

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KAHOOT! AS
Petitioner

v.

INTERSTELLAR INC.
Patent Owner

Patent No. 10,339,825

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 10,339,825**

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Ex. 1003	Curriculum Vitae of Gregory Abowd, Ph.D.
Ex. 1004	Prosecution History of U.S. Patent No. 10,339,825
Ex. 1005	U.S. Patent No. 8,231,470 to Feeney et al.
Ex. 1006	U.S. Patent No. 10,861,343 to Rogers et al.
Ex. 1007	U.S. Patent Pub. No. 2004/0004325 to Maurseth et al.
Ex. 1008	U.S. Application No. 11/539,179 to Feeney, filed January 3, 2007
Ex. 1009	U.S. Patent No. 6,752,396 to Smith
Ex. 1010	U.S. Patent No. 6,086,381 to Downs et al.
Ex. 1011	U.S. Pat. Pub. No. 2010/0030578 to Siddique et al.
Ex. 1012	U.S. Patent Pub. No. 2009/0104591 to Panetta
Ex. 1013	Exhibit 2 attached to Complaint in <i>Interstellar Inc. v. Kahoot! EDU, Inc. et al</i> , Case No. 1:24-cv-00727-JRP (W.D. Tex.)

I. INTRODUCTION

Kahoot! AS (“Petitioner”) respectfully requests *inter partes* review of claims 1-5, 9, 11, 14-18, 22, and 24 (the “challenged claims”) of U.S. Patent No. 10,339,825 (the “’825 patent”) (Ex. 1001) assigned to Interstellar Inc (“Patent Owner”).

II. MANDATORY NOTICES

Real Parties-in-Interest: Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioner identifies the following as the real parties-in-interest: Kahoot! EDU, Inc. and Kahoot! AS, which is wholly-owned by Kangaroo HoldCo AS.

Related Matters: The ’825 patent is asserted in the following civil action: *Interstellar Inc. v. Kahoot! EDU, Inc. et al.*, Case No. 1:24-cv-00727-JRP (W.D. Tex.). The ’825 patent originated from U.S. Patent Application No. 13/439,305, filed on April 4, 2012. (Ex. 1001, Cover.)

Counsel and Service Information: Lead counsel is Rudolph Y. Kim (Reg. No. 44,831). Backup counsel are Chetan Bansal (Reg. No. 81,590) and Maksim Mints (Reg. No. 78,507). Service information is Paul Hastings LLP, 2050 M Street NW, Washington, D.C. 20036, Tel.: 202.551.1700, Fax: 202.551.1705, email: PH-Kahoot-Interstellar-IPR@paulhastings.com. Petitioner consents to electronic service.

III. PAYMENT OF FEES UNDER 37 C.F.R. §§ 42.15 AND 42.103

The PTO is authorized to charge any fees due during this proceeding to Deposit Account No. 50-2613.

IV. GROUNDS FOR STANDING

Petitioner certifies under 37 C.F.R. § 42.104(a) that the '825 patent is available for review and Petitioner is not barred or estopped from requesting review on the grounds identified herein.

V. PRECISE RELIEF REQUESTED AND GROUNDS RAISED

Petitioner respectfully requests review of claims 1-5, 9, 11, 14-18, 22, and 24 of the '825 patent and cancellation of these claims as unpatentable. The challenged claims should be found unpatentable on the following grounds:

Ground 1: Claims 1-5, 9, 14-18, and 22 are unpatentable under pre-AIA 35 U.S.C. § 103(a) as rendered obvious by U.S. Pat. No. 8,231,470 to Feeney *et al.* ("Feeney") (Ex. 1005) in combination with U.S. Pat. No. 10,861,343 to Rogers *et al.* ("Rogers") (Ex. 1006).

Ground 2: Claims 9 and 22 are unpatentable under pre-AIA 35 U.S.C. § 103(a) as rendered obvious by Feeney, Rogers, and U.S. Pat. No. 6,086,381 to Downs *et al.* ("Downs") (Ex. 1010).

Ground 3: Claims 11 and 24 are unpatentable under pre-AIA 35 U.S.C. § 103(a) as rendered obvious by Feeney, Rogers, and U.S. Pat. Pub. No. 2010/0030578 to Siddique *et al.* (“Siddique”) (Ex. 1011).

Ground 4: Claims 1-5, 9, 14-18, and 22 are unpatentable under pre-AIA 35 U.S.C. § 103(a) as rendered obvious by Feeney, Rogers, U.S. Pat. Pub. No. 2004/0004325 to Maurseth (“Maurseth”) (Ex. 1007), and U.S. Pat. Pub. No. 2009/0104591 to Panetta (“Panetta”).

Ground 5: Claims 9 and 22 are unpatentable under pre-AIA 35 U.S.C. § 103(a) as rendered obvious by Feeney, Rogers, Maurseth, Panetta, and Downs.

Ground 6: Claims 11 and 24 are unpatentable under pre-AIA 35 U.S.C. § 103(a) as rendered obvious by Feeney, Rogers, Maurseth, Panetta, and Siddique.

The '825 patent has a filing date of April 4, 2012. Feeney was filed on October 16, 2009, and Rogers was filed on May 8, 2008. They are therefore prior art to the challenged claims under pre-AIA 35 U.S.C. § 102(e). Maurseth published on January 8, 2004, Downs published on July 11, 2000, Siddique published on February 4, 2010, and Panetta published on April 23, 2009. They are each prior art under pre-AIA 35 U.S.C. § 102(b).

Only Downs was considered by the Patent Office during prosecution of the '825 patent. (*See* Ex. 1001, cover.) Downs, however, is merely being relied upon

as a secondary reference in conjunction with other references not considered by the Office. Thus, a discretionary denial under 35 U.S.C. § 325(d) is not appropriate.

VI. LEVEL OF ORDINARY SKILL

A person of ordinary skill in the art at the time of the alleged invention of the '825 patent ("POSA") would have had an undergraduate degree in electrical engineering, computer engineering, computer science or a related field along with two years of work experience in the field of web-based technologies. (Ex. 1002, ¶¶16-18.)¹ More education can supplement practical experience and vice versa. (*Id.*)

VII. OVERVIEW OF THE '825 PATENT AND THE PRIOR ART

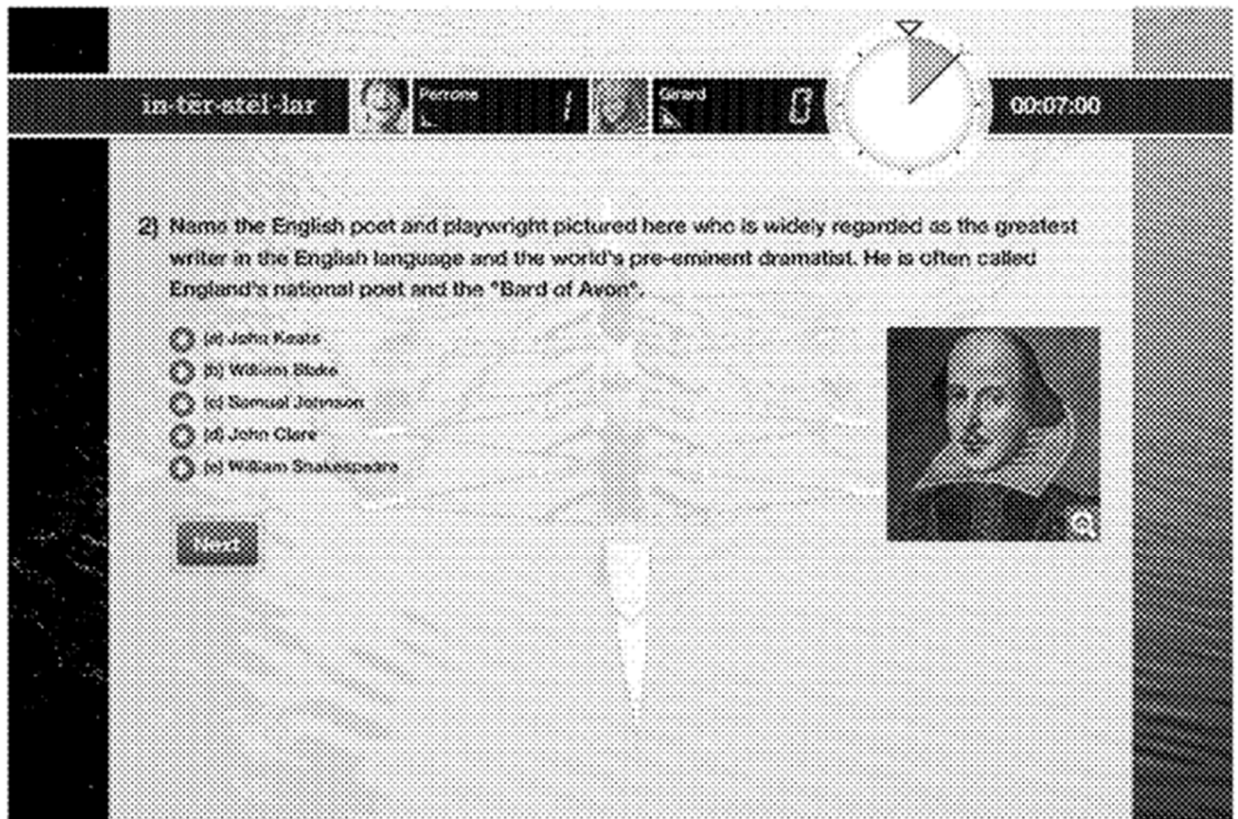
A. THE '825 PATENT

The '825 patent discloses a "web application [that] facilitates live on-line academic competition between teams and individuals." (Ex. 1001, Abs.; Ex. 1002, ¶¶26-29.) In one embodiment, the web application allows questions to be presented to the contestants and a scoreboard to be displayed on the contestant devices. (*Id.*, 2:29-58.) The system displays an individual score or a team score on the scoreboard. (*Id.*, 18:18-26, 32:22-28.) The scoreboard also displays a "time mechanism" that

¹ Petitioner submits herewith the declaration of Dr. Gregory Abowd (Ex. 1002), an expert in the field of the '825 patent. (Ex. 1002, ¶¶ 3-12; Ex. 1003.)

“shows where the Team member is in relation to his/her opponent, how much time has elapsed in the test and consecutively for each question, and whether he/she is on pace to finish on time.” (*Id.*, 17:29-38, 17:60-18:18.)

Figure 109 (reproduced below) “illustrates the scoreboard during a contest.” (*Id.*, 39:29.)



(*Id.*, FIG. 109.)

The scoreboard includes a “clock figure” and a “radius line inside the clock figure marks the proportion of time remaining in the competition.” (*Id.*, 17:62-65; *see also id.*, 38:33-38.) The “radius line rotates around the clock figure until no time remains.” (*Id.*, 17:65-66, 38:37-38.) The clock figure includes “marks around the

tube [to] represent each question.” (*Id.*, 18:3-4, 38:42-46.) “As soon as the radius line reaches a mark in the tube, the area behind it fills in as grey,” which “signifies that the average amount of time allotted for a particular question has elapsed.” (*Id.*, 18:4-11, 39:29-37.)

As explained below, neither of these features nor any limitations recited in the challenged claims is novel or non-obvious. (*Infra* Section IX; Ex.1002, ¶¶35-138.)

B. PROSECUTION HISTORY

The ’825 patent claims issued after patentee amended the claims to overcome various rejections. