

Summary of verbatim (or nearly verbatim) matches between the ‘539 Petition to Meta’s Petition in the Meta-MDT-IPRs (Ex.2034)

	Petition in the ‘539 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. 539 IPR Petition, p.5	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. (EX1002, ¶¶14-18.) Ex.2034, p.6
2	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 ’336 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; Neibauer, pp.477-480.) Neibauer also discloses the ability to access Yahoo! services via mobile devices. (EX-1002, ¶59; Neibauer, pp.166-174.) Neibauer renders obvious the majority of the	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 ’336 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, real-time 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 phones. (EX1002, ¶56; Neibauer,

	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 '336 patent. (EX-1024, 4.) All grounds also cite to Cheng (EX-1005), which additionally demonstrates it would have been obvious to provide the Yahoo! Clubs features from Neibauer to users via mobile devices. (EX-1002, ¶¶101-05.) Cheng describes a proxy server that can convert any existing (non-mobile) webpage for use on a mobile device. (EX-1002, ¶¶65-70.) Cheng was also cited in the earlier reexamination mentioned above. (EX-1024, 04.) 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, ¶¶61-62.) Ausems (EX-1006) is cited in Ground 2 for dependent claim 7, and Fransioli (EX-1007) in Ground 3 for dependent claims 21-22. 539 IPR Petition, pp.9-10	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 the parent patent of the '336 patent in a prior reexamination, to which the '336 patent was 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, 120-122.) As noted in Part III.C above, Cheng was also cited in the successful reexamination of the parent to the '336 patent. 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, 103-104.) Ausems (EX1006) is cited in Ground 2 for dependent claim 7, and Fransioli (EX1007) in Ground 3 for dependent claims 21-22. Ex.2034, pp.9-10
3	Neibauer discloses features of a Yahoo! service known as Yahoo! Clubs.	As explained in detail below, Neibauer discloses features of a Yahoo! Service

	(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 example club page is shown below: [image omitted] (Neibauer, p.483, Fig. 21-13.) 539 IPR Petition, pp.10-11	known as Yahoo! Clubs. (Neibauer, pp.473-483.) As Neibauer explains, “[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 more 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	To the extent the preamble is limiting, Neibauer discloses a “<i>method for managing information content in a network-based communication system.</i>” Neibauer discloses a method for “<i>managing</i>” information content because a club founder can manage the information on a club such as messages and photos shared with other members of the club. For example, the club founder can “control the contents of photo albums, and customize the photo and messages on the club’s home page,” among other capabilities. (Neibauer, p.480; <i>see also id.</i>, pp.478-479.) Neibauer also discloses managing information content “<i>in a network-based communication system,</i>” i.e., the Internet. (EX-1002, ¶¶113-14.) 539 IPR Petition, p.11	To the extent the preamble is limiting, Neibauer discloses “[a] method for managing information content in a network-based communication system.” Neibauer discloses a method for “managing” information content because a club founder can manage the information on a club such as messages and photos shared with other members of the club. For example, the club founder can “control the contents of photo albums, and customize the photo and messages on the club’s home page,” among other capabilities. (Neibauer, p.480; <i>see also id.</i>, pp.478-479.) Neibauer also discloses managing information content “in a network-based communication system,” i.e., the Internet. (EX1002, ¶92.) Ex.2034, pp.12-13

5	The step of providing “<i>a first web-based interface</i>” takes place in Neibauer when a web-based interface is provided to a user to create a new club (“<i>accessible to a first user</i>”). In particular, the club founder (“<i>first user</i>”) can access a web form that solicits options for creating a new club. (Neibauer, pp.480-481.) 539 IPR Petition, p.12	The step of providing “a first web-based interface” takes place in Neibauer when a web-based interface is provided to a user to create a new club (“accessible to a first user”). In particular, the club founder (“first user”) can access a web form that solicits options for creating a new club: Ex.2034, p.13
6	The “<i>first web-based interface</i>” includes the user interface that the club founder (“<i>first user</i>”) uses to create the club—but does not include the webpages for the created club, which constitute the “<i>second web-based interface</i>” in limitation [1B]. It would have been obvious that the club-creation interface is a “<i>web-based interface</i>” because it is provided via web pages delivered over the Internet to a web browser. (EX-1002, ¶¶118-19.) Neibauer’s first web-based interface is also “<i>configured to permit the first user to activate a given mobile information channel for sharing content between the first user and one or more additional users.</i>” Neibauer discloses three features that each independently discloses a <i>mobile information channel</i>. First, Neibauer explains that the club includes 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 “first web-based interface” includes the user interface that the club founder (“first user”) uses to create the club as discussed above – but does not include the webpages for the actual created club, to which Petitioner has mapped the “second web-based interface” for limitation 1[b] below. It would have been obvious that the club-creation interface above qualifies as a “web-based interface” because it is provided to the club founder via web pages delivered over the Internet to a web browser. (EX1002, ¶95.) The first web-based interface in Neibauer is also “configured to permit the first user to activate a given mobile information channel for sharing content between the first user and one or more 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

	<i>see also id.</i>, p.477 (“Every club has its own private message board.”); pp.469-471 (describing process for posting a new message).) 539 IPR Petition, pp.13-14	bulletin board on an office wall. It’s a place to leave messages to others and to read their replies.” (Neibauer, p.468.) Ex.2034, p.15
7	Second, as a another example of a <i>mobile information channel</i>, Neibauer discloses a chat feature that allows users to engage in real-time messaging communications. (Neibauer, p.479 (“The Chat option in the Our Pages section opens a private chat area for club members.”).) 539 IPR Petition, p.14	As a second example of a mobile information channel, Neibauer discloses a chat feature that allows users to engage in real-time messaging communications: [block quote omitted] (Neibauer, p.479 (bold in original).) Ex.2034, p.16
8	Third, Neibauer discloses, as another <i>mobile information channel</i>, a photo sharing feature that allows club members to share images. (Neibauer, p.477 (“The Photos option in the Our Pages section lets members share photographs and other graphics.”).) In order to add a photograph to an album, the user identifies the location of the photo and enters a name and description. (Neibauer, p.478, ¶¶2-3.) 539 IPR Petition, p.14	Third, Neibauer discloses a photo sharing feature that allows club members to share photos and other graphics: [block quote omitted] (Neibauer, p.477 (bold in original).) In order to add a photograph to an album, the user identifies the location of the photo and enters a name and description. (Neibauer, p.478, ¶¶2-3.) Ex.2034, p.16
9	Each of these club features is a <i>mobile information channel</i> configured “<i>for sharing content between the first user and one or more additional users,</i>” because each feature can be used for sending and receiving content between club members. (EX-1002, ¶¶121-25.) Neibauer’s disclosures are consistent with exemplary “<i>mobile information channels</i>” in the ’336 patent. The ’336	Each of these club features discloses a mobile information channel configured “for sharing content between the first user and one or more additional users,” because each feature can be used for sending and receiving content between club members such as club message board or chat messages, or photographs with accompanying textual names and descriptions. (EX1002, ¶¶96-100.)

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, 8:11-17.) The ’336 patent identifies several examples of these channels—“discussion forum,” “chat,” and “photo blog” (EX-1001, 8:27-38)—which mirror, respectively, Neibauer’s club message board, chat, and photo sharing features. (EX-1002, ¶126.) Below is a separate discussion explaining why information channels in Neubauer qualify as “<i>mobile</i>” information channels, based on Neibauer alone or in view of Cheng. The club founder in Neibauer can also “<i>activate</i>” the mobile information channels via “<i>the first web-based 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 activates each mobile information channel by taking actions to create a new club using the club-creation user interface (“<i>the first web-based interface</i>”), which activates the given mobile information channel (e.g., club message board, chat,	Neibauer’s disclosures are consistent with exemplary “mobile information channels” in the written description of the ’336 patent. The ’336 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.” (’336, 8:11-17.)¹ In fact, the ’336 patent expressly identifies, as examples of mobile information channels, “discussion forum,” “chat,” and “photo blog” (’336, 8:27-38), 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 and in view of Cheng. The club founder in Neibauer can also “activate” the above mobile information channels via “the first web-based 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
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	photo sharing) by making it available for use by the founder and other club members through the newly-created club. (EX-1002, ¶¶129-30.) It is unclear if the requirement that the “<i>first web-based interface</i>” is configured to allow the first user to “<i>activate a given mobile information channel</i>” requires that the first user be able to use the interface to selectively choose a particular mobile information channel. 539 IPR Petition, pp.14-16	taking actions to create a new club using the club-creation user interface (“the first web-based interface”), which activates the given mobile information channel (e.g., club message board, chat, photo sharing) by making it available for use by the founder and other club members through the newly-created club. Petitioner notes that it is unclear if the requirement that the “first web-based interface” is configured to allow the first user to “activate a given mobile information channel,” requires that the first user be able to use the first web-based interface to selectively choose a particular mobile information channel that be included with the club. Ex.2034, pp.16-18
10	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.) With respect to the selection of communications features, Miller discloses a user interface for allowing	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 (e.g. 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 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, ¶¶131-32.) 539 IPR Petition, pp.16-17	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, ¶104.) Ex.2034, p.19
11	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>first web-based interface</i>” further allowing the club founder to select and activate the particular communication features (including “<i>a given mobile information channel</i>”) provided for the club. (EX-1002, ¶82.) Neibauer and Miller are analogous references in the same field the same field as the ’336 patent of network-based communication systems and information content management, and would have been reasonably pertinent to problems facing the inventors. (EX-1002, ¶¶74-77.)	<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 “first web-based interface” further allowing the club founder to select and activate the particular communication features (including “a given mobile information channel”) provided for the club. (EX1002, ¶105.) Neibauer and Miller are analogous references in the same field the same field as the ’336 patent of network-based communication systems and information content management, and would have been reasonably pertinent to problems facing the inventors. (EX1002, ¶106.) A skilled artisan would have been motivated to combine Neibauer with

