobile information channels “<i>associated with an entertainment-related entity</i>,” <i>i.e.</i>, one or more James Bond movies. 537 IPR Petition, pp.57-58	under “Our Pages,” for the club message board (“Messages”), club photo sharing feature (“Photos”), and club chat (“Chat”), among others. This discloses multiple examples of mobile information channels “associated with an entertainment-related entity,” <i>i.e.</i>, one or more James Bond movies. Ex.2034, pp.58-59
29	Each mobile information channel is also associated with “<i>a mobile device application</i>,” <i>i.e.</i>, a browser software application executing on the mobile device. (Cheng, <i>e.g.</i>, 2:11-15 (listing exemplary mobile browsers).) This is consistent with the ’801 patent, which similarly specifies that a mobile device can access a mobile website using a browser. (EX-1001, 12:64-66.) Each mobile information channel is thus “<i>associated with a mobile device application</i>,” because the web browser on the mobile device is used to access the mobile information channel, as explained in claim 1. (EX-1002, ¶227.) 537 IPR Petition, p.59	Each mobile information channel is also associated with “a mobile device application,” <i>i.e.</i>, a browser software application executing on the mobile device. (Cheng, <i>e.g.</i>, 2:11-15 (listing exemplary mobile browsers).) This is consistent with the ’801 patent, which similarly specifies that a mobile device can access a mobile website using a browser. (’801, 12:64-66.) Each mobile information channel is thus “associated with a mobile device application,” because the web browser on the mobile device is used to access the mobile information channel over the wireless network and use the features of the club as described in Neibauer, as fully explained in claim 1. (EX1002, ¶171.) Ex.2034, pp.59-60
30	The browser on the mobile device also comprises a “<i>personalized content application</i>,” based on two separate theories. First, as explained for claim 1, club members including the founder can post their own personalized messages using the private message board. (Neibauer, p.483, Fig. 21-13.) They can also engage in online chat, and add their own personalized photos	The browser on the mobile device also comprises a “personalized content application,” based on two separate theories. First, as explained for claim 1, club members including the founder can post their own personalized messages using the private message board. (Neibauer, p.483, Fig. 21-13 (showing personalized “Welcome” message posted by club founder).) They can also engage

or create their own personalized photo albums. (Neibauer, pp.477-479.) In each of these examples, the mobile browser enables a club member to access “<i>personalized content</i>” because, in the case of the club founder for example, the content would have included messages written by the founder. By allowing a club member to access personalized content, the browser application on the mobile device “<i>comprises a personalized content application.</i>” (EX-1002, ¶228.) Separately, Neibauer discloses the ability to customize one’s own Yahoo! home page using Yahoo! Companion, a toolbar added to the web browser. (Neibauer, pp.56.) This feature allows the user to personalize and customize aspects of the user’s My Yahoo! home page. (Neibauer, pp.66-74.) Under either theory, the browser “<i>comprises a personalized content application</i>” because the browser allows a user to access personalized content through the features described in Neibauer. (EX-1002, ¶¶228-30.) 537 IPR Petition, pp.59-60	in online chat with other members, and add their own personalized photos or create their own personalized photo albums. (Neibauer, pp.477-479.) In each of these examples, the mobile browser enables a club member to access “personalized content” because, in the case of the club founder for example, the content would have included messages written by or directed to the founder, or in the case of private club chat, would have included messaging content specifically directed to the club founder by one or more other members. By allowing a club member to access personalized content, the browser application on the mobile device “comprises a personalized content application.” (EX1002, ¶172.) As a separate and independent theory, Neibauer discloses the ability of a user to customize their own Yahoo! home page using Yahoo! Companion, a toolbar added to the web browser window. (Neibauer, pp.56.) This feature allows the user, among other things, to personalize and customize aspects the content of the user’s My Yahoo! home page. (Neibauer, pp.66-74.) Under either theory, therefore, the browser “comprises a personalized content application” because, in both cases, the browser allows a user to access personalized content through the features described in Neibauer. (EX1002, ¶¶172-174.) Ex.2034, pp.60-61
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31	Claim 22 adds nothing of patentable significance, as it would have been obvious that the steps of claim 1 would have been carried out by software code executed by a processing element, such as a server with a processor and memory. (EX-1002, ¶231; Cheng, <i>e.g.</i>, 23:16-20.) The 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. (Cheng, <i>e.g.</i>, 23:64-24:4.) Under the combination with Cheng, therefore, the “<i>processing element</i>” would have included origin web server 102 in Cheng (which would have performed the functions in Neibauer), and proxy server 110 (which would have made the features of Neibauer available to mobile devices). (EX-1002, ¶232.) Mapping the claimed “<i>processing element</i>” to origin web server 102 and proxy server 110 is consistent with the ’801 patent, which makes clear that a processing element or server can itself comprise multiple servers. (EX-1001, 9:8-10) And even if the claim required that the “<i>processing element</i>” be contained within a single physical server (it does not), it would have been obvious to combine proxy server 110 and origin server 102 into a single server. (EX-1002, ¶233.) Cheng explains that the computer system implementing the proxy server can “be replaced by, or combined with, any suitable processing system operative in accordance with the principles of the	Claim 22 adds nothing of patentable significance, as 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 communication system, such as a server that includes a processor and memory. (EX1002, ¶176; Cheng, <i>e.g.