

Summary of verbatim (or nearly verbatim) matches between the 00539 petition to the Houh Declaration Ex.1002

	'539 Petition	Houh Decl. (Ex. 1002)
1	The '336 patent, filed February 2, 2012, claims priority through 3 continuations to U.S. Patent 7,599,983, filed June 18, 2003, which claims priority to U.S. Provisional Application No. 60/389,430, filed on June 18, 2002. 539 Petition, p. 1	The '336 patent, filed February 2, 2012, claims priority through three continuations to U.S. Patent 7,599,983, filed June 18, 2003, which claims priority to Provisional 60/389,430, filed June 18, 2002. Ex. 1002, ¶ 24
2	each applied reference was filed or published before June 18, 2002. 539 Petition, p. 1	each applied reference was filed or published before June 18, 2002. Ex. 1002, ¶ 24
3	The '336 patent “relates generally to network-based communications systems, and more particularly to techniques for information content management in such systems.” (EX-1001, 1:26-28.) 539 Petition, p. 3	The '336 patent “relates generally to network-based communications systems, and more particularly to techniques for information content management in such systems.” (EX-1001, 1:24-26.) Ex. 1002, ¶ 25
4	The '336 patent identifies “accessing of information content over wireless networks via web-enabled mobile devices” as among “the most rapidly expanding aspects of wireless networking.” (EX-1001, 1:30-32.) 539 Petition, p. 3	The '336 patent identifies “accessing of information content over wireless networks via web-enabled mobile devices” as among “the most rapidly expanding aspects of wireless networking.” (EX-1001, 1:30-32.) Ex. 1002, ¶ 26
5	Figure 1A (below) “shows an example network-based communication system 10” including “wireless network 12 coupled to the Internet 14, a set of mobile devices 15, a set of servers 16 and a set of user terminals 18.” (EX-1001, 3:59-64.)	Figure 1A, reproduced below, “shows an example network-based communication system 10” including “wireless network 12 coupled to the Internet 14, a set of mobile devices 15, a set of servers 16 and a set of user terminals 18.” (EX-1001, 3:46-50.)

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	539 Petition, pp. 3-4	Ex. 1002, ¶ 26
6	System 10 “provides at least one content management site accessible to a system user” including “M-channels” which “allow unsophisticated users to easily and efficiently author message data or other types of information content to be made accessible via a collaborative workspace, a data mailbox, a collaborative community, or other type of mobile site.” (EX-1001, 5:10-12, 8:11-17.) Such mobile sites may be associated with “a group comprising multiple members having a common interest” (EX-1001, 6:23-25), “an event” (EX-1001, 6:43-44), “a game” (EX-1001, 7:24-25), or “a user of IM, SMS, MMS, email or other type of messaging service” (EX-1001, 7:36-38), among other associations. (EX-1001, 6:23-8:6.) 539 Petition, pp. 4-5	The patent discloses that the system “provides at least one content management site accessible to a system user” including “M-channels” which “allow unsophisticated users to easily and efficiently author message data or other types of information content to be made accessible via a collaborative workspace, a data mailbox, a collaborative community, or other type of mobile site.” (EX-1001, 5:10-12, 8:11-16.) Such mobile sites may be associated with “a group comprising multiple members having a common interest” (EX-1001, 6:23-25), “an event” (EX-1001, 6:43-48), “a game” (EX-1001, 7:24-25), or “a user of IM, SMS, MMS, email or other type of messaging service” (EX-1001, 7:36-38), among other associations. (EX-1001, 6:23-8:6.) Ex. 1002, ¶ 28
7	A person of ordinary skill in the art (“POSITA”) would have had a bachelor’s degree in electrical engineering, computer science, or similar field, with two years of experience in developing and implementing network-based computer systems that interact with mobile devices, such as systems for storing and retrieving information over the Internet or communicating using the Web using wireless mobile devices. A person could also have qualified as a person of ordinary skill in the art with some combination of (1) more formal	In my opinion, a POSITA would have had a bachelor’s degree in electrical engineering, computer science, or similar field, with two years of experience in developing and implementing network-based computer systems that interact with mobile devices, such as systems for storing and retrieving information over the Internet or communicating using the Web using wireless mobile devices. A person could also have qualified as a POSITA with some combination of (1) more formal education (such as a master’s of science degree) and less