	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 Neubauer may not have been useful or desirable for some clubs. (EX-1002, ¶80.) Allowing the club founder to select the particular features (e.g., 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 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, ¶¶61, 85-86.) 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, ¶87.) 539 IPR Petition, pp.17-18	Miller to enhance the flexibility and customizability of clubs in Neibauer. For example, it would have been obvious that certain club features available in Neubauer may not have been particularly useful or desirable for some clubs. (EX1002, ¶107.) Allowing the club founder to select the particular features (e.g., 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 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, ¶107.) A 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 beyond standard Web programming technologies. (EX1002, ¶108.) Ex.2034, pp.19-20
12	The “<i>second web-based interface</i>” in Neibauer corresponds to one or more web pages for the Yahoo! club. Figure 21-13 shows a sample home page: [image omitted]	The “second web-based interface” in Neibauer corresponds to one or more web pages for the Yahoo! club created by the club founder. Figure 21-13 shows a home page for the exemplary unlisted Yahoo! club described earlier:

(Neibauer, p.483, Fig. 21-13.) “Figure 21-13 shows an example of a personal club page.” (Neibauer, p.482.) The screen image in Figure 21-13 appears to have been inadvertently cut off as it does not show the “Our Pages” links on the left side, as shown in other club pages in Neibauer. (Neibauer, p.473 (“The Our Pages section of the page lists the pages and features that are available to members.”), p.475, Fig. 21-8 (“The James Bond Movie Series” listed club showing “Our Pages” section).) The personal club page in Figure 21-13 “contains all of the elements found on other club pages.” (Neibauer, p.482.) It thus would have been obvious to implement the personal club page as shown in Figure 21-13 to include the Our Pages features, which allow access to the message board, chat, photo, and other features. (EX-1002, ¶134.) The “<i>second web-based interface</i>” therefore includes the web pages that provide the functionality for the Yahoo! club created by the founder, including the club home page (as shown for example in Figure 21-13 above) and additional pages for the features available to club members. (Neibauer, p.477 (“Every club has its own message board.”), p.479 (“The Chat option in the Our Pages section opens up a private chat area for club members.”), p.477 (“The Photos option in the Our Pages section lets members share photographs and other	[image omitted] (Neibauer, p.483, Fig. 21-13.) “Figure 21-13 shows an example of a personal club page.” (Neibauer, p.482.) Petitioner observes that the screen image in Figure 21-13 appears to have been inadvertently cut off as it does not show the “Our Pages” links on the left side, as shown in other exemplary club pages in Neibauer. (Neibauer, p.473 (“The Our Pages section of the page lists the pages and features that are available to members.”), p.475, Fig. 21-8 (“The James Bond Movie Series” listed club showing “Our Pages” section).) Neibauer explains that the personal club page in Figure 21-13 “contains all of the elements found on other club pages.” (Neibauer, p.482.) It thus would have been obvious to implement that the personal club page as shown in Figure 21-13 to include the Our Pages features, which allow access to the message board, chat, photo, and other features. (EX1002, ¶126.) The “second web-based interface” therefore includes the web pages that provide the functionality for the Yahoo! club created by the founder, including the club home page (as shown for example in Figure 21-13 above) and additional pages for the features available to club members. (Neibauer, p.477 (“Every club has its own message board.”), p.479 (“The Chat option in the Our Pages section opens up a private chat area for club members.”), p.477 (“The Photos option in the Our Pages
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graphics.”).) This is consistent with the ’336 patent which discloses that the second web-based interface is a mobile web site that can comprise a number of linked pages. (EX-1001, 14:52-53, Figs. 18 & 24-25.) And for the same reasons as limitation [1A] above, it would have been obvious that this interface qualifies as a “<i>web-based interface</i>.” (EX-1002, ¶¶119, 135.) Further, the “<i>second-web-based interface</i>” would have been delivered to mobile devices using the techniques in Neibauer alone or in view of Cheng. (EX-1002, ¶¶91-93, 96.) The second web-based interface is also “<i>different</i>” from the “<i>first web-based interface</i>” because it provides different web pages that deliver different content. (EX-1002, ¶136.) In fact, the “<i>second web-based interface</i>” does not even exist until the club itself is created, which occurs after the founder creates the club via the “<i>first web-based interface</i>,” further confirming that the two web-based interfaces are different from each other. (<i>Id.</i>; Neibauer, p.481 (“Click Yes! I Accept. You’ll see a page that tells you the club has been created. The page shows the club name and its Web address.”).) The Web address for the new club includes the name selected by the club founder via the “<i>first web-based interface</i>,” further confirming that second web-based interface is created later. (Neibauer, p.481 Fig. 21-12 (“Step 1: Name Your Club [] Keep the name	section lets members share photographs and other graphics.”).) This is consistent with the ’336 patent which discloses that the second web-based interface is a mobile web site that can comprise a number of linked pages. (’336, 14:52-53, Figs. 18 & 24-25.) And for the same reasons as limitation 1[a] above, it would have been obvious that this interface qualifies as a “web-based interface.” (EX1002, ¶¶127, 95.) And as explained above, the “second-web-based interface” would have been delivered to mobile devices using the techniques in Neibauer alone or in view of Cheng. (EX1002, ¶¶116-117, 119.) The second web-based interface is also “different” from the “first web-based interface” described in the discussion of limitation 1[a], because it provides different web pages that deliver different content. (EX1002, ¶128.) As explained for limitation 1[a], in fact, the “second web-based interface” does not even exist until the club itself is created, which occurs after the founder creates the club via the “first web-based interface,” further confirming that the two web-based interfaces are different from each other. (Neibauer, p.481 (“Click Yes! I Accept.. You’ll see a page that tells you the club has been created. The page shows the club name and its Web address.”).) The Web address for the newly-created club, in fact, includes the name selected by the club founder via the “first web-based interface,” further confirming that second web-based interface did not exist at the time
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short, as it will be in your Web address.”) (bold in original).) The second web-based interface in Neibauer also “<i>provides each of the one or more additional users access to at least a portion of the shared content via the given mobile information channel to thereby facilitate interaction between the first user and the one or more additional users.</i>” Based on Neibauer and under the further combination with Cheng, if accessed by a mobile device, the “<i>second web-based interface</i>” would be converted and delivered to the mobile device in an appropriate format. (EX-1002, ¶¶92-94, 137.) The “<i>second web-based interface</i>” also allows the club founder and other club members to access the club message board, chat and photo sharing features, which allow club members to access shared messages and photos. (EX-1002, ¶137.) The second web-based interface also “<i>facilitate[s] interaction between the first user and the one or more additional users,</i>” because it allows for exchanging of information between the founder and the other club members using the mobile information channels. (EX-1002, ¶¶125, 137.) 539 IPR Petition, pp.18-21	the first web-based interface was used. (Neibauer, p.481 Fig. 21-12 (“Step 1: Name Your Club [] Keep the name short, as it will be in your Web address.”) (bold in original).) The second web-based interface in Neibauer also “provides each of the one or more additional users access to at least a portion of the shared content via the given mobile information channel to thereby facilitate interaction between the first user and the one or more additional users.” Based on Neibauer and under the further combination with Cheng, as described for limitation 1[a], if accessed by a mobile device, the “second web-based interface” would have been converted and delivered to mobile device in an appropriate format. (EX1002, ¶¶129, 116-117.) The “second web-based interface” also allows the club founder and other club members to access the club message board, chat and photo sharing features, which allow club members to access shared messages and photos as described above for limitation 1[a] (“access to at least a portion of the shared content via the given mobile information channel”). The second web-based interface also “facilitate[s] interaction between the first user and the one or more additional users,” because it allows for exchanging of information between the founder and the other club members using the mobile information channels, as discussed extensively above for limitation 1[a]. (EX1002, ¶¶97-100, 129.)
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		Ex.2034, pp.30-34
13	As explained for limitation [1B], each of the club message board, chat and photo sharing features described in Neibauer (“<i>the given mobile information channel</i>”) supports messaging between the founder (“<i>the first user</i>”) and the other club members (“<i>the one or more additional users</i>”). The “<i>messaging</i>” in Neibauer thus corresponds to sending textual messages (with respect to the club message board and club chat mobile information channels), and sending photographs with accompanying titles and descriptions (with respect to the photo sharing mobile information channel), from or to at least the club founder. (EX-1002, ¶138; <i>see also</i> Neibauer, p.477 (“Every club has its own private message board. Recent messages posted to the board are shown on the club’s home page. Click Post in the Recent Messages banner to add your own comment to the board, or click View All or Messages in the Our Pages section to access the entire board.”), p.479 (“The Chat option in the Our Pages section opens up a private chat area for club members.”), p.477 (“The Photos option in the Our Pages section lets members share photographs and other graphics... Click Photo to see a list of the albums that the club maintains... Click an album name to see a list of the photographs stored there. For each photo, you will see the title, the contributor’s name, the photo’s size,	As explained for limitation 1[b], each of the club message board, chat and photo sharing features described in Neibauer (“the given mobile information channel”) supports messaging between the founder (“the first user”) and the other club members (“the one or more additional users”). The “messaging” in Neibauer thus corresponds to sending textual messages (with respect to the club message board and club chat mobile information channels), and sending photographs with accompanying titles and descriptions (with respect to the photo sharing mobile information channel), from or to at least the club founder. (EX1002, ¶130; <i>see also</i> Neibauer, p.477 (“Every club has its own private message board. Recent messages posted to the board are shown on the club’s home page. Click Post in the Recent Messages banner to add your own comment to the board, or click View All or Messages in the Our Pages section to access the entire board.”), p.479 (“The Chat option in the Our Pagers section opens up a private chat area for club members.”), p.477 (“The Photos option in the Our Pages section lets members share photographs and other graphics... Click Photo to see a list of the albums that the club maintains... Click an album name to see a list of the photographs stored there. For each photo, you will see the title, the contributor’s name, the photo’s size, and the date it was posted. Click a photo to see the photo on your screen.”).)