</i>, 23:16-20.) It would also have been obvious that the 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). (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).) Under the combination with Cheng, therefore, the “processing element” would have included origin web server 102 in Cheng (which would have performed the functions in Neibauer), and proxy server 110 (which would have made the features of Neibauer available to mobile devices). Petitioner notes that mapping the claimed “processing element” to origin web server 102 and proxy server 110 is consistent with the ’801 patent, which makes clear that a processing element or server can itself comprise multiple servers. (’801, 9:8-10 (“Each of the servers 33, 35, 37 and 39 [of processing elements 30] may comprise one or more of the servers 16 or other elements shown in FIG. 1A, or suitable portions or combinations thereof.”).) And even if the claim required that the “processing
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	present invention....” (Cheng, 23:20-25.) A POSITA would have been familiar with well-known techniques for consolidating tasks within a single server when needed. (EX-1002, ¶233.) For example, a POSITA would have been motivated to combine these servers to improve performance of the overall system, as this would have eliminated the step of (and network overhead associated with) origin server 102 having to send the original web page 104 to proxy server 110. (<i>Id.</i>) 537 IPR Petition, pp.60-62	element” be contained within a single physical server (it does not), it would have been obvious to combine proxy server 110 and origin server 102 into a single server. (EX1002, ¶177.) This implementation is disclosed by Cheng itself, which explains that the computer system implementing the proxy server can “be replaced by, or combined with, any suitable processing system operative in accordance with the principles of the present invention....” (Cheng, 23:20-25.) This would have been obvious and trivial in view of Cheng, as ordinarily skilled artisans would have been familiar with well-known techniques for consolidating tasks within a single server when needed. (EX1002, ¶177.) For example, an ordinarily skilled artisan would have been motivated to combine these servers to improve performance of the overall system, as this would have eliminated the step (and network overhead associated with) origin server 102 having to send the original web page 104 to proxy server 110 over the Internet. (<i>Id.</i>) Ex.2034, pp.61-63
32	Dependent claim 24, which depends from claim 23, expressly recites that “<i>the processing element comprises at least one server</i>,” confirming that the claimed processing element can comprise servers. It would have apparent and obvious that origin web server 102 in Cheng (which would have provided the features deceived in Neibauer and Miller), and proxy server 110, under	Dependent claim 24, which depends from claim 23, expressly recites that “the processing element comprises at least one server,” confirming that the claimed processing element can comprise servers. It would have apparent and obvious that origin web server 102 in Cheng (which would have provided the features deceived in Neibauer and Miller), and proxy server 110, under the proposed combination, would have comprised “a

	the proposed combination, would have comprised “<i>a processing element comprising a processor coupled to a memory.</i>” (EX-1002, ¶236.) Mapping the claimed “<i>processing element</i>” as including a web server and proxy server 110 is consistent with the ’801 patent, as explained for claim 22. And as explained for claim 22 above, it would also have been obvious to combine origin server 102 and proxy server 110 if the claim were construed to impose such a requirement. (EX-1002, ¶¶233, 236.) 537 IPR Petition, pp.62-63	processing element comprising a processor coupled to a memory.” (EX1002, ¶180.) Petitioner notes that mapping the claimed “processing element” as including a web server and proxy server 110 is consistent with the ’801 patent, as explained for claim 22. And as fully explained for claim 22 above, it would also have been obvious to combine origin server 102 and proxy server 110, to the extent the claim were construed to impose such a requirement. (EX1002, ¶¶177, 180.) Ex.2034, pp.63-64
33	This function would also have been performed by the claimed processing element as described above. Under the proposed combination, origin web server 102 and proxy server 110 (the “<i>at least one processing element</i>”) would have worked together to provide the claimed interface. 537 IPR Petition, p.63	This function would also have been performed by the claimed processing element as described above. Under the proposed combination, origin web server 102 and proxy server 110 (the “at least one processing element”) would have worked together to provide the claimed interface. Ex.2034, p.64
34	Ground 2 is substantially the same as Ground 1 except that it adds Harvey (EX-1010) to account for a construction of “mobile information channel” proposed by Petitioner in litigation. If this term is unconstrued, this ground need not be considered. 537 IPR Petition, p.66	Ground 2 is substantially the same as Ground 1 except that it adds Harvey (EX1010) to account for a construction of “mobile information channel” proposed by Petitioner in the litigation. In the event the Board finds it unnecessary to construe this term for this IPR, this ground need not be further considered. Ex.2034, p.67