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	education (such as a master’s of science degree) and less technical experience, or (2) less formal education and more technical or professional experience.4 (EX-1002, ¶¶32-33.) 539 Petition, p. 5	technical experience, or (2) less formal education and more technical or professional experience. Ex. 1002, ¶ 33
8	PO traversed these rejections and the Examiner agreed, stating that the prior art does not teach a “web-based interface being 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 user,” or “activation of [a] mobile channel by a user.” (EX-1023, 342.) 539 Petition, p. 6	Examiner confirmed the patentability of the claims on March 14, 2024, stating the prior art does not teach a “web-based interface being 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 user,” or “activation of [a] mobile channel by a user.” (EX-1023, 342.) Ex. 1002, ¶ 36
9	Petitioners dispute PO’s narrow Meta-MDT-IPR construction which is contrary to the express definition in the specification. (See, e.g., EX-1001, 4:30-33.) Petitioners apply the plain meaning which is consistent with Meta’s Meta-MDT-IPR and MDT-Meta-Litigation constructions. (EX-1002, ¶40.) 539 Petition, p. 7	I dispute PO’s narrow Meta-MDT-IPR construction because it is contrary to the express definition in the specification. (See, e.g., EX-1001, 4:30-33 (“The term ‘mobile device’ as used herein is intended to include, without limitation, any type of portable information processing device capable of being configured for communication over a network.”).) I apply the plain meaning for this term which is consistent with Meta’s Meta-MDT-IPR and MDT-Meta-Litigation constructions. Ex. 1002, ¶ 40
10	Neibauer discloses features of a Yahoo! service known as Yahoo! Clubs. (Neibauer, pp.473-483.) Neibauer explains that “[a] <i>club</i> is a group of	One of the features of Yahoo! described in Neibauer was called Yahoo! Clubs. Yahoo! Clubs provided users the ability to create online

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	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).) 539 Petition, p. 10	communities through which users could share information. As Neubauer 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.” (Neibauer, p.473 (italics in original).) Ex. 1002, ¶ 48
11	To the extent the preamble is limiting, Neubauer discloses a “<i>method for managing information content in a network-based communication system.</i>” Neubauer 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; see also id., pp.478-479.) 539 Petition, p. 11	Neibauer therefore discloses “[a] <i>method for managing information content in a network-based communication system,</i>” as recited in the preamble of claim 1. Neibauer discloses a method for “<i>managing</i>” information content because the club founder can manage the information, such as messages and photos, that is shared in a club with other members of a Yahoo! club. For example, as noted, 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; see also id., p.478) Ex. 1002, ¶ 113
12	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]. 339 Petition, p. 13	Neibauer’s “<i>first web-based interface</i>” includes the form that the club founder (“<i>first user</i>”) uses to create the club as discussed above – but does not include the page for the actual created club, i.e. the “<i>second web-based interface</i>” as recited in limitation [1B] Ex. 1002, ¶ 58

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13	It would have been obvious that the club-creation interface is a “web-based interface” because it is provided via web pages delivered over the Internet to a web browser. 339 Petition, p. 13	The club-creation form described 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. Ex. 1002, ¶ 119
14	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>. 539 Petition, pp. 13-14	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 at least three features of a Yahoo! club, with each feature independently qualifying as “<i>a given mobile information channel.</i>” Ex. 1002, ¶ 121
15	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) 539 Petition, p. 14	Neibauer explains that every club will include a private message board, as shown in the exemplary unlisted club in Figure 21-13 above. Neibauer describes that “[a] message board can be compared to a bulletin board on an office wall. It’s a place to leave messages to others and to read their replies.” (Neibauer, p.468.) Ex. 1002, ¶ 122
16	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 Petition, p. 14	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. 1002, ¶ 124
17	Each of these club features is a <i>mobile information channel configured “for sharing content between the first user</i>	Each of these three features of a club is a <i>mobile information channel configured “for sharing content</i>

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	<i>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.) 539 Petition, p. 14	<i>between the first user and one or more additional users,”</i> because these features could be used for sending and receiving messages such as club message board or chat messages, or photographs with accompanying textual names and descriptions (“<i>for sharing content</i>”). Ex. 1002, ¶ 125
18	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.” (EX-1001, 8:11-17.) 539 Petition, p. 15	As noted above, according to the ’336 patent, these “M-channels allow unsophisticated users to easily and efficiently author message data or other types of information content to be made accessible via a collaborative workspace, a data mailbox, a collaborative community, or other type of mobile site or portion thereof generated or otherwise managed in the system 10.” (EX-1001, 8:11-17.) Ex. 1002, ¶ 30
19	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 (“the first web-based interface”), which activates the given mobile information	The club founder can also “activate” any of the above mobile information channels via “<i>the first web-based interface.</i>” 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 “<i>activates</i>” each <i>mobile information channel</i> by creating a new club. This action, which takes place using the club-creation web form (“<i>the first web-based interface</i>”),

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	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. (EX-1002, ¶¶129-30.) 539 Petition, pp. 15-16	“<i>activates</i>” the given “<i>mobile information channel</i>” (e.g., club message board, chat, photo sharing) by making it available for use by the founder and other club members. Ex. 1002, ¶ 129
20	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.) 539 Petition, p. 16	Miller discloses a system for allowing users to create collaborative web-based environments, which are similar to clubs as described in Neibauer. (Miller, Abstract, 0036:30-0037:12.) Miller’s process for creating a new environment is also similar, in many ways, to the steps outlined in Neibauer. Miller discloses a number of web-based forms that allow the user to (among other things) specify a name and description for the environment (Fig. 13B) identify the members of the environment (Fig. 13C, 14A-C), and select the various communication features (e.g., bulletin board) that will be available for members (Fig. 16). (Miller, 0043:12-0044:27.) Ex. 1002, ¶ 61
21	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.)	In light of the above, it would have been obvious to combine Neibauer with Miller, predictably resulting in the system and method for creating a Yahoo! club described in Neibauer, but with the “<i>first web-based interface</i>” further allowing the club creator to select and activate the particular communication features (including “<i>a given mobile information channel</i>”) that will be available in the club.

