

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GETTATTLE, INC.
Petitioner

v.

AFTERWORDS, INC.
Patent Owner

IPR Case No.: 2025-00677
U.S. Patent No. 10,430,811

**PATENT OWNER'S REVISED CONTINGENT MOTION TO AMEND
UNDER 37 C.F.R. § 42.121**

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LIST OF NEW EXHIBITS

Exhibit No.	Description
2005	May 15, 2026 Declaration of Ivan Zatkovich

I. INTRODUCTION

AfterWords, Inc. (“**Patent Owner**”) files this Revised Contingent Motion to Amend (“**Revised Motion**”) and requests that should the Board find Patent No. 10,430,811 (“**‘811 Patent**”) independent claim 1 or 19 to be unpatentable, Patent Owner be permitted to cancel claim 1 or 19 and enter the substitute claims from the amended claim listing attached as **Appendix A**. 37 C.F.R. § 42.121(e). This Revised Motion addresses issues raised by the Board’s Preliminary Guidance, Paper 22 (April 22, 2026) (“**Preliminary Guidance**”) and Petitioner’s Opposition to Patent Owner’s Motion to Amend, Paper 15 (Apr. 7, 2026) (“**Opposition**”).

Proposed substitute independent claims 20 and 38 (corresponding to the ‘811 Patent independent claims) have been amended to specify that the Survey Module comprises software code “for displaying *one or more survey questions and for implementing branching logic that is configured to determine a second Survey Question based on a first user-generated input in response to the first Survey Question.*” The substitute independent claims also recite that the vendor survey interface runs the Survey Module to “*determining the second Survey Question.*”

The Board’s Preliminary Guidance noted the prior substitute claims required only that the Survey Module branching logic *display* a second Survey Question. The substitute claims now specify that the branching logic *determines* a second Survey Question to better reflect the utility of the branching logic in executing a decision

about the next question to present and to further distinguishes the references cited by Petitioner, U.S. Pub. No. 2015/0193794 to Douglas, *et al.* (“**Douglas**”) and U.S. Pub. No. 2014/0337098 to Ganesh, *et al.* (“**Ganesh**”).

Douglas and Ganesh do not disclose a Survey Module as originally claimed and as clarified by the substitute claims. The proposed substitute claims are, therefore, novel over these references and go directly to the grounds of unpatentability asserted by the Petition. *Blue Calypso, LLC v. Groupon, Inc.*, 815 F.3d 1331, 1341 (Fed. Cir. 2016) (“[A] prior art reference will anticipate if it ‘disclose[s] each and every element of the claimed invention.’”).

The proposed substitute claims include nearly all of the original language from claims 1–19. Only independent claims 20 and 38 include substantive revisions. The remaining substitute claims 21-37 are dependent claims amended to maintain proper dependency and antecedent basis. By using the original claim language with additional elements relating to the Survey Module, the proposed claims do not enlarge the scope of the current claims, nor do they add new matter.

Patent Owner presents a reasonable number of substitute claims. 37 C.F.R. § 42.121(a)(3). Patent Owner proposes substantive amendments to two claims and amendments to the language of five dependent claims to maintain proper antecedent bases. The remaining dependent claims are amended only as to dependency. There is a presumption that Patent Owner is permitted to submit one substitute claim for

each challenged claim. *Id.* Petitioner challenges 12 claims. Patent Owner proposes amending the language of 7 claims, and the reasonableness presumption should apply. *Toyota Motor Corp.*, IPR2013-00419, 2014 WL 1691619, at *1 (PTAB Mar. 7, 2014) (“[A]n unchanged dependent claim . . . still retains its same scope.”).

For the foregoing reasons and those discussed below, this Revised Motion is properly granted if the Board find claims 1 or 19 to be unpatentable.

II. AMENDED CLAIMS LISTING

An amended claim listing is provided as **Appendix A**. The amended claim listing is directed to addressing issues raised by the Board’s Preliminary Guidance, including that: (i) the claim term “at least one Survey Question” lacked an antecedent basis; (ii) the prior claim listing did not recite the dependent claims; and (iii) the prior substitute claims employed branching logic only to display questions. To address these issues, the substitute claims omit the term “at least one Survey Question;” the claim listing now includes dependent claims; and the claims recite the Survey Module “determines” instead of “displays” a second Survey Question.

III. LEGAL STANDARDS

The patent owner bears the burden to show, by a preponderance of evidence, that substitute claims: (i) do not enlarge the scope of the original claims or introduce new matter; (ii) respond to the grounds of unpatentability raised in the petition; (iii) have support in the original disclosure of the patent; and (iv) have support in an

earlier-filed disclosure for each claim for which the benefit of the filing date of the earlier-filed disclosure is sought. 35 U.S.C. § 316(d)(1)-(3); 37 C.F.R. § 42.121(e). While a patent owner must show that substitute claims respond to grounds of unpatentability raised in the petition, the burden of proving unpatentability remains on the petitioner. *Askeladden LLC v. Rothschild*, IPR2019-00855, 2020 WL 6815069, at *4 (PTAB Nov. 19, 2020).

IV. SUPPORT FOR THE SUBSTITUTE CLAIMS

A motion to amend must “set forth support in an earlier filed disclosure for each [substitute] claim.” *Lectrosonics, Inc. v. Zaxcom, Inc.*, IPR2018-01129, 2019 WL 1118864, at *3 (PTAB Feb. 25, 2019). While the written support requirement refers to “an earlier filed disclosure,” the Board found that to be entitled to claim priority to the ‘043 Provisional Application, Patent Owner must show the substitute claims find support within each application in the ‘811 Patent family. Preliminary Guidance at 8 (“Patent Owner asserts . . . the benefit of priority of the ‘043 provisional application, [but] the Motion does not identify written description support in the intervening parent application[s].”).

Accordingly, Patent Owner submits **Appendix B** that includes citations and quotes to written description support for each element of the substitute claims for each application in the ‘811 Patent family. Patent Owner also includes tables in subsection C below that includes citations to written description support in the ‘811

Patent application and the provisional application to which priority is claimed for each substitute claim with amended language (claims 20, 28-32, and 38). For reference, a summary of the ‘811 Patent family is included below:

The ‘811 Patent issued from U.S. Patent Application No. 16/456,490 filed on June 28, 2019 (“**490 Application**”). EX1003, ‘490 Application File History. The ‘811 Patent claims priority to the following three applications:

- App. No. 16/279,387 (“**387 Application**”) filed February 19, 2019, which issued as Patent No. 10,380,611. EX2003, ‘387 Application File History.
- App. No. 14/997,434 (“**434 Application**”) filed January 15, 2016, which is now abandoned. EX1002, ‘434 Application File History.
- Provisional App. No. 62/104,043 (“**043 Provisional Application**”) filed January 15, 2015. EX2002, ‘043 Application File History.

A. Petitioner’s Positions and the Board’s Preliminary Guidance.

The proposed amendments find support in each application in the ‘811 Patent family. The test for written description support requires “an objective inquiry into the four corners of the specification from the perspective of a PHOSITA.” *Knowles Elecs. LLC v. Cirrus Logic, Inc.*, 883 F.3d 1358, 1365 (Fed. Cir. 2018). As explained by Patent Owner’s expert, a person of ordinary skill in the art (“POSITA”) would read each application in the ‘811 Patent family and conclude the applications teach a survey module having branching logic that determines questions based on user

inputs to prior questions. EX2005, May 2026 Declaration of Ivan Zatkovich ¶¶ 21, 29, 32-36, 41, 47 (“**Zatkovich May 2026 Decl.**”).

Petitioner’s Opposition did not offer any expert testimony about what a POSITA would glean from the relevant applications. Petitioner relies solely on legal argument, which is no substitute for expert testimony. *Invitrogen Corp. v. Clontech Lab’ys, Inc.*, 429 F.3d 1052, 1069 (Fed. Cir. 2005) (“Unsubstantiated attorney argument regarding the meaning of technical evidence is no substitute for competent, substantiated expert testimony.”).

More specifically, Petitioner contends the ‘043 Provisional Application does not disclose branching logic to modify questions—which is not the case, *see* EX2002, ‘043 Provisional Application ¶ [069] (“[Q]uestion generation [may] depend on previous questions generated and responses received.”) & claims 3, 20 (“[E]ach response is employed in the generation of related questions.”). Petitioner also points to the absence of the terms “autonomous,” “self-contained,” “web-container package” and “logic” from the ‘043 Provisional Application. However, the absence of certain terms does not change how a POSITA would read the ‘043 Provisional Application or any of the subsequent applications in the ‘811 Patent family. *Ariad Pharm., Inc. v. Eli Lilly & Co.*, 598 F.3d 1336, 1352 (Fed. Cir. 2010) (“[T]he description requirement does not demand . . . that the specification recite the claimed invention *in haec verba*.”).

The Board's Preliminary Guidance found the Motion to Amend did not demonstrate the '811 Patent family supports claiming a Survey Module with software code to implement branching logic. Preliminary Guidance at 11-12. Patent Owner respectfully submits that a POSITA would, in fact, read the applications within the '811 Patent family as teaching this feature, as discussed below.

B. Support for the Amendments.

The '490 Application, the '387 Application, the '434 Application, and the '043 Provisional Application (“**811 Family**”) all support claiming a Survey Module comprising software with branching logic that determines a survey question based on a response to a prior question. First, the '811 Family recites a “web-service (WS) that allows merchants . . . to integrate a check-level **survey module** into their own branded web-site.” EX1003, '490 Application ¶ [009], [00100]; EX2003, '387 Application ¶ [009], [0099]; EX1002, '434 Application ¶ [013], [0105]; EX2002, '043 Application ¶ [010], [090]. Guests participate in the survey with “survey features being delivered to the merchant web-site using a . . . Guest **Survey Module** web-service as the data-integration and storage platform.” *Id.*

In short, the '811 Family teaches that a Survey Module is employed as a web service to integrate surveys into a merchant website. The '811 Family also teaches that the Survey Module includes software that uses branching logic. The surveys use Java tags, and a POSITA would know that java tags are used to embed a software

application in a webpage. EX2005, Zatkovich May 2026 Decl. ¶¶ 30-31. The ‘811 Family states that “the current configurable survey allows merchants to bury a small java-tag into their website.” EX1003, ‘490 Application ¶ [00150]; EX2003, ‘387 Application ¶ [00148]; EX1002, ‘434 Application ¶ [0154]; EX2002, ‘043 Provisional Application ¶ [0136]. When accessing a webpage having the survey module, the Java tag causes the software application to run on the computing device used to display the survey. EX2005, Zatkovich May 2026 Decl. ¶¶ 32-36.

The disclosure of a Java tag, therefore, tells a POSITA that the Survey Module incorporates software, and the incorporation of software entails the use of branching logic. *Id.* ¶ 36. Any component with software requires the ability to perform branching logic, such as a “yes/no” decision. *Id.* ¶¶ 13, 29. Software is created with a programming language, and programming languages require instructions for branching logic. *Id.* ¶ 12. The ‘811 Family includes multiple examples of branching logic in a survey, which together with the use of Java tags, further supports the conclusion that the ‘811 Family teaches a Survey Module comprising software that implements branching logic.

As one example of branching logic, Figure 3 of the ‘490, ‘387, and ‘434 Applications and Figure 2 of the ‘043 Provisional Application show branching logic occurring at a yes/no decision block 210 where a survey is created if “yes,” a customer has a valid token. EX2005, Zatkovich May 2026 Decl. ¶ 21; EX1003,

'490 Application ¶ [0045]; EX2003, '387 Application ¶ [0045]; EX1002, '434 Application ¶ [051]; EX2002, '043 Application ¶ [037]. Industry practice for flow diagrams is that a diamond-shaped decision block depicts branching logic. *Id.* ¶ 21.