	and the date it was posted. Click a photo to see the photo on your screen.”).) 539 IPR Petition, pp.22-23	Ex.2034, pp.34-35
14	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, ¶68.) 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, ¶¶66, 93.) Figure 1 further shows a mobile device 108 connected to proxy server 110, optionally through gateway 109. (Cheng, 3:33-36.) “Mobile devices 108	Cheng relies on an already-known technology known as “proxy servers,” which were commonly used to provide security and/or 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, ¶111.) The left shows a mobile device 108 connected to proxy server 110, optionally through gateway 109. (Cheng,

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 – 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	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 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
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	server 110. (Cheng, Fig. 1, 2:19-21, 3:58-67, 7:65-8:2; EX-1002, ¶70.) “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.) 539 IPR Petition, pp.25-27	being received by proxy server 110. (Cheng, Fig. 1, 2:19-21, 3:58-67, 7:65-8:2.) “Upon determining that the requested page 104 resides at the server 102, the proxy server 110 makes a request 112 for the page. As shown, the proxy server 110 and the server 102 are connected via a network 114 such as the Internet.” (Cheng, 3:65-4:2; <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 (“Referring now to FIG. 1, it is envisioned that a proxy server 110 reformats/converts web content 104 on an origin web server 102 into a format 122 readable on any mobile device 108 (which can be any number of different mobile device types).”).) Ex.2034, pp.22-25
15	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. 539 IPR Petition, p.29	<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 creation functionality described above being delivered to mobile devices over the Internet.

		Ex.2034, p.25
16	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, ¶93; 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, ¶93.) In any case, combining Neibauer, Miller, and Cheng would not have affected the underlying functionality in Neibauer, further motivating the combination. (EX-1002, ¶95.) 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, ¶¶89-90.) 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! To Go” that enabled content from Yahoo! services to be provided to mobile devices. (Neibauer, pp.166-	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, ¶¶117, 121-122; 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, ¶117.) 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, ¶¶117, 121-122.) 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 device users. (EX1002, ¶118.) A skilled artisan would have been motivated to combine. As noted above, Neibauer itself expressly suggests the proposed combination by disclosing services such as “Yahoo! Mobile” and “Yahoo! To Go” that enabled content

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, ¶¶97-99.) 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 ’336 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, 1:30-34.) 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, ¶¶99-100.) 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. (EX-1002, ¶103.) Furthermore, Cheng’s proxy server techniques were well-known and deployed for the very	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, ¶¶119-120.) 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 ’336 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.” (’336, 1:30-34.) 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, ¶120.) 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 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,
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	purpose of converting web page content into formats suitable for mobile devices. (EX-1002, ¶102.) A POSITA would also have had a reasonable expectation of success as Cheng relies on known and industry-standard technologies. (EX-1002, ¶105.) 539 IPR Petition, pp.29-31	thus simplifying the implementation. (EX1002, ¶121.) As a further motivation to combine, the proxy server transcoding techniques in Cheng were already well-known and had already been deployed for the very purpose of converting web page content into formats suitable for mobile devices. (EX1002, ¶122.) A skilled artisan would also have had a reasonable expectation of success, as Cheng relies on well-known and industry-standard Internet and wireless technologies. (EX1002, ¶123.) Ex.2034, pp.25-28
17	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, ¶153.) Cheng similarly discloses wireless network device connectivity. (Cheng, <i>e.g.</i>, 2:4-7, 5:33 (mobile device 108 can include “a cellular telephone”), 23:44-51 (describing use of transport media such as “wireless communication (e.g., radio frequency (RF), and the like)”).) It would have been obvious that the messaging communication would have been provided “<i>over a wireless network,</i>” such as a known cellular communications network (like GSM). (EX-1002, ¶¶154-57.) A POSITA would have been motivated to allow	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, ¶131.) Cheng similarly discloses wireless network device connectivity. (Cheng, <i>e.g.</i>, 2:4-7, 5:33 (mobile device 108 can include “a cellular telephone”), 23:44-51 (describing use of transport media such as “wireless communication (e.g., radio frequency (RF), and the like)”).) It would have been obvious that the messaging communication under the proposed combination would have been provided “over a wireless network,” such as a known cellular communications network such as GSM commonly used to communicate information to and from wireless mobile

	messaging over a wireless network to take advantage of the growing popularity of mobile and wireless computing. (EX-1002, ¶¶154, 97-98.) 539 IPR Petition, pp.31-32	devices. A skilled artisan would have been motivated to allow messaging over a wireless network to take advantage of the growing popularity of mobile and portable computing. (EX1002, ¶¶131, 120.) Ex.2034, pp.35-36
18	Limitation [1D] is largely redundant of [1C]. Each of the club message board, club chat and photo sharing features permits the club founder (“<i>the first user</i>”) to send messaging content to other club members (“<i>one or more additional users</i>”), or receive messaging content from those other club members. The “<i>messaging content</i>,” for purposes of the club message board and club chat <i>mobile information channels</i>, corresponds to textual messages and, as noted, to photograph or image data (with accompanying textual descriptions) for the photo sharing mobile information channel. (EX-1002, ¶¶125, 162.) 539 IPR Petition, pp.33-34	For our purposes here, limitation 1[d] is largely redundant of 1[c]. As explained, each of club message board, club chat and photo sharing features permit the club founder (“the first user”) to send messaging content to other club members (“one or more additional users”), or receive messaging content from those other club members. The “messaging content,” for purposes of the club message board and club chat mobile information channels, corresponds to textual messages and, as noted, to photograph or image data (with accompanying textual descriptions) for the photo sharing mobile information channel. (EX1002, ¶¶130, 132.) Ex.2034, p.36
19	As explained for limitation [1B], the two claimed web-based interfaces would have been different from one another. It would also have been obvious that the two web-based interfaces would have been identified by two different uniform resource locators (URLs). (EX-1002, ¶¶136, 165.) It was basic knowledge that every web page on the Internet was identified by a unique URL, the standard	As fully explained for limitation 1[b], the two claimed web-based interfaces would have been different from one another. It would also have been obvious that the two web-based interfaces would have been identified by two different uniform resource locators (URLs). (EX1002, ¶¶133-135.) It was basic knowledge that every web page on the Internet was identified by a unique URL, the standard technique for identifying

technique for identifying resources on the Internet such as web pages. (EX-1002, ¶166; Cheng, 3:56-57 (“It is envisioned that each instance of web content 104 each have associated therewith a URL.”); <i>see also</i> David Fox et al., <i>HTML Web Publisher’s Construction Kit</i> (1995) (EX-1013), p.13 (“A URL (or <i>Universal Resource Locator</i>) is the address of a document, file or other Internet resources... The World Wide Web gives every article, newsgroup, database, computer file, or other Internet fragment its very own URL.”) (italics in original).) It therefore would also have been obvious that the URLs for the “<i>first web-based interface</i>” (for creating the club) and the “<i>second web-based interface</i>” (the club web pages providing access to the given mobile information channel) would have been “<i>different.</i>” (EX-1002, ¶166.) This is further confirmed by Figure 21-12 of Neibauer below, which confirms that the Web address (<i>i.e.</i> URL) for a new club will include the user-selected name: [image omitted] (Neibauer, p.481, Fig. 21-12.) As shown under Step 1, the user is instructed to “[k]eep the name short, as it will be in your Web address.” (<i>Id.</i>) As explained for limitation [1B], because the Web address (URL) for the club home page (the “<i>second web-</i>	resources on the Internet such as web pages. (EX1002, ¶134; Cheng, 3:56-57 (“It is envisioned that each instance of web content 104 each have associated therewith a URL.”); <i>see also</i> David Fox et al., <i>HTML Web Publisher’s Construction Kit</i> (1995) (EX1013), p.13 (“A URL (or <i>Universal Resource Locator</i>) is the address of a document, file or other Internet resources... The World Wide Web gives every article, newsgroup, database, computer file, or other Internet fragment its very own URL.”) (italics in original).) It therefore would also have been obvious that the URLs for the “first web-based interface” (for creating the club) and the “second web-based interface” (the club web pages providing access to the given mobile information channel) would have been “different.” (EX1002, ¶134.) This is further confirmed by Figure 21-12 of Neibauer below, which confirms that the Web address (<i>i.e.</i> URL) for a new club will include the user-selected name: [image omitted] (Neibauer, p.481, Fig. 21-12.) As shown under Step 1, the user is instructed to “[k]eep the name short, as it will be in your Web address.” (<i>Id.</i>) As explained for limitation 1[b], because the Web address (URL) for the club home page (the “second web-based interface”) is only known after the club is named and the created (using the “first
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	<i>based interface</i>”) is only known after the club is named and the created (using the “<i>first web-based interface</i>”), as it specifically incorporates the name provided by the founder through the web creation form, it would have been obvious that the two claimed web-based interfaces would have been identified by different URLs. (EX-1002, ¶168.) 539 IPR Petition, pp.34-36	web-based interface”), as it specifically incorporates the name provided by the founder through the web creation form, it would have been obvious that the two claimed web-based interfaces would have been identified by different URLs. (EX1002, ¶135.) Ex.2034, pp.36-38
20	It would have been obvious that the shared content would have been obtained from a “<i>device-captured data source of the first user</i>” that includes at least a source of “<i>device-captured image data.</i>” (EX-1002, ¶¶169-70.) As noted for claim 1, Neibauer discloses a club photo sharing feature in which the club founder and other club members can upload and share photos. (Neibauer, pp.477-479.) It would have been obvious for the shared content to have included “<i>device-captured image data,</i>” such as digital photographs captured using a digital camera of the first user. (Neibauer, p.478, Fig. 21-10 (showing exemplary club photo album having photos of Denise Richards and Famke Janssen).) It was also known, as of June 2002, that portable communications devices included digital cameras for capturing and storing images. (EX-1002, ¶235.) Petitioners have also provided a separate Ground 2 in the event it is determined that a further prior art reference is required to explicitly show	It would have been obvious that the shared content would have been obtained from a “device-captured data source of the first user” that includes at least a source of “device-captured image data.” (EX1002, ¶¶136-137.) As noted for claim 1, Neibauer discloses a club photo sharing feature in which the club founder and other club members can upload and share photos. (Neibauer, pp.477-479.) It would have been obvious for the shared content to have included “device-captured image data,” such as digital photographs captured using a digital camera of the first user. (Neibauer, p.478, Fig. 21-10 (showing exemplary club photo album having photos of Denise Richards and Famke Janssen).) It was also known, as of June 2002, that portable communications devices included digital cameras for capturing and storing images. (EX1002, ¶137.) Petitioner has also provided a separate Ground 2 in the event it is determined that a further prior art reference is required to explicitly show a portable device capable of capturing image data.