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	539 Petition, p. 17	Ex. 1002, ¶ 82
22	“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.) 539 Petition, p. 19	“Figure 21-13 shows an example of a personal club page.” (Neibauer, p.482.) The screen image in Figure 21-13 appears cut-off as it does not show the “Our Pages” links on the left side, as shown in other exemplary club pages. (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).) 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 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
23	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	Neibauer’s “<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 other pages for club features accessible from that page. This is consistent with the ’336 patent specification, in which the claimed second web-based interface is a mobile web site that can comprise a number of linked pages. (EX-1001, 14:52-53,

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	in the Our Pages 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. (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.) 539 Petition, p. 20	Figs. 18 & 24-25.) And for the same reasons as described for limitation [1A] above, it would have been obvious that this interface qualifies as a “<i>web-based interface</i>,” Ex. 1002, ¶ 135
24	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. (Id.; 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 short, as it will be in your Web address.”) (bold in original).)	The second web-based interface is also “<i>different</i>” from the “<i>first web-based interface</i>” described in the discussion of limitation [1A], because it provides different web pages that deliver different content. As explained for limitation [1A], 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. (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 created club includes the name provided by the club founder in the “<i>first web-based interface</i>.” (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).)

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	539 Petition, pp. 20-21	Ex. 1002, ¶ 136
25	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 Petition, p. 21	Neibauer’s second web-based interface 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>” As described for limitation [1A], if accessed by a mobile device, the “<i>second web-based interface</i>” would have been converted and delivered to the mobile device in an appropriate format. The “<i>second web-based interface</i>” also allows the club founder and any invited 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 [1A] (“<i>access to at least a portion of the shared content via the given mobile information channel</i>”). The <i>second web-based interface</i> 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 one or more other club members using the mobile information channels, as discussed for limitation [1A]. Ex. 1002, ¶ 137
26	“Mobile Information Channel.” As explained for limitation [1B], each of the club message board, chat and photo sharing features described in Neibauer	“Mobile Information Channel.” As discussed above for limitation [1B], each of Neibauer’s club message board, chat, and photo sharing features (“<i>the</i>

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	(“<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, and the date it was posted. Click a photo to see the photo on your screen.”).) 539 Petition, pp. 22-23	<i>given mobile information channel</i>”) supports messaging between the founder (“<i>the first user</i>”) and the other club member(s) (“<i>the one or more additional users</i>”). Neibauer’s “<i>messaging</i>” is the sending of textual messages (with respect to the club message board and club chat <i>mobile information channels</i>), and sending of photographs with accompanying titles and descriptions (with respect to the photo sharing <i>mobile information channel</i>), from or to at least the club founder. (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.”).) Ex. 1002, ¶ 138

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27	Addressing Proposed Constructions in Co-Pending Proceedings: In the Meta-MDT-IPR, PO proposes that the term “<i>mobile information channel</i>” should mean “a component of a mobile site configured to permit a wide variety of mobile devices to send and receive content over a wireless network.” (EX-1030, 19.) 539 Petition, p. 23	Addressing Proposed Constructions in Co-Pending Proceedings: As noted above, I understand that Patent Owner, in the Meta-MDT-IPR, has argued that “<i>mobile information channel</i>” should be construed to mean “a component of a mobile site configured to permit a wide variety of mobile devices to send and receive content over a wireless network.” (EX-1025, 1-2.) Ex. 1002, ¶ 139
28	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.) 539 Petition, pp. 25-26	The right side of Cheng’s Figure 1 above shows an origin web server 102 that contains original web page 104. (Cheng, 3:36-37 (“In this context, an origin web server 102 is a web server that contains the original web page 104.”).) 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.) A POSITA would have recognized that Cheng’s web page 104 could have been represented by any web page in HTML format reachable via the Internet. Ex. 1002, ¶ 66
29	Figure 1 further shows a mobile device 108 connected to proxy server 110, optionally through gateway 109. (Cheng, 3:33-36.) “Mobile devices 108 generally come in a variety of different sizes and have a variety of different	Figure 1 shows mobile device 108 connected to proxy server 110, optionally through gateway 109. (Cheng, 3:33-36.) “Mobile devices 108 generally come in a variety of different