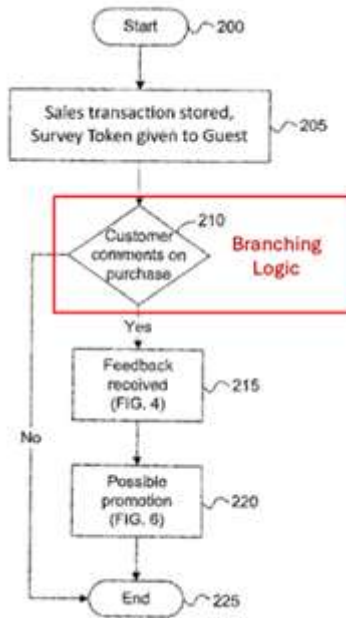


Fig. 2, '043 Application.

The '811 Family discloses additional survey operations that are performed with branching logic, such as determining if survey takers should be given a coupon, analyzing transaction data to generate questions for merchant specified items, or determining if a response is required to a particular survey question. In each case, the operations require a decision that is the hallmark of branching logic and the use of software to implement such logic:

At block 515, the transaction line is searched for merchant specified items. When an item in the transaction line matches a merchant's specified category, a question about the item may be generated.

EX1003, ‘490 Application ¶¶ [0070]-[0071]; EX2003, ‘387 Application ¶¶ [0071]-[0073]; EX1002, ‘434 Application ¶¶ [077]-[079]; EX2002, ‘043 Application ¶¶ [063]-[065].

The system may determine, for example, that the guest should be given a coupon When it is determined that a promotion [or Post Survey Site Selection] should be generated, the yes branch is followed.

EX1003, ‘490 Application ¶ [0077] (the bracketed language appears only in the ‘490 Application); EX2003, ‘387 Application ¶ [0079]; EX1002, ‘434 Application ¶ [085]; EX2002, ‘043 Application ¶ [071].

If a response is ‘Required’ the flag indicating such should be set to true the GSM web service module generates the flag.

EX1003, ‘490 Application ¶ [00116]; EX2003, ‘387 Application ¶ [00114]; EX1002, ‘434 Application ¶ [0120]; EX2002, ‘043 Application ¶ [0103].

Importantly, the entire ‘811 Family specifically discloses the logical operation of generating a current question based on a response to a prior question:

It will be appreciated that merchant preferences may cause [questions to be generated that] **question generation to** depend on previous questions generated and responses received The merchant may specify that after the question has been answered a certain number of times that another question be asked instead of the question.

EX1003, ‘490 Application ¶ [00116] (bracketed language appears only in the ‘490 Application replacing the bolded language); EX2003, ‘387 Application ¶ [0077]; EX1002, ‘434 Application ¶ [083]; EX2002, ‘043 Application ¶ [069].

The ‘043 Provisional Application includes the additional disclosure in claims 3 and 20 that “each response is employed in the generation of related questions in each subsequent survey,” which illustrates that as of the priority date, Patent Owner possessed the feature of using responses to generate questions. The ‘490 Application

includes the disclosure that surveys can be a “web-container package with branching logic that changes the questions presented . . . based upon a survey respondent’s answers to prior survey questions.” EX1003, ‘490 Application ¶ [0065].

The Board found that “[a]lthough both a Survey Module and branching logic (software) are concepts discussed in the ‘490 application, the two concepts are not expressly described as integrated.” Preliminary Guidance at 6-10. The written description requirement does not, however, require such an expression. Instead, a specification must include sufficient detail to allow a POSITA to conclude the Patent Owner had possession of the claimed invention. *Moba, B.V. v. Diamond Automation, Inc.*, 325 F.3d 1306, 1319 (Fed. Cir. 2003).

Here, the ‘811 Family does include examples of branching logic implemented by the Survey Module that show a POSITA the concepts are integrated. The ‘811 Family states the Survey Module handles authentication and guest information:

[T]he Guest **Survey Module** (GSM) . . . includes multiple services [GSM Create/Edit Guest] — optional feature allows guest to create/edit their Information The [GSM Guest Authentication] service allows a guest to either create or authenticate The [GSM Create/Edit Guest] allows the merchant’s web page to react to a failed guest authentication or to handle a new authentication Service-confirmation returns the Guest GUID for successful insertion or an edit success or fail error message.

EX1003, ‘490 Application ¶¶ [0132]-[00137]; EX2003, ‘387 Application ¶¶ [0130]-[0135]; EX1002, ‘434 Application ¶¶ [0136]-[0141]; EX2002, ‘043 Application ¶¶

[0118]-[0123]. These functions are described as being implemented by the Survey Module and require the use of branching logic. EX2005, Zatkovich May 2026 Decl.

¶ 39. The [GSM Create/Edit Guest] service, for example, “returns the Guest GUID for successful insertion” or “fail error message.” This selection of return values denotes the use of branching logic as part of making the selection.

Even assuming *arguendo* that only a subset of the operations described in the ‘811 Family are expressly attributed to the Survey Module, a POSITA would still understand that the Survey Module includes software implementing branching logic. The ‘811 Family states that survey features are delivered to a merchant system using the Survey Module, EX1003, ‘490 Application ¶ [009]; EX2003, ‘387 Application ¶ [009]; EX1002, ‘434 Application ¶ [013]; EX2002, ‘043 Application ¶ [010], and a POSITA would understand that survey features requiring logic could be among those incorporated in the Survey Module. EX2005, Zatkovich May 2026 Decl. ¶ 41.

In short, the ‘811 Family includes disclosure of survey features that require branching logic (software) and expressly states that “survey features [are] delivered to the merchant web-site using a Guest **Survey Module**.” EX2002, ‘043 Application ¶ [010]. A POSITA would conclude that a survey feature such as determining a survey question based on past responses is incorporated into the Survey Module for delivery to a vendor interface, as recited in the proposed substitute claims.

C. Citations to Support for elements of substitute claims.

Substitute Claim 20	Support in '811 Spec.	Support in '043 Appl.
A system for implementing transaction-specific surveys comprising:	Para. [007]–[0011]; Claim 1; FIGS. 1–4.	Abstract; Para. [02], [09]–[010], [0146] (claims 1-25); FIGS. 1–5.
(a) a point-of-sale interface used in conducting a commercial transaction between a consumer and a vendor, the point-of-sale interface being configured to record transaction data relating to the commercial transaction wherein the transaction data comprises at least one purchase detail identifier and a survey token;	Para. [007]–[008], [0030], [0068], [00102]; Claim 1(a); FIGS. 1, 6.	Para. [06], [025]–[027], [0030], [036], [043], [092]–[093], [0146] (claims 19, 22); Fig. 1–2.
(b) a survey server computing device configured to receive and store the transaction data generated by the point-of-sale interface, wherein:	Para. [0010], [0034], [0044], [0055]; Claim 1; Fig. 1–3.	Para. [026]–[027], [046]–[047] [0146] (claim 19); Fig. 1, 3–4.
(i) the survey server computing device comprises (A) a vendor database storing a plurality of purchase detail identifiers, and (B) a campaign data structure having survey question data and a configurable Condition that is satisfied by the detection of a given purchase detail identifier; and wherein	Para. [0024], [0028], [0034], [0064], [0089]–[0090], [0105], Fig. 1.	Para. [025]–[027], [061]–[066], [074]–[081], [095]–[096], [0146]; Claim 19; Fig. 1.
(ii) the survey server computing device is configured to perform the operations comprising (A) receiving a survey token, (B) retrieving the transaction data having the stored survey token corresponding to the received survey token, (C) determining whether the transaction data includes the given purchase detail identifier such that the configurable	Para. [0034], [0053], [0063]–[0065], [0070], [0090]–[0091],	Para. [027], [010], [045], [054]–[057], [061]–[069], [074]–[081], [090], [0118]–[0131], [0146]

Condition is satisfied, and if the configurable Condition is satisfied, generating a first Survey Question using the given survey question data and the purchase detail identifier, and (D) generating a Survey Module comprising software code for displaying one or more survey questions and for implementing branching logic that is configured to determine a second Survey Question based on a first user-generated input in response to the first Survey Question;	Claim 1(b)(ii); Fig. 1–3, 5–6, 8.	(claim 19); Fig. 1–2, 5, 7–8.
a vendor survey interface configured to perform the operations comprising: (i) transmitting the survey token to the survey server computing device; (ii) receiving from the survey server computing device the Survey Module; (iii) generating a graphical user interface on a display screen; (iv) running the Survey Module to perform operations comprising (A) displaying the first Survey Question as an integrated component within the graphical user interface, and (B) determining the second Survey Question; (v) generating a Respondent Header based on user-generated inputs that comprise the first user-generated input in response to the first Survey Question; and (vi) transmitting the Respondent Header to the survey server computing device.	Para. [0037], [0046], [0063], [0065]–[0067]; [0073]–[0074]; [00119]–[00123]; Claim 1(c); Fig. 2, 5–6.	Para. [027], [029], [055]–[057], [092]–[093], [096], [0105]–[0110], [129], [0146] (claim 19–25); Fig. 1, 4, 7–8.

Substitute claim 28	Support in ‘811 Spec.	Support in ‘043 Appl.
The system of claim 20, wherein: (a) the survey server computing device further comprises an Attribute Group database	Para. [0064], [0089], [0109]; Claim 9.	(Provisional uses “smart groups” rather than “Attribute

comprising one or more purchase detail identifiers sharing a preselected attribute; (b) the campaign data structure further comprises a second configurable condition that is satisfied if a certain purchase detail identifier shares the preselected attribute; and wherein (c) the survey server computing device is further configured to perform the operations of (E) determining whether the transaction data includes the certain purchase detail identifier that shares the preselected attribute such that the second configurable Condition is satisfied, and (F) if the second configurable Condition is satisfied, generating a third Survey Question using the survey question data and the certain purchase detail identifier.		Groups” but discloses grouping by shared attributes.) ¶ [096].
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Substitute claim 29	Support in ‘811 Spec.	Support in ‘043 Appl.
The system of claim 20, wherein: (a) the purchase detail identifiers comprise a product/service identifier that represents a products/service available for purchase through the vendor; and (b) the first Survey Question or the second Survey Question is a Product Survey Question relating to the product/service.	Para. [0024], [0069]–[0070], [0090]; Claim 10; Fig. 6.	Para. [045], [061]–[066]; Fig. 5.

Substitute claim 30	Support in ‘811 Spec.	Support in ‘043 Appl.
The system of claim 20, wherein: (a) the purchase detail identifiers comprise a vendor facility identifier that represents a vendor facility used by the vendor for commercial transactions; and (b) the first Survey Question or the second Survey Question is a Facility Survey Question relating to the vendor facility.	Para. [0024], [0069]; Claim 11; Fig. 6.	Para. [045]; Fig. 5.

Substitute claim 31	Support in ‘811 Spec.	Support in ‘043 Appl.
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The system of claim 20, wherein: (a) the purchase detail identifiers comprise a vendor personnel identifier identifying vendor personnel; and (b) the first Survey Question or the second Survey Question is a Vendor Personnel Survey Question relating to the vendor personnel.	Para. [0024], [0069]; Claim 12; Fig. 6.	Para. [044]–[045]; Fig. 5.
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Substitute claim 32	Support in ‘811 Spec.	Support in ‘043 Appl.
The system of claim 20, wherein: (a) the purchase detail identifiers comprise a service mode identifier that represents a mode of service; and (b) the first Survey Question or the second Survey Question is a Service Mode Survey Question.	Para. [0069]; Claim 13; Fig. 6.	Para. [045]; Fig. 5.

Substitute Claim 38	Support in ‘811 Spec.	Support in ‘043 Appl.
A computer-implemented method for providing transaction-specific surveys comprising the operations of:	Para. [007]–[0011]; Claim 19; Fig. 1–4.	Abstract; Para. [02], [09]–[010], [0146] (claims 1-25); Fig. 1–7–8.
(a) providing a survey server configured to receive and store transaction data generated by a point-of-sale interface relating to a commercial transaction between a consumer and a vendor, wherein	Para. [0030], [0034], [0055]; Claim 19; Fig. 1–2.	Para. [06], [025]–[027], [036], [043], [0146] (claims 19, 22); Fig. 1–2.
(i) the transaction data comprises purchase detail identifiers and a survey token; and	Para. [0030]; Claim 19(a)(i); Fig. 1–2.	Para. [025]–[027], [036], [047], [092]–[093], [0146] (claim 1, 5); Fig. 1.
(ii) the survey server comprises (A) a vendor database storing a plurality of purchase detail identifiers, and (B) a campaign data structure	Para. [0024]–[0025], [0034],	Para. [027], [063], [074]–[081], [080],

having survey question data and a configurable Condition that is satisfied by the detection of a given purchase detail identifier;	[0064], [0090]; Claim 19(a)(ii); Fig. 1.	[096], [0102], [0146] (claim 1–2, 15, 25); Fig. 1.
(b) receiving by the survey server, a survey token;	Para. [0063], [00102]–[00103]; Claim 19(b); Fig. 2–3, 6.	Para. [054]–[055], [0146] (claim 1, 12); Fig. 1, 4.
(c) retrieving by the survey server, the transaction data having the stored survey token corresponding to the received survey token;	Para. [0063]; Claim 19(c); Fig. 2, 5.	Para. [056], [058], [061], [0146] (claim 1, 5, 13, 15); Fig. 5, 7.
(d) determining by the survey server, whether the transaction data includes the given purchase detail identifier such that the configurable Condition is satisfied, and if the configurable Condition is satisfied, generating a first Survey Question using the survey question data and the purchase detail identifier;	Para. [0090]–[0091]; Claim 19(d); Fig. 6.	Para. [045], [061]–[066], [083], [0146] (claim 1, 3, 13, 15); Fig. 5.
(e) generating by the survey server, a Survey Module comprising software code for (i) displaying one or more survey questions as an integrated component within a graphical user interface, and (ii) implementing branching logic that determines a second Survey Question based on a first user-generated input in response to the first Survey Question	Para. [009], [0065], [0073], [0091]; Claim 19(e); Fig. 2, 6.	Para. [010], [027], [056]–[057], [068]–[069], [074]–[081], [090], [0118]–[0131] [0146] (claim 1, 3, 14, 20); Fig. 4–5, 7.
(f) transmitting by the survey server, the Survey Module to a vendor survey interface; and	Para. [0073]; Claim 19(f); Fig. 2, 6.	Para. [056]–[057], [0067] [0146] (claim 1); Fig. 1, 5.
(g) receiving by the survey server, a Respondent Header generated based on user-generated inputs that comprise the first user-generated input in response to the first Survey Question.	Para. [00106], [00118]–[00120], [00121]–	Para. [057]–[058], [096], [107], [0105]–[0110]; Fig. 7–8.

	[00122]; Claim 19(g).	
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V. PATENTABILITY OF THE SUBSTITUTE CLAIMS

The Petition contends that Douglas and Ganesh each anticipate independent claims 1 and 19, which are incorporated into substitute claims 20 and 38. However, neither reference discloses a Survey Module as recited by the substitute claims. The substitute claims recite a Survey Module having software code that implements branching logic and that is executed by a vendor interface to determine a survey question based on a response to a prior question—a feature that is not found in Douglas or Ganesh. EX2001, Zatkovich January 13, 2026 Declaration ¶¶ 83-87, 99-100, 112-119 (“**Zatkovich Jan. Decl.**”). The substitute claims, therefore, address and refute the grounds of unpatentability raised in the Petition.

Both Ganesh and Douglas teach a server-centric system in which survey logic resides on a centralized server. The survey logic processes user inputs received from a remote interface (*e.g.*, a user mobile device) to determine additional content that is pushed to the remote interface for display. This mode of operation is distinct from Patent Owner’s claimed system where Survey Module software code is executed by a vendor interface—not a centralized server—to determine content for display.

With respect to Douglas, survey responses are input to a customer device 106 and sent across a network 108 to a survey generator 103. EX1007, Douglas ¶¶

[0005]-[0006], [0035], [0037], [0069]. The survey generator 103 runs on a backend survey system 101 that is remote from the customer device 106. *Id.*, ¶ [0059] & Figure 1 (showing the Survey Generator 103 remote from the customer device 106).

Douglas's survey generator 103 processes the survey responses received from the remote customer device 106 to determine follow-up questions that are sent to the customer device 106. *Id.*, ¶ [0035] (“[S]urvey generator 103 may create and transmit additional Survey queries based on the responses.”), ¶ [0069]. Douglas does not state that the content transmitted to a customer device 106 includes software capable of determining the next question. EX2001, Zatkovich Jan. Decl. ¶ 84 (“Douglas does not disclose a survey or survey module that comprises software code.”).

The only disclosure in Douglas concerning the format of its surveys is that a “survey may be presented as a notification, text message, email, SMS, MMS, or presented to the customer device on the user interface,” and “[s]urveys may include visual graphics, images, animations, videos, and other digital media.” *Id.* ¶ [0033]. These formats are not software code.

Douglas does reference transmitting “web pages, relating to, for example, online banking applications” where the webpages comprise “HTML documents” and “scripts.” EX1007, Douglas ¶ [0054]. However, the transmitted webpages are only mentioned in connection with “banking applications and the like,” and Douglas does not state that its surveys are transmitted in webpage, HTML, or “script” format.

In any event, even if Douglas taught surveys in HTML or script format, Patent Owner's expert has explained that "HTML . . . is not a programming language nor can it produce an executable software code." EX2001, Zatkovich Jan. 2026 Decl. ¶ 81; EX2005, Zatkovich May 2026 Decl. ¶ 59. HTML is a "markup language" rather than a programming language, and HTML has no capability for flow control, computation, or conditional logic. EX2005, Zatkovich May 2026 Decl. ¶¶ 59.

Moreover, the term "script" used in Douglas is not synonymous with software code and instead denotes computer instructions that can be read and executed at the same time without the need to be compiled before execution. *Id.* ¶¶ 56-57. That is, software can be a "compiled" programming language or a "scripting" language, such as "JavaScript." *Id.* But the term "script" can also apply to markup languages like HTML that do not constitute software. *Id.* ¶ 57. Thus, use of the word "script" does not inform a POSITA that Douglas is sending software.

The only relevant software referenced in Douglas is installed on the customer device 106 prior to receiving the survey and is not generated or sent by a server, as claimed by Patent Owner. EX1007, Douglas ¶ [0018]. Douglas provides examples of its software stating that the "software applications may be web-based applications and/or native mobile applications installed on the customer device 106." *Id.*

Additionally, Douglas does not teach a vendor survey interface that executes a survey module. Douglas refers to a "user interface," which displays information

to a user. *Id.* ¶¶ [0033]. On the other hand, Patent Owner’s vendor survey interface is a system interface, EX2001, Zatkovich Jan. 2026 Decl. ¶ 42, which “allows one system component to communicate information to and from another system component,” *id.* ¶ 41. As recited in substitute claim 20, Patent Owner’s vendor survey interface performs distinct operations beyond displaying information, such as transmitting a survey token to a server or generating a Respondent Header.

Similar to Douglas, Ganesh discloses a centralized system where a time-of-purchase (“TOP”) software module 540B running on a server 105A pushes content to a remote portable computing device (“PCD”) 110 based on a user’s survey responses. EX1008, Ganesh ¶¶ [0055], [0059] (“Once the survey response is recorded . . . the survey server 105A determines if there is additional content to be pushed to PCD 110.”). The survey logic that determines content runs on a server that is remote from the interface where the content is displayed. Ganesh includes no disclosure of software generated or transmitted by a server. EX2001, Zatkovich Jan. 2026 Decl. ¶¶ 118-119 (“There is no teaching or suggestion that the content determination module actually generates software to be included in the survey.”).

By contrast, Patent Owner’s proposed substitute claims recite Survey Module software code that is executed by a vendor interface to determine questions to be displayed as an integrated component within a graphical user interface (“GUI”). The next-question decision can be executed on a device remote from the survey server,

like a mobile computing device. EX1001, ‘811 Patent, C2:52-63, C11:15-34, C17:12-17. Patent Owner’s system minimizes the required communication between system devices, which is an advantage not achieved by the systems of Douglas or Ganesh. *Id.*, C11:15-18.

Petitioner’s Opposition contends that the substitute claims are anticipated because they do not foreclose the possibility that survey questions could be determined by a server. However, even if that were true, it does not change the fact that Patent Owner’s claims include an element and a functionality that Douglas and Ganesh do not—a Survey Module executed by a vendor interface to determine the next question based on an answer to the last. Put another way, if Douglas and Ganesh teach element “A” (server-centric operation) and Patent Owner claims elements “A” and “B” (possible remote execution) then Patent Owner’s claims are not anticipated.

“A claim is anticipated only if each and every element as set forth in the claim is found . . . in a single prior art reference.” *Verdegaal Bros., Inc. v. Union Oil Co. of Cal.*, 814 F.2d 628, 631 (Fed. Cir. 1987). The single reference “must also disclose those elements [as] ‘arranged as in the claim.’” *Net MoneyIN, Inc. v. VeriSign, Inc.*, 545 F.3d 1359, 1369 (Fed. Cir. 2008) (citation omitted).

Given Douglas and Ganesh do not disclose every element of Patent Owner’s independent claims, the references do not anticipate any challenged claim. Moreover, even if these references taught Survey Module software code with

branching logic, there is no disclosure that the software code is sent to, or run by, a vendor survey interface. In other words, neither Douglas nor Ganesh disclose a system with the same elements, *arranged in the same manner*, as the system claimed by Patent Owner, and the references are not anticipating prior art.

The Douglas and Ganesh references also do not provide grounds for raising a new question of patentability based on obviousness grounds, regardless of whether the references are considered alone or in combination with other references. An obviousness analysis requires considering a claim as a whole, 35 U.S.C. § 103, and a suggestion of all limitations in a claim. *CFMT, Inc. v. Yieldup Int'l Corp.*, 349 F.3d 1333, 1342 (Fed. Cir. 2003) (citing *In re Gulack*, 703 F.2d 1381, 1385 n.9 (Fed. Cir. 1983) & *In re Royka*, 490 F.2d 981, 985 (CCPA 1974)). In this case, the fact that Douglas and Ganesh do not disclose each element of Patent Owner's substitute claims undermines any potential obviousness argument. *Broadcom Corp. v. Emulex Corp.*, 732 F.3d 1325, 1334 (Fed. Cir. 2013); *Vizio, Inc. v. Int'l Trade Comm'n*, 605 F.3d 1330, 1343 (Fed. Cir. 2010).

The distinct modes of operation between Patent Owner's system and the systems of Douglas and Ganesh also illustrate why these references do not support a finding of obviousness. When modifying the teachings of a prior art reference would change its principle of operation, one of skill in the art would not have a motivation to modify or combine the teachings to arrive at a patent owner's system.

See, e.g., Plas-Pak Indus., Inc. v. Sulzer Mixpac AG, 600 F. App’x 755, 758 (Fed. Cir. 2015) (“[C]ombinations that change the ‘basic principles under which the [prior art] was designed to operate’ . . . fail to support a conclusion of obviousness.”) (internal citations omitted); *In re Gardner*, 449 F. App’x 914, 916 (Fed. Cir. 2011).

The systems of Douglas and Ganesh are intentionally designed to be centralized with a server that orchestrates survey implementation. Moving the branching logic into a survey module would preclude the continuous server control that both Douglas and Ganesh require. EX1007, ¶¶ [0023], [0026], [0031]-[0032]; EX1008, ¶ [0004], [0028]-[0029], [0036]. Where, as here, modifying references to arrive at a patent owner’s claimed invention would produce a seemingly unsatisfactory system, there is no suggestion or motivation to make the modification, and the references cannot serve as a predicate for a *prima facie* case of obviousness. *Univ. of Maryland Biotechnology Inst. v. Presens Precision Sensing GmbH*, 711 F. App’x 1007, 1010 (Fed. Cir. 2017).

For the reasons discussed above, the substitute claims are responsive to the grounds of invalidity raised in the Petition. Neither Douglas nor Ganesh disclose or suggest the features claimed by Patent Owner, and the substitute claims are patentable over the cited references.

VI. CONCLUSION

For the foregoing reasons, Patent Owner requests that this Contingent Motion to Amend be granted in the event claims 1 and/or 19 are found to be unpatentable.

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I certify that a copy of the foregoing document was served by electronic mail upon the following:

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APPENDIX A
PATENT OWNER'S AMENDED CLAIM LISTING IN SUPPORT OF
CONTINGENT MOTION TO AMEND

Claim Listing Pursuant to 37 C.F.R. 42.121(a)–(b)

1. (Original but cancelled if the Board finds claim 1 to be unpatentable) A system for implementing transaction-specific surveys comprising:

(a) a point-of-sale interface used in conducting a commercial transaction between a consumer and a vendor, the point-of-sale interface being configured to record transaction data relating to the commercial transaction wherein the transaction data comprises at least one purchase detail identifier and a survey token;

(b) a survey server computing device configured to receive and store the transaction data generated by the point-of-sale interface, wherein:

(i) the survey server computing device comprises (A) a vendor database storing a plurality of purchase detail identifiers, and (B) a campaign data structure having survey question data and a configurable Condition that is satisfied by the detection of a given purchase detail identifier; and wherein

(ii) the survey server computing device is configured to perform the operations comprising (A) receiving a survey token, (B) retrieving the transaction data having the stored survey token corresponding to the received survey token, (C) determining whether the transaction data includes the given purchase detail identifier such that the configurable Condition is satisfied, and

if the configurable Condition is satisfied, generating a Survey Question using the given survey question data and the purchase detail identifier, and (D) generating a Survey Module comprising software code for displaying the at least one Survey Question;

(c) a vendor survey interface configured to perform the operations comprising: (i) transmitting the survey token to the survey server computing device; (ii) receiving from the survey server computing device the Survey Module; (iii) generating a graphical user interface on a display screen; (iv) running the Survey Module to display the at least one Survey Question as an integrated component within the graphical user interface; (v) generating a Respondent Header based on user-generated inputs in response to the at least one Survey Question; and (vi) transmitting the Respondent Header to the survey server computing device.

2. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein: (a) the vendor survey interface is implemented as a web server computing device; (b) the graphical user interface is a host vendor webpage; (c) and the Survey Module is a webpage frame configured for display as an integrated component of the host vendor webpage.

3. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein the point-of-sale interface is implemented as a point-of-sale computing device.
4. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 3, wherein (a) the point-of-sale computing device transmits the transaction data to a cloud server, and (b) the survey server computing device is configured to receive and store the transaction data transmitted by the cloud server.
5. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein vendor survey interface is implemented as a software application running on a mobile computing device, and the survey token is input by the consumer to the vendor survey interface.
6. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein the survey token comprises a combination of purchase detail identifiers that identify the commercial transaction.
7. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein the point-of-sale interface and the vendor survey

interface are both implemented as a software application running on a mobile computing device.

8. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein:

(a) the campaign data structure further comprises an Exit Page that points to a webpage address and a second configurable Condition that is satisfied based on a Survey Question response;

(b) the display screen that displays the graphical user interface is an integrated component of a customer response client computing device, and the graphical user interface is displayed by a web browser integrated with the customer response client computing device; and wherein

(c) the survey server computing device is further configured to perform the operation of incorporating within the Survey Module software code that redirects the web browser of the customer response client computing device to the Exit Page, if the second configurable Condition is satisfied.

9. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein:

- (a) the survey server computing device further comprises an Attribute Group database comprising one or more purchase detail identifiers sharing a preselected attribute;
- (b) the campaign data structure further comprises a second configurable condition that is satisfied if a certain purchase detail identifier shares the preselected attribute; and wherein
- (c) the survey server computing device is further configured to perform the operations of (E) determining whether the transaction data includes the certain purchase detail identifier that shares the preselected attribute such that the second configurable Condition is satisfied, and (F) if the second configurable Condition is satisfied, generating a second Survey Question using the survey question data and the certain purchase detail identifier.

10. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein:

- (a) the purchase detail identifiers comprise a product/service identifier that represents a products/service available for purchase through the vendor; and
- (b) the Survey Question comprises a Product Survey Question relating to the product/service.

11. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein:

(a) the purchase detail identifiers comprise a vendor facility identifier that represents a vendor facility used by the vendor for commercial transactions; and

(b) the Survey Question comprises a Facility Survey Question relating to the vendor facility.

12. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein:

(a) the purchase detail identifiers comprise a vendor personnel identifier identifying vendor personnel; and

(b) the Survey Question comprises a Vendor Personnel Survey Question relating to the vendor personnel.

13. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein:

(a) the purchase detail identifiers comprise a service mode identifier that represents a mode of service; and

(b) the Survey Question comprises a Service Mode Survey Question relating to the mode of service.

14. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 10, wherein:

(a) the purchase detail identifiers further comprise at least one vendor facility identifier that represents a vendor facility where the commercial transaction occurred;

(b) the campaign data structure comprises a second configurable Condition that is satisfied by the detection of a given vendor facility identifier;

(c) the survey server computing device is configured to perform the further operations comprising (E) determining whether the transaction data includes the given vendor facility identifier such that the second configurable Condition is satisfied, and if the second configurable Condition is satisfied, generating a Facility Survey Question using the survey question data and the given facility identifier, and (F) incorporating within the Survey Module software code for displaying the Facility Survey Question.

15. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 14, wherein:

(a) the purchase detail identifiers further comprise at least one internal facility location identifier identifying an internal location within a vendor facility;

(b) the campaign data structure comprises a third configurable Condition that is satisfied by the detection of a given internal facility location identifier;

(c) the survey server computing device is configured to perform the further operations comprising (G) determining whether the transaction data includes the given internal facility location identifier such that the third configurable Condition is satisfied, and if the third configurable Condition is satisfied, generating an Internal Facility Survey Question using the survey question data and the given internal facility location identifier, and (H) incorporating within the Survey Module software code for displaying the Internal Facility Survey Question.

16. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein: (a) the survey question data includes at least one General Survey Question that is not specific to the transaction data; and (b) the survey server computing device is further configured to perform the operation of incorporating within the Survey Module software code for displaying the at least one General Survey Question.

17. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein the Campaign data structure further comprises a Max

Question configurable Condition setting a maximum number of survey questions included within the Survey Module.

18. (Original but cancelled if the Board finds claim 1 to be unpatentable) The system of claim 1, wherein:

(a) the Campaign data structure further comprises an Event that triggers an electronic notification transmitted to a vendor representative and a second configurable Condition that is satisfied based on a Survey Question response; and wherein

(b) the survey server computing device is further configured to perform the operations of (E) incorporating within the Survey Module software code that determines whether the second configurable Condition is satisfied, and (F) that implements the Event to transmit an electronic notification to the vendor representative, if the second configurable condition is satisfied.

19. (Original but cancelled if the Board finds claim 19 to be unpatentable) A computer-implemented method for providing transaction-specific surveys comprising the operations of:

(a) providing a survey server configured to receive and store transaction data generated by point-of-sale interface relating to a commercial transaction between a consumer and a vendor, wherein

(i) the transaction data comprises purchase detail identifiers and a survey token; and

(ii) the survey server comprises (A) a vendor database storing a plurality of purchase detail identifiers, and (B) a campaign data structure having survey question data and a configurable Condition that is satisfied by the detection of a given purchase detail identifier;

(b) receiving by the survey server, a survey token;

(c) retrieving by survey server, the transaction data having the stored survey token corresponding to the received survey token;

(d) determining by survey server, whether the transaction data includes the given purchase detail identifier such that the configurable Condition is satisfied, and if the configurable Condition is satisfied, generating a Survey Question using the survey question data and the purchase detail identifier;

(e) generating by the survey server, a Survey Module comprising software code for displaying the at least one Survey Question as an integrated component within a graphical user interface;

(f) transmitting by the survey server, the Survey Module to a vendor survey interface; and

(g) receiving by the survey server, a Respondent Header generated based on user-generated inputs in response to the at least one Survey Question.

20. (Substitute for claim 1 if claim 1 is cancelled) A system for implementing transaction-specific surveys comprising:

(a) a point-of-sale interface used in conducting a commercial transaction between a consumer and a vendor, the point-of-sale interface being configured to record transaction data relating to the commercial transaction wherein the transaction data comprises at least one purchase detail identifier and a survey token;

(b) a survey server computing device configured to receive and store the transaction data generated by the point-of-sale interface, wherein:

(i) the survey server computing device comprises (A) a vendor database storing a plurality of purchase detail identifiers, and (B) a campaign data structure having survey question data and a configurable Condition that is satisfied by the detection of a given purchase detail identifier; and wherein

(ii) the survey server computing device is configured to perform the operations comprising (A) receiving a survey token, (B) retrieving the transaction data having the stored survey token corresponding to the received

survey token, (C) determining whether the transaction data includes the given purchase detail identifier such that the configurable Condition is satisfied, and if the configurable Condition is satisfied, generating a first Survey Question using the given survey question data and the purchase detail identifier, and (D) generating a Survey Module comprising software code for displaying one or more survey questions and for implementing branching logic that is configured to determine a second Survey Question based on a first user-generated input in response to the first ~~the at least one~~ Survey Question;

(c) a vendor survey interface configured to perform the operations comprising: (i) transmitting the survey token to the survey server computing device; (ii) receiving from the survey server computing device the Survey Module; (iii) generating a graphical user interface on a display screen; (iv) running the Survey Module to perform operations comprising (A) displaying the ~~at least one~~ first Survey Question as an integrated component within the graphical user interface, and (B) determining the second Survey Question; (v) generating a Respondent Header based on user-generated inputs that comprise the first user-generated input in response to the ~~at least one~~ first Survey Question; and (vi) transmitting the Respondent Header to the survey server computing device.

21. (Substitute for claim 2 if claim 2 is cancelled) The system of claim [\[\[1\]\] 20](#), wherein: (a) the vendor survey interface is implemented as a web server computing device; (b) the graphical user interface is a host vendor webpage; (c) and the Survey Module is a webpage frame configured for display as an integrated component of the host vendor webpage.

22. (Substitute for claim 3 if claim 3 is cancelled) The system of claim [\[\[1\]\] 20](#), wherein the point-of-sale interface is implemented as a point-of-sale computing device.

23. (Substitute for claim 4 if claim 4 is cancelled) The system of claim [\[\[3\]\] 22](#), wherein (a) the point-of-sale computing device transmits the transaction data to a cloud server, and (b) the survey server computing device is configured to receive and store the transaction data transmitted by the cloud server.

24. (Substitute for claim 5 if claim 5 is cancelled) The system of claim [\[\[1\]\] 20](#), wherein vendor survey interface is implemented as a software application running on a mobile computing device, and the survey token is input by the consumer to the vendor survey interface.

25. (Substitute for claim 6 if claim 6 is cancelled) The system of claim [[1]] 20, wherein the survey token comprises a combination of purchase detail identifiers that identify the commercial transaction.

26. (Substitute for claim 7 if claim 7 is cancelled) The system of claim [[1]] 20, wherein the point-of-sale interface and the vendor survey interface are both implemented as a software application running on a mobile computing device.

27. (Substitute for claim 8 if claim 8 is cancelled) The system of claim [[1]] 20, wherein:

(a) the campaign data structure further comprises an Exit Page that points to a webpage address and a second configurable Condition that is satisfied based on a Survey Question response;

(b) the display screen that displays the graphical user interface [[i]]as an integrated component of a customer response client computing device, and the graphical user interface is displayed by a web browser integrated with the customer response client computing device; and wherein

(c) the survey server computing device is further configured to perform the operation of incorporating within the Survey Module software code that redirects

the web browser of the customer response client computing device to the Exit Page, if the second configurable Condition is satisfied.

28. (Substitute for claim 9 if claim 9 is cancelled) The system of claim ~~[[1]]~~ 20, wherein:

(a) the survey server computing device further comprises an Attribute Group database comprising one or more purchase detail identifiers sharing a preselected attribute;

(b) the campaign data structure further comprises a second configurable condition that is satisfied if a certain purchase detail identifier shares the preselected attribute; and wherein

(c) the survey server computing device is further configured to perform the operations of (E) determining whether the transaction data includes the certain purchase detail identifier that shares the preselected attribute such that the second configurable Condition is satisfied, and (F) if the second configurable Condition is satisfied, generating a ~~thirdsecond~~ Survey Question using the survey question data and the certain purchase detail identifier.

29. (Substitute for claim 10 if claim 10 is cancelled) The system of claim ~~[[1]]~~ 20, wherein:

(a) the purchase detail identifiers comprise a product/service identifier that represents a product[[s]]/service available for purchase through the vendor; and

(b) the first Survey Question or the second Survey Question ~~comprises-is~~ a Product Survey Question relating to the product/service.

30. (Substitute for claim 11 if claim 11 is cancelled) The system of claim [[1]] 20, wherein: (a) the purchase detail identifiers comprise a vendor facility identifier that represents a vendor facility used by the vendor for commercial transactions; and (b) the first Survey Question or the second Survey Question ~~comprises-is~~ a Facility Survey Question relating to the vendor facility.

31. (Substitute for claim 12 if claim 12 is cancelled) The system of claim [[1]] 20, wherein:

(a) the purchase detail identifiers comprise a vendor personnel identifier identifying vendor personnel; and

(b) the first Survey Question or the second Survey Question ~~comprises-is~~ a Vendor Personnel Survey Question relating to the vendor personnel.

32. (Substitute for claim 13 if claim 13 is cancelled) The system of claim [[1]] 20, wherein:

(a) the purchase detail identifiers comprise a service mode identifier that represents a mode of service; and

(b) the first Survey Question or the second Survey Question ~~comprises is~~ a Service Mode Survey Question relating to the mode of service.

33. (Substitute for claim 14 if claim 14 is cancelled) The system of claim ~~[[10]]~~ 29, wherein:

(a) the purchase detail identifiers further comprise at least one vendor facility identifier that represents a vendor facility where the commercial transaction occurred;

(b) the campaign data structure comprises a second configurable Condition that is satisfied by the detection of a given vendor facility identifier;

(c) the survey server computing device is configured to perform the further operations comprising (E) determining whether the transaction data includes the given vendor facility identifier such that the second configurable Condition is satisfied, and if the second configurable Condition is satisfied, generating a Facility Survey Question using the survey question data and the given facility identifier, and (F) incorporating within the Survey Module software code for displaying the Facility Survey Question.

34. (Substitute for claim 15 if claim 15 is cancelled) The system of claim ~~[[33]]~~ 33, wherein:

(a) the purchase detail identifiers further comprise at least one internal facility location identifier identifying an internal location within a vendor facility;

(b) the campaign data structure comprises a third configurable Condition that is satisfied by the detection of a given internal facility location identifier;

(c) the survey server computing device is configured to perform the further operations comprising (G) determining whether the transaction data includes the given internal facility location identifier such that the third configurable Condition is satisfied, and if the third configurable Condition is satisfied, generating an Internal Facility Survey Question using the survey question data and the given internal facility location identifier, and (H) incorporating within the Survey Module software code for displaying the Internal Facility Survey Question.

35. (Substitute for claim 16 if claim 16 is cancelled) The system of claim ~~[[1]]~~ 20, wherein: (a) the survey question data includes at least one General Survey Question that is not specific to the transaction data; and (b) the survey server computing device is further configured to perform the operation of incorporating within the Survey Module software code for displaying the at least one General Survey Question.

36. (Substitute for claim 17 if claim 17 is cancelled) The system of claim [\[\[1\]\] 20](#), wherein the Campaign data structure further comprises a Max Question configurable Condition setting a maximum number of survey questions included within the Survey Module.

37. (Substitute for claim 18 if claim 18 is cancelled) The system of claim [\[\[1\]\] 20](#), wherein:

(a) the Campaign data structure further comprises an Event that triggers an electronic notification transmitted to a vendor representative and a second configurable Condition that is satisfied based on a Survey Question response; and wherein

(b) the survey server computing device is further configured to perform the operations of (E) incorporating within the Survey Module software code that determines whether the second configurable Condition is satisfied, and (F) that implements the Event to transmit an electronic notification to the vendor representative, if the second configurable condition is satisfied.

38. (Substitute for claim 19 if claim 19 is cancelled) A computer-implemented method for providing transaction-specific surveys comprising the operations of:

(a) providing a survey server configured to receive and store transaction data generated by a point-of-sale interface relating to a commercial transaction between a consumer and a vendor, wherein

(i) the transaction data comprises purchase detail identifiers and a survey token; and

(ii) the survey server comprises (A) a vendor database storing a plurality of purchase detail identifiers, and (B) a campaign data structure having survey question data and a configurable Condition that is satisfied by the detection of a given purchase detail identifier;

(b) receiving by the survey server, a survey token;

(c) retrieving by the survey server, the transaction data having the stored survey token corresponding to the received survey token;

(d) determining by the survey server, whether the transaction data includes the given purchase detail identifier such that the configurable Condition is satisfied, and if the configurable Condition is satisfied, generating a first Survey Question using the survey question data and the purchase detail identifier;

(e) generating by the survey server, a Survey Module comprising software code for (i) displaying ~~the at least one~~ or more ~~S~~survey ~~Q~~questions as an integrated component within a graphical user interface, and (ii) implementing branching logic

that determines a second Survey Question based on a first user-generated input in response to the first Survey Question;

(f) transmitting by the survey server, the Survey Module to a vendor survey interface; and

(g) receiving by the survey server, a Respondent Header generated based on user-generated inputs that comprise the first user-generated input in response to the ~~at least one~~ first Survey Question.

APPENDIX B

SUPPORT FOR SUBSTITUTE CLAIMS

Substitute Claim 20	Support in originally filed '811 Specification	Support in the '043 Application	Support in the '611 Patent	Support in the '434 Application
A system for implementing transaction-specific surveys comprising:	At least Para. [007]–[0011]; Claim 1; FIGS. 1–4.	At least Abstract; Para. [02], [09]–[010], [0146] (claims 1–25); FIGS. 1–5, 7–8.	At least Para. [0030], [0034], [0055]; Claims 1, 19; FIGS. 1–6.	At least Para. [036], [040], [061]; Claim 1; FIGS. 1–6.
(a) a point-of-sale interface used in conducting a commercial transaction between a consumer and a vendor, the point-of-sale interface being configured to record transaction data relating to the commercial transaction wherein the transaction data comprises at least one purchase	At least Para. [007]–[008], [0030], [0068], [00102]; Claim 1(a); FIGS. 1, 6. “POS terminal 105 represents anywhere a purchase takes place . . . Purchase detail component 110 collects transaction information that may include price, quantity, and name of each item purchased, time and date of purchase, employees on duty, and/or any other relevant information associated with a purchase.” ¶	At least Para. [06], [025]–[027], [0030], [036], [043], [092]–[093], [0146] (claims 19, 22); FIGS. 1–2. “POS terminal 105 represents anywhere a purchase takes place Purchase detail component 110 collects transaction information that may include price, quantity, and name of each item purchased, time and date of purchase,	At least Para. [0030]; Claim 1(a); FIGS. 1–2. “POS terminal 105 represents anywhere a purchase takes place Purchase detail component 110 collects transaction information that may include price, quantity, and name of each item purchased, time and date of purchase,	At least Para. [036]; Claim 1; FIGS. 1–2. “POS terminal 105 represents anywhere a purchase takes place Purchase detail component 110 collects transaction information that may include price, quantity, and name of each item purchased, time and date of purchase,

detail identifier and a survey token;	[0030]. “When a customer uses a loyalty card or some other means of identification during the purchase, purchase detail component 110 may collect a survey token that identifies the particular customer or transaction.” ¶ [0030].	employees on duty, and/or any other relevant information associated with a purchase.” ¶ [025]. “[W]hen a guest uses a loyalty card or some other means of identification during the purchase, purchase detail component 110 may collect a survey token that identifies the particular guest.” ¶ [025].	employees on duty, and/or any other relevant information associated with a purchase.” ¶ [0030]. “[W]hen a customer uses a loyalty card or some other means of identification during the purchase, purchase detail component 110 may collect a survey token that identifies the particular customer.” ¶ [0030].	employees on duty, and/or any other relevant information associated with a purchase.” ¶ [036]. “[W]hen a customer uses a loyalty card or some other means of identification during the purchase, purchase detail component 110 may collect a survey token that identifies the particular customer.” ¶ [036].
(b) a survey server computing device configured to receive and store the transaction	At least Para. [0010], [0034], [0044], [0055]; Claim 1(b); FIGS. 1–3. “At block 320 , the server 140 receives the purchase detail	At least Para. [026]–[027], [046]–[047] [0146] (claim 19); FIGS. 1, 3–4. “At block 320 , the server	At least Para. [0034], [0055]; Claim 1(b); FIGS. 1–2. “At block 320 , the server	At least Para. [040], [061]; Claim 1; FIGS. 1–2. “At block 320 , the server receives the

data generated by the point-of-sale interface, wherein:	as transaction data, assigns a survey token to the purchase detail, and stores the purchase detail with the survey token for future access.” ¶ [0055].	receives the purchase detail, assigns a survey token to the detail, and stores the purchase detail with the survey token for future access.” ¶ [047].	receives the purchase detail, assigns a survey token to the detail, and stores the purchase detail with the survey token for future access.” ¶ [0055].	purchase detail, assigns a survey token to the detail, and stores the purchase detail with the survey token for future access.” ¶ [061].
(i) the survey server computing device comprises (A) a vendor database storing a plurality of purchase detail identifiers, and (B) a campaign data structure having survey question data and a configurable Condition that is satisfied by the detection of a given	At least Para. [0024], [0028], [0034], [0064], [0089]–[0090], [00105]–[00106]; Claim 1(b)(i); FIG. 1. “Purchase detail table 170 stores purchase detail as transaction data that is collected on purchase system client 100 and associates a survey token and possibly a customer survey token with each entry.” ¶ [0034].	At least Para. [025]–[027], [061]–[066], [074]–[081], [095]–[096], [0146] (claim 19); FIG. 1. “Purchase detail table 170 stores purchase detail collected on purchase system client 100 and associates a survey token and possibly a guest survey token with each entry.” ¶ [027]. “[S]erver 140 uses the survey token to retrieve related	At least Para. [0034], [0064]; Claim 1(b)(i); FIG. 1. “Purchase detail table 170 stores purchase detail collected on purchase system client 100 and associates a survey token and possibly a customer survey token with each entry.” ¶ [0034]. “[T]he server	At least Para. [040], [070]; Claim 1; FIG. 1. “Purchase detail table 170 stores purchase detail collected on purchase system client 100 and associates a survey token and possibly a customer survey token with each entry.” ¶ [040]. “[T]he server retrieves

purchase detail identifier; and wherein		purchase information in purchase detail table 170 . Then, purchase question generator module 150 generates questions based on the detail retrieved.” ¶ [056].	retrieves purchase detail associated with the survey token and generates questions for the purchase . . . the questions generated are related to the items purchased and preference data associated with merchant preferences.” ¶ [0064].	purchase detail associated with the survey token and generates questions for the purchase. . . the questions generated are related to the items purchased and preference data associated with merchant preferences.” ¶ [070].
(ii) the survey server computing device is configured to perform the operations comprising (A) receiving a survey token, (B) retrieving the transaction data having the stored	At least Para. [0034], [0053], [0063]–[0065], [0070], [0090]–[0091], Claim 1(b)(ii); FIGS. 1–3, 5–6, 8. “The merchant preferences can be formatted as a Campaign, which is a data structure that includes Conditions, Survey Questions,	At least Para. [027], [010], [045], [054]–[057], [061]–[069], [074]–[081], [090], [0118]–[0131], [0146] (claim 19); FIG. 1–2, 5, 7–8. “At block 410 , the customer response client forwards the survey token to	At least Para. [0062]–[0064]; Claim 1(b)(ii); FIGS. 2, 5–6. “At block 415 , the server retrieves purchase detail associated with the	At least Para. [068]–[070]; Claim 1; FIGS. 2, 5–6. “At block 415 , the server retrieves purchase detail associated with the survey token and generates

survey token corresponding to the received survey token, (C) determining whether the transaction data includes the given purchase detail identifier such that the configurable Condition is satisfied, and if the configurable Condition is satisfied, generating a <u>first</u> Survey Question using the given survey question data and the purchase detail identifier, and (D) generating a Survey Module comprising software code for	Events, Incentives, Exit Pages, groupings and general logic utilized in constructing Survey Questions.” ¶ [0034]. “Surveys are created using the transaction data as well as the Campaign data structure, which includes configurable Conditions, Survey Questions, and branching logic set according to merchant preferences.” ¶ [0064]. “A wide variety of configurable Conditions can be specified as part of the Campaign. Typical Conditions can include, for instance, determining whether: (i) the transaction data includes a particular product/service identifier.” ¶ [0090]. “At block	the server [T]he server retrieves purchase detail associated with the survey token and generates questions for the purchase.” ¶ [055]–[056]. “[T]hese questions are then formatted into web pages 160 which are then sent to browser 130.” ¶ [056].	survey token and generates questions for the purchase . . . the questions generated are related to the items purchased and preference data associated with merchant preferences.” ¶ [0064]. “[T]hese questions are then formatted into web pages 160 which are then sent to browser 130.” ¶ [0064].	questions for the purchase . . . the questions generated are related to the items purchased and preference data associated with merchant preferences.” ¶ [070]. “[T]hese questions are then formatted into web pages 160 which are then sent to browser 130.” ¶ [070].
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displaying the at least one that implements branching logic that is configured to display a second Survey Question based on a first user- generated input in response to the first Survey Question;	410, the customer response client forwards the survey token to the server. . . . At block 415, the server retrieves purchase detail associated with the survey token and retrieves the associated Campaign data structure and generates a survey comprised of a set of Survey Questions relating to the purchase.” ¶ [0063]. “The survey may be assembled into an autonomous, self-contained, web-container package with branching logic that changes the questions presented or the order of the questions presented based upon a survey respondent’s answers to prior survey questions.” ¶ [0065]. “Surveys are created using the transaction data as well as the			
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	Campaign data structure, which includes configurable Conditions, Survey Questions, and branching logic set according to merchant preferences.” ¶ [0064].			
(c) a vendor survey interface configured to perform the operations comprising: (i) transmitting the survey token to the survey server computing device; (ii) receiving from the survey server computing device the Survey Module; (iii) generating a graphical user interface on a display screen; (iv) running the Survey	At least Para. [0037], [0046], [0063], [0065]–[0067]; [0073]–[0074]; [00119]–[00123]; Claim 1(c); FIGS. 2, 5–6. “The WS-based Customer Survey Module (GSM) of the current invention allows merchants to integrate a GSM into their branded website allowing integration to both survey templates and actual check details.” ¶ [0100]. “[T]hese questions are then formatted into web pages 160 that can be embedded into a merchant’s branded website and sent to the	At least Para. [027], [029], [055]–[057], [092]–[093], [096], [0105]–[0110], [129], [0146] (claim 19–25); FIG. 1, 4, 7–8. “The WS-based Guest Survey Module (GSM) of the current invention allows merchants to integrate a GSM into their branded website allowing integration to both survey templates and actual check details.” ¶ [090].	At least Para. [0062]–[0065], [0099], [00105]; Claim 1(c); FIGS. 2, 4–5. “The WS-based Customer Survey Module (GSM) of the current invention allows merchants to integrate a GSM into their branded website allowing integration to both survey templates	At least Para. [068]–[071], [0105]; Claim 1; FIGS. 2, 4–5. “The WS-based Customer Survey Module (GSM) of the current invention allows merchants to integrate a GSM into their branded website allowing integration to both survey templates and actual check

Module to display the at least one first and second Survey Question as an integrated component within the graphical user interface; (v) generating a Respondent Header based on user-generated inputs in response to the at least one Survey Question; and (vi) transmitting the Respondent Header to the survey server computing device.	customer browser 130.” ¶ [0063]. “Respondent Header — the response header is generated by the customer respondent and contains the information about the survey response itself; a survey is likely to have many responses, but there should only be one response per unit/customer/check instance.” ¶ [0106].	“ Respondent Header - the response header is generated by the guest respondent and contains the information about the survey response itself; a survey is likely to have many responses, but there should only be one response per unit/guest/check instance.” ¶ [096].	and actual check details.” ¶ [0099]. “ Respondent Header - the response header is generated by the customer respondent and contains the information about the survey response itself.” ¶ [00105].	details.” ¶ [0105]. “ Respondent Header - the response header is generated by the customer respondent and contains the information about the survey response itself.” ¶ [0111].
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Substitute claim 21	Support in originally filed ‘811 Specification	Support in the ‘043 Application	Support in the ‘611 Patent	Support in the ‘434 Application
The system of claim 20, wherein:	At least Para. [0063], [00100]; Claim 2; FIG.	At least Para. [090]; FIG. 1. “The WS-based Guest	At least Para. [0064], [0099]; Claim 2; FIG. 2.	At least Para. [070], [0105]; Claim 1; FIG. 2. “The WS-

(a) the vendor survey interface is implemented as a web server computing device; (b) the graphical user interface is a host vendor webpage; (c) and the Survey Module is a webpage frame configured for display as an integrated component of the host vendor webpage.	2. “The WS-based Customer Survey Module (GSM) of the current invention allows merchants to integrate a GSM into their branded website.” ¶ [00100]. “[T]hese questions are then formatted into web pages 160 that can be embedded into a merchant’s branded website and sent to the customer browser 130.” ¶ [0063].	Survey Module (GSM) of the current invention allows merchants to integrate a GSM into their branded website.” ¶ [090]. “[A] method of providing a web-service (WS) that allows merchants . . . to integrate a check-level survey module into their own branded web-site.” ¶ [010].	“The WS-based Customer Survey Module (GSM) of the current invention allows merchants to integrate a GSM into their branded website.” ¶ [0099]. “[T]hese questions are then formatted into web pages 160 which are then sent to browser 130.” ¶ [0064].	based Customer Survey Module (GSM) of the current invention allows merchants to integrate a GSM into their branded website.” ¶ [0105]. “[T]hese questions are then formatted into web pages 160 which are then sent to browser 130.” ¶ [070].
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Substitute claim 22	Support in originally filed ‘811 Specification	Support in the ‘043 Application	Support in the ‘611 Patent	Support in the ‘434 Application
The system of claim 20, wherein the point-of-sale interface is implemented	At least Para. [0029]; Claim 3; FIG. 2. “POS client 100 includes point of sales	At least Para. [025]; FIG. 1. “POS client 100 includes point of sales (POS)	At least Para. [0030]; Claim 3; FIG. 2. “POS client 100 includes point of sales	At least Para. [036]; Claim 1; FIG. 2. “POS client 100 includes point of sales

as a point-of-sale computing device.	(POS) terminal 105, purchase detail component 110, purchase system client to server interface 115.” ¶ [0029].	terminal 105, purchase detail component 110, purchase system client to server interface 115 and web pages 160.” ¶ [025].	(POS) terminal 105 , purchase detail component 110 , purchase system client to server interface 115 and web pages 160. ” ¶ [0030].	(POS) terminal 105 , purchase detail component 110 , purchase system client to server interface 115 and web pages 160. ” ¶ [036].
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Substitute claim 23	Support in originally filed ‘811 Specification	Support in the ‘043 Application	Support in the ‘611 Patent	Support in the ‘434 Application
The system of claim 22, wherein (a) the point-of-sale computing device transmits the transaction data to a cloud server, and (b) the survey server computing device is configured to receive and store the transaction data transmitted by	At least Para. [0030], [0059]; Claim 4; FIG. 2. “The purchase detail component 110 may store transaction data locally to a POS device, a merchant server, or to a remote location, such as a cloud service provider.” ¶ [0030]. “In one embodiment of the	At least Para. ¶¶ [046]–[048].	At least Para. [0055], [0059]; Claim 4. “In one embodiment of the invention, purchase detail is forwarded to the server at the time of the purchase.” ¶ [0059].	At least Para. [061], [065]. “In one embodiment of the invention, purchase detail is forwarded to the server at the time of the purchase.” ¶ [065].

the cloud server.	invention, purchase detail is forwarded by the POS terminal 105 to a cloud service provider or the server 140 at the time of the purchase.” ¶ [0059].			
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Substitute claim 24	Support in originally filed ‘811 Specification	Support in the ‘043 Application	Support in the ‘611 Patent	Support in the ‘434 Application
The system of claim 20, wherein vendor survey interface is implemented as a software application running on a mobile computing device, and the survey token is input by the consumer to the vendor survey interface.	At least Para. [0062], [00102]; Claim 5; FIG. 5. “[C]heck information and the token can be provided electronically such as through email or the use of a mobile application.” ¶ [00102]. “Inputting the survey token into the customer	At least Para. [092]; FIG. 4. “[C]heck information and the token can be provided electronically such as through email or the use of a mobile application.” ¶ [092].	At least Para. [0062], [00101]; Claim 4; FIG. 5. “[C]heck information and the token can be provided electronically such as through email or the use of a mobile application.” ¶ [00101]. “Inputting the survey token into the customer	At least Para. [068], [0107]; Claim 1; FIG. 5. “[C]heck information and the token can be provided electronically such as through email or the use of a mobile application.” ¶ [0107]. “Inputting the survey token into the customer response

	response client may be done in many ways, including entering the survey token on a keyboard, using a computer on which the survey token was stored as a cookie or otherwise, scanning a bar code, swiping a loyalty card containing the survey token, etc.” ¶ [0062].		response client may be done in many ways, including entering the survey token on a keyboard.” ¶ [0062].	client may be done in many ways, including entering the survey token on a keyboard.” ¶ [068].
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Substitute claim 25	Support in originally filed ‘811 Specification	Support in the ‘043 Application	Support in the ‘611 Patent	Support in the ‘434 Application
The system of claim 20, wherein the survey token comprises a combination of	At least Para. [0031], [00102]; Claim 6. “The token can also be a composite of multiple types of data. For example, the token can comprise a facility identification	At least Para. [092]. “[T]his token is preferably a concatenation of UNIT+DATE+CHECK” ¶ [092].	At least Para. [0031], [00101]; Claim 6. “The token can also be a composite of several different pieces of data. For example, the token can comprise a facility identification	At least Para. [037], [0107]. “The token can also be a composite of several different pieces of data. For example, the token can comprise a facility identification number,

purchas e detail identi fiers that identify the comme rcial transact ion.	number, transaction number (e.g., a receipt or check number), and transaction date.” ¶ [0031]. “this token is preferably a concatenation of STORE+DATE +CHECK” ¶ [00102].		number, transaction number and transaction date.” ¶ [0031]. “[T]his token is preferably a concatenation of STORE+DATE +CHECK” ¶ [00101].	transaction number and transaction date.” ¶ [037]. “[T]his token is preferably a concatenation of STORE+DATE +CHECK” ¶ [0107].
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Substitute claim 26	Support in originally filed ‘811 Specification	Support in the ‘043 Application	Support in the ‘611 Patent	Support in the ‘434 Application
The system of claim 20, wherein the point-of-sale interface and the vendor survey interface are both implemented as a software application running on a mobile computing device.	At least Para. [0029], [0062], [00102]; Claim 7. Mobile application disclosed at ¶ [00102]; POS terminal disclosed at ¶ [0029].	At least Para. [025], [092]. Mobile application disclosed at ¶ [092]; POS terminal disclosed at ¶ [025].	At least Para. [0030], [0062], [00101]; Claim 7. Mobile application disclosed at ¶ [00101]; POS terminal disclosed at ¶ [0030].	At least Para. [036], [068], [0106]; Claim 1. Mobile application disclosed at ¶ [0107]; POS terminal disclosed at ¶ [036].

Substitute claim 27	Support in originally filed ‘811 Specification	Support in the ‘043 Application	Support in the ‘611 Patent	Support in the ‘434 Application
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The system of claim 20, wherein: (a) the campaign data structure further comprises an Exit Page that points to a webpage address and a second configurable Condition that is satisfied based on a Survey Question response; (b) the display screen that displays the graphical user interface is an integrated component of a customer response client computing device, and the graphical user interface is displayed by a web browser integrated with the	At least Para. [0092], [00108]; Claim 8. “An Exit Page selection as part of the survey design determines where the customer response client 120 browser 130 will be directed following the completion of a survey... The Exit Page can likewise be associated with a Condition.” ¶ [0092].	At least Para. [0130]–[0131], [0136], Fig. 2, 6 (forwarding promotion to browser after survey completion). “The submit page provides the guest a last point before submitting the comment, and the Thank you page provides a simple thank you statement.” ¶ [0136]	At least Para. [00107]. (The specification includes the Survey Header with CkDetails Exist Action and CkDetails Missing Action).	At least Para. [0113]. (The specification includes the Survey Header with CkDetails Exist Action and CkDetails Missing Action).
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customer response client computing device; and wherein (c) the survey server computing device is further configured to perform the operation of incorporating within the Survey Module software code that redirects the web browser of the customer response client computing device to the Exit Page, if the second configurable Condition is satisfied.				
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Substitute claim 28	Support in originally filed '811 Specification	Support in the '043 Application	Support in the '611 Patent	Support in the '434 Application
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The system of claim 20, wherein: (a) the survey server computing device further comprises an Attribute Group database comprising one or more purchase detail identifiers sharing a preselected attribute; (b) the campaign data structure further comprises a second configurable condition that is satisfied if a certain purchase detail identifier shares the preselected attribute; and (c) the survey server computing	At least Para. [0064], [0089], [0109]; Claim 9. “The Campaign data structure is comprised of a series of actions that can be organized into Attribute Groups where the actions include Survey Questions, Conditions, Exit Pages, Events, and Incentives.” ¶ [0064]. “The configurable Conditions allow survey organization into Attribute Groups, such as creating a Condition that all facilities of a certain size range will utilize a given set of survey questions.” ¶ [0109].	(Provisional uses “smart groups” rather than “Attribute Groups” but discloses grouping by shared attributes.) ¶ [096].	At least Para. [0028]–[0029], [00107]. (The specification uses “smart groups” with the functionality of grouping identifiers by shared attributes.)	At least Para. [034]–[035], [0111]–[0113]. (The specification uses “smart groups” with the functionality of grouping identifiers by shared attributes.)
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device is further configured to perform the operations of (E) determining whether the transaction data includes the certain purchase detail identifier that shares the preselected attribute such that the second configurable Condition is satisfied, and (F) if the second configurable Condition is satisfied, generating a second Survey Question using the survey question data and the certain purchase detail identifier.				
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Substitute claim 29	Support in originally filed '811 Specification	Support in the '043 Application	Support in the '611 Patent	Support in the '434 Application
The system of claim 20, wherein: (a) the purchase detail identifiers comprise a product/service identifier that represents a products/service available for purchase through the vendor; and (b) the Survey Question comprises a Product Survey Question relating to the product/service.	At least Para. [0024], [0069]–[0070], [0090]; Claim 10; FIG. 6.	At least Para. [045], [061]–[066]; FIG. 5.	At least Para. [0069]–[0070]; Claim 10; FIG. 6.	At least Para. [075]–[076]; Claim 1; FIG. 6.

Substitute claim 30	Support in originally filed '811 Specification	Support in the '043 Application	Support in the '611 Patent	Support in the '434 Application
The system of claim 20, wherein: (a) the purchase detail identifiers comprise a vendor facility	At least Para. [0024], [0069]; Claim 11; FIG. 6. Vendor facility identifiers disclosed.	At least Para. [045]; FIG. 5. Vendor facility identifiers disclosed.	At least Para. [0069]; Claim 11; FIG. 6. Vendor facility identifiers disclosed.	At least Para. [037], [075]; Claim 1; FIG. 6. Vendor facility identifiers disclosed.

identifier that represents a vendor facility used by the vendor for commercial transactions; and (b) the Survey Question comprises a Facility Survey Question relating to the vendor facility.				
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Substitute claim 31	Support in originally filed '811 Specification	Support in the '043 Application	Support in the '611 Patent	Support in the '434 Application
The system of claim 20, wherein: (a) the purchase detail identifiers comprise a vendor personnel identifier identifying vendor personnel; and (b) the Survey Question	At least Para. [0024], [0069]; Claim 12; FIG. 6. Vendor personnel identifiers disclosed.	At least Para. [044]–[045]; FIG. 5. Vendor personnel (employees on duty) disclosed.	At least Para. [0069]; Claim 9; FIG. 6. Vendor personnel identifiers disclosed.	At least Para. [037], [075]; Claim 1; FIG. 6. Vendor personnel identifiers disclosed.

comprises a Vendor Personnel Survey Question relating to the vendor personnel.				
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Substitute claim 32	Support in originally filed '811 Specification	Support in the '043 Application	Support in the '611 Patent	Support in the '434 Application
The system of claim 20, wherein: (a) the purchase detail identifiers comprise a service mode identifier that represents a mode of service; and (b) the Survey Question comprises a Service Mode Survey Question relating to the mode of service.	At least Para. [0069]; Claim 13; FIG. 6. Service mode identifiers disclosed.	At least Para. [045]; FIG. 5. Mode of service delivery disclosed.	At least Para. [0069], [0074]; Claim 12; FIG. 6. Service mode identifiers disclosed.	At least Para. [08], [075]; FIG. 6. Service mode identifiers disclosed.

Substitute claim 33	Support in originally filed '811 Specification	Support in the '043 Application	Support in the '611 Patent	Support in the '434 Application
The system of claim 29, wherein: (a) the purchase detail identifiers further comprise at least one vendor facility identifier that represents a vendor facility where the commercial transaction occurred; (b) the campaign data structure comprises a second configurable Condition that is satisfied by the detection of a given vendor facility identifier; (c) the survey server computing device is configured to	At least Para. [0069], [0090]; Claim 14; FIG. 6. Second configurable Condition for vendor facility identifier disclosed.	At least Para. [061]–[066]; FIG. 5. Facility-based question generation disclosed.	At least Claim 6.	At least Claim 2.

perform the further operations comprising (E) determining whether the transaction data includes the given vendor facility identifier such that the second configurable Condition is satisfied, and if the second configurable Condition is satisfied, generating a Facility Survey Question using the survey question data and the given facility identifier, and (F) incorporating within the Survey Module software code for displaying the Facility				
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Survey Question.				
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Substitute claim 34	Support in originally filed '811 Specification	Support in the '043 Application	Support in the '611 Patent	Support in the '434 Application
The system of claim 33, wherein: (a) the purchase detail identifiers further comprise at least one internal facility location identifier identifying an internal location within a vendor facility; (b) the campaign data structure comprises a third configurable Condition that is satisfied by the detection of a given internal facility	At least Para. [0069]; Claim 15; FIG. 6. Third configurable Condition for internal facility location identifier disclosed.	At least Para. [045]; FIG. 5. Internal facility location (e.g., table number) disclosed.	At least Claim 7.	At least Claim 2.

location identifier; (c) the survey server computing device is configured to perform the further operations comprising (G) determining whether the transaction data includes the given internal facility location identifier such that the third configurable Condition is satisfied, and if the third configurable Condition is satisfied, generating an Internal Facility Survey Question using the survey question data and the given internal				
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facility location identifier, and (H) incorporating within the Survey Module software code for displaying the Internal Facility Survey Question.				
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Substitute claim 35	Support in originally filed '811 Specification	Support in the '043 Application	Support in the '611 Patent	Support in the '434 Application
The system of claim 20, wherein: (a) the survey question data includes at least one General Survey Question that is not specific to the transaction data; and (b) the survey server computing device is further configured to	At least Para. [0089]; Claim 16. General Survey Questions not specific to transaction data disclosed.	At least Para. [061]–[066]; FIG. 5. General questions not specific to purchase detail disclosed.	At least Claim 10. General Survey Questions not specific to transaction data disclosed.	At least Claim 1. General Survey Questions not specific to transaction data disclosed.

perform the operation of incorporating within the Survey Module software code for displaying the at least one General Survey Question.				
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Substitute claim 36	Support in originally filed '811 Specification	Support in the '043 Application	Support in the '611 Patent	Support in the '434 Application
The system of claim 20, wherein the Campaign data structure further comprises a Max Question configurable Condition setting a maximum number of survey questions included within the Survey Module.	At least Para. [0071], [00108]; Claim 17. "At block 525, a determination is made as to whether either no more transaction lines exist for the purchase or whether a maximum number of questions have been generated regarding the purchase." ¶ [0071].	(Not explicitly disclosed in the provisional in the same terms.)	At least Claim 13. "[T]he vendor preference data further comprises a Max Question value setting a maximum number of survey questions included within the Survey Module." Claim 13.	At least Para. [079], FIG. 6.

Substitute claim 37	Support in originally filed '811 Specification	Support in the '043 Application	Support in the '611 Patent	Support in the '434 Application
The system of claim 20, wherein: (a) the Campaign data structure further comprises an Event that triggers an electronic notification transmitted to a vendor representative and a second configurable Condition that is satisfied based on a Survey Question response; and wherein (b) the survey server computing device is further configured to perform the operations of (E) incorporating	At least Para. [0093], [00108]; Claim 18. “The Campaign design can also include Event actions associated with a Condition that trigger a particular response or communication. For instance, an Event may be classified as a concern, response, or recovery.” ¶ [0093]. Campaign data structure includes “Events” and “configurable Conditions.” ¶ [00108].	(Provisional does not explicitly use “Event” terminology in the same Campaign context.)	At least Para. [00106]–[00107] (Discloses notification/alert functionality based on survey responses.).	[0112]–[00113] (Discloses notification/alert functionality based on survey responses.).

within the Survey Module software code that determines whether the second configurable Condition is satisfied, and (F) that implements the Event to transmit an electronic notification to the vendor representative, if the second configurable condition is satisfied.				
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Substitute Claim 38	Support in originally filed '811 Specification	Support in the '043 Application	Support in the '611 Patent	Support in the '434 Application
A computer-implemented method for providing transaction-specific surveys comprising	<i>Same specification support as substitute claim 20.</i> At least Para. [007]–[0011]; Claim 19; FIGS. 1–4.	<i>Same specification support as substitute claim 20. Method steps are disclosed in ¶ [0062]–[0070] and FIG. 4–6 flowcharts.</i> At least Abstract; Para. [02], [09]–	<i>Same specification support as substitute claim 20. Method steps are disclosed in ¶ [068]–</i>	<i>Same specification support as substitute claim 20. Method steps are disclosed in ¶ [055]–</i>

the operations of:		[010], [0146] (claims 1-25); FIGS. 1-7-8.	[076] and FIG. 4-6 flowchart.	[063] and FIG. 4-5 flowchart.
			At least Para. [0030], [0034], [0055], [0062]-[0064]; Claim 14; FIGS. 1-6.	At least Para. [036], [040], [061], [068]-[070]; Claim 1; FIGS. 1-6.
(a) providing a survey server configured to receive and store transaction data generated by a point-of-sale interface relating to a commercial transaction between a consumer and a vendor, wherein	At least Para. [0030], [0034], [0055]; Claim 19(a); FIGS. 1-2. "POS terminal 105 represents anywhere a purchase takes place Purchase detail component 110 collects transaction information that may include price, quantity, and name of each item purchased, time and date of purchase, employees on duty, and/or any other relevant information associated with a purchase." ¶	At least Para. [06], [025]-[027], [036], [043], [0146] (claims 19, 22); FIGS. 1-2. "POS terminal 105 represents anywhere a purchase takes place Purchase detail component 110 collects transaction information that may include price, quantity, and name of each item purchased, time and date of purchase, employees on duty, and/or any other relevant information associated with a purchase." ¶ [025]. "[W]hen a guest uses a loyalty card or some other means of	At least Para. [0030], [0034], [0055]; Claim 14(a); FIGS. 1-2. "POS terminal 105 represents anywhere a purchase takes place Purchase detail component 110 collects transaction information that may include price, quantity,	At least Para. [036], [040], [061]; Claim 1; FIGS. 1-2. "POS terminal 105 represents anywhere a purchase takes place Purchase detail component 110 collects transaction information that may include price, quantity, and name of each

	[0030]. “When a customer uses a loyalty card or some other means of identification during the purchase, purchase detail component 110 may collect a survey token that identifies the particular customer or transaction.” ¶ [0030].	identification during the purchase, purchase detail component 110 may collect a survey token that identifies the particular guest.” ¶ [025].	and name of each item purchased, time and date of purchase, employees on duty, and/or any other relevant information associated with a purchase.” ¶ [0030]. “[W]hen a customer uses a loyalty card or some other means of identification during the purchase, purchase detail component 110 may collect a survey token that identifies the particular	item purchased, time and date of purchase, employees on duty, and/or any other relevant information associated with a purchase.” ¶ [036]. “[W]hen a customer uses a loyalty card or some other means of identification during the purchase, purchase detail component 110 may collect a survey token that identifies the particular customer.” ¶ [036].
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			customer.” ¶ [0030].	
(i) the transaction data comprises purchase detail identifiers and a survey token; and	At least Para. [0030]; Claim 19(a)(i); FIGS. 1–2. “[A] ‘token’ can be any identifying information that identifies a particular customer or transaction. In the case of a customer token, for example, the token can be a unique identifier generated at the point of sale or the token can be a loyalty program account number.” ¶ [0030].	At least Para. [025]–[027], [036], [047], [092]–[093], [0146] (claim 1, 5); FIG. 1. “The survey invitation begins with a survey token being generated by the POS, this token is preferably a concatenation of UNIT+DATE+CHECK, and presented on the guest check.” ¶ [092].	At least Para. [0030]; Claim 14(a)(i); FIGS. 1–2. “[A] ‘token’ can be any identifying information that is unique to a particular customer or transaction. In the case of a customer token, for example, the token can be a unique identifier generated at the point of sale or the token can be a loyalty program account number.” ¶ [0030].	At least Para. [036]; Claim 1; FIGS. 1–2. “[A] ‘token’ can be any identifying information that is unique to a particular customer or transaction. In the case of a customer token, for example, the token can be a unique identifier generated at the point of sale or the token can be a loyalty program account number.” ¶ [036].
(ii) the survey	At least Para. [0024]–[0025],	At least Para. [027], [063], [074]–[081],	At least Para.	At least Para. [040],

server comprises (A) a vendor database storing a plurality of purchase detail identifiers, and (B) a campaign data structure having survey question data and a configurable Condition that is satisfied by the detection of a given purchase detail identifier;	[0034], [0064], [0090]; Claim 19(a)(ii); FIG. 1. “Purchase question generator module 150 generates questions based on purchase information stored in purchase detail table 170 and preference data associated with merchant preferences. The merchant preferences can be formatted as a Campaign, which is a data structure that includes Conditions, Survey Questions, Events, Incentives, Exit Pages, groupings and general logic utilized in constructing Survey Questions.” ¶ [0034]. “A wide variety of configurable	[080], [096], [0102], [0146] (claim 1–2, 15, 25); FIG. 1. “Purchase question generator module 150 generates questions based on purchase information stored in purchase detail table 170 and preference data associated with merchant preferences.” ¶ [027]. “When an item in the transaction line matches a merchant’s specified category, a question about the item may be generated depending on preference data associated with merchant preferences.” ¶ [063].	[0034], [0064]; Claim 14(a)(ii); FIG. 1. “Purchase question generator module 150 generates questions based on purchase information stored in purchase detail table 170 and preference data associated with merchant preferences.” ¶ [0034].	[070]; Claim 1; FIG. 1. “Purchase question generator module 150 generates questions based on purchase information stored in purchase detail table 170 and preference data associated with merchant preferences.” ¶ [040].
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	Conditions can be specified as part of the Campaign. Typical Conditions can include, for instance, determining whether: (i) the transaction data includes a particular product/service identifier.” ¶ [0090].			
(b) receiving by the survey server, a survey token;	At least Para. [0063], [00102]–[00103]; Claim 19(b); FIGS. 2–3, 6. “At block 410, the customer response client forwards the survey token to the server.” ¶ [0063].	At least Para. [054]–[055], [0146] (claim 1, 12); FIG. 1, 4. “At block 405, a survey token is inputted into a guest response client.” ¶ [054]. “At block 410, the guest response client forwards the survey token to the server.” ¶ [055].	At least Para. [0062]–[0063]; Claim 14(b); FIGS. 2, 5. “At block 405, a survey token is inputted into a customer response client.” ¶ [0062]. “At block 410, the customer response client forwards	At least Para. [068]–[0069]; Claim 1; FIGS. 2, 5. “At block 405, a survey token is inputted into a customer response client.” ¶ [068]. “At block 410, the customer response client forwards the survey

			the survey token to the server.” ¶ [0063].	token to the server.” ¶ [069].
(c) retrieving by <u>the</u> survey server, the transaction data having the stored survey token corresponding to the received survey token;	At least Para. [0063]; Claim 19(c); FIGS. 2, 5. “At block 415, the server retrieves purchase detail associated with the survey token and retrieves the associated Campaign data structure.” ¶ [0063].	At least Para. [056], [058], [061], [0146] (claim 1, 5, 13, 15); FIG. 5, 7. “[T]he server retrieves purchase detail associated with the survey token and generates questions for the purchase [S]erver 140 uses the survey token to retrieve related purchase information in purchase detail table 170.” ¶ [056].	At least Para. [0064]; Claim 14(c); FIGS. 2, 5. “[T]he server retrieves purchase detail associated with the survey token and generates questions for the purchase . . . for the purchase . . . [S]erver 140 uses the survey token to retrieve related purchase information in purchase detail table 170.” ¶ [0064].	At least Para. [070]; Claim 1; FIGS. 2, 5. “[T]he server retrieves purchase detail associated with the survey token and generates questions for the purchase . . . [S]erver 140 uses the survey token to retrieve related purchase information in purchase detail table 170.” ¶ [070].
(d) determining by <u>the</u>	At least Para. [0090]–[0091]; Claim 19(d);	At least Para. [045], [061]–[066], [083], [0146] (claim 1, 3,	At least Para. [0064];	At least Para. [070]; Claim 1;

survey server, whether the transaction data includes the given purchase detail identifier such that the configurable Condition is satisfied, and if the configurable Condition is satisfied, generating a <u>first</u> Survey Question using the survey question data and the purchase detail identifier;	FIG. 6. “A wide variety of configurable Conditions can be specified as part of the Campaign. Typical Conditions can include, for instance, determining whether: (i) the transaction data includes a particular product/service identifier.” ¶ [0090]. “The Survey Question is then associated with the Condition that the Survey Question is only asked when the transaction data includes certain information, such as only asking ‘How was your taco salad?’ when the transaction data indicates that the customer purchased a taco salad.” ¶ [0091].	13, 15); FIG. 5. “When an item in the transaction line matches a merchant’s specified category, a question about the item may be generated depending on preference data associated with merchant preferences.” ¶ [063]. “[T]he purchase detail can be used to generate customized questionnaires automatically.” ¶ [045].	Claim 14(d); FIG. 6. “[T]he server retrieves purchase detail associated with the survey token and generates questions for the purchase [P]urchase question generator module 150 generates questions based on the detail retrieved.” ¶ [0064].	FIG. 6. “[T]he server retrieves purchase detail associated with the survey token and generates questions for the purchase [P]urchase question generator module 150 generates questions based on the detail retrieved.” ¶ [070].
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(e) generating by the survey server, a Survey Module comprising software code for (i) displaying the at least one <u>first</u> Survey Question as an integrated component within a graphical user interface, and (ii) <u>implementing branching logic that displays a second Survey Question based on a first user-generated input in response to the first Survey Question;</u>	At least Para. [009], [0065], [0073], [0091]; Claim 19(e); FIGS. 2, 6. “[T]he survey may be assembled into an autonomous, self-contained, web-container package with branching logic that changes the questions presented or the order of the questions presented based upon a survey respondent’s answers to prior survey questions.” ¶ [0065].	At least Para. [010], [027], [056]–[057], [068]–[069], [074]–[081], [090], [0118]–[0131] [0146] (claim 1, 3, 14, 20); FIG. 4–5, 7. “[T]he server retrieves purchase detail associated with the survey token and generates questions for the purchase [T]hese questions are then formatted into web pages 160 which are then sent to browser 130.” ¶ [056]. “[W]herein each received response is employed as feedback in the generation of each related question in each subsequent survey.” Claim 3. “[W]herein each response is employed in the generation of related questions in each subsequent survey” Claim 20.	At least Para. [0064]; Claim 14(e); FIGS. 2, 5. “[T]hese questions are then formatted into web pages 160 which are then sent to browser 130.” ¶ [0064].	At least Para. [070]; Claim 20(e); FIGS. 2, 5. “[T]hese questions are then formatted into web pages 160 which are then sent to browser 130.” ¶ [070].
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(f) transmitting by the survey server, the Survey Module to a vendor survey interface; and	At least Para. [0073]; Claim 19(f); FIGS. 2, 6. “[T]he server 140 sends the generated questions to the customer response client computer 120 . The server 140 may do so by populating the merchant’s web pages 160 that the client computer 120 accesses.” ¶ [0073].	At least Para. [056]–[057], [0067] [0146] (claim 1); FIG. 1, 5. “[T]he server sends the generated questions to the client computer. The server may do so by populating the merchant’s web pages 160 that the client computer accesses.” ¶ [067].	At least Para. [0064]; Claim 14(f); FIGS. 2, 5. “[T]hese questions are then formatted into web pages 160 which are then sent to browser 130 .” ¶ [0064].	At least Para. [070]; Claim 1; FIGS. 2, 5. “[T]hese questions are then formatted into web pages 160 which are then sent to browser 130 .” ¶ [070].
(g) receiving by the survey server, a Respondent Header generated based on user-generated inputs in response to the at least one Survey Question.	At least Para. [00106], [00118]–[00120], [00121]–[00122]; Claim 19(g). “ Respondent Header - the response header is generated by the customer respondent and contains the information about the survey response itself; a survey is likely to have many responses, but	At least Para. [057]–[058], [096], [107], [0105]–[0110]; FIG. 7–8. “ Respondent Header - the response header is generated by the guest respondent and contains the information about the survey response itself; a survey is likely to have many responses, but there should only be one response per unit/guest/check instance.” ¶ [096].	At least Para. [00105]; Claim 14(g). “ Respondent Header - the response header is generated by the customer respondent and contains the information about the survey	At least Para. [0111]; Claim 1. “ Respondent Header - the response header is generated by the customer respondent and contains the information about the survey response

	there should only be one response per unit/customer/check instance.” ¶ [00106].		response itself.” ¶ [00105].	itself.” ¶ [0111].
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