

Summary of verbatim (or nearly verbatim) matches between the 00543 petition to the Houh Declaration Ex.1002

	'543 Petition	Houh Decl. (Ex. 1002)
1	The '578 patent, filed July 7, 2014, claims priority through 5 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. 543 Petition, p.1	The '578 patent, filed July 7, 2014, claims priority through five continuations to U.S. Patent 7,599,983, filed June 18, 2003, which claims priority to Provisional App. 60/389,430, filed June 18, 2002. Ex. 1002, ¶ 24
2	each applied reference was filed or published before June 18, 2002. 543 Petition, p. 1	each applied reference was filed or published before June 18, 2002. Ex. 1002, ¶ 24
3	The '578 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.) 543 Petition, p. 3	The '578 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.) Ex. 1002, ¶ 25
4	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.) 543 Petition, p. 3	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, 3:59-64.) Ex. 1002, ¶ 26
5	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	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

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	collaborative workspace, a data mailbox, a collaborative community, or other type of mobile site.” (EX-1001, 5:27-29, 8:30-35.) Such mobile sites may be associated with “a group comprising multiple members having a common interest” (EX-1001, 6:39-41), “an event” (EX-1001, 6:60-61), “a game” (EX-1001, 7:42-43), or “a user of IM, SMS, MMS, email or other type of messaging service” (EX-1001, 7:54-56), among other associations. (EX-1001, 6:25-8:25. 543 Petition, p. 4	made accessible via a collaborative workspace, a data mailbox, a collaborative community, or other type of mobile site.” (EX-1001, 5:27-28, 8:30-35.) Such mobile sites may be associated with “a group comprising multiple members having a common interest,” (EX-1001, 6:39-41), “an event,” (EX-1001, 6:60-65), “a game,” (EX-1001, 7:42-43), or “a user of IM, SMS, MMS, email or other type of messaging service,” (EX-1001, 7:54-56), among other associations. (EX-1001, 6:39-8:25.) Ex. 1002, ¶ 28
6	A person of ordinary skill in the art (“POSITA”) would have had a bachelor’s degree in electrical engineering, computer science, or similar field, with two years of experience in developing and implementing network-based computer systems that interact with mobile devices, such as systems for storing and retrieving information over the Internet or communicating using the Web using wireless mobile devices. A person could also have qualified as a person of ordinary skill in the art with some combination of (1) more formal education (such as a master’s of science degree) and less technical experience, or (2) less formal education and more technical or professional experience.³ (EX-1002, ¶¶31-32.) 543 Petition, pp. 4-5	In my opinion, a POSITA would have had a bachelor’s degree in electrical engineering, computer science, or similar field, with two years of experience in developing and implementing network-based computer systems that interact with mobile devices, such as systems for storing and retrieving information over the Internet or communicating using the Web using wireless mobile devices. A person could also have qualified as a POSITA with some combination of (1) more formal education (such as a master’s of science degree) and less technical experience, or (2) less formal education and more technical or professional experience. Ex. 1002, ¶ 34

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7	During prosecution, the Examiner rejected all pending claims as anticipated by U.S. Pat. Pub. No. 2001/0027422 to Brandrud (“Brandrud”). (EX-1022, 245-52.) The Examiner also rejected claims 21 and 22 for double patenting over claims 1-25 of U.S. Pat. No. 8,825,801. (EX-1022, 252-54.) Applicants filed a response on September 14, 2016, amending the claims, claim 21 below is representative, where the added limitations are underlined, and deleted limitations are struck through. 543 Petition, p. 5	During prosecution, the Examiner rejected all pending claims as anticipated by U.S. Pat. Pub. No. 2001/0027422 to Brandrud (“Brandrud”). (EX-1002, 245-52.) The Examiner also rejected claims 21 and 22 for double patenting over claims 1-25 of U.S. Pat. No. 8,825,801. (EX-1022 at 252-54.) The Examiner and Applicant held a telephonic interview on August 10, 2016. Applicant filed a response on September 14, 2016, amending the claims, claim 21 below is representative, where the added limitations are underlined, and deleted limitations are struck through. Ex. 1002, ¶ 14
8	Meta agreed to PO’s construction in the MDT-Meta-Litigation of “a computer program-based medium for transferring information” for the purpose of the Meta-MDT-IPR. (EX-1030, 6.) PO however proposed a different construction for the term in the Meta-MDT-IPR. (“a component of a mobile site configured to permit a wide variety of mobile devices to send and receive content over a wireless network.”.) Notably, PO’s Meta-MDT-IPR construction differs from the construction it proposed for the same term in the <i>Meta Platforms, Inc. v. Mobile Data Techs. LLC</i>, IPR2024-00248. (EX-1036, 17.) PO did not explain or justify why it is advocating for two different constructions of the identical phrase. (EX-1002, ¶¶40-42.)	I understand that Meta and PO agreed to the construction “a computer program-based medium for transferring information” for the purpose Meta-MDT IPR. (See EX-1033, 6.) PO however proposed a different construction for the term in the Meta-MDT-IPR. (Compare EX-1025, 2, with EX-1030, 21.) I note the construction that MDT proposes in the Meta-MDT-IPR differs from the construction it proposed for the same term in the <i>Meta Platforms, Inc. v. Mobile Data Techs. LLC</i>, IPR2024-00248. PO did not explain or justify why it is advocating for two different constructions of the identical phrase. Ex. 1002, ¶ 42

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9	Meta contends PO applies the construction, “wireless network separate from the Internet,” in its arguments. (EX-1033, 9.) Meta further contends the term should be construed as “a network that allows a device to communicate wirelessly over a network.” (EX-1033, 9.) 543 Petition, p. 9	Meta contends that PO applies the above construction in its arguments. (EX-1033, 9.) Meta further contends that the term should be construed as “a network that allows a device to communicate wirelessly over a network.” (EX-1033, 9) Ex. 1002, ¶ 44
10	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 (<i>italics in original</i>).) 543 Petition, p. 11	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.” (Neibauer, p.473 (<i>italics in original</i>).) Ex. 1002, ¶ 121
11	For purposes of claim 1, Petitioners will focus on the club photo sharing feature described in Neibauer. 543 Petition, p. 13	For purposes of claim 1, I will focus on the club photo sharing feature described in Neibauer. Ex. 1002, ¶ 122
12	To add a photograph to an album, the user identifies the location of the photo and enters a name and description of the photo that will be uploaded. (Neibauer, p.478, ¶¶2-3.) 543 Petition, p. 13	In order to add a photograph to an album, the user identifies the location of the photo and enters a name and description of the photo that will be uploaded. (Neibauer, p.478, ¶¶2-3.) Ex. 1002, ¶ 123
13	Neibauer thus discloses “ <i>providing a first interface permitting designation of at least one content item... for insertion into an application-based information channel.</i> ” (EX-1002, ¶126). The “ <i>content item</i> ” for purposes of	Neibauer thus discloses “ <i>providing a first interface permitting designation of at least one content item ... for insertion into an application-based information channel.</i> ” The “content item” for purposes of limitation [1A] is

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	limitation [1A] is the photo selected by the club member for the album. (Id.) 543 Petition, p. 14	the actual photo uploaded by the club member to the album. Ex. 1002, ¶ 126
14	The content item is also inserted “<i>into an application-based information channel.</i>” The term “application” is generally understood by a POSITA as referring to a computer software program for performing a particular function. (EX-1002, ¶127; see also <i>Microsoft Computer Dictionary</i> (5th ed. 2002) (EX-1021), p.31 (“application <i>n.</i> A program designed to assist in the performance of a specific task, such as word processing, accounting, or inventory management.”) (bold and italics in original).) This is also consistent with how “application” is used in the patent. (EX-1001, 18:60-64 (“Also, the system provides a platform for the development of a wide variety of personalized content applications for users of mobile devices....”).) The ’578 patent also discloses use of a browser on the mobile device to access shared content. (EX-1001, 13:21-24 (“The mobile site home page 400 may be accessed, for example, by entering a corresponding URL of the mobile site into a browser at one of the mobile devices 15.”).) Accordingly, the club photo sharing information channel in Neibauer is “<i>application-based</i>” because it is provided using software programs running on at least the server that provides the club functionality in Neibauer, and using at least a web	The first interface in Neibauer also allows designation of a content item “<i>for insertion into an application-based information channel.</i>” The term “application” is commonly understood by a POSITA as referring to a computer software program for performing a particular function. (See <i>Microsoft Computer Dictionary</i> (5th ed. 2002) (EX-1021), p.31 (“application <i>n.</i> A program designed to assist in the performance of a specific task, such as word processing, accounting, or inventory management.”) (bold and italics in original).) This is also consistent with how the term “application” is used in the written description. (EX-1001, 18:60-64 (“Also, the system provides a platform for the development of a wide variety of personalized content applications for users of mobile devices, thereby allowing wireless network service providers not only to increase their subscriber base, but also to reduce turnover in their subscriber base.”), 13:21-24 (“The mobile site home page 400 may be accessed, for example, by entering a corresponding URL of the mobile site into a browser at one of the mobile devices 15.”).) In the case of Neibauer, as observed above, the club photo sharing feature is provided by one or more software programs or applications running on

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	browser application running on the mobile device of the club member, which allows the club member to interact with and use that feature. (EX-1002, ¶127.) 543 Petition, pp. 14-15	the web server, and the web browser application running on the club member’s mobile device, which allows club members to interact with and use the club photo sharing feature. Ex. 1002, ¶ 127
15	“Via a Mobile Device”: Limitation [1A] further requires that designation of the content item occur “<i>via a mobile device.</i>” It would have been obvious to adapt Neibauer’s club photo sharing feature to allow a club member to designate a photo via a mobile device. The ’578 patent defines a “mobile device” as including, among other things, a laptop computer. (EX-1001, 4:45-55.) It was well-known that conventional laptop computers provided the same functionality as desktop computers and could run web browser software and visit web pages on the Internet. (EX-1002, ¶128.) It therefore would have been obvious that the Yahoo! website, including the club photo sharing feature discussed above, would have been accessible to a user of a mobile device such as a laptop computer. (<i>Id.</i>) 543 Petition, pp. 15-16	“Via a Mobile Device”: Limitation [1A] also requires that the designation of the at least one content item occur “<i>via a mobile device.</i>” Neibauer discloses that the club photo sharing features are adapted to allow a club member to designate a photo via a mobile device. For example, the ’578 patent itself expressly defines a “mobile device” as including, among other things, a laptop computer. (EX-1001, 4:45-55.) It was well-known that conventional laptop computers provided the same functionality as desktop computers and were able to run web browser software and visit web pages on the Internet. The Yahoo! website, including the club photo sharing feature discussed above, would have been accessible to a user of a mobile device such as a laptop computer. Ex. 1002, ¶ 128
16	Addressing Proposed Constructions in Co-Pending Proceedings: As noted above, Meta argued in the MDT-Meta-Litigation that “<i>application-based information channel</i>” should be construed as synonymous with “mobile information channel,” which Meta argues means “a virtual location at the	Addressing the Proposed Constructions in Co-Pending Proceedings: Meta has argued in the MDT-Meta-Litigation that “<i>application-based information channel</i>” should be construed as “a virtual location at the content management site at which user-

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	content management site at which user-authored content may be added for transmission to the mobile web site.” (EX-1025, 1-2.) Meta further argues “<i>content management site</i>” within this construction means “a web site that allows a user without programming to create and manage content on a mobile web site, or a portion thereof.” (EX-1025, 3.) 543 Petition, p. 16	authored content may be added for transmission to the mobile web site.” (EX-1025.) Meta has taken the position that “<i>content management site</i>” within this construction means “a web site that allows a user without programming to create and manage content on a mobile web site, or a portion thereof.” (EX-1025.) This claim construction dispute appears to be the only Ex. 1002, ¶ 137
17	It would have been obvious the content management site in Neibauer would have further allowed the club founder to add user-authored content to the club. (Neibauer, 480-482 (describing how to create clubs and add content such as club name and photo); EX-1002, ¶138) This content would also have been made available on a “mobile web site, or a portion thereof,” i.e., the club webpages delivered to mobile devices, under Neibauer alone or in view of Cheng. (EX-1002, ¶138.) 543 Petition, pp. 16-17	It would have been obvious that the content management site in Neibauer would have further allowed the club founder to add user-authored content to the club. (Neibauer, pp.480-482 (describing how to create clubs and add content such as club name and photo).) This content would also have been made available on a “mobile web site, or a portion thereof,” i.e., the club webpages delivered to mobile devices, under Neibauer alone or in view of Cheng Ex. 1002, ¶ 138
18	In the Meta-MDT-IPR, Patent Owner proposes that the term “<i>application-based information channel</i>” should mean “a component of a mobile site configured to permit a wide variety of mobile devices to send and receive content over a wireless network.” (EX-1030, 21.) Patent Owner further argues that a “<i>mobile device</i>” should mean “a portable device with limited display space and limited navigational capabilities that connects to a mobile	As noted above, I understand that Patent Owner has argued in the Meta-MDT-IPR that the term “<i>application-based 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, at 21.) Patent Owner has also asserted that “<i>mobile device</i>” should mean “a portable device with limited display space and limited navigational

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	site and/or mobile information channel via a wireless network.” (EX-1030, 24.) 543 Petition, p. 17	capabilities that connects to a mobile site and/or mobile information channel via a wireless network.” (EX-1030, at 24.) Ex. 1002, ¶ 129
19	Neibauer itself discloses services such as “Yahoo! Mobile” and “Yahoo! To Go” that enable content from Yahoo! services to be provided to handheld devices such as pagers, cell phones, web phones, and personal digital assistants (PDAs). (Neibauer, pp.166-174.) “Yahoo! To Go lets you receive Yahoo! information on your mobile device.” (Neibauer, p.167.) For example, one option referred to as “Yahoo! On Your PDA” allowed users of browser-enabled PDAs to select particular Yahoo! content that would accessible from their PDA. (Neibauer, pp.171-174.) 543 Petition, p. 18	Neibauer itself suggests the proposed combination by disclosing services such as “Yahoo! Mobile” and “Yahoo! To Go” that enable content from Yahoo! services to be provided to mobile devices such as pagers, cell phones, web phones, and personal digital assistants (PDAs). (Neibauer, pp.166-174.) “Yahoo! To Go lets you receive Yahoo! information on your mobile device.” (Neibauer, p.167.) “The Yahoo! To Go option lets you set up your mobile device and Yahoo! so that they work together, as well as specify the content that will be sent to your device.” (<i>Id.</i>) For example, one option referred to as “Yahoo! On Your PDA” allowed users of browser-enabled PDAs, such as Palm, Windows CE and smartphone devices, to select particular types of Yahoo! content accessible from their PDA. (Neibauer, pp.171-174.) Ex. 1002, ¶ 95
20	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	The right side of 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.”).) “The web page 104 is typically an HTML file with references to any component

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	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, ¶¶131.) 543 Petition, pp. 19-20	.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 web page 104 in Cheng could have been represented by any web page in HTML format reachable via the Internet, such as a web page from the Yahoo! website as described in Neibauer. Ex. 1002, ¶ 131
21	Figure 1 further shows a mobile device 108 connected to proxy server 110, optionally through gateway 109. (Cheng, 3:33-36.) “Mobile devices 108 generally come in a variety of different sizes and have a variety of different screen interfaces... [T]he present invention provides the ability to uniquely tailor web page 104 content for specific mobile devices 108.” (Cheng, 5:11-15.) Cheng explains that, in one example, mobile device 108 could be a mobile device with a Palm operating system that includes a web browser. (Cheng, 5:17-23, 2:8-15.) 543 Petition, p. 20	The left of Figure 1 shows a mobile device 108, such as a handheld PDA or smartphone, connected to proxy server 110, optionally through gateway 109. (Cheng, 3:33-36.) “Mobile devices 108 generally come in a variety of different sizes and have a variety of different screen interfaces... [T]he present invention provides the ability to uniquely tailor web page 104 content for specific mobile devices 108.” (Cheng, 5:11-15.) Cheng explains that, in one example, mobile device 108 could be a mobile device with a Palm operating system that includes a web browser. (Cheng, 5:17-23, 2:8-15.) Ex. 1002, ¶ 132
22	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	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

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	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.) 543 Petition, p. 20	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, ¶ 34
23	The general operation of proxy server 110 in Cheng is straightforward. As shown in Figure 1, mobile device 108 can issue a request 106 for an original web page 104 using standard HyperText Transport Protocol (HTTP), as was well-known in the art, with the request 106 being received by proxy server 110. (Cheng, Fig. 1, 2:19-21, 3:58-67, 7:65-8:2; EX-1002, ¶73.) “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	The operation of proxy server 110 is generally straightforward. As shown in Figure 1, mobile device 108 issues a request 106 for an original web page 104 using standard HyperText Transport Protocol (HTTP), as was well-known in the art, with the request 106 being received by proxy server 110. (Cheng, Fig. 1, 2:19-21, 3:58-67, 7:65-8:2.) Cheng describes that “[u]pon determining that the requested page 104 resides at the server 102, the proxy server 110 makes a request 112 for the page. As shown, the proxy server 110 and the server 102 are connected via a 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

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	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.) 543 Petition, p. 21	is extracted, subsequently and/or converted, and transmitted as a reformatted web page 122 to the mobile device 108.” (Cheng, 5:46-49; <i>see also id.</i>, 3:22-26) Ex. 1002, ¶ 73
24	Here, Cheng teaches that a mobile device user can input text, image, and file data into the mobile device; that information is then transmitted from the mobile device to a website. Thereafter, the device profile information, received from the mobile device, enables Cheng’s proxy server 110 to identify the mobile device 108 and to determine which webpage conversions to perform for that device. (See Cheng, 8:54-62, 7:59-65.) 543 Petition, pp. 22-23	In the above example, Cheng discloses that a mobile device user can input text, image, and file data into the mobile device and that information is then transmitted from the device to a website. Thereafter, the device profile information, received from the mobile device, enables proxy server 110 to identify the mobile device 108, and to determine which webpage conversions to perform for that device. (See Cheng, 8:54-62, 7:59-65.) Ex. 1002, ¶ 147
25	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, ¶91; 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 proxy server 110 could have been operated by the same or a different entity from the operator of the origin web server 102. (EX-1002, ¶91.)	The implementation of 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. (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, in the proposed combination, could have been operated by the same or a different entity from the operator of the origin web server.

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	543 Petition, p. 23	Ex. 1002, ¶ 91
26	A POSITA would have been motivated to combine Neibauer 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, 166-174.) 543 Petition, p. 24	A POSITA would have been motivated to combine Neibauer with Cheng. Neibauer itself suggests the proposed combination by disclosing services such as “Yahoo! Mobile” and “Yahoo! To Go” that enable content from Yahoo! services to be provided to mobile devices such as pagers, cell phones, web phones, and personal digital assistants (PDAs). (Neibauer, pp.166-174.) Ex. 1002, ¶ 95
27	Cheng further explains “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 ’578 patent itself admits “[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, 1:32-36.) 543 Petition, p. 24	Cheng explains that as of November 2000, “users of wireless devices now demand that businesses deliver web content for viewing on desktop, or mobile/portable (e.g., handheld) devices.” (Cheng, 1:19-22.) The Background of the ’578 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.” (EX-1001, 1:32-36.) Ex. 1002, ¶ 98
28	“Captured by the Mobile Device”: Limitation [1A] concludes by reciting that the at least one content item <i>“compris[es] media data captured by the mobile device.”</i> It would have been obvious for the photo designated by a club member, under the combination of	“Captured by the Mobile Device”: Limitation [1A] concludes by reciting that the at least one content item <i>“compris[es] media data captured by the mobile device.”</i> This limitation adds nothing of significance, as it would have been obvious that the photo

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	Neibauer and Cheng, to have included media data captured by the mobile device, as portable communications devices prior to June 2002 included digital cameras that allowed the devices to capture, store, and transmit digital images. (EX-1002, ¶136.) 543 Petition, p.	designated by a club member, under the combination of Neibauer and Cheng, could have included media data captured by the mobile device, as portable communications devices prior to June 2002 included digital cameras that allowed the devices to capture, store, and transmit digital images. Ex. 1002, ¶ 136
29	Ausems discloses one such mobile device combining the functionality of a PDA with a wireless telephone. (Ausems, 3:5-8.) This PDA telephone device 100 includes, among other things, a touchscreen display. (Ausems, e.g., 1:57-58, 4:30-39, 6:9-14.) 543 Petition, p. 26	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 things, a touchscreen display. (Ausems, e.g., 1:57-58, 4:30-39, 6:9-14.) Ex. 1002, ¶ 77
30	The device also includes digital camera 190 for recording and storing images, which can be transmitted. (Ausems, e.g., 2:5-6 (“[T]he device also includes [a] digital camera for recording images....”), 5:17-22 (“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).”).) 543 Petition, p. 26	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, ¶ 77
31	It would have been obvious to combine Neibauer and Cheng with Ausems, predictably resulting the system under the proposed combination, further adapted such that the photo uploaded by the club member to the club photo	In this way, it would have been obvious to combine Neibauer and Cheng with Ausems, predictably resulting in the system under the proposed combination, further adapted such that the photo uploaded by the club member

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	sharing feature would have comprised “<i>media data captured by the mobile device</i>,” i.e., a photo captured by a digital camera incorporated into the mobile device. (EX-1002, ¶107.) For example, under the combination with Ausems, the club member would have obtained image data using a digital camera of the mobile device, which would have been transmitted for upload to the club for sharing with other club members using Neibauer’s photo sharing features. (EX-1002, ¶109; Neibauer, 477-478.) 543 Petition, p. 27	to the club photo sharing feature would have comprised “<i>media data captured by the mobile device</i>,” i.e., a photo captured by a digital camera incorporated into the mobile device. For example, under the proposed combination with Ausems, the club member would have obtained image data using a digital camera of its mobile device, which would have been transmitted for upload to the club for sharing with other club members using the photo sharing features described in Neibauer. (Neibauer, pp.477-478.) Ex. 1002, ¶ 109
32	Ausems is in the same field as the ’578 patent of wireless and mobile communications and would have been reasonably pertinent to problems facing the inventor including how to capture media data using a mobile device and share that data with other users. (EX-1002, ¶110.) 543 Petition, p. 27	Ausems is an analogous reference in the same field of the ’578 patent of wireless and mobile communications, and would have been reasonably pertinent to problems facing the inventor. Ex. 1002, ¶ 110
33	A POSITA would have had a reasonable expectation of success. (EX-1002, ¶112.) As Ausems confirms, mobile devices with digital cameras and the ability to transmit images captured by digital cameras were already known. (<i>Id.</i>) 543 Petition, p. 28	A POSITA would also have had a reasonable expectation of success. Ausems confirms that, as of its February 1999 filing date, digital cameras and the ability to transmit images captured by digital cameras were known. Ex. 1002, ¶ 112
34	The proposed combination discloses multiple examples of information associated with at least one wireless	The proposed combination discloses multiple examples of the claimed information associated with at least one

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	networking functionality that track the examples in the patent and satisfy limitation [1B]. (EX-1002, ¶149.) 543 Petition, p. 28	wireless networking functionality of the wireless network that mirror the examples in the patent, each satisfying limitation [1B]. Ex. 1002, ¶ 149
35	As explained, new photos posted by club members are integrated into the club photo sharing feature, and as noted, each photo also includes a textual name and description of the photo. (Neibauer, pp.477-478.) 543 Petition, p. 29	As explained, the new photo posted by the club member is integrated into the club photo sharing feature, and as noted, includes a name and description of the photo. (Neibauer, pp.477-478 (“3. Enter a name and description of the photo.”).) Ex. 1002, ¶ 150
36	This information would have been used to “generate at least one integrated content item” in the form of the photo and associated textual message content placed together in integrated fashion in the album. This is shown in Figure 21-10 of Neibauer depicting a user interface displaying the integrated into a particular album: [image omitted] (Neibauer, p.478, Fig. 21-10.) 543 Petition, p. 30	This information would have been used to “generate at least one integrated content item,” the integrated content item taking the form of the photo and textual message content, shown in integrated fashion in the album. This is shown in Figure 21-10 of Neibauer depicting a user interface displaying the integrated into a particular album: [image omitted] (Neibauer, p.478, Fig. 21-10.) Ex. 1002, ¶ 152
37	Figure 21-10 above shows a partial list of photographs stored in an album. Although this shows photo messages posted by only one contributor (blueraja3), Neibauer confirms that any member of a group album can post a photo. (Neibauer, p.477 (“Any member can place a photo in a group	Figure 21-10 above shows a partial list of photographs stored in an album. Although the example in Figure 21-10 shows photo messages posted by only one contributor (blueraja3), Neibauer confirms that any member of a group album can post a photo. (Neibauer, p.477 (“Any member can place a photo

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	album....”).) Under the proposed combination, therefore, when the club member posts a new photo to a selected photo album, the photo, along with its textual name and description, would have been integrated and incorporated into the photo album to which they were assigned. Neibauer therefore discloses “<i>integrating the at least one content item and information associated with at least one wireless networking functionality of the mobile device to generate at least one integrated content item,</i>” because the new photo (“<i>content item</i>”) and textual message content (“<i>information associated with at least one wireless networking functionality of the mobile device</i>”) would have been integrated together in the album. (EX-1002, ¶¶152-53.) 543 Petition, pp. 30-31	in a group album....”).) Under the proposed combination, when the club member posts a new photo to a selected photo album, the photo, along with its textual name and description, would have been integrated and incorporated into the photo album to which they were assigned. Neibauer therefore discloses “<i>integrating the at least one content item and information associated with at least one wireless networking functionality of the mobile device to generate at least one integrated content item,</i>” because the new photo (“<i>content item</i>”) and textual message content (“<i>information associated with at least one wireless networking functionality of the mobile device</i>”) would have been integrated and displayed together in the album. Ex. 1002, ¶ 153
38	Squibbs describes a technique of recording and displaying data (such as photos) along with the location where the photo was taken. (Squibbs, Abstract.) Squibbs explains that digital cameras that included Global Positioning System (GPS) receivers were known in the art, as were systems that could display the location where the photo was taken on an electronic map. (Squibbs, ¶¶0003-0004.) 543 Petition, p. 31	Squibbs describes a technique of recording and displaying data (such as photos) along with the location where the photo was taken. (Squibbs, Abstract.) Squibbs explains that digital cameras that included Global Positioning System (GPS) receivers were known in the art, as were systems that could display the location where the photo was taken on an electronic map. (Squibbs, ¶¶0003-0004. Ex. 1002, ¶ 80
39	Squibbs discloses a photo album system that allows a user to capture and record digital images, which can be	Squibbs discloses a photo album system that allows a user to record digital images, which can be associated

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	associated with the physical location where they were taken. An overview of the system is shown in Figure 3: [image omitted] (Squibbs, Fig. 3.) 543 Petition, p. 32	with the geographic location where they were taken. An overview of the system is shown in Figure 3 [image omitted] (Squibbs, Fig. 3.) Ex. 1002, ¶ 81
40	For example, Load Mode 52 allows the user to download data from camera 3, and Catalog Mode 53 allows the user to manage newly loaded photos using a map-based display, and Map View Mode 54 allows the user to browse the photo album and select photos for viewing. (Squibbs, ¶¶0033, 0035-0036.) 543 Petition, p. 33	For example, Load Mode 52 allows the user to download data from camera 3, and Catalog Mode 53 allows the user to manage newly loaded photos using a map based display, and Map View Mode 54 allows the use to browse the photo album and select photos for viewing. (Squibbs, ¶¶0033, 0035-0036.) Ex. 1002, ¶ 158
41	Figure 6 shows a display generated by the album program in Catalog Mode 53 (Squibbs, ¶0064): [image omitted] (Squibbs, Fig. 6.) 543 Petition, pp. 33-34	Figure 6 shows a display generated by the album program in Catalog Mode 53 (Squibbs, ¶0064.): [image omitted] (Squibbs, Fig. 6.) Ex. 1002, ¶ 84
42	Figure 6 shows a central map area 61 which “is sufficient to encompass the locations registered for the newly loaded batch of photos.” (Squibbs, ¶0064.) “A thumbnail 63 of each new photo is shown in one or other of the margin areas 62A, B and a lead line 65 connects each thumbnail 63 to a corresponding marker 64 showing on the map the location where the photo	Figure 6 shows a central map area 61 which “is sufficient to encompass the locations registered for the newly loaded batch of photos.” (Squibbs, ¶0064.) “A thumbnail 63 of each new photo is shown in one or other of the margin areas 62A, B and a lead line 65 connects each thumbnail 63 to a corresponding marker 64 showing on the map the location where the photo

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	was taken.” (Squibbs, ¶¶0064.) Figure 6 also shows an upper control bar with, from left-to-right, Show Photo Control 66 for displaying the photo corresponding to a selected thumbnail 63, Group Control 68 for creating groups and assigning a photo to one or more groups, and Edit Photo Details Control 67 for displaying and editing the details of a selected thumbnail. (Squibbs, ¶¶0065-0068.) 543 Petition, pp. 34-35	was taken.” (Squibbs, ¶¶0064.) Figure 6 also shows an upper control bar with, from left-to-right, Show Photo Control 66 for displaying the photo corresponding to selected thumbnail 63, Group Control 68 for creating groups and assigning a photo to one or more groups, and Edit Photo Details Control 67 for displaying and editing the details of a selected thumbnail. (Squibbs, ¶¶0065-0068.) Ex. 1002, ¶ 85
43	Figure 7 shows a display generated by the album program in Map View 54 (Squibbs, ¶¶0074): [image omitted] (Squibbs, Fig. 7.) 543 Petition, p. 35	Figure 7 shows a display generated by the album program in Map View 54 (Squibbs, ¶¶0074): [image omitted] (Squibbs, Fig. 7.) Ex. 1002, ¶ 86
44	The Map View mode in Figure 7 allows a user to browse the album. (Squibbs, ¶¶0074.) Squibbs explains that “[t]he starting map displayed in the Map View Mode is, for example, a world map or a map encompassing the locations of all the photos recorded in the album; alternatively, the map displayed could be the same map as being used in the Catalogue Mode before transiting to the Map View Mode.” (Squibbs, ¶¶0075.) Figure 7 shows photos represented “either as thumbnails 81, individual photo icons 80, group icons (see current-abode group icon 85), or concentration icons (see icon 82).” (Squibbs, ¶¶0075.)	The Map View mode shown in Figure 7 allows a user to browse the album after it has finished editing the photo metadata and assigning the photos to groups. (Squibbs, ¶¶0074.) Squibbs explains that “[t]he starting map displayed in the Map View Mode is, for example, a world map or a map encompassing the locations of all the photos recorded in the album; alternatively, the map displayed could be the same map as being used in the Catalogue Mode before transiting to the Map View Mode.” (Squibbs, ¶¶0075.) Figure 7 shows photos represented “either as thumbnails 81, individual photo icons 80, group icons

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	Squibbs also discloses (in Figure 8) the ability to display a full-size image of a photo selected from the Map View Mode. (Squibbs, ¶0091, Fig. 8.) 543 Petition, pp. 35-36	(see current-abode group icon 85), or concentration icons (see icon 82).” (Squibbs, ¶0075.) Squibbs also discloses (in Figure 8) the ability to display a full-size image of a photo selected from the Map View Mode. (Squibbs, ¶0091, Fig. 8.) Ex. 1002, ¶ 87
45	Squibbs discloses a number of ways in which a photo can be associated with location data. In the example in Figure 3, the digital camera itself has a built-in GPS receiver. In another embodiment of Figure 11, a digital camera 90 transmits the photo image data to a cell phone 20, which in turn uploads the image data over a cellular connection to service system 40 for storage on network store 43. (Squibbs, ¶0101, Fig. 11 (showing transfer 105); <i>see also</i> Squibbs, ¶0031 (noting that the photo store can be “external”).) The cell phone, when uploading photo image data, also transmits location information. (Squibbs, ¶0101.) Squibbs explains that the cell phone can determine location information in a number of ways, including from “a location server of the mobile radio infrastructure,” or using “a GPS system built into the cell phone.” (Squibbs, ¶0098; <i>see also id.</i>, ¶0101.) 543 Petition, p. 36	Squibbs discloses a number of ways in which a photo can be associated with location data. In the example above shown in Figure 3, the digital camera itself has a built-in GPS receiver. In another embodiment shown in Figure 11, a digital camera 90 transmits the photo image data to a cell phone 20, which in turn uploads the image data over a cellular connection to service system 40 for storage on network store 43. (Squibbs, ¶0101, Fig. 11 (showing transfer 105); <i>see also id.</i>, ¶0031 (noting that the photo store can be “external”).) The cell phone, concurrently with the upload of photo image data, also transmits location information associated with the photo image data. (Squibbs, ¶0101.) Squibbs explains that the cell phone can determine location information in a number of ways, including from “a location server of the mobile radio infrastructure,” or using “a GPS system built into the cell phone.” (Squibbs, ¶0098; <i>see also id.</i>, ¶0101.) Ex. 1002, ¶ 88
46	For example, under the proposed combination, when a club member	For example, under the proposed combination, when a club member

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	uploads a photo using the club photo sharing feature, the mobile device would not only upload the photo image data (for example, obtained from a digital camera), but also transmit geographic location associated with the photo.⁵ (EX-1002, ¶114.) 543 Petition, p. 37	uploads a photo to a club using the photo sharing feature in Neibauer, the mobile device would not only upload the photo image data but also would have transmitted geographic location associated with the photo. Ex. 1002, ¶ 114
47	A POSITA would have been motivated to combine in order to improve the user experience of club members who use the photo sharing feature. (EX-1002, ¶117.) The ability to associate a location with a digital photo would have provided a clear benefit by improving the classification and enjoyment of uploaded photos. 543 Petition, p. 38	A POSITA would have been motivated to combine in order to improve the experience club members who use the club photo sharing feature described in Neibauer. The ability to associate a location with a digital photo would have provided a clear benefit to the club photo sharing feature of Neibauer by improving the classification and enjoyment of uploaded photos. Ex. 1002, ¶ 117
48	Squibbs explains that classification of photos “has long been a problem due to the effort involved in maintaining any organisation of the photos.” (Squibbs, ¶0002.) Geographic location would have provided a clear way to classify digital photos, allowing club members to better understand the context behind the photo and identify objects in it. (EX-1002, ¶118.) 543 Petition, p. 38	Squibbs itself explains that classification of photos “has long been a problem due to the effort involved in maintaining any organisation of the photos.” (Squibbs, ¶0002.) Geographic location information would not only have provided a clear way to classify digital photos, but the location would have allowed club members to better understand the context behind the photo. Ex. 1002, ¶ 118
49	Neibauer provides a further suggestion to combine with Squibbs by disclosing a Yahoo! Maps feature that allows users to request and view electronic maps. (Neibauer, pp.222-224.)	Neibauer provides a further express motivation to combine with Squibbs by disclosing a Yahoo! Maps feature that allows users to request and obtain electronic maps. (Neibauer, pp.222-

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	Neibauer further describes how a user can annotate a map to identify objects of interest on the map, such as the user’s house and the location of an upcoming event. (Neibauer, pp.226-228, Fig. 10-5 (showing “My House” and “The picnic is here”).) The annotation described in Neibauer is similar to the functionality in Squibbs, and in any case, the fact that Neibauer already discloses the ability to display electronic maps – and suggests annotating those maps to show location of objects and events within the map – confirms that Neibauer and Squibbs are naturally combinable and that a POSITA would have been motivated to do so. (EX-1002, ¶119.) 543 Petition, p. 39	224.) Neibauer further describes how a user can annotate a map to identify objects of interest on the map, such as the user’s house and the location of an upcoming picnic. (Neibauer, pp.226-228, Fig. 10-5 (showing “My House” and “The picnic is here”).) The annotation described in Neibauer is similar to the thumbnail view in Squibbs, as discussed above. In any case, the fact that Neibauer already discloses the ability to display electronic maps, and suggests annotating those maps to show the location of events, confirms that Neibauer and Squibbs are naturally combinable, and that a POSITA would have been motivated to do so. Ex. 1002, ¶ 119
50	Cheng, for example, discloses a “local area network,” which is a well-known network that can be established independent of the internet (e.g., Cheng, 24:4-9), and such a local area network could be used to implement all functionalities of Neibauer. (EX-1002, ¶170.) 543 Petition, p. 41	For example, Cheng explicitly discloses a “local area network,” which would have been a well-known network that can be established independent of the internet. (E.g., Cheng 24:4-9). A local area network could be used to implement all functionalities of Neibauer. Ex. 1002, ¶ 170
51	Furthermore, geotracking data is well-known to be used via satellite channels, not the internet. (EX-1002, ¶171.) 543 Petition, p. 41	Separately, geotracking data is well known to be used via satellite channels, not the internet. Ex. 1002, ¶ 171
52	It would have been obvious to a POSITA that obtaining location information of the mobile device through GPS was a wireless	A POSITA would have known that obtaining location information of the mobile device through GPS was a wireless networking functionality that

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	networking functionality independent of the Internet, as the location information was obtained by using GPS signals, wirelessly received by the device from satellites, to calculate the device’s current location. (EX-1002, ¶171.) 543 Petition, p. 41	was “ <i>independent</i> ” of the Internet, as the location information was calculated by using GPS signals wirelessly received by the device from satellites, which the device uses to calculate its current location. Ex. 1002, ¶ 171
53	It would also have been obvious that the club photo sharing feature (“ <i>the application-based information channel</i> ”) would have provided a second interface allowing two or more club members to share access to a plurality of uploaded photos, including the “ <i>integrated content item.</i> ” (EX-1002, ¶173.) Neibauer discloses a user interface for allowing club members to select a photo album and view the photos within the selected album. First, with respect to selection of an album: [image omitted] (Neubauer, p.477.) 543 Petition, pp. 42-43	It would also have been obvious that the club photo sharing feature (“ <i>the application-based information channel</i> ”) would have provided a second interface allowing two or more club members to share access to a plurality of uploaded photos, including the “ <i>integrated content item.</i> ” Neibauer discloses a user interface for allowing club members to select a photo albums and view the photos within the selected album. First, with respect to selection of an album: [image omitted] (Neubauer, p.477.) Ex. 1002, ¶173
54	The user interface shown above lists a number of available photo albums. “Click an album name to see a list of the photographs stored there, as shown in Figure 21-10.” (Neibauer, p.477.) 543 Petition, p. 43	This user interface, as noted above, has an “Add Photo” link to allow a member to add a new photo to the album: “Click an album name to see a list of the photographs stored there, as shown in Figure 21-10.” (Neibauer, p.477.) Ex. 1002, ¶ 174
55	Figure 21-10 as noted above shows a list of photographs stored in an album. This user interface also has “Add	Figure 21-10 as noted above shows a list of photographs stored in an album. This user interface also has “Add

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	Photo” button to allow a member to add a new photo to the album. “For each photo you will see the title, contributor’s name, the photo’s size, and the date it was posted. Click a photo title to see the photo on your screen. Click View Thumbnails to see miniatures of all of the photographs.” (Neibauer, p.477.) Neibauer thus discloses a “<i>second interface wherein two or more users share access to a plurality of content items,</i>” because it discloses a user interface allowing multiple club members to share access to the photos posted to a photo album. 543 Petition, pp. 43-44	Photo” button to allow a member to add a new photo to the album. “For each photo you will see the title, contributor’s name, the photo’s size, and the date it was posted. Click a photo title to see the photo on your screen. Click View Thumbnails to see miniatures of all of the photographs.” (Neibauer, p.477.) Neibauer thus discloses a “<i>second interface wherein two or more users share access to a plurality of content items,</i>” because it discloses a user interface allowing multiple club members to share access to the photos posted to a photo album. Ex. 1002, ¶ 175
56	Under the proposed combination, the “<i>second interface</i>” would also have provided access to “<i>the at least one integrated content item.</i>” In the case where the integrated content item comprises a photo with its accompanying textual message content (based on a “messaging action” or “collaboration action”), as explained for limitation [1B] above, the interface described and shown above in Figure 21-10 allows club members to access both the photo and its accompanying textual name and description. 543 Petition, p. 44	The “<i>second interface</i>” would also have provided access to “<i>the at least one integrated content item.</i>” In the case where the integrated content item comprises a photo with its accompanying textual message content, as explained for limitation [1B] above, the interface was described above and as shown in Figure 21-10, allows club members to access both the photo and its accompanying textual name and description. Ex. 1002, ¶ 176
57	In the case where “<i>the integrated content item</i>” is a photo that integrates location information, under the proposed combination with Squibbs, the user interface in Neibauer would have been adapted to display the photo	In the case where “<i>the integrated content item</i>” is a photo message also having location information, under the proposed combination with Squibbs, the user interface in Neibauer would have been adapted to display the photo

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	(or a thumbnail of the photo) with accompanying location information. This could have been implemented in a number of ways, presenting a trivial design choice to a POSITA. In one example, the photo album listing and photo display user interface in Neibauer discussed above have been further adapted such that, upon selecting a photo from Figure 21-10 that had associated location information (the “<i>integrated content item</i>”), the photo could have been displayed in connection with an electronic map showing where the photo was taken, as disclosed in Squibbs. (EX-1002, ¶177.) As another example, the interface in Figure 21-10 could itself have been adapted based on Figures 6 and 7 of Squibbs, such that multiple photos in the album are displayed in thumbnail view on a map. Many other implementations would have been apparent and obvious to a POSITA. (Id.) 543 Petition, pp. 44-45	(or a thumbnail of the photo) with accompanying location information. This could have been implemented in a number of ways, presenting a trivial design choice to a POSITA. In one example, the photo album listing and photo display user interface in Neibauer discussed above have been further adapted such that, upon selecting a photo from Figure 21-10 that had associated location information (the “<i>integrated content item</i>”), the photo could have been displayed in connection with an electronic map showing where the photo was taken, as disclosed in Squibbs. As another example, the user interface shown in Figure 21-10 could itself have been adapted based on Figures 6 and 7 of Squibbs, such that multiple photos in the album are displayed in thumbnail view on an electronic map. Many other implementations would have been apparent and obvious to a POSITA. Ex. 1002, ¶ 177
58	It also would have been obvious that the “<i>second interface</i>” would have been different from the “<i>first interface</i>” of limitation [1A]. As explained, the “<i>first interface</i>” of limitation [1A] includes the user interface for adding a new photo to a selected album; as explained, this interface is reachable by clicking “Add Photo” on the “<i>second interface</i>” described above – confirming that they are different user	It also would have been obvious that the “<i>second interface</i>” of limitation [1C] would have been different from the “<i>first interface</i>” of limitation [1A]. As explained, the “<i>first interface</i>” of limitation [1A] includes the user interface for adding a new photo to a selected album; as explained, this interface is reachable by clicking “Add Photo” on the “<i>second interface</i>” described above – confirming that they

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	interfaces providing distinct functionality. (EX-1002, ¶178.) 543 Petition, p. 45	are different user interfaces providing distinct functionality. Ex. 1002, ¶ 178
59	It would have been obvious to apply the Yahoo! Classifieds teachings to the club photo sharing feature, predictably resulting in the photo sharing feature being used by club members to post messages and photos relating to items they are offering for sale. (EX-1002, ¶182.) 543 Petition, p. 48	It would have been obvious to apply the Yahoo! Classifieds teachings to the club photo sharing feature, which would have predictably resulted in the club photo sharing feature being further enabled to allow club members to post photos relating to products they are offering for sale. Ex. 1002, ¶ 182
60	This would have provided a advantage of not only specifically targeting club members (who are likely to have had similar interests), but the accompanying photos would have provided a more compelling advertisement when compared to a text-only advertisement. (EX-1002, ¶182.) 543 Petition, p. 48	This would have provided a clear advantage of not only specifically targeting club members (who are likely to have had similar interests), but the accompanying photos would have provided a more compelling advertisement when compared to a text-only advertisement. Ex. 1002, ¶ 182
61	It would also have been obvious to obtain product-identifying information “<i>over at least one wireless network,</i>” because under the proposed combination, the information would have been sent to the photo sharing service over the Internet 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	It would also have been obvious that the product-identifying information would have been obtained “<i>over at least one wireless network,</i>” because the mobile device used to post the photo would have communicated with the photo sharing service over the Internet 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

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	dominant wireless (cellular) mobile network in widespread use in the United States the early 2000s. (EX-1002, ¶183.) Cheng similarly discloses wireless network device connectivity. (Cheng, e.g., 2:4-7, 5:33) 543 Petition, pp. 48-49	Communication, was a dominant wireless (cellular) mobile network in widespread use in the United States the early 2000s. Cheng similarly discloses wireless network device connectivity. (Cheng, e.g., 2:4-7) Ex. 1002, ¶ 183
62	Claim 4 continues by reciting, <i>“identifying additional content based on the obtained product-identifying information.”</i> Neibauer discloses that, in connection with a classified ad, additional content such as the price, condition, and warranty information would have been identified. (Neibauer, p.491. Fig. 21-20 (showing classified ad form showing required fields for price, condition, warranty).) Under the proposed combination, therefore, a photo-enabled classified ad posted to the photo sharing feature would have included this additional content, which would have been based on the product identifying information (e.g., the price, condition, and warranty information for a 2002 Volkswagen Jetta). (EX-1002, ¶184.) 543 Petition, p. 49	Claim 4 continues by reciting <i>“identifying additional content based on the obtained product-identifying information.”</i> Neibauer discloses that, in connection with a classified ad, additional content such as the price, condition, and warranty information would have been provided. (Neibauer, p.491. Fig. 21-20 (showing classified ad form showing required fields for price, condition, warranty).) Under the combination, therefore, a photo-enabled classified ad posted to the photo sharing feature would have included this additional content, which would have been based on the product identifying information (e.g., the price, condition, and warranty information for a 2002 Volkswagen Jetta). Ex. 1002, ¶ 184
63	Claim 4 concludes by <i>“generating the at least one integrated content item by combining the at least one content item with the additional content,”</i> which would have occurred under the proposed combination because, as discussed for limitation [1B], the photo uploaded by the club member (<i>“the at least one content item”</i>) is integrated	Claim 4 concludes with <i>“generating the at least one integrated content item by combining the at least one content item with the additional content,”</i> which would have occurred under the combination because, as discussed for limitation [1B], the photo uploaded by the club member (<i>“the at least one content item”</i>) is integrated with textual

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	with textual content provided by the user. Under the further combination with Neibauer’s Yahoo! Classifieds disclosures, the generated integrated content item would have included the additional content such as the price, condition, and warranty information for the product. (EX-1002, ¶185.) 543 Petition, p.	content provided by the user. Under the further combination with Neibauer’s Yahoo! Classifieds disclosures, the generated integrated content item would have included the additional content such as the price, condition, and warranty information for the product. Ex. 1002, ¶ 185
64	As explained for claim 4, the additional content would also have comprised pricing and sales conditions information (“<i>product ordering</i>”) and warranty information from the seller (“<i>product purchase support</i>”). (Neibauer, p.491 (“Complete the form by describing the item and your sales conditions, and then click Submit Entry.”), Fig. 21-20.) It would have been apparent and obvious that many other well-known types of product ordering or purchase support information could have been provided, including whether the seller accepted returns or all sales were final, who payment and delivery/shipping were to be effectuated, among others. (EX-1002, ¶186. 543 Petition, p. 50	As explained for claim 4, the additional content would have comprised pricing and sales conditions information (“<i>product ordering</i>”) and warranty information from the seller (“<i>product purchase support</i>”). (Neibauer, p.491 (“Complete the form by describing the item and your sales conditions, and then click Submit Entry.”), Fig. 21-20 (Condition, Price, and Warranty information).) It would have been obvious that many other well-known types of product ordering or purchase support information could have been provided, including whether the seller accepted returns or all sales were final, who payment and delivery/shipping were to be effectuated, among others. Ex. 1002, ¶ 186
65	As shown, the user can define a number of conversions to reduce the size of an image including, among other things, scaling, color reduction, resolution reduction, and reducing the quality of the JPEG image conversion, among other things. (Cheng, 10:63-11:19.) The user can also specify a	As shown, the user can define a number of conversions to reduce the size of an image including, among other things, scaling, color reduction, resolution reduction, and reducing the quality of the JPEG image conversion, among other things. (Cheng, 10:63-11:19.) The user can also specify a

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	maximum file size for a converted image. (Cheng, 11:17-19, 12:47-50.) It would have been obvious to also include these conversion options from Cheng with the photo sharing feature of Neibauer (along with its existing resizing capability), to provide the club member further control (via the first interface) over the conversion of images for display on mobile devices. (EX-1002, ¶189.) Any one of the conversion options disclosed in Neibauer alone or in combination with Cheng qualifies as a “content integration option,” because each option allows club members to specify how uploaded photos will be transformed before being integrated into the photo sharing feature. (Id.) 543 Petition, pp. 52-53	maximum file size for a converted image. (Cheng, 11:17-19, 12:47-50.) It would have been obvious to also include these conversion options from Cheng with the photo sharing feature of Neibauer (along with its existing resizing capability), to provide further control over the conversion of images for display on mobile devices. Any one of the conversion options disclosed in Neibauer or Cheng qualifies as a “content integration option,” because each option allows club members to specify how uploaded photos will be transformed or altered before being integrated into the mobile information channel, thus affecting how they appear when viewed through the photo sharing feature of the club and via a mobile device Ex. 1002, ¶ 189
66	Mapping the claimed “<i>processing element</i>” to origin web server 102 and proxy server 110 is consistent with the ’578 patent, which makes clear that a processing element or server can itself comprise multiple servers. (EX-1001, 9:21-24 (“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.”).) 543 Petition, p. 54	Mapping the claimed “<i>processing element</i>” to origin web server 102 and proxy server 110 is consistent with the ’578 patent, which makes clear that a processing element or server can itself comprise multiple servers. (EX-1001, 9:21-24 (“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, ¶ 191
67	And even if the claim required that the “<i>processing element</i>” be contained within a single physical server (it does	Even if the claim required that the “<i>processing element</i>” be contained within a single physical server (it does

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	not), it would have been obvious to combine proxy server 110 and origin server 102 into a single server. (EX-1002, ¶192.) Cheng explains that the computer system implementing the proxy server can “be replaced by, or combined with, any suitable processing system operative in accordance with the principles of the present invention....” (Cheng, 23:20-25.) 543 Petition, p. 54	not), it would have been obvious to combine proxy server 110 and origin server 102 into a single server. 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.) Ex. 1002, ¶ 192
68	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 (“Communications with external devices... occur utilizing communication port 1516....”); Neibauer, p.4 (explaining that Yahoo! members need access to an Internet connection).) 543 Petition, p. 57	It would have been obvious that these servers would also 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. (Cheng, 23:44-51 (“Communications with external devices, for example, the other components of the system described herein, occur utilizing communication port 1516. For example, optical fibers and/or electrical cables and/or conductors and/or optical communication (e.g., infrared, and the like) and/or wireless communication (e.g., radio frequency (RF), and the like) can be used as the transport medium between the external devices and communication port 1516.”); Neibauer, p.4 (explaining that Yahoo! members need access to an Internet connection),

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		Ex. 1002, ¶ 200
69	First, the proposed combination renders obvious “[a] network-based communication system comprising a plurality of servers configured to communicate over a network,” which would have included one or more origin servers 102 on the Internet that contain web page content, along with at least proxy server 110. (Cheng, 3:49-53.) 543 Petition, p. 58	To start, the proposed combination renders obvious “[a] network-based communication system comprising a plurality of servers configured to communicate over a network,” which include one or more origin servers 102 on the Internet that contain web page content, along with at least proxy server 110. (Cheng, 3:49-53) Ex. 1002, ¶ 201
70	Claim 11 continues by reciting that “a given one of the servers compris[es] the apparatus of claim 9.” For purposes of claim 11, it would have been obvious that “a given one of the servers” would have corresponded to proxy server 110 in Cheng with origin server 102, as noted, because the ’578 patent makes clear that a given server can comprise multiple servers. (EX-1001, 9:21-24. 543 Petition, p. 58	Claim 11 further states that “a given one of the servers compris[es] the apparatus of claim 9.” For purposes of claim 11, it would have been obvious that “a given one of the servers” would have corresponded to the proxy server 110 in Cheng and origin server 102 providing the functionality of Neibauer. Ex. 1002, ¶ 202
71	But to the extent the claim were interpreted to require a single server, as noted, it would have been obvious to combine proxy server 110 with origin server 102 to form a combined server for performing the functions of claim 9. (EX-1002, ¶¶192, 202.) 543 Petition, p. 58	But to the extent “a given one of the servers” requires a single server, it would have been obvious to combine proxy server 110 and origin server 102 to form a combined server for performing the functions of claim 9. Ex. 1002, ¶ 202
72	. Limitation [12A] is substantially similar to but arguably broader than [1A] as it does not recite the “first interface” limitation of [1A].	Limitation [12A] is substantially similar to but arguably broader than limitation [1A] as it does not recite the “first interface” limitation of limitation

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	Limitation [12B] (“<i>providing information ... for integration with the at least one content item,</i>”) is substantially similar to [1B] (“<i>integrating the at least one content item and information,</i>”), an immaterial difference. The “<i>wherein</i>” limitations of 1[12C]-[12D] are already captured in [1B]-[1C]. There are slight differences in wording, for example [12C]-[12D] are written as “<i>wherein</i>” clauses in passive voice, whereas [1B]-[1C] are written as active voice method steps, but they recite the same features. Claim 12 is rendered obvious for the reasons stated for claim 1. (EX-1002, ¶204.) 543 Petition, p. 59	[1A]. Limitation [12B] is substantially similar to limitation [1B] and simply flips the wording of the limitations; limitation [12B] recites “<i>providing information ... for integration with the at least one content item,</i>” whereas limitation [1B] recites “<i>integrating the at least one content item and information,</i>” a difference without significance for purposes of my analysis. The “<i>wherein</i>” limitations of [12C]-[12D] are captured (more succinctly) in limitation [1B]-[1C]. There are slight differences in wording, for example limitations [12C]-[12D] are written as “<i>wherein</i>” clauses in passive voice, whereas limitations [1B]-[1C] are written as active voice method steps, but they recite the same features and thus claim 12 is rendered obvious for the reasons previously stated for claim 1. Ex. 1002, ¶ 204
73	In either scenario, Neibauer discloses “<i>providing one or more content integration options to a user,</i>” i.e., providing albums where the photo will be integrated, and “<i>receiving user input selecting at least one of the content integration options,</i>” i.e., selecting add photo to integrate the photo in an album. 543 Petition, p. 61	In either scenario, Neibauer discloses “<i>providing one or more content integration options to a user,</i>” i.e., providing options to select a particular photo album where the photo will be integrated, and “<i>receiving user input selecting at least one of the content integration options,</i>” i.e., when the user selects a particular photo album to which the photo will be integrated. Ex. 1002, ¶ 207
74	For example, the top entry in the exemplary club photo album of Figure 21-10 is for a photo named “Denise	For example, the top entry in the exemplary club photo album of Figure 21-10 is for a photo named “Denise

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	Richards” described as “Stunning blue bikini,” and this information is shown as being part of “Blueraja’s BOND GIRL Album,” the album selected by that club member for that photo. (EX-1002, ¶¶208-09.) 543 Petition, p. 62	Richards” described as “Stunning blue bikini,” and this information is shown as being part of “Blueraja’s BOND GIRL Album,” the album selected by that club member for that photo. Ex. 1002, ¶ 209
75	Further, as explained for limitation [22B], this information is sent “to said at least one server.” This information would have been provided “responsive to user input,” because it would have occurred in response to input by the club member in providing a photo for inclusion in an album using the photo sharing feature. (EX-1002, ¶226.) 543 Petition, p. 67	This information is sent “to said at least one server,” as explained for limitation [22B]. This information would also have been sent “responsive to user input,” because it would have occurred in response to input by the club member in selecting the photo to upload for inclusion in the club photo sharing feature. Ex. 1002, ¶ 226
76	Ground 2 is substantially the same as Ground 1 except that it adds Harvey (EX-1010) to account for a construction of “ <i>application-based information channel</i> ” proposed by Meta in the MDT-Meta-Litigation. 543 Petition, p. 67	Ground 2 is substantially the same as Ground 1, except that it adds Harvey (EX-1010) to account for a narrower construction of “ <i>application-based information channel</i> ” that was proposed in the pending litigation. Ex. 1002, ¶ 229
77	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 543 Petition, p. 68	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. With respect to all other claim limitations in the challenged claims, my analysis from Grounds 1 applies here Ex. 1002, ¶ 229
78	Harvey explains that “[t]he community creating module permits the creator to	Harvey explains that “[t]he community creating module permits the creator to

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	create a community, and designate applications and content presented in the community by a user interface.” (Harvey, 4:28-30.) 543 Petition, p. 68	create a community, and designate applications and content presented in the community by a user interface.” (Harvey, 4:28-30.) Ex. 1002, ¶ 231
79	“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, ¶231.) Users access the community “through browser access to an appropriate website.” (Harvey, 29:59-62.) 543 Petition, pp. 68-69	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, ¶ 231
80	Motivation to Combine with Harvey: It would have been obvious to combine the prior art cited for Ground 1 with Harvey, predictably resulting in the club creation user interface in Neibauer with the <i>further</i> ability to allow the club founder to add content to one or more mobile information channels, before the club is created and launched. (EX-1002, ¶232.)	Motivation to Combine with Harvey: It would have been obvious to combine the prior art cited for Ground 1 with Harvey, predictably resulting in the club creation system under the proposed combination, with the further ability of the web-based club creation interface to allow the club founder to add content to one or more mobile information channels.

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	543 Petition, p. 69	Ex. 1002, ¶ 232
81	This would have satisfied Meta’s proposed construction of “<i>application-based 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, ¶233.) 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>) 543 Petition, p. 69	This would have satisfied Meta’s proposed construction of “<i>application-based information channel</i>” as “a virtual location at the content management site at which user-authored content may be added for transmission to the mobile web site.” Under the proposed combination, therefore, the “<i>content management site</i>” would have included the web-based interface for allowing the founder to create a club disclosed in Neibauer, and that interface would have further permitted the club founder to add content for the club, such as initial club messages, initial photos, and so forth. Ex. 1002, ¶ 233