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	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.) 539 Petition, p. 26	sizes and have a variety of different screen 32 interfaces... [T]he present invention provides the ability to uniquely tailor web page 104 content for specific mobile devices 108.” (Cheng, 5:11-15.) Cheng explains that, in one example, mobile device 108 could be a mobile device with a Palm operating system that includes a web browser. (Cheng, 5:17-23, 2:8-15.) Ex. 1002, ¶ 67
30	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.) 539 Petition, p. 26	Cheng discloses a format conversion proxy server that translates web pages and requests between mobile device 108 and proxy server 110. As Cheng explains, 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 store a device profile for mobile device 108 based on the type of mobile device and its web browser. (Cheng, 5:20-23) Ex. 1002, ¶ 69
31	The general operation of proxy server 110 in Cheng is straightforward. As shown in Figure 1, mobile device 108	The operation of proxy server 110 is generally straightforward. As shown in Figure 1, mobile device 108 issues a

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	can issue a request 106 for an original web page 104 using standard HyperText Transport Protocol (HTTP), as was well-known in the art, with the request 106 being received by proxy server 110. (Cheng, Fig. 1, 2:19-21, 3:58-67, 7:65-8:2; EX-1002, ¶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 Petition, p. 27	request 106 for an original web page 104 using standard HyperText Transport Protocol (HTTP), as was well-known in the art, with the request 106 being received by proxy server 110. (Cheng, Fig. 1, 2:19-21, 3:58-67, 7:65-8:2.) Cheng describes that “[u]pon determining that the requested page 104 resides at the server 102, the proxy server 110 makes a request 112 for the page. As shown, the proxy server 110 and the server 102 are connected via a 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, e.g., 2:24-29, 5:46-49, 4:56-60.) As Cheng describes: “[t]he designated HTML content of the retrieved web page 104 is extracted, subsequently and/or converted, and transmitted as a reformatted web page 122 to the mobile device 108.” (Cheng, 5:46-49; <i>see also id.</i>, 3:22-26) Ex. 1002, ¶ 70
32	For example, Cheng discloses creating device profiles for mobile devices that specify, among other things, the types of web user input (including text, files and images) that the mobile devices can support. 539 Petition, p. 28	For example, Cheng discloses the ability to specify, as part of the device profile of a mobile device, that the mobile device is capable of text, image, and file input. Ex. 1002, ¶ 150
33	Here, Cheng teaches that a mobile device user can input text, image, and	In the above example, Cheng discloses that a mobile device user can input text,

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	file data into the mobile device; that information is then transmitted from the mobile device to a website. Thereafter, the device profile information, received from the mobile device, enables Cheng’s proxy server 110 to identify the mobile device 108 and to determine which webpage conversions to perform for that device. (See Cheng, 8:54-62, 7:59-65.) 539 Petition, pp. 28-29	image, and file data into the mobile device and that information is then transmitted from the device to a website. Thereafter, the device profile information, received from the mobile device, enables proxy server 110 to identify the mobile device 108, and to determine which webpage conversions to perform for that device. (See Cheng, 8:54-62, 7:59-65.) Ex. 1002, ¶ 151
34	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.) 539 Petition, p. 29	The implementation would have been straightforward as Cheng provides “bolt-on” functionality, with the proxy server capable of converting and reformatting any existing HTML-based web page into a format suitable for display on a mobile device. (See, e.g., Cheng, e.g., 2:30-32 (“The [reformatting] may be done for at least one of groups of devices, individual devices, web site-specific conversions, or for all web sites.”).) It would have been obvious that the proxy server could have been operated by the same or a different entity from the operator of the origin web server. Ex. 1002, ¶ 93
35	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	The ’336 patent Background 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),

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	(PDAs), palmtop computers, etc.” (EX-1001, 1:30-34.) 539 Petition, p. 30	palmtop computers, etc.” (EX-1001, 1:30-34.) Ex. 1002, ¶ 99
36	“Over a Wireless Network.” It would also have been obvious that the given mobile information channel supports messaging communication “over a wireless network,” because club members would have accessed the club and its features (including the ability to add content) via mobile devices associated with a wireless network. For example, Neibauer discloses in connection with the Yahoo! Mobile service that a mobile PDA could have included a “GSM Phone” modem. (Neibauer, p.171, ¶5.) GSM, which stands for Global System for Mobile Communication, was a dominant wireless (cellular) mobile network in widespread use in the United States the early 2000s. (EX-1002, ¶153.) Cheng similarly discloses wireless network device connectivity. 539 Petition, p. 31	“Over a Wireless Network.” It would also have been obvious based on Neibauer and Miller, in further view of Cheng, that the given mobile information channel supports messaging communication “over a wireless network,” because a mobile device accessing the mobile information channel would have been connected via a wireless network to the Internet. For example, Neibauer discloses in connection with the Yahoo! Mobile service that a mobile PDA could have included a “GSM Phone” modem. (Neibauer, p.171, ¶5.) GSM, which stands for Global System for Mobile Communication, was a dominant wireless (cellular) mobile network in widespread use in the United States the early 2000s. Cheng similarly discloses wireless network device connectivity. Ex. 1002, ¶ 153
37	Addressing Proposed Constructions in Co-Pending Proceedings: In the Meta-MDT-IPR, PO has argued that the term “wireless network” should be construed to mean “a network separate from the internet that facilitates connection to the internet by mobile device.” (EX-1030, 27-28.) 539 Petition, p. 32	Addressing Proposed Constructions in Co-Pending Proceedings: As noted above, I understand that, in the Meta-MDT-IPR, Patent Owner has argued that the term “wireless network” should be construed to mean “a network separate from the internet that facilitates connection to the internet by mobile device.” Ex. 1002, ¶ 155

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38	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 Petition, p. 34	My analysis for limitation [1D] is similar to that of limitation [1C]. As explained above, each of Neibauer’s club message board, club chat and photo sharing features is configured to permit the club founder (“<i>the first user</i>”) to send messaging content to other club member(s) (“<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 to photograph or image data (with accompanying textual descriptions) for the photo sharing <i>mobile information channel</i>. Ex. 1002, ¶ 162
39	It was basic knowledge that every web page on the Internet was identified by a unique URL, the standard 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 (“<i>A URL (or 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.”) (<i>italics in original</i>).) It therefore would also have been obvious that the URLs	It would have been basic knowledge of a POSITA that every web page on the Internet would each have been identified by its own unique URL. URLs were (and remain today) the standard technique for uniquely identifying resources such as web pages on the Internet, with each web page or other resource having its own unique URL. (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 (“<i>A URL (or Universal Resource Locator)</i> is the address of a document, file or other Internet

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	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.) 539 Petition, p. 35	87 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>” from each other Ex. 1002, ¶ 166
40	As shown under Step 1, the user is instructed to “[k]eep the name short, as it will be in your Web address.” (Id.) As explained for limitation [1B], because the Web address (URL) for the club home page (the “<i>second web-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 Petition, p. 36	As shown under Step 1, the user is instructed to “[k]eep the name short, as it will be in your Web address.” (Id.) A POSITA would have understood “Web address” to refer to the club’s URL. Because the URL for the club web page (the “<i>second web-based interface</i>”) is only known after the club is named and then created (using the “<i>first web-based interface</i>”), as it specifically incorporates the name provided by the founder through the web form, it would have been obvious that the two claimed web-based interfaces would have been identified by different URLs. Ex. 1002, ¶ 168
41	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	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>” As explained for claim 1, Neibauer discloses a photo sharing

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	club photo sharing feature in which the club founder and other club members can upload and share photos. (Neibauer, pp.477-479.) 539 Petition, p. 37	feature in which the club founder and other club members can upload and share photos. (Neibauer, pp.477-479.) Ex. 1002, ¶ 169
42	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.) 539 Petition, p. 37	It therefore would have been obvious that the shared content could have included “ <i>device-captured</i> ” image data, such as image data captured using a digital camera of the first user. (Neibauer, p.478, Fig. 21-10 (showing exemplary club photo album).) It was well-known, as of June 2002, that portable communications devices included digital cameras for capturing and storing images. Ex. 1002, ¶ 170
43	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. (EX-1002, ¶171.)	For example, Neibauer discloses the 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 that this same process, when used to specify the club photo, would have similarly resulted in an upload of the selected photo (“an information item”) from the user’s computer.

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	539 Petition, pp. 38-39	Ex. 1002, ¶ 171
44	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 Petitioners have mapped the “<i>second web-based interface</i>.” 539 Petition, p. 39	Neibauer indicates that the feature for adding a photo to the club’s home page does not need to reside on the club home page itself. 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: ▪ 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 photo (available under “Fix It Up”), which is separate and distinct from the club home page (available under “Let Me See It”), i.e. Neibauer’s “<i>second web-based interface</i>.” Ex. 1002, ¶ 172
45	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	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

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	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.) 539 Petition, pp. 39-40	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
46	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.) 539 Petition, p. 40	Alternatively, for purposes of claim 8, the claimed “<i>first web-based interface</i>” could include not just Neibauer’s club-creation form but also the “page that tells you the club has been created” (Neibauer, p.481), which includes the club photo upload functionality discussed above. Ex. 1002, ¶ 174
47	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.) 539 Petition, p. 40	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 photo is shown to other club members when they view the club page (i.e., “<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 photo provided by club founder).) Ex. 1002, ¶ 175
48	An unlisted club, on the other hand, “is private. Only Yahoo! members who were invited to join may join the club	An unlisted club, on the other hand, “is private. Only Yahoo! members who were invited to join may join the club

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	and be able to access it.” (Neibauer, p.473; see also id., p.475.) 539 Petition, p. 41	and be able to access it.” (Neibauer, p.473; see also id., p.475 Ex. 1002, ¶ 55
49	When a club founder (“ <i>the first user</i> ”) selects an “unlisted” club, therefore, the club founder is specifying “ <i>accessibility rules</i> ” 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: 539 Petition, p. 41	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 (as opposed to a “listed” club), and can only be accessed by other users upon receipt of an invitation to join. The invitation, in turn, provides instructions on how to join. (Neibauer, pp.475-476.) Neibauer’s Figure 21-9 below shows that, in order to join a club in response to an invitation, the invited user may enter an optional comment and must click “Yes! I Accept” to join the club: Ex. 1002, ¶ 176
50	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 539 Petition, p. 42	As explained for claim 8, when a club founder invites additional user(s) to join an unlisted club and those members agree to join, the one or more additional user(s) comprise “ <i>individuals that with the first user</i> ,” i.e., first user being the club founder. Ex. 1002, ¶ 178
51	“ <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</i>	The “ <i>individuals that with the first user</i> ” also “ <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</i>

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	<i>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 [1A] (“said shared content”) via the club pages (“via the second web-based interface”). (EX-1002, ¶¶179, 136.)</i> 539 Petition, p. 42-43	<i>shared content via the second web-based interface.” In other words, they collectively comprise a group of members that can access content shared via one or more of the mobile information channels as described above for limitation [1A] (“said shared content”) via the club page (“via the second web-based interface”)</i> Ex. 1002, ¶ 179
52	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.”).) 539 Petition, p. 44	Interpreting the “<i>processing element</i>” as including origin web server 102 and proxy server 110 is consistent with the ’336 patent, which makes clear that a processing element or server can itself 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.”).) Ex. 1002, ¶ 181
53	And even if the claim required that the “<i>processing element</i>” be contained within a single physical server (it does not), it would have been obvious to combine proxy server 110 and origin server 102 into a single server. (EX-1002, ¶182. 539 Petition, p. 44	Even if claim 10 required that the “<i>processing element</i>” be contained within a single physical server, (it does not), it would have been obvious to combine proxy server 110 and origin server 102 into a single server. Ex. 1002, ¶ 182
54	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	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

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	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 Petition, p. 45	techniques, as this would have eliminated the step of (and network overhead associated with) origin server 102 having to send the original web page to the proxy server over a network connection without meaningful benefit. Ex. 1002, ¶ 184
55	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. (EX-1002, ¶190; Cheng, 23:16-20; Miller, 0043:32-0044:2.) 539 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 and “a memory.” (Cheng, e.g., 23:16-20) Ex. 1002, ¶ 190
56	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 Petition, p. 46	As also explained above for claim 10, it would also have been obvious to combine origin server 102 and proxy server 110, to the extent the claim were construed to require a processing element contained within a single server. Ex. 1002, ¶ 192
57	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 “at least one processing element”) would have worked together to provide the claimed web-based interfaces. 539 Petition, p. 47	This step would also have been provided by the claimed processing element as described for limitation [11A]. Under the proposed combination, therefore, the origin web server 102 and proxy server 110 (the “at least one processing element”) would have worked together to provide the first web-based interface to the first user as, as described above for limitation [1A]. Ex. 1002, ¶ 194

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58	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 Petition, pp. 47-48	As explained for limitation [11A], the processing element comprises at least origin web server 102 (corresponding to the Yahoo! web server that provides the functions of Neibauer) and proxy server 110 (“<i>at least one server</i>”). Thus, the “<i>processing element</i>” comprises “<i>at least one server.</i>” Ex. 1002, ¶ 198
59	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.”).) 539 Petition, p. 48	The servers as identified in my discussion 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.”).) Ex. 1002, ¶ 199
60	It would have been obvious that these servers would have been accessible over the Internet “<i>via a network 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, 23:44-51 539 Petition, p. 48	It would have been obvious that these servers would have been accessible over the Internet “<i>via a network 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
61	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	First, the system comprises the web server providing Neibauer’s and Miller’s functionalities, which also corresponds to Cheng’s origin web server 102. (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

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	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.) 539 Petition, p. 49	system under the proposed combination also includes Cheng’s proxy server 110 that, as explained for claim 1, reformats and translates Neibauer’s web pages for delivery to a mobile device. (Cheng, 3:31-33) Ex. 1002, ¶ 204
62	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, e.g., 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 Petition, pp. 51-52	Neibauer’s Contacts feature 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, can access the given mobile information channel, e.g., 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, ¶ 212
63	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).) 539 Petition, p. 52	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).) Ex. 1002, ¶ 213
64	It therefore would have been obvious for one or more messages posted in the club message board of Neibauer (“a given mobile information channel”) to include advertising content posted by the founder or other club members (such as offers to buy or sell), which	It therefore would have been obvious, based on the combination of Neibauer and Miller, that one or more messages posted in the club message board of Neibauer (“a given mobile information channel”) could have included advertising content posted by the

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	would have been distributed to other club members when viewed. (EX-1002, ¶217.) 539 Petition, p. 53	founder or other club members (such as offers to buy or sell items), which would have been distributed to other club members when they viewed those messages. Ex. 1002, ¶ 217
65	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> ”). 539 Petition, p. 53	In the first example referring to Figure 21-8 of Neibauer, the sponsorship advertisement appearing on the club page (“ <i>advertising content</i> ”) was inserted on the page alongside messaging content in the club message board (“ <i>the given mobile information channel</i> ”). Ex. 1002, ¶ 218
66	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	As explained above for claim 1, Neibauer discloses multiple examples of “ <i>personalized messaging content</i> ” for the “ <i>first user</i> ,” i.e., the club founder. For example, as explained for claim 1, 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 and add its own personalized photos or create its own personalized photo albums. (Neibauer, pp.477-479.) Each of these examples of “ <i>messaging content</i> ,” i.e., the messaging content exchanged between the club founder and the one or more additional users, are “ <i>personalized</i> ” for the first user. This is because, in each case, the messaging content included

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	or intended for or directed to the club founder. (EX-1002, ¶221.) 539 Petition, p. 54	content either written by the club founder itself, or intended for or directed to the club founder Ex. 1002, ¶ 221
67	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 Petition, p. 55	It would have been obvious that the messaging content would have comprised any one of the examples recited in claim 24. 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 from davislaw_1975: “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 from longportalan: “Welcome to the Yahoo! Message Board for Alan and Barbara’s Clubhouse”).) Ex. 1002, ¶ 223
68	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”).)	As explained above 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 provided by the founder) all comprise shared content “<i>authored by the first user,</i>” as claimed. (Neibauer, p.483, Fig. 21-13 (exemplary club page posted by club founder longportalan: “Welcome to the Yahoo! Message

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	539 Petition, p. 56	Bord for Alan and Barbara’s Clubhouse”).) Ex. 1002, ¶ 224
69	As 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. (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 the mobile information channels, as shown in Figure 21-13: [image omitted] (Neibauer, p.483, Fig. 21-13.) 539 Petition, p. 57	As explained above 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 mobile information channels, as shown in Neibauer’s Figure 21-13: [image omitted] (Neibauer, p.483, Fig. 21-13.) Ex. 1002, ¶ 225
70	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 Petition, p. 59	As explained above for limitation [1B], the club created by the club founder, under the proposed combination, 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 facilitates interaction and exchange of information between the club founder and the other club member(s). Ex. 1002, ¶ 230
71	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 discloses a portable mobile device that combines the functionality of a PDA with a wireless telephone. (Ausems, 3:5-8.) This PDA telephone device 100 includes, among other

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	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 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).”).) 539 Petition, pp. 59-60	things, a touchscreen display. (Ausems, e.g., 1:57-58, 4:30-39, 6:9-14.) Ausems’ device also includes a camera for recording and storing images, which can be transmitted. (Ausems, e.g., 2:5-6, 5:17-18 (“Camera 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).”).) Ex. 1002, ¶ 234
72	Ausems 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.) 539 Petition, p. 60	Ausems is an analogous reference in the same field of the ’336 patent of wireless and mobile communications, and would have been reasonably pertinent to problems facing the inventor. Ex. 1002, ¶ 240
73	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. 539 Petition, p. 61	For purposes of Ground 3, the “personalized messaging content” corresponds to content personalized for the first user based on the further combination with Fransioli. Ex. 1002, ¶ 249
74	Miller discloses several examples of providing advertising to users of a collaborative environment or group. 539 Petition, p. 61	Miller discloses several examples of providing advertising content for users of a collaborative environment or group. Ex. 1002, ¶ 250
75	With respect to “personalized” messaging content, this would have	With respect to the requirement of “personalized” messaging content, this

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	been obvious in further view of 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).) 539 Petition, pp. 61-62	would have been obvious in further view of Fransioli. Fransioli 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, which may be a wireless or a cellular handset. (Fransioli, ¶0006; , ¶¶0029, 0030; <i>see also id.</i>, ¶0018 (“Advantageously, the portable receiving device may be a portable phone, wireless modem, or an other known portable device for receiving information over a wireless link.”), Fig. 1 (portable device 26).) Ex. 1002, ¶ 251
76	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.) 539 Petition, p. 62	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.) Ex. 1002, ¶ 253
77	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 variant, a user can	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.) Fransioli explains that “[i]n

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	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.) 539 Petition, p. 62	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 based on the location and/or direction of travel of their portable wireless device. (Fransioli, ¶0005.) Ex. 1002, ¶ 254
78	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.) 539 Petition, p. 63	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 “personalized messaging content for the first user,” i.e., the messaging content would have been selected for the first user based on at least the location and/or direction of travel of its mobile device. Ex. 1002, ¶ 255
79	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.	For example, in one exemplary implementation of the proposed combination, the messaging content could have comprised an advertisement or information about a particular event from a club message board, selected for delivery to the mobile device of the club founder (“<i>the first user</i>”) based on

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	539 Petition, p. 63	at least the location of the first user’s wireless mobile device. Ex. 1002, ¶ 257
80	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.) 539 Petition, pp. 63-64	A POSITA would have been motivated to combine to enhance user experience by providing for personalized (location-based) content as taught by Fransioli. 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 and/or direction of travel, is far more likely to be relevant and interesting to the user as compared to messaging content provided without regard to location. Ex. 1002, ¶ 259
81	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.) 539 Petition, p. 64	Fransioli also provides a further 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 commonly used to refer to websites that served as jumping-off or starting points for Internet users, typically by providing search services and together from a variety of sources. (Neibauer, p.4 (“What is a portal? A portal is an entry point, a starting place, and a way to get into something. You want an Internet portal to give you access to a wide range of locations and features.”))

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		(italics in original).) A POSITA would have immediately recognized Yahoo!, as described in Neibauer, as a well-known example of web portal in existence at that time. Ex. 1002, ¶ 261
82	As explained above, the combination would have provided “<i>location-based service information of the wireless network</i>,” 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 “<i>location-based service information of the wireless network</i>,” which the given mobile information channel would have “<i>integrat[ed]</i>” 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 “<i>integrates</i>” location-based service information with the personalized messaging content by using the current location to establish the message delivered to the user. (Fransioli, ¶0031	As explained above for claim 21, the proposed combination would have provided “<i>location-based service information of the wireless network</i>,” i.e. the current location of the first user’s mobile device. Fransioli explains that the mobile device location can be determined by the device itself using well-known global position system (GPS) techniques, or can be determined by the wireless network based on signal strengths between the device and various transmitters in the wireless access network. (Fransioli, ¶¶0027, 0030.) The proposed combination would have provided “<i>location-based service information of the wireless network</i>,” as claimed, which the given mobile information channel would have “<i>integrat[ed]</i>” 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, under the proposed combination, thus “<i>integrates</i>” location-based service information with the personalized

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	(“At block 76 [of Figure 2] a message is established that includes content based on location and direction of travel.”).) 539 Petition, pp. 64-65	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. 1002, ¶ 264
83	Grounds 4-6 are substantially the same as Grounds 1-3, respectively, except that they add Harvey (EX-1010) to account for a construction of “<i>mobile information channel</i>” proposed by Meta in the MDT-Meta-Litigation. As explained for limitation [1A] in Ground 1, Meta argued in the MDT-Meta-Litigation that this term should be construed as “a virtual location at the content management site at which user-authored content may be added for transmission to the mobile web site.” (EX-1025, 1-2.) 539 Petition, p. 65	Grounds 4-6 are substantially the same as Grounds 1-3, respectively, except that they add Harvey (EX-1010) to account for a narrower construction of “<i>mobile information channel</i>” that was proposed in the MDT-Meta-Litigation. As explained for Ground 1, limitation [1A], Meta has argued that “<i>mobile information channel</i>” should be construed as “a virtual location at the content management site at which user-authored content may be added for transmission to the mobile web site.” Ex. 1002, ¶ 266
84	With respect to the requirement that the “<i>content management site</i>” permit the user to add “<i>user-authored content</i>,” to the extent not already obvious over Neibauer, this would have been obvious in further view of Harvey. 539 Petition, p. 66	With respect to the requirement that the “<i>content management site</i>” permit the user to add “<i>user-authored content</i>,” this would have been obvious in further view of Harvey. Ex. 1002, ¶ 366
85	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	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

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	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; see also id., 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.) 539 Petition, p. 66-67	user can access a creating module 165 in order to create a new community, which may include web-based community creation. (Harvey, 7:49-54, 7:55-56 (“According to another embodiment of the invention, community creation may comprise a web-based creation.”).) “A creator accesses community creating module 165 through a central controller module 115 at step 200 [of Figure 2].” (Harvey, 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; see also id., 9:41-47 (“Options may include... creating specific content...”).) Later, “[a]t step 230, a creator may launch a community.” (Harvey, 12:67-13:1.) A user can establish a connection with a community, among other ways, “through browser access to an appropriate website.” (Harvey, 29:59-62.) Ex. 1002, ¶ 268
86	This would have satisfied Meta’s proposed construction of “mobile information channel” as “a virtual location at the content management site	This would have satisfied Meta’s proposed construction of “mobile information channel” as “a virtual location at the content management site

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	at which user-authored content may be added for transmission to the mobile web site.” (EX-1002, ¶270.) Under the proposed combination, the “content management site” 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. (Id.) This information would have been made available for transmission to “the mobile website,” i.e., the club site as delivered to mobile users. (Id.) 539 Petition, p. 67	at which user-authored content may be added for transmission to the mobile web site.” Under the proposed combination, therefore, the “content management site” would have included the web-based interface for allowing the founder to create a club disclosed in Neibauer, and that interface would have further permitted the club founder – in addition to the ability to activate features such as the club message board – to add content for the club, such as initial club messages, initial photos, and so forth. This information would have been made available for transmission to “the mobile website,” i.e., the club site as delivered to mobile users, on the club page itself. Ex. 1002, ¶ 270