35	Harvey discloses techniques for allowing users to create on-line communities, similar to the web-based	Harvey discloses techniques for allowing users to create on-line communities in which users can communicate and share

clubs disclosed in Neibauer and the collaborative environments described in Miller. (Harvey, 4:24-43.) Harvey allows a community creator to author content for a community before the community is launched. Harvey explains that “[t]he community creating module permits the creator to create a community, and designate applications and content presented in the community by a user interface.” (Harvey, 4:28-30.) A user can access a creating module 165 in order to create a new community. (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, designate content and application objects, subscribe to subscription objects, and add other information associated with the community.” (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 before the community is created. 537 IPR Petition, pp.67-68	information, which are similar to the web-based clubs disclosed in Neibauer and the collaborative environments described in Miller. (Harvey, 4:24-43.) The key feature of Harvey here is the ability of a community creator to author content for a community before the community is created and launched. As noted, Harvey explains that “[t]he community creating module permits the creator to create a community, and designate applications and content presented 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, designate content and application objects, subscribe to subscription objects, and add other information associated with the community.” (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.2034, pp.68-69
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36	Motivation to Combine with Harvey: It would have been obvious to combine the prior art cited for Ground 1 with Harvey, predictably resulting in the club creation user interface in Neibauer with the further ability to allow the club founder to add content to mobile information channels, before the club is launched. (EX-1002, ¶251.) This satisfies Meta’s proposed construction of “<i>mobile information channel</i>” as “a virtual location at the content management site at which user-authored content may be added for transmission to the mobile web site.” Under the proposed combination, therefore, the “<i>content management site</i>” would have included the web-based interface for allowing the founder to create a Neibauer club, which would have further permitted the club founder to add content for the club via the mobile information channels. This information would have been made available for transmission to “<i>the mobile website</i>,” i.e., the club site as delivered to mobile users, on the club page itself as described for limitations [1A]-[1B] in Ground 1. (EX-1002, ¶252.) 537 IPR Petition, p.68	<i>Rationale and Motivation to Combine (with Harvey):</i> It would have been obvious to combine the prior art cited for Ground 1 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, before the club is created and launched. This would have satisfied Petitioner’s proposed construction of “mobile information channel” as “<i>a virtual location at the content management site at which user-authored content may be added for transmission to the mobile web site.</i>” Under the proposed combination, therefore, the “<i>content management site</i>” would have included the web-based interface for allowing the founder to create and manage a club disclosed in Neibauer, which would have further permitted the club founder to add content for the club via the mobile information channels, such as initial club messages, initial photos, and so forth. This information would have been made available for transmission to “<i>the mobile website</i>,” i.e., the club site as delivered to mobile users, on the club page itself as described for limitations 1[a]-[b] in Ground 1. (EX1002, ¶¶88-91, 108-109, 118, 193-194.) Harvey is an analogous reference and would have been reasonably pertinent to problems facing the inventors. (EX1002, ¶195.) Ex.2034, p.69
37	A POSITA would have been motivated to combine to provide club founders	A skilled artisan would have been motivated to combine in order to provide

with greater customizability for clubs by allowing them to use the club-creation interface <i>before</i> the club is made available to other members. (EX-1002, ¶254.) This would have allowed the club founder to ensure that other club members would not experience a “blank” club devoid of content, because the club founder would have populated mobile information channels (such as the club message board) with initial content, thus providing a more engaging club experience. (<i>Id.</i>) A POSITA would also have had a reasonable expectation of success and could have implemented the combination using conventional techniques. (EX-1002, ¶¶253, 255.) 537 IPR Petition, pp.68-69	club founders with greater customizability for clubs by allowing them to use the club-creation interface to populate mobile information channels with initial content, <i>before</i> the club is made available to other members. (EX1002, ¶196.) This would have allowed the club founder to ensure that other club members would not experience a “blank” club devoid of content, because the club founder would have populated mobile information channels (such as the club message board) with some initial content, thus providing a more engaging club experience for other members, featuring content available from the moment of the club’s creation. (<i>Id.</i>) A skilled artisan would also have had a reasonable expectation of success and could have implemented the combination using conventional techniques. (EX1002, ¶197.) Ex.2034, p.70
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