	a portable device capable of capturing image data. 539 IPR Petition, p.37	Ex.2034, p.39
21	One of the features disclosed in Neibauer allows the club founder to specify a club picture (“<i>an information item</i>”) that will appear on the club page (“<i>the second web-based interface</i>”). (Neibauer, p.482.) For example, Neibauer explains that “[t]o load a photograph that is on your computer, either select its path and name or click Browse to locate the photograph.” (Neibauer, p.482.) Neibauer does not expressly state that this process results in the selected club picture being “<i>upload[ed]</i>,” but this would have been apparent and obvious. (EX-1002, ¶171.) Neibauer discloses the very same user interface technique for sharing a photo using the club photo sharing feature, in which the user can specify the location of a photo on their disk of their local computer. (Neibauer, pp.478-479, ¶¶1-2.) Neibauer explains that, when the user has completed their selections, it can “click Upload to move a copy of the photo into the club’s Web space.” (Neibauer, p.478, ¶5.) It would have been obvious to apply the club photo sharing technique to the club picture feature, predictably resulting in uploading of the selected club picture (“<i>an information item</i>”) from the user’s computer. (EX-1002, ¶171.) <i>See Boston Scientific Scimed, Inc. v. Cordis Corp.</i>, 554 F.3d 982, 991 (Fed. Cir. 2009)	One of the features disclosed in Neibauer allows the club founder to specify a club picture (“an information item”) that will appear on the club page (“the second web-based interface”). (Neibauer, p.482.) For example, Neibauer explains that “[t]o load a photograph that is on your computer, either select its path and name or click Browse to locate the photograph.” (Neibauer, p.482.) Neibauer does not expressly state that this process results in the selected club picture being “upload[ed],” but this would have been apparent and obvious. (EX1002, ¶138.) Neibauer discloses the very same user interface technique for sharing a photo using the club photo sharing feature, in which the user can specify the location of a photo on their disk of their local computer. (Neibauer, pp.478-479, ¶¶1-2.) Neibauer explains that, when the user has completed their selections, it can “click Upload to move a copy of the photo into the club’s Web space.” (Neibauer, p.478, ¶5.) It would have been obvious to apply the club photo sharing technique to the club picture feature, predictably resulting in uploading of the selected club picture (“an information item”) from the user’s computer. (EX1002, ¶138.) <i>See Boston Scientific Scimed, Inc. v. Cordis Corp.</i>, 554 F.3d 982, 991 (Fed. Cir. 2009) (“Combining two embodiments

(“Combining two embodiments disclosed adjacent to each other in a prior art [reference] does not require a leap of inventiveness.”). It would also have been obvious that the club picture upload feature would have been available via “<i>the first web-based interface</i>,” such as on the club creation user interface. Neibauer indicates, in fact, that the feature for adding a picture to the club’s home page is not on the club home page. For example, after pressing “Yes! I Accept” on the club creation form, Neibauer explains: You’ll see a page that tells you the club has been created. The page shows the club name and its Web address. You also get these options: • Invite Friend Lets you invite others to join the club. • Fix It Up Lets you add text and a photo to the club’s home page. • Let Me See It Opens the club’s home page. (Neibauer, p.481 (boldface in original).) Neibauer therefore discloses an interface that allows the founder to add a club picture (available under “Fix It Up”), which is separate and distinct from the club home page (available under “Let Me See It”) to which	disclosed adjacent to each other in a prior art [reference] does not require a leap of inventiveness.”). It would also have been obvious that the club picture upload feature would have been available via “the first web-based interface,” such as on the club creation user interface. Neibauer indicates, in fact, that the feature for adding a picture to the club’s home page is not on the club home page. For example, after pressing “Yes! I Accept” on the club creation form, Neibauer explains: You’ll see a page that tells you the club has been created. The page shows the club name and its Web address. You also get these options: • Invite Friend Lets you invite others to join the club. • Fix It Up Lets you add text and a photo to the club’s home page. • Let Me See It Opens the club’s home page. (Neibauer, p.481 (boldface in original).) Neibauer therefore discloses an interface that allows the founder to add a club picture (available under “Fix It Up”), which is separate and distinct from the club home page (available under “Let Me See It”) to which Petitioner has mapped the “second web-based interface.” In any case, it would have been obvious to include, as part of “the first web-based interface,” the functionality described above for
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Petitioners have mapped the “<i>second web-based interface</i>.” In any case, it would have been obvious to include, as part of “<i>the first web-based interface</i>,” the functionality described above for allowing the club founder to upload a club photo. A POSITA would have been motivated to implement Neibauer in this way because, as explained, the club creation web form allows the founder to enter the name for the club (Neibauer, p.481, ¶4), and it would have been obvious to allow the founder to select and upload the club photo as part of the club creation process. (EX-1002, ¶173.) Alternatively, for purposes of claim 8, the claimed “<i>first web-based interface</i>” includes not just the club-creation form in Neibauer but also the “page that tells you the club has been created” (Neibauer, p.481), and the club picture upload functionality discussed above. (EX-1002, ¶174.) Neibauer also discloses that “<i>the second web-based interface provides said one or more additional users with access to said at least one uploaded information</i>,” because the uploaded club picture is shown to other club members when they view the club page (“<i>the second web-based interface</i>”). (Neibauer, p.481 (“Fix it Up [...] Lets you add text and a photo to the club’s home page.” (bold in original; underlining added)), p.483, Fig. 21-13 (showing exemplary club home page with club picture provided by club founder); EX-1002, ¶175.)	allowing the club founder to upload a club photo. A skilled artisan would have been motivated to implement Neibauer in this way because, as explained, the club creation web form allows the founder to enter the name for the club (Neibauer, p.481, ¶4), and it would have been obvious to allow the founder to select and upload the club photo as part of the club creation process. (EX1002, ¶139.) Alternatively, for purposes of claim 8, the claimed “first web-based interface” includes not just the club-creation form in Neibauer but also the “page that tells you the club has been created” (Neibauer, p.481), and the club picture upload functionality discussed above. Neibauer also discloses that “the second web-based interface provides said one or more additional users with access to said at least one uploaded information,” because the uploaded club picture is shown to other club members when they view the club page (“the second web-based interface”). (Neibauer, p.481 (“Fix it Up [...] Lets you add text and a photo to the club’s home page.”) (bold in original; underlining added)), p.483, Fig. 21-13 (showing exemplary club home page with club picture provided by club founder).) Neibauer further discloses that the other club members are provided “access to said at least one uploaded information item in accordance with accessibility rules established by the first user via
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Neibauer further discloses that the other club members are provided “access to said at least one uploaded information item in accordance with accessibility rules established by the first user via the first web-based interface,” because the founder can select through the club-creation web pages (“the first web-based interface”) the new club will be either “listed” or “unlisted.” (Neibauer, p.482, ¶6.) “A listed club is one that is open to all Yahoo! members. To join the club, you simply fill our on online form. Don’t worry, you cannot be rejected from a listed club.” (Neibauer, p.473.) An unlisted club, on the other hand, “is private. Only Yahoo! members who were invited to join may join the club and be able to access it.” (Neibauer, p.473; see also id., p.475.) When a club founder (“the first user”) selects an “unlisted” club, therefore, the club founder is specifying “accessibility rules” for the club page, which include the club being private and not open to the public (unlike a “listed” club), and can only be accessed by other users upon receipt of an invitation to join the club. The invitation, in turn, provides instructions on how to join a club. (Neibauer, pp.475-476.) Figure 21-9 below shows another rule that, in order to join a club in response to an invitation, the invited user may enter an optional comment but must click “Yes! I Accept” to join the club:	the first web-based interface,” because the founder can select through the club-creation web pages (“the first web-based interface”) the new club will be either “listed” or “unlisted.” (Neibauer, p.482, ¶6.) “A listed club is one that is open to all Yahoo! members. To join the club, you simply fill our on online form. Don’t worry, you cannot be rejected from a listed club.” (Neibauer, p.473.) An unlisted club, on the other hand, “is private. Only Yahoo! members who were invited to join may join the club and be able to access it.” (Neibauer, p.473; see also id., p.475.) When a club founder (“the first user”) selects an “unlisted” club, therefore, the club founder is specifying “accessibility rules” for the club page, which include the club being private and not open to the public (unlike a “listed” club), and can only be accessed by other users upon receipt of an invitation to join the club. The invitation, in turn, provides instructions on how to join a club. (Neibauer, pp.475-476.) Figure 21-9 below shows another rule that, in order to join a club in response to an invitation, the invited user may enter an optional comment but must click “Yes! I Accept” to join the club: [image omitted] (Neibauer, p.476, Fig. 21-9.) Because these accessibility rules govern access to the club page, which in turn includes the club picture, the accessibility rules govern “access to said at least one uploaded information item.”
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	[image omitted] (Neibauer, p.476, Fig. 21-9.) Because these accessibility rules govern access to the club page, which in turn includes the club picture, the accessibility rules govern “<i>access to said at least one uploaded information item.</i>” (EX-1002, ¶¶176-77.) 539 IPR Petition, pp.38-42	Ex.2034, pp.40-44
22	As explained for claim 8, when a club founder invites other additional users to join an unlisted club—and those members agree to join—the one or more additional users comprise “<i>individuals that with the first user,</i>” i.e., with the club founder, “<i>by mutual consent,</i>” i.e., by the club founder inviting the additional members to join, and those invited members agreeing to join, “<i>collectively comprise a group of members that have access to at least a portion of said shared content via the second web-based interface,</i>” i.e., collectively comprise a group of club members that can access content shared via one or more of the mobile information channels as described in limitation [1A] (“<i>said shared content</i>”) via the club pages (“<i>via the second web-based interface</i>”). (EX-1002, ¶¶179, 136.) 539 IPR Petition, pp.42-43	As just explained for claim 8, when a club founder invites other additional users to join an unlisted club – and those members agree to join – the one or more additional users comprise “individuals that with the first user,” i.e., with the club founder, “by mutual consent,” i.e., by the club founder inviting the additional members to join, and those invited members agreeing to join, “collectively comprise a group of members that have access to at least a portion of said shared content via the second web-based interface,” i.e., collectively comprise a group of club members that can access content shared via one or more of the mobile information channels as described in limitation 1[a] (“said shared content”) via the club pages (“via the second web-based interface”). (EX1002, ¶¶142, 96-100.) Ex.2034, p.44
23	Claim 10 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	Claim 10 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

