

Summary of verbatim (or nearly verbatim) matches between the 00537 petition to the Houh Declaration Ex.1002

	'537 Petition	Houh Decl. (Ex. 1002)
1	The '801 patent "relates generally to network-based communications systems, and more particularly to techniques for information content management in such systems." (EX-1001, 1:24-26.) 537 Petition, p. 2	The '801 patent pertains to "network-based communications systems, and more particularly to techniques for information content management in such systems." ('801 patent, 1:24-26.) Ex. 1002, ¶ 25
2	Figure 1A (below) "shows an example network-based communication system 10" including "wireless network 12 coupled to the Internet 14, a set of mobile devices 15, a set of servers 16 and a set of user terminals 18." (EX-1001, 3:54-58.) 537 Petition, p. 3	Figure 1A of the '801 patent, (reproduced below) "shows an example network-based communication system 10" including "wireless network 12 coupled to the Internet 14, a set of mobile devices 15, a set of servers 16 and a set of user terminals 18." (EX-1001, 3:54-58.) Ex. 1002, ¶ 26
3	System 10 "provides at least one content management site accessible to a system user" including "M-channels" which "allow unsophisticated users to easily and efficiently author message data or other types of information content to be made accessible via a collaborative workspace, a data mailbox, a collaborative community, or other type of mobile site." (EX-1001, 5:18-20, 8:17-23.) Such mobile sites may be associated with "a group comprising multiple members having a common interest" (EX-1001, 6:30-32), "an event" (EX-1001, 6: 50-51), "a game," (EX-1001, 7:30-31), or "a user of IM, SMS, MMS, email or other type of messaging service" (EX-1001, 7:42-	The patent discloses that the system "provides at least one content management site accessible to a system user" including "M-channels" which "allow unsophisticated users to easily and efficiently author message data or other types of information content to be made accessible via a collaborative workspace, a data mailbox, a collaborative community, or other type of mobile site" (EX-1001, 5:18-20, 8:17-23.) Such mobile sites may be associated with "a group comprising multiple members having a common interest," (EX-1001, 6:30-32), "an event," (EX-1001, 6:50-51), "a game," (EX-1001, 7:30-31), or "a user of IM, SMS, MMS, email or other type of

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	44), among other associations. (EX-1001, 6:30-8:12.) 537 Petition, p. 3-4	messaging service,” (EX-1001, 7:42-44), among other associations. (EX-1001, 6:30-8:12.) Ex. 1002, ¶ 28
4	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. A person could also have qualified as a person of ordinary skill in the art with some combination of (1) more formal education (such as a master’s of science degree) and less technical experience, or (2) less formal education and more technical or professional experience.² (EX-1002, ¶¶30-31.) 537 Petition, p. 4-5	In my opinion, a 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. A person could also have qualified as a POSITA with some combination of (1) more formal education (such as a master’s of science degree) and less technical experience, or (2) less formal education and more technical or professional experience. Ex. 1002, ¶ 33
5	In response to this rejection, the applicant argued that the pending claims were patentably distinct because they included the phrase “integrating into the mobile information channel information associated with at least one networking functionality of said at least one network,” which did not appear in U.S. 8,135,801. (EX-1022, 300.) 537 Petition, p. 5	In response, Applicant argued that the pending claims and patent’s claims were distinct because the pending claims included the limitation “integrating into the mobile information channel information associated with at least one networking functionality of said at least one network,” whereas U.S. Patent claims 8,135,801 did not. (EX-1022, 300.) Ex. 1002, ¶ 34

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6	Neibauer discloses features of a Yahoo! service known as Yahoo! Clubs. (Neibauer, pp.473-483.) Neibauer explains that “[a] club 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.) 537 Petition, p. 10-11	Neibauer discloses features of the Yahoo! online service. (Neibauer, pp.473-483.) The Yahoo! online service included a feature known as Yahoo! Clubs. (<i>Id.</i>) As Neibauer explains, “[a] club 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.” (Neibauer, p.473 (italics in original).) Yahoo! members could also create their own clubs. (Neibauer, pp.480-82.) For example, a member could click “Create Club” to cause a web-based form to appear asking for information about the new club. (Neibauer, p.480-81.) Ex. 1002, ¶ 129
7	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; 537 Petition, p. 13	Neibauer explains that every club will include a private message board, as shown in the exemplary unlisted club in Figure 21-13 above. Neibauer describes that “[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.) Ex. 1002, ¶ 135
8	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	Each of these features of a club discloses a mobile information channel “<i>through which the first user can share access to content with a plurality of additional users,</i>” because these features could be used by the club founder for sending and receiving messages such as club message board

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	club message board or chat messages, or photographs. (EX-1002, ¶¶135-39.) 537 Petition, p. 14	or chat messages, or photographs with accompanying textual names and descriptions (“ <i>share access to content</i> ”), to and from other club members (“ <i>a plurality of additional users</i> ”). Ex. 1002, ¶ 138
9	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.) 537 Petition, p. 14	As noted above, according to the ’801 patent, these “M-channels allow unsophisticated users to easily and efficiently author message data or other types of information content to be made accessible via a collaborative workspace, a data mailbox, a collaborative community, or other type of mobile site or portion thereof generated or otherwise managed in the system 10.” (EX-1001, 8:17-23.) Ex. 1002, ¶ 30
10	The club founder in Neibauer can also “control activation of” the above mobile information channels via the “interface.” 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 (<i>e.g.</i> , club message board, chat, photo sharing) by making it available through the newly-	The club founder in Neibauer can also “control activation” of the above mobile information channels via the “interface.” As noted previously, 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 activates each mobile information channel by creating a new club. This action, which takes place using the club-creation web form (“the interface”), activates the given mobile information channel (<i>e.g.</i> , club message board, chat, photo sharing) by

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	created club. (EX-1002, ¶¶143-44; see also Neibauer, p.473.) 537 Petition, p. 15	making it available for use by the founder and other club members. Ex. 1002, ¶ 142
11	Miller discloses a system similar to Neibauer for allowing users to create collaborative web-based environments. (Miller, Abstract, 0036:30-0037:12.) 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 (e.g. bulletin board, etc.) that will be available for members (Fig. 16). (Miller, 0043:12-0044:27.) 537 Petition, p. 16	Miller discloses a system for allowing users to create collaborative web-based environments, which are similar to clubs as described in Neibauer. (Miller, Abstract, 0036:30-0037:12.) Miller’s process for creating a new environment is also 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 (e.g., bulletin board) that will be available for members (Fig. 16). (Miller, 0043:12-0044:27.) Ex. 1002, ¶ 64
12	In the Meta-MDT-IPR, Patent Owner proposes that the term “<i>mobile information channel</i>” should mean “a component of a mobile site configured to permit a wide variety of mobile devices to send and receive content over a wireless network.” (EX-1030, 21-22.) 537 Petition, p. 18	As noted above, I understand that Patent Owner, in the Meta-MDT-IPR, has argued that “<i>mobile information channel</i>” should be construed to mean “a component of a mobile site configured to permit a wide variety of mobile devices to send and receive content over a wireless network.” (EX-1030, 21-22.) Ex. 1002, ¶ 146
13	Patent Owner further argues that a “<i>mobile device</i>” should mean “a portable device with limited display space and limited navigational	Relatedly, I understand that Patent Owner also has argued in the Meta-MDT-IPR that a “<i>mobile device</i>” should mean “a portable device with

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	capabilities that connects to a mobile site and/or mobile information channel via a wireless network.” (EX-1030, 24.) 537 Petition, p. 18	limited display space and limited navigational capabilities that connects to a mobile site and/or mobile information channel via a wireless network.” (EX-1030, 24.) Ex. 1002, ¶ 147
14	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 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.) 537 Petition, p. 21	Figure 1 shows 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.) Ex. 1002, ¶ 70
15	The general operation of proxy server 110 in Cheng is straightforward. As shown in Figure 1, mobile device 108 can issue a request 106 for an original web page 104 using standard HyperText Transport Protocol (HTTP), as was well-known in the art, with the request 106 being received by proxy server 110. (Cheng, Fig. 1, 2:19-21, 3:58-67, 7:65-8:2; 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	The operation of proxy server 110 is generally straightforward. As shown in Figure 1, mobile device 108 issues 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.) Cheng describes that “[u]pon 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

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	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 Petition, p. 22	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.) As Cheng describes: “[t]he 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. 1002, ¶ 73
16	Here, Cheng teaches that a mobile device user can input text, image, and file data into the mobile device; that information is then transmitted from the mobile device to a website. Thereafter, the device profile information, received from the mobile device, enables Cheng’s proxy server 110 to identify the mobile device 108 and to determine which webpage conversions to perform for that device. (See Cheng, 8:54-62, 7:59-65.) 537 Petition, pp. 23-24	In the above example, Cheng discloses that a mobile device user can input text, image, and file data into the mobile device and that information is then transmitted from the device to a website. Thereafter, the device profile information, received from the mobile device, enables proxy server 110 to identify the mobile device 108, and to determine which webpage conversions to perform for that device. (See Cheng, 8:54-62, 7:59-65.) Ex. 1002, ¶ 158
17	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	The implementation 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. (See, <i>e.g.</i>,

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	[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.) 537 Petition, p. 24	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 the proxy server could have been operated by the same or a different entity from the operator of the origin web server. Ex. 1002, ¶ 107
18	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 (“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 club 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.”) (<i>italics in original</i>).) 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	This limitation was addressed in the discussion of limitation [1A] above. As discussed, after the club founder makes the required selections for the club and clicks “Yes! I Accept” on the club creation form (“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 founder 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”). The mobile information channels would then be available for use by the founder and other club members. (Neibauer, p.473 (“A club 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.”) (<i>italics in original</i>).) Under the further combination with Miller, the input by the club founder would have further

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	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 Petition, pp. 25-26	included the selection of the particular mobile information channel(s) to include in the club and this input, under the proposed combination, would also have been received via the club creation interface. Ex. 1002, ¶ 159
19	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.) 537 Petition, p. 27	As explained for limitation [1A], each of the club message board, chat and photo sharing features described in Neibauer (“ <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> ” in Neibauer thus corresponds to the first user providing textual messages (with respect to the club message board and club chat mobile information channels), and providing photographs (with respect to the photo sharing mobile information channel), provided by the club founder. Ex. 1002, ¶ 160
20	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: (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-	For example, for the club message board mobile information channel, a club member can create 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: (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

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	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) 537 petition, pp. 27-29	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 message content provided by the club member 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, ¶ 161
21	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 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.”).) 537 Petition, p. 29	A similar analysis applies to the club photo sharing mobile information channel. Neibauer explains that a club member 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 content provided by the club member would have been “<i>insert[ed]... into the mobile information channel,</i>” as it would have been available through the club photo sharing feature. (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.”).) Ex. 1002, ¶ 162
22	The same analysis applies to the club chat mobile information channel, because a club member (including the	And the same analysis applies to the club chat mobile information channel, because a club member can type in a

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	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.”).) 537 Petition, p. 29	message and it will appear in the chat. (Neibauer, p.479 (“The Chat option in the Our Pages section opens a private chat area for club members. There is also a Chat section on the page that lists the members who are currently chatting. Click on the Chat section header to enter the 88 Chat.”).) It would have been obvious that the content provided by the club member would have been “<i>insert[ed]... into the mobile information channel,</i>” 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.”).) Ex. 1002, ¶ 163
23	Finally, it would have been obvious that the “<i>content</i>” 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. (EX-1002, ¶165.) 537 Petition, p. 30	Finally, under each of the examples above, at least some content would have needed to be 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, photo sharing feature, or chat features using the techniques described above. Ex. 1002, ¶ 164
24	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	Limitation [1D] is largely redundant of limitation [1C]. As explained, each of club message board, club photo sharing feature and club chat can receive content from not just the club founder,

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	other club members beyond the club founder (“ <i>one or more of said additional users</i> ”). (EX-1002, ¶166.) 537 Petition, p. 30	but other club members (“ <i>one or more of said additional users</i> ”). Ex. 1002, ¶ 165
25	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. 537 Petition, p. 30	It would also have been obvious based on Neibauer and Miller, in further view of Cheng, 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> ” because the club members would have accessed the club and its features (including the ability to add content) via their mobile devices. Ex. 1002, ¶ 166
26	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 (<i>e.g.</i> , radio frequency (RF), and the like”).) 537 Petition, pp. 30-31	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. Cheng similarly discloses wireless network device connectivity. (Cheng, <i>e.g.</i> , 2:4-7 (“[T]he present invention provides a system, method, and medium that extracts a portion of web page content and reformats the extracted content for delivery to one or more wireless devices.”); <i>see also id.</i> , 5:33 (mobile device 108 can include “a cellular telephone”).)

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		Ex. 1002, ¶ 167
27	Similarly, Cheng discloses that acceptable networks for communicating includes networks (114) distinct from the internet. (Cheng, 4:2-4 (“It should be understood that the present invention can be used with networks other than the Internet where visual content is involved.”)). 537 Petition, p. 32	Likewise, Cheng discloses that acceptable networks for communicating consistent with its teachings include networks (114) distinct from the internet. (See, <i>e.g.</i>, Cheng, 4:2-4 (“It should be understood that the present invention can be used with networks other than the Internet where visual content is involved.”)). Ex. 1002, ¶ 173
28	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.”).) 537 Petition, p. 34	Messaging or Collaboration Action: For example, using the patent’s own examples of a “messaging action” and “collaboration action,” the patent places few if any restrictions on the type of messaging and collaboration actions, and makes clear they can include posting and exchanging information by members to facilitate collaboration. (’801 patent, <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.”).) Ex. 1002, ¶ 179
29	As shown in the discussion of limitations [1C]-[1E], any other club	As explained in my discussion of limitation [1C], when other club

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	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 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>” i.e., the club message board, photo sharing feature, or chat, “<i>information associated with at least one wireless networking functionality of said at least one wireless network,</i>” 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. (EX-1002, ¶181.) 537 Petition, pp. 34-35	members provide new messages, new photos and new chat messages, they are integrated into the club message board, club photo sharing feature, and private chat (“<i>the mobile information channel</i>”), respectively. This additional information provided by other members is associated with a “messaging action” and “collaboration action” because it provides messaging content being made available to other club members, allowing them to collaborate on topics of interest. The proposed combination thus renders obvious “<i>integrating into the mobile information channel,</i>” i.e., the club message board, photo sharing feature, or chat, “<i>information associated with at least one wireless networking functionality of said at least one wireless network,</i>” i.e., a messaging or collaboration action by which another club member (through their mobile device and over a wireless network under the proposed combination) provided messaging content to be made accessible to club members via the club. Ex. 1002, ¶ 180
30	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	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

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	the photo was taken on an electronic map. (Squibbs, ¶¶0003-0004.) 537 Petition, p. 35	the photo was taken on an electronic map. (Squibbs, ¶¶0003-0004.) Ex. 1002, ¶ 182
31	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: 537 Petition, p. 35	Squibbs discloses a photo album system that allows a user to record digital images, which can be associated with the geographic location where they were taken. An overview of the system is shown in Figure 3: Ex. 1002, ¶ 183
32	Album program 50 allows the user to “catalogue, manage, and view their photos through a map-based interface, the photos being represented on a displayed map by a marked indicating the location where they were taken.” (Squibbs, ¶0032.) It comprises “five main operating modes 51 to 55,” as shown. (Squibbs, ¶0033.) For example, Load Mode 52 allows the user to download data from camera 3, and Catalog Mode 53 allows the user to manage newly loaded photos using a map-based display, and Map View Mode 54 allows the user to browse the photo album and select photos for viewing. (Squibbs, ¶¶0033, 0035-0036.) 537 Petition, p. 37	Squibbs also discloses an album program 50 as shown in Figure 3 that allows the user to “catalogue, manage, and view their photos through a map-based interface, the photos being represented on a displayed map by a marked indicating the location where they were taken.” (Squibbs, ¶0032.) The album program as shown in Figure 3 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 use to browse the photo album and select photos for viewing. (Squibbs, ¶¶0033, 0035-0036.) Ex. 1002, ¶ 80
33	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	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

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	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.) 537 Petition, pp. 38-39	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 40 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.) Ex. 1002, ¶ 82
34	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.) 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	The Map View mode shown in Figure 7 allows a user to browse the album after it has finished editing the photo metadata and assigning the photos to groups. (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.) 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

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	photo selected from the Map View Mode. (Squibbs, ¶0091, Fig. 8.) 537 Petition, pp. 39-40	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.) Ex. 1002, ¶ 84
35	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.) 537 Petition, p. 40	Squibbs discloses a number of ways in which a photo can be associated with location data. In the example above shown in Figure 3, the digital camera itself has a built-in GPS receiver. In another embodiment shown in 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, concurrently with the upload of photo image data, also transmits location information associated with the photo image data. (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.) Ex. 1002, ¶ 85
36	Motivation to Combine Neibauer, Miller, Cheng, and Squibbs: It would have been obvious to combine Neibauer, Miller and Cheng with Squibbs, predictably resulting in the	Motivation to Combine Neibauer, Miller, Cheng, and Squibbs: It would have been obvious to combine Neibauer, Miller and Cheng with Squibbs, predictably resulting in the

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	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. (EX-1002, ¶121.) 537 Petition, pp. 40-41	system and method for creating a Yahoo! club described in Neibauer as 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. For example, under the proposed combination, when a club member uploads a photo to a club using the photo sharing feature in Neibauer, the mobile device would not only upload the photo image data but also would have transmitted geographic location associated with the photo. Ex. 1002, ¶ 120
37	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	Claim 1 does not recite any specifics for how <i>“integrating”</i> wireless network functionality information into a mobile information channel must take place, but under the proposed combination, it would have been obvious to adapt the photo sharing feature described in Neibauer 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. Under the proposed combination, therefore, the club photo sharing feature as described in Neibauer would have been further adapted to display location information

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	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 below. (EX-1002, ¶¶122.) 537 Petition, pp. 41-42	(for example on an electronic map), in association with the photos. This would have been seen as a natural extension of the features already disclosed in Neibauer. Ex. 1002, ¶ 121
38	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. 537 Petition, p. 42	A POSITA would have been motivated to combine in order to improve the experience of club members who use the club photo sharing feature described in Neibauer. The ability to associate a location with a digital photo would have provided a clear benefit to the club photo sharing feature of Neibauer by improving the classification and enjoyment of uploaded photos. Ex. 1002, ¶ 123
39	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.) 537 Petition, p. 42	Squibbs itself 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 information would not only have provided a clear way to classify digital photos, but the location would have allowed club members to better understand the context behind the photo. Ex. 1002, ¶ 124
40	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	Neibauer provides a further express motivation to combine with Squibbs by disclosing a Yahoo! Maps feature that allows users to request and obtain electronic maps. (Neibauer, pp.222-224.) Neibauer further describes how a

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	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 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.) 537 Petition, pp. 42-43	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 picnic. (Neibauer, pp.226-228, Fig. 10-5 (showing “My House” and “The picnic is here”).) The annotation described in Neibauer is similar to the thumbnail view in Squibbs, as discussed above. In any case, the fact that Neibauer already discloses the ability to display electronic maps, and suggests annotating those maps to show the location of events, confirms that Neibauer and Squibbs are naturally combinable, and that a POSITA would have been motivated to do so. Ex. 1002, ¶ 125
41	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 Petition, p. 44	The combination with Squibbs, 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>”) based on the mobile device location, as described in Squibbs and explained for limitation [1F]. Ex. 1002, ¶200
42	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.)	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 patent, 5:63-6:8, claims 7 & 8.)

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	537 Petition, p. 45	Ex. 1002, ¶ 201
43	As shown, a user posts an advertisement by entering product-identifying 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.) 537 Petition, p. 46	As shown, the club member enters product identifying information such as the ad title or description. (<i>Id.</i>) It would have been obvious to apply the Yahoo! Classifieds teachings to the club message board feature, which would have predictably resulted in the club message board being used by club members to post messages relating to items they are offering for sale. Ex. 1002, ¶ 202
44	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 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.)	In sum, it would have been obvious, based on the combination of Neibauer alone or with Miller, that one or more messages posted in the club message board of Neibauer (“<i>the mobile information channel</i>”) could have included information identifying a product being offered for purchase or sale (“<i>product-identifying information</i>”). 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 over the wireless network. The proposed combination would also have resulted in “<i>inserting content into the mobile information channel based on the obtained product-identifying information</i>,” because the product-identifying information (“<i>content</i>”) would have been included in the title and/or body of the message posted by the club member, which

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	537 Petition, pp. 46-47	would have been displayable to club members through the club message board (“ <i>the mobile information channel</i> ”). Ex. 1002, ¶ 203
45	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 Petition, p. 48	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. Ex. 1002, ¶ 206
46	Any one of the conversion options disclosed in Neibauer alone or in combination with Cheng qualifies as a “ <i>content integration option</i> ,” because each option allows members to specify how uploaded photos will be integrated into the photo sharing feature. [EX-1002, ¶209.] 537 Petition, P. 50	Any one of the conversion options disclosed in Neibauer or Cheng qualifies as a “ <i>content integration option</i> ,” because each option allows club members to specify how uploaded photos will be transformed or altered before being integrated into the mobile information channel, thus affecting how they appear when viewed through the photo sharing feature of the club. Ex. 1002, ¶ 208
47	Content integration options would also have been based, at least in part, “ <i>on respective wireless networking functionalities</i> .” This is because the “ <i>content integration options</i> ” address bandwidth limitations by reducing the size of photos, thereby reducing the amount of transmitted data. The option to specify a maximum image file size discussed for claim 9, for example,	It would have been obvious that the content integration options of claim 9 would have been based, at least in part, “ <i>on respective wireless networking functionalities</i> ” available to the club founder and other club members. First, the “ <i>content integration options</i> ” under the proposed combination address bandwidth limitations of mobile devices by reducing the size of photos,

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	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.) 537 Petition, p. 50	thus reducing the amount of data that needs to be sent to the mobile device. 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.) Ex. 1002, ¶ 209
48	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, 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 Petition, p. 51	It would also 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, and reducing the quality of the JPEG image conversion in Cheng. (Cheng, 10:63-11:19.) 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 (“<i>based in part on respective wireless networking functionalities available to the first user and the plurality of additional users</i>”), thus conserving network bandwidth,

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		improving performance, and overall enhancing the user’s experience. Ex. 1002, ¶ 210
49	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 Petition, pp. 51-52	With respect to the example of a “ <i>mobile information channel</i> ” of a club message board in Neibauer, 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> ”). Ex. 1002, ¶ 212
50	In each example, “ <i>content is associated with the mobile information channel,</i> ” <i>e.g.</i> , via the club message board, photo sharing feature, or chat, by a user-activatable control mechanism. 537 Petition, p. 52	In each of these examples, content is associated with the mobile information channel, <i>e.g.</i> , by being added to or displayed through the club message board, photo sharing feature, or chat, by a user-activatable control mechanism. Ex. 1002, ¶ 214
51	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, the sponsorship advertisement appearing on the club page (“ <i>advertising content</i> ”) was inserted alongside messaging content. 537 Petition, p. 54	Finally, the advertising content would have been inserted “ <i>along with said portion of the additional content,</i> ” as claimed. In the first example referring to Figure 21-8 of Neibauer, the sponsorship advertisement appearing on the club page (“ <i>advertising content</i> ”) was inserted on the page alongside messaging content in the club message board. Ex. 1002, ¶ 219

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52	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>.” 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) 537 Petition, pp. 54-55	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>.” As noted for claim 1, Neibauer discloses a photo sharing feature in which the club founder and other club members can upload and share photos. (Neibauer, pp.477-479.) Under the proposed combination with Squibbs, as explained for limitation [1F], it would have been obvious that photos uploaded by the user would have included location coordinates associated with the photo. (Squibbs, Fig. 4 (showing “LOCATION COORD” field for photo), ¶0049) Ex. 1002, ¶ 220
53	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, e.g., 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: (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.) 537 Petition, p. 56	As explained for claim 1, one of the steps for creating a club using the “<i>interface</i>” involves the club founder (“<i>the first user</i>”) providing a title or name for the club. (Neibauer, e.g., 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, as shown in Figure 21-13 (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.) Ex. 1002, ¶ 222

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54	As explained for claim 1, Neibauer discloses a <i>mobile information channel</i> in the form of a <i>chat channel</i> <i>facilitating</i> communication between at least the club founder and other club users. (Neibauer, p.479; EX-1002, ¶225.) 537 Petition, p. 57	As explained for claim 1, Neibauer discloses a mobile information channel in the form of a chat channel, which could have facilitated communication between at least the club founder and other club users. (Neibauer, p.479) Ex. 1002, ¶ 224
55	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.) 537 Petition, pp. 57-58	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, ¶ 225
56	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.) 537 Petition, p. 59	Each of the mobile information channels is associated with “ <i>a mobile device application</i> ,” which takes the form of a browser application that executes on a 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. 1002, ¶ 226
57	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 Petition, p. 60	Under either theory, the web browser “ <i>comprises a personalized content application</i> ” because, in both cases, the browser allows a user to access personalized content through the features described in Neibauer. Ex. 1002, ¶ 229
58	Mapping the claimed “ <i>processing element</i> ” to origin web server 102 and	Mapping the claimed “ <i>processing element</i> ” to origin web server 102 and

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	proxy server 110 is consistent with the ’801 patent, which makes clear that a processing element or server can itself comprise multiple servers. 537 Petition, p. 61	proxy server 110 is consistent with the ’801 patent, which makes clear that a processing element or server can itself comprise multiple servers. Ex. 1002, ¶ 231
59	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. 537 Petition, p. 62	Dependent claim 24, which depends from claim 23 and is addressed below, expressly recites that “<i>the processing element comprises at least one server</i>,” thus confirming that the claimed processing element can comprise one or more servers. Ex. 1002, ¶ 234
60	Ground 2 is substantially the same as Ground 1 except that it adds Harvey (EX-1010) to account for a construction of “<i>mobile information channel</i>” proposed by Petitioner in litigation. If this term is unconstrued, this ground need not be considered. Meta has argued in the MDT-Meta-Litigation that “<i>mobile information channel</i>” should be construed as “a virtual location at the content management site at which user-authored content may be added for transmission to the mobile website.” 537 Petition, p. 66	Ground 2 is substantially the same as Ground 1, except that it adds Harvey (EX-1010) to account for a narrower construction of “<i>mobile information channel</i>” that was proposed in the MDT-Meta-Litigation. As explained for Ground 1, limitation [1A], Meta has argued in the MDT-Meta-Litigation that “<i>mobile information channel</i>” should be construed as “a virtual location at the content management site at which user-authored content may be added for transmission to the mobile web site.” Ex. 1002, ¶ 247
61	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	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

	‘537 Petition	Houh Decl. (Ex. 1002)
	creating module 165 in order to create a new community. 537 Petition, p. 67	creating module 165 in order to create a new community, which may include web-based community creation. Ex. 1002, ¶ 249
62	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. 537 Petition, p. 68	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 system under the proposed combination, with the further ability of the web-based club creation interface to allow the club founder to add content to one or more mobile information channels. Ex. 1002, ¶ 250
63	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>i.e.</i>, 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.)	This would have satisfied 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 “content management site” would have included the web-based interface for allowing the founder to create a club disclosed in Neibauer, and that interface would have further permitted the club founder – in addition to the ability to activate features such as the club message board – to add content for the club, 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>i.e.</i>, the club site as delivered to mobile users, on the club page itself.

	'537 Petition	Houh Decl. (Ex. 1002)
	537 Petition, p. 68	Ex. 1002, ¶ 251