the communication system, such as a server that includes a processor and memory. (EX-1002, ¶180; <i>e.g.</i>, Cheng, 23:16-20.) It would have been obvious that the software used to carry out the functions of Neibauer, Miller, and Cheng as described for claim 1 would have been stored on at least one non-transitory computer-readable storage medium, such as a hard disk drive or random access memory (RAM). (<i>E.g.</i>, Cheng, 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 further combination with Cheng, 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, ¶181.) Mapping the “<i>processing element</i>” to origin web server 102 and proxy server 110 in Cheng is consistent with the ’336 patent, which makes clear that a processing element or server can comprise multiple servers. (EX-1001, 9:2-4 (“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 “<i>processing element</i>” be contained within a single physical server (it does not), it would	communication system, such as a server that includes a processor and memory. (EX1002, ¶143; Cheng, <i>e.g.</i>, 23:16-20.) It would have been obvious that the software used to carry out the functions of Neibauer, Miller, and Cheng as described for claim 1 would have been stored on at least one non-transitory computer-readable storage medium, such as a hard disk 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 further combination with Cheng, 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 in Cheng is consistent with the ’336 patent, which makes clear that a processing element or server can itself comprise multiple servers. (’336, 9:2-4 (“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 element” be contained within a single physical server (it does not), it would have been obvious to
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	have been obvious to combine proxy server 110 and origin server 102 into a single server. (EX-1002, ¶182.) 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, a POSITA would have been familiar with well-known techniques for consolidating tasks within a single server when needed. (EX-1002, ¶183.) For example, a POSITA would have been motivated to combine origin web server 102 with proxy server 110 to improve the performance of Cheng’s proxy server techniques, as this would have eliminated the step (and network overhead associated with) origin server 102 having to send the original web page to the proxy server over the Internet. (EX-1002, ¶184.) 539 IPR Petition, pp.43-45	combine proxy server 110 and origin server 102 into a single server. (EX1002, ¶144.) 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 skilled artisans would have been familiar with well-known techniques for consolidating tasks within a single server when needed. (EX1002, ¶144.) For example, a skilled artisan would have been motivated to combine origin web server 102 with proxy server 110 to improve the performance of Cheng’s proxy server techniques, as this would have eliminated the step (and network overhead associated with) origin server 102 having to send the original web page to the proxy server over the Internet. (<i>Id.</i>) Ex.2034, pp.45-46
24	The claimed “<i>apparatus</i>” for claim 11 includes the web server that provides the functionality of Neibauer and Miller (which also corresponds to the origin web server 102 in Cheng) and based on the combination with Cheng, proxy server 110 that reformats and translates the web pages from Neibauer for delivery to mobile device. (Cheng, 3:31-33.) As explained for claim 1, the origin web server and the proxy server in Cheng work together to carry out	The claimed “apparatus” for claim 11 includes the web server that provides the functionality of Neibauer and Miller (which also corresponds to the origin web server 102 in Cheng) and based on the combination with Cheng, proxy server 110 that reformats and translates the web pages from Neibauer for delivery to mobile device. (Cheng, 3:31-33.) As explained for claim 1, the origin web server and the proxy server in

	each of the claim steps. (EX-1002, ¶189.) 539 IPR Petition, p.45	Cheng work together to carry out each of the claim steps. Ex.2034, pp.46-47
25	It would have been obvious that the claimed apparatus includes at least one “<i>processing element</i>,” such as at least one server that includes a processor coupled to a memory as explained for claim 10. (EX-1002, ¶190; Cheng, 23:16-20; Miller, 0043:32-0044:2.) Dependent claim 13, discussed below, 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 been obvious that, under the further combination with Cheng, origin web server 102 (which would have provided the features described in Neibauer and Miller), and proxy server 110, would have comprised “<i>a processing element comprising a processor coupled to a memory</i>.” (EX-1002, ¶191.) Mapping the “<i>processing element</i>” as including a web server and proxy server 110 is consistent with claim 11, which merely requires “<i>at least one</i>” processing element and thus does not preclude multiple processing elements. And as explained for claim 10 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. (EX-1002, ¶¶192, 184.) 539 IPR Petition, p.46	It would have been obvious that the claimed apparatus includes at least one “processing element,” such as at least one server that includes a processor coupled to a memory as explained for claim 10. (EX1002, ¶147; Cheng, 23:16-20; Miller, 0043:32-0044:2.) Dependent claim 13, which depends from claim 11 and is addressed below, 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, under the further combination with Cheng, origin web server 102 (which would have provided the features described in Neibauer and Miller), and proxy server 110, would have comprised “a processing element comprising a processor coupled to a memory.” (EX1002, ¶148.) Petitioner notes that mapping the claimed “processing element” as including a web server and proxy server 110 is consistent with claim 11, which merely requires “at least one” processing element and thus does not preclude multiple processing elements. And as fully explained for claim 10 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, ¶¶148, 144.)

		Ex.2034, pp.47-48
26	The functions in limitations [11B]-[11C] are substantially similar to the steps in limitations [1A]-[1B], respectively, and are obvious for the same reasons. (EX-1002, ¶¶193-96.) These steps would also have been performed by the claimed processing element as described for limitation [11A]. Under the proposed combination with Cheng, origin web server 102 and proxy server 110 (the “<i>at least one processing element</i>”) would have worked together to provide the claimed web-based interfaces. 539 IPR Petition, p.47	The functions in limitations 11[b]-[c] are substantially similar to the steps in 1[a]-[b], respectively, and obvious for the same reasons. (EX1002, ¶¶149-150.) These steps would also have been performed by the claimed processing element as described for limitation 11[a]. Under the proposed combination with Cheng, origin web server 102 and proxy server 110 (the “at least one processing element”) would have worked together to provide the claimed web-based interfaces. Ex.2034, p.48
27	These limitations are identical to limitations [1C]-[1D], respectively, and are obvious for the reasons provided above. 539 IPR Petition, p.47	These limitations are identical to limitations 1[c]-[d], respectively, above, and are obvious for the reasons provided. Ex.2034, p.48
28	As explained for limitation [11A], the processing element comprises at least origin web server 102 (corresponding to a web server that provides the functions of Neibauer) and proxy server 110 (“<i>at least one server</i>”). 539 IPR Petition, pp.47-48	As explained for limitation 11[a], the processing element comprises at least origin web server 102 (corresponding to a web server that provides the functions of Neibauer) and proxy server 110 (“at least one server”). Ex.2034, p.48
29	The servers of claim 13, discussed above, are both accessible over the Internet. (Cheng, 3:67-4:2 (“As shown [in Figure 1], the proxy server 110 and the server 102 are connected via a network 114 such as the Internet.”).) It would have been obvious that these servers would have been accessible over the Internet “<i>via a network</i>	The servers of claim 13 are both accessible over the Internet. (Cheng, 3:67-4:2 (“As shown [in Figure 1], the proxy server 110 and the server 102 are connected via a network 114 such as the Internet.”).) It would have been obvious that these servers would have been accessible over the Internet “via a network interface,” as a network

	<i>interface,”</i> as a network interface such as a communications port is a basic component for allowing a computer (such as a server) to communicate with other devices over a network such as the Internet. (EX-1002, ¶200; Cheng, 23:44-51 (“Communications with external devices... occur utilizing communication port 1516...”); Neibauer, p.4 (explaining that Yahoo! members need access to an Internet connection).) 539 IPR Petition, p.48	interface such as a communications port is a basic component for allowing a computer (such as a server) to communicate with other devices over a network such as the Internet. (EX1002, ¶153; Cheng, 23:44-51 (“Communications with external devices... occur utilizing communication port 1516...”); Neibauer, p.4 (explaining that Yahoo! members need access to an Internet connection).) Ex.2034, p.49
30	As explained for claim 1 and limitation [11A], the combination of Neibauer and Cheng discloses a network-based communication system that includes at least two servers that communicate over the Internet. First, the system comprises the web server providing the functionality of Neibauer and Miller, which also corresponds to origin web server 102 in Cheng. (Cheng, 3:36-37 (“In this context, an origin web server 102 is a web server that contains the original web page 104.”).) The network-based system under the proposed combination also includes proxy server 110 in Cheng that, as explained for claim 1, reformats and translates the web pages from Neibauer for delivery to a mobile device. (Cheng, 3:31-33.) Both of these servers are also “<i>configured to communicate over a network,</i>” <i>i.e.</i>, the Internet. (Cheng, <i>e.g.</i>, 3:67-4:2; EX-1002, ¶205.) 539 IPR Petition, p.49	As explained for claim 1 and limitation 11[a], the proposed combination of Neibauer and Cheng discloses a network-based communication system that includes at least two servers that communicate over the Internet. First, the system comprises the web server providing the functionality of Neibauer and Miller, which also corresponds to origin web server 102 in Cheng. (Cheng, 3:36-37 (“In this context, an origin web server 102 is a web server that contains the original web page 104.”).) The network-based system under the proposed combination also includes proxy server 110 in Cheng that, as explained for claim 1, reformats and translates the web pages from Neibauer for delivery to a mobile device. (Cheng, 3:31-33.) Both of these servers are also “configured to communicate over a network,” <i>i.e.</i>, the Internet. (Cheng, <i>e.g.</i>, 3:67-4:2; EX1002, ¶156.) Ex.2034, pp.49-50

31	The functions here are substantially similar to the steps of [1A]-[1B] and [11B]-[11C], respectively. Under the proposed combination as described, at least one of the servers in the network-based system would have performed these functions. For example, the web server that corresponds to origin web server 102 in Cheng would have provided the web-based interface for creating or accessing the club. If accessed using a mobile device, that web-based interface would also have been reformatted and converted by proxy server 110 in Cheng into a form suitable for the founder’s mobile device, which proxy server 110 would have provided to the mobile device. In either case, the claimed web-based interfaces would have been provided by at least one of the servers, as claimed. (EX-1002, ¶207.) 539 IPR Petition, pp.49-50	The functions here are substantially similar to the steps of 1[a]-[b], and 11[b]-[c], respectively. Under the proposed combination as described, at least one of the servers in the network-based system would have performed these functions. For example, the web server that corresponds to origin web server 102 in Cheng would have provided the web-based interface for creating or accessing the club. If accessed using a mobile device, that web-based interface would also have been reformatted and converted by proxy server 110 in Cheng into a form suitable for the founder’s mobile device, which proxy server 110 would have provided to the mobile device. In either case, the claimed web-based interfaces would have been provided by at least one of the servers, as claimed. (EX1002, ¶157.) Ex.2034, p.50
32	These limitations are identical to limitations [1C]-[1D], respectively, and are obvious for the same reasons. 539 IPR Petition, p.50	These limitations are identical to limitations 1[c]-[d], respectively, above, and are obvious for the reasons provided. Ex.2034, p.51
33	Neibauer discloses multiple examples of the claimed contact list. First, as explained for claim 1, one example of a mobile information channel is the club chat. (Neibauer, p.479.) As Neibauer explains, the Chat section on the club page “lists the members who are currently chatting.” (Neibauer, p.479.) Accordingly, when the given mobile information channel corresponds to a club chat, the “<i>contact list</i>” thus	Neibauer discloses multiple examples of the claimed contact list. First, as explained for claim 1, one example of a mobile information channel is the club chat. (Neibauer, p.479.) As Neibauer explains, the Chat section on the club page “lists the members who are currently chatting.” (Neibauer, p.479.) Accordingly, when the given mobile information channel corresponds to a club chat, the “contact list” thus

	corresponds to the list of members currently chatting. Second, Neibauer discloses a contacts feature that lists the IDs of the club founder and other club members as shown in Figure 21-11: [image omitted] (Neibauer, p.480, Fig. 21-11.) The contact list in Neibauer provides “<i>a contact list for the given mobile information channel</i>,” because it lists all of the members who are members of (and thus can access) the club. These members, in turn, are allowed to access the given mobile information channel, <i>e.g.</i>, private message board, chat, photo sharing, etc., as described for claim 1, because they are members of the club that includes that channel. (EX-1002, ¶¶210-12.) 539 IPR Petition, pp.50-52	corresponds to the list of members currently chatting. Second, Neibauer discloses a contacts feature that lists the IDs of the club founder and other club members as shown in Figure 21-11: [image omitted] (Neibauer, p.480, Fig. 21-11.) The contact list in Neibauer provides “a contact list for the given mobile information channel,” because it lists all of the members who are members of (and thus can access) the club. These members, in turn, are allowed to access the given mobile information channel, <i>e.g.</i>, private message board, chat, photo sharing, etc., as described for claim 1, because they are members of the club that includes that channel. (EX1002, ¶¶160-161.) Ex.2034, pp.51-52
34	Neibauer teaches that a club can be used to distribute advertising content to other club members: [image omitted] (Neibauer, p.475, Fig. 21-8 (red box added).) As shown in the red box, the exemplary club in Figure 21-8 includes an advertisement. The advertising content here is also shown accompanying a club message board (an example of a “<i>mobile information channel</i>” as explained for limitation [1A]), thus disclosing “<i>distributing</i>	Neibauer discloses that a club can also be used to distribute advertising content to other club members: [image omitted] (Neibauer, p.475, Fig. 21-8 (red box added).) As shown in the red box, the exemplary club in Figure 21-8 includes an advertisement. The advertising content here is also shown accompanying a club message board (an example of a “mobile information channel” as explained for limitation 1[a]), this disclosing “distributing

	<i>advertising content to the one or more additional users via the given mobile information channel.”</i> (EX-1002, ¶214.) The claimed ability to distribute advertising content via a web page adds nothing of patentable significance as this was a well-known and widespread practice with webpages long before June 2002. (EX-1002, ¶215.) Claim 17 is also obvious in view of the bulletin board feature of Miller, which provides substantially similar functionality to the message board feature in Neibauer, but further discloses that a bulletin board may include “offers to buy and or sell” items. (Miller, 0046:20-33, Fig. 2.) It therefore would have been obvious for one or more messages posted in the club message board of Neibauer (“<i>a given mobile information channel</i>”) to include advertising content posted by the founder or other club members (such as offers to buy or sell), which would have been distributed to other club members when viewed. (EX-1002, ¶217.) 539 IPR Petition, pp.52-53	advertising content to the one or more additional users via the given mobile information channel.” (EX1002, ¶162.) The claimed ability to distribute advertising content via a web page and also adds nothing of patentable significance as this was a well-known and widespread practice with webpages long before June 2002. (EX1002, ¶163.) Claim 17 is also obvious in view of the bulletin board feature of Miller, which provides substantially similar functionality to the message board feature in Neibauer, but further discloses that a bulletin board may include “offers to buy and or sell” items. (Miller, 0048:20-33, Fig. 2.) It therefore would have been obvious that one or more messages posted in the club message board of Neibauer (“a given mobile information channel”) would have included advertising content posted by the founder or other club members (such as offers to buy or sell), which would have been distributed to other club members when viewed. (EX1002, ¶164.) Ex.2034, pp.52-54
35	In the first example above in claim 17 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 (“<i>the given mobile information channel</i>”). In the second example referencing Miller, the advertising content takes the form of	In the first example in claim 17 referring to Figure 21-8 of Neibauer, the sponsorship advertisement appearing on the club page (“advertising content”) was inserted on the page alongside messaging content in the club message board (“the given mobile information channel”). In the second example referencing Miller, the advertising content takes the form of actual

	actual advertising messages appearing alongside other types of messages in the club message board. Each example thus discloses advertising content being inserted “<i>along with messaging content in the given mobile information channel</i>,” i.e., along with other messages in the mobile information channel. 539 IPR Petition, pp.53-54	advertising messages appearing alongside other types of messages in the club message board. Each example thus discloses advertising content being inserted “along with messaging content in the given mobile information channel,” i.e., along with other messages in the mobile information channel. Ex.2034, p.54
36	As explained for claim 1, Neibauer discloses multiple examples of “<i>personalized messaging content</i>” for the first user, i.e., the club founder. For example, a club founder can post its own personalized messages using the private message board. (Neibauer, p.483, Fig. 21-13 (showing personalized “Welcome” message posted by club founder).) The founder can also engage in online chat with other members. (Neibauer, p.479.) The founder can also add its own personalized photos or create its own personalized photo albums. (Neibauer, pp.477-479.) Each example provides “<i>messaging content</i>,” i.e., the messages exchanged between the club founder and the one or more additional users, “<i>personalized</i>” for the first user because the messages would have either been written by the club founder or intended for or directed to the club founder. (EX-1002, ¶221.) 539 IPR Petition, pp.54-55	As explained for claim 1, Neibauer discloses multiple examples of “personalized messaging content” for the first user, i.e., the club founder. For example, a club founder can post its own personalized messages using the private message board. (Neibauer, p.483, Fig. 21-13 (showing personalized “Welcome” message posted by club founder).) The founder can also engage in online chat with other members. (Neibauer, p.479.) The founder can also add its own personalized photos or create its own personalized photo albums. (Neibauer, pp.477-479.) Each example provides “messaging content,” i.e., the messages exchanged between the club founder and the one or more additional users, “personalized” for the first user because the messages would have either been written by the club founder or intended for or directed to the club founder. (EX1002, ¶167.) Ex.2034, p.55
37	It would have been obvious that the messaging content would have comprised any one of the examples	It would have been obvious that the messaging content would have comprised any one of the examples

	recited in claim 24. (EX-1002, ¶223.) For example, Neibauer discloses examples of messages disclosing at least “<i>announcements</i>” and “<i>notes</i>.” (Neibauer, p.475, Fig. 21-8 (exemplary club page showing message: “Hi, I am a new member of the club and I would like to express my comments”), p.483, Fig. 21-13 (exemplary club page showing message: “Welcome to the Yahoo! Message Board for Alan and Barbara’s Clubhouse”).) 539 IPR Petition, p.55	recited in claim 24. (EX1002, ¶169.) For example, Neibauer discloses examples of messages disclosing at least “announcements” and “notes.” (Neibauer, p.475, Fig. 21-8 (exemplary club page showing message: “Hi, I am a new member of the club and I would like to express my comments”), p.483, Fig. 21-13 (exemplary club page showing message: “Welcome to the Yahoo! Message Board for Alan and Barbara’s Clubhouse”).) Ex.2034, p.56
38	As explained for claim 1, Neibauer discloses multiple examples in which “<i>at least a portion of the shared content is authored by the first user.</i>” For example, messages posted by the club founder, chat messages from the club founder, and photos shared by the club founder (with accompanying textual descriptions) all comprise shared content “<i>authored by the first user.</i>” (Neibauer, 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”).) 539 IPR Petition, p.56	As explained for claim 1, Neibauer discloses multiple examples in which “at least a portion of the shared content is authored by the first user.” For example, messages posted by the club founder, chat messages from the club founder, and photos shared by the club founder (with accompanying textual descriptions) all comprise shared content “authored by the first user.” (Neibauer, 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”).) Ex.2034, p.56
39	As explained for claim 1, one of the steps for creating a club using the “<i>first web-based interface</i>” involves the club founder (“<i>the first user</i>”) providing a title or name for the club. (E.g., Neibauer, p.481, ¶4 (“Enter a name for the club.”).) This name is then used as the title for the club page containing	As fully explained for claim 1, one of the steps for creating a club using the “first web-based interface” involves the club founder (“the first user”) 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

the mobile information channels, as shown in Figure 21-13: [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. Neibauer discloses other examples in which the first user can establish a title for a mobile information channel. With respect to the club photo sharing feature, the user can create a new photo album and “enter an album name.” (Neibauer, p.479; <i>see also id.</i>, p.478, Fig. 21-10 (showing photo album titled “Blueraja’s BOND GIRL Album” displayed using the club photo sharing feature).) Similarly for the club message board, a user can specify a new message topic (thread) and title it by giving it a heading. (Neibauer, p.471.) In each of these further examples, the first user establishes a title for the given mobile information channel. 539 IPR Petition, pp.56-58	mobile information channels, as shown in Figure 21-13: [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. Neibauer discloses other examples in which the first user can establish a title for a mobile information channel. With respect to the club photo sharing feature, the user can create a new photo album and “enter an album name.” (Neibauer, p.479; <i>see also id.</i>, p.478, Fig. 21-10 (showing photo album titled “Blueraja’s BOND GIRL Album” displayed using the club photo sharing feature).) Similarly for the club message board, a user can specify a new message topic (thread) and title it by giving it a heading. (Neibauer, p.471.) In each of these further examples, the first user establishes a title for the given mobile information channel. Ex.2034, pp.56-58
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40	As explained for [1B], the Neibauer-Miller-Cheng combination discloses a given mobile information channel (e.g., club message board, club chat, photo sharing) for sharing content authored by a first user with one or more additional users. The claimed <i>generating</i> occurs when the mobile information channel is made available to club members via the club page. (EX-1002, ¶¶228, 137.) 539 IPR Petition, p.58	As explained for 1[b], the proposed combination discloses a given mobile information channel (e.g. club message board, club chat, photo sharing) for sharing content authored by a first user with one or more additional users. The claimed generating occurs when the mobile information channel is made available to club members via the club page. (EX1002, ¶¶173, 127, 129-130, 97-100.) Ex.2034, pp.58-59
41	The club created by the club founder would have provided the other club members access to at least a portion of the shared content. This access would have been provided via the given mobile information channel and would have facilitated interaction and exchange of information between the club founder and the other club members. (EX-1002, ¶¶229-30.) 539 IPR Petition, p.59	As explained, the club created by the club founder would have provided the other club members access to at least a portion of the shared content. This access would have been provided, as explained, via the given mobile information channel and would have facilitated interaction and exchange of information between the club founder and the other club members. (EX1002, ¶¶97-100, 130.) Ex.2034, p.59
42	VII. Ground 2: Claim 7 Is Obvious Over Ground 1 Prior Art in View of Ausems. Ausems discloses a portable mobile device that combines the functionality of a Personal Digital Assistant (PDA) with a wireless telephone. (Ausems, 3:5-8.) The PDA telephone 100 in Ausems can also run a conventional mobile operating system and may include a web browser. (Ausems, 7:64-8:5.) The device also includes a digital camera 190 for recording and storing images, which can be transmitted. (Ausems, e.g., 2:5-6, 5:17-18 (“Camera	D. Ground 2: Claim 7 Is Obvious Over Ground 1 Prior Art In View Of Ausems. Ausems discloses a portable mobile device that combines the functionality of a Personal Digital Assistant (PDA) with a wireless telephone. (Ausems, 3:5-8.) The PDA telephone 100 in Ausems can also run a conventional mobile operating system and may include a web browser. (Ausems, 7:64-8:5.) The device also includes a digital camera 190 for recording and storing images, which can be transmitted. (Ausems, e.g., 2:5-6, 5:17-18 (“Camera 190 records video

190 records video images and stores them within. Additionally, video images recorded by camera 190 may also be transmitted from PDA telephone 100 in real time during a telephone call (thus allowing for video conferencing).”) A usems thus discloses a “<i>device-captured data source</i>” that comprises a source of at least “<i>device-captured image data</i>,” as recited in claim 7. Motivation to Combine Ground 1 Prior Art with A usems: It would have been obvious to combine the Ground 1 prior art with A usems, predictably resulting the proposed combination being further adapted so content shared by the club founder (“<i>the first user</i>”) would have been obtained from a “<i>device-captured data source</i>” that comprises a source of at least “<i>device-captured image data</i>,” as recited in claim 7. (EX-1002, ¶239.) For example, the club founder would have captured image data using a digital camera of the mobile device and uploaded it to the club for sharing with other club members. (Neibauer, pp.477-478.) A usems is an analogous reference in the field of wireless and mobile communications and would have been reasonably pertinent to problems facing the inventor. (EX-1002, ¶240.) A POSITA would have been amply motivated to combine in order to expand the universe of image data that the founder could share with other members of the club. (EX-1002, ¶241.) A POSITA would have had a	images and stores them within. Additionally, video images recorded by camera 190 may also be transmitted from PDA telephone 100 in real time during a telephone call (thus allowing for video conferencing).”) A usems thus discloses a “device-captured data source” that comprises a source of at least “device-captured image data,” as recited in claim 7. <i>Rationale and Motivation to Combine (Ground 1 Prior Art with A usems):</i> It would have been obvious to combine the Ground 1 prior art with A usems, predictably resulting the proposed combination being further adapted so content shared by the club founder (“the first user”) would have been obtained from a “device-captured data source” that comprises a source of at least “device-captured image data,” as recited in claim 7. (EX1002, ¶180.) For example, the club founder would have captured image data using a digital camera of the mobile device and uploaded it to the club for sharing with other club members. (Neibauer, pp.477-478.) A usems is an analogous reference in the field of wireless and mobile communications and would have been reasonably pertinent to problems facing the inventor. (EX1002, ¶181.) A skilled artisan would have been amply motivated to combine in order to expand the universe of image data that the founder could share with other members of the club. (EX1002, ¶182.) A skilled artisan would have had a reasonable expectation of success, and could have
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	reasonable expectation of success, and could have implemented the proposed combination using conventional techniques. (EX-1002, ¶242.) 539 IPR Petition, pp.59-61	implemented the proposed combination using conventional techniques. (EX1002, ¶183.) Ex.2034, pp.59-61
43	VIII. Ground 3: Claims 21-22 Are Obvious Over Ground 1 Prior Art in View of Fransioli. A. Claim 21 The Ground 1 prior art in combination with Fransioli renders obvious “<i>the messaging content comprises personalized messaging content for the first user</i>” [21]. As explained for claim 17, Neibauer and Miller each renders obvious that the messaging content can comprise advertising content. For purposes of Ground 3 and claims 21-22, the “<i>personalized messaging content</i>” corresponds to content personalized for the first user based on the further combination with Fransioli. Miller discloses several examples of providing advertising to users of a collaborative environment or group. (Miller, 0047:1-5.) Miller also discloses using its bulletin board feature to post offers to buy or sell items. (Miller, Fig. 2, 0046:20-33.) It therefore would have been obvious for “<i>the messaging content</i>” in claim 1 to have comprised advertising content. With respect to “<i>personalized</i>” messaging content, this would have been obvious in further view of	E. Ground 3: Claims 21-22 Are Obvious Over Ground 1 Prior Art In View Of Fransioli. 1. Claim 21: [claim language omitted] As explained for Ground 1 and dependent claim 17, both Neibauer and Miller disclose and render obvious that the messaging content can comprise advertising content. For purposes of Ground 3 and claims 21-22, the “personalized messaging content” corresponds to content personalized for the first user based on the further combination with Fransioli. Miller discloses several examples of providing advertising to users of a collaborative environment or group. (Miller, 0049:1-5.) As explained for claim 17, Miller also discloses using its bulletin board feature to post offers to buy or sell items. (Miller, Fig. 2, 0048:20-33.) It therefore would have been obvious for “the messaging content” in claim 1 to have comprised advertising content. With respect to the requirement of “personalized” messaging content, this would have been obvious in further view of Fransioli, which discloses a method and system for providing a message to a

Fransioli, which discloses a method and system for providing a message to a user that is based on the location and direction of the user's portable device. (Fransioli, ¶0006.) The portable device can be a wireless or cellular handset. (Fransioli, ¶¶0029, 0030; <i>see also id.</i>, ¶0018, Fig. 1 (portable device 26).) In one embodiment, a server determines the location of the portable device, the direction of travel of the mobile device, and then establishes a message that includes content based on the mobile device's location and direction of travel. (Fransioli, ¶¶0007, 0015, 0023.) The location of the device can be determined using well-known GPS techniques or using various transmitters in the wireless access network. (Fransioli, ¶¶0027, 0030.) The location-based information sent to the portable device can include, among other things, personalized advertising information. (Fransioli, ¶0018 ("For example, advertising may be delivered to the portable device based on location and direction of travel."), 0029.) But location-based information is not limited to advertisements. "For example, the message content may include a public service announcement, a local event schedule, a traffic report possibly including alternative route information, and/or a weather report," among others. (Fransioli, ¶0011.) Fransioli further explains that its method "can apply to data with the newer wireless handsets or an	user that is based on the location and direction of the user's portable device. (Fransioli, ¶0006.) The portable device can be a wireless or cellular handset. (Fransioli, ¶¶0029, 0030; <i>see also id.</i>, ¶0018, Fig. 1 (portable device 26).) In one embodiment, a server determines the location of the portable device, the direction of travel of the mobile device, and then establishes a message that includes content based on the mobile device's location and direction of travel. (Fransioli, ¶¶0007, 0015, 0023.) The location of the device can be determined using well-known GPS techniques or using various transmitters in the wireless access network. (Fransioli, ¶¶0027, 0030.) The location-based information sent to the portable device can include, among other things, personalized advertising information. (Fransioli, ¶0018 ("For example, advertising may be delivered to the portable device based on location and direction of travel."), 0029.) But location-based information is not limited to advertisements. "For example, the message content may include a public service announcement, a local event schedule, a traffic report possibly including alternative route information, and/or a weather report," among others. (Fransioli, ¶0011.) Fransioli further explains that its method "can apply to data with the newer wireless handsets or an interactive wireless data device integrated into a vehicle." (Fransioli, ¶0030.) "In this
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interactive wireless data device integrated into a vehicle.” (Fransioli, ¶0030.) “In this variant, a user can invoke the data service and connect to multimedia content or a web portal. Based on the location and travel direction information retrieved, the user can view the same type of information, except instead of being audio, it will be interactive multimedia or Internet media.” (Fransioli, ¶0030.) Fransioli therefore discloses “<i>personalized</i>” messaging content, i.e., messages personalized for the user (such as advertisements) based on the location and/or direction of travel of the mobile device. (Fransioli, ¶0005.) Motivation to Combine Ground 1 Prior Art and Fransioli: It would have been obvious to combine the Ground 1 prior art with Fransioli, predictably resulting in the combined system providing “<i>personalized messaging content for the first user</i>,” i.e., messaging content selected for the first user based on at least the location of her mobile device. (EX-1002, ¶255.) For example, in one exemplary implementation, the messaging content could have comprised an advertisement or information about a particular event from a club message board, selected for delivery to the club founder based on at least the location of its wireless mobile device. (EX-1002, ¶257.) Fransioli is an analogous reference in the same field of wireless and mobile devices and would have been reasonably	variant, a user can invoke the data service and connect to multimedia content or a web portal. Based on the location and travel direction information retrieved, the user can view the same type of information, except instead of being audio, it will be interactive multimedia or Internet media.” (Fransioli, ¶0030.) Fransioli therefore discloses “personalized” messaging content, i.e., messages personalized for the user (such as advertisements) based on the location and/or direction of travel of their mobile device. (Fransioli, ¶0005.) <i>Rationale and Motivation to Combine (Ground 1 Prior Art with Fransioli):</i> It would have been obvious to combine the Ground 1 prior art with Fransioli, predictably resulting in the combined system providing “personalized messaging content for the first user,” i.e., messaging content that would have been selected for the first user based on at least the location of their mobile device. (EX1002, ¶190.) For example, in one exemplary implementation, the messaging content could have comprised an advertisement or information about a particular event from a club message board, selected for delivery to the club founder based on at least the location of its wireless mobile device. (<i>Id.</i>) Fransioli is an analogous reference in the same field of wireless and mobile devices and would have been reasonably pertinent to problems facing the inventors. (EX1002, ¶191.)
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	pertinent to problems facing the inventors. (EX-1002, ¶256.) A POSITA would have been motivated to combine the Ground 1 prior art with Fransioli to enhance user experience by providing personalized (location-based) content. Fransioli expressly motivates the combination by explaining that the system “provides localized and personalized information content in ways that improve over existing systems.” (Fransioli, ¶0005.) It would have been obvious that personalized content based on the user’s current location would have been more likely to be relevant to the user as compared to messaging content provided without regard to location. (EX-1002, ¶259; Fransioli, ¶0028.) Fransioli provides a further express motivation to combine with Neibauer by explaining that a user can invoke the data service by connecting to a “web portal.” (Fransioli, ¶0030.) The term “web portal” was used to refer to websites that served as jumping-off or starting points for Internet users, and Yahoo! was widely known and recognized in Neibauer itself as a well-known web portal. (EX-1002, ¶261.) A POSITA would also have had a reasonable expectation of success and could have implemented the proposed combination using conventional techniques. (EX-1002, ¶262.) 539 IPR Petition, pp.61-64	A skilled artisan would have been motivated to combine to enhance user experience by providing for personalized (location-based) content. Fransioli provides an express motivation to combine by explaining that his system “provides localized and personalized information content in ways that improve over existing systems.” (Fransioli, ¶0005.) It would have been obvious that personalized content based on the user’s current location would have been more likely to be relevant to the user as compared to messaging content provided without regard to location. (EX1002, ¶192; Fransioli.) Fransioli provides a further express motivation to combine with Neibauer by explaining that a user can invoke the data service by connecting to a “web portal.” (Fransioli, ¶0030.) The term “web portal” was used to refer to websites that served as jumping-off or starting points for Internet users, and Yahoo! was widely known and recognized in Neibauer itself as a well-known web portal. (EX1002, ¶193.) A skilled artisan would also have had a reasonable expectation of success and could have implemented the proposed combination using conventional techniques. (EX1002, ¶194.) Ex.2034, pp.61-64
44	As explained above, the combination would have provided “<i>location-based</i>	As just explained, the proposed combination would have provided

	<i>service information of the wireless network,” i.e., the location of the first user’s mobile device. Fransioli further explains that the mobile device location can be determined by the device itself using well-known global position system (GPS) techniques, or using the wireless network itself through signal strengths between the device and various transmitters in the wireless network. (Fransioli, ¶¶0027, 0030.) In either case, the combination would have provided “location-based service information of the wireless network,” which the given mobile information channel would have “integrat[ed]” with the personalized messaging content, as the current location information would have been used to personalize the message content for the first user. (Fransioli, ¶0011 (“For example, a driver in a vehicle may desire information about products and services in the locality.”).) The given mobile information channel thus “integrates” location-based service information with the personalized messaging content by using the current location to establish the message delivered to the user. (Fransioli, ¶0031 (“At block 76 [of Figure 2] a message is established that includes content based on location and direction of travel.”).)</i> 539 IPR Petition, pp.64-65	“location-based service information of the wireless network,” i.e., the location of the first user’s mobile device. Fransioli further explains that the mobile device location can be determined by the device itself using well-known global position system (GPS) techniques, or using the wireless network itself through signal strengths between the device and various transmitters in the wireless network. (Fransioli, ¶¶0027, 0030.) In either case, the proposed combination would have provided “location-based service information of the wireless network,” as claimed, which the given mobile information channel would have “integrat[ed]” with the personalized messaging content. This is because, under the proposed combination, the current location information would have been used to personalize the message content for the first user. (Fransioli, ¶0011 (“For example, a driver in a vehicle may desire information about products and services in the locality.”).) The given mobile information channel thus “integrates” location-based service information with the personalized messaging content by using the current location to establish the message delivered to the user. (Fransioli, ¶0031 (“At block 76 [of Figure 2] a message is established that includes content based on location and direction of travel.”).) Ex.2034, pp.64-65
45	Harvey discloses techniques for creating on-line communities, which are similar to the web-based clubs disclosed in Neibauer. (Harvey, 4:24-	Harvey discloses techniques for allowing users to create on-line communities in which users can communicate and share information, which are similar to the

43.) Harvey teaches the ability of a community creator to author content for a community before the community is created. (EX-1002, ¶268.) 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 adding content before the community is created. (EX-1002, ¶268.) Users access the community “through browser access to an appropriate website.” (Harvey, 29:59-62.) Motivation to Combine with Harvey: It would have been obvious to combine the prior art cited for Grounds 4-6 with Harvey, predictably resulting in the club creation user interface in Neibauer with the <i>further</i> ability to allow 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. A user can establish a connection with a community, among other ways, “through browser access to an appropriate website.” (Harvey, 29:59-62.)
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club founder to add content to one or more mobile information channels, before the club is created and launched. (EX-1002, ¶269.) 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.” (EX-1002, ¶270.) Under the proposed combination, the “<i>content management site</i>” would have included the web-based interface for allowing the founder to create a Neibauer club and to add content for the club via the application-based information channels, such as initial club messages, initial photos with textual descriptions, etc. (<i>Id.</i>) 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. (<i>Id.</i>) Harvey is an analogous reference and would have been reasonably pertinent to problems facing the inventors. (EX-1002, ¶271.) A POSITA would have been motivated to combine in order to provide club founders with better customizability allowing them to use the club-creation interface to populate mobile information channels with initial content, <i>before</i> the club is launched. (EX-1002, ¶272.) This would have avoided “blank” clubs devoid of content, because the club would be populated with some initial content before launch, which creates a more	<i>Rationale and Motivation to Combine (with Harvey)</i>: It would have been obvious to combine the prior art cited for Grounds 1-3 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 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 limitation 1[b] in Ground 1. (EX1002, ¶¶199-200.) Harvey is an analogous reference and would have been reasonably pertinent to problems facing the inventors. (EX1002, ¶201.) A skilled artisan would have been motivated to combine in order to provide greater customizability to the clubs by
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	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, ¶273.) 539 IPR Petition, pp.66-68	allowing the club creator to use the club-creation interface to populate the mobile information channels with initial content, before the club is launched and made available to other members. (EX1002, ¶202.) This would have allowed the club founder to ensure that other members would not experience a “blank” club devoid of content, because under the proposed combination, the club founder could have populated its mobile information channels (such as the club message board) with at least 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 proposed combination using conventional techniques. (EX1002, ¶203.) Ex.2034, pp.66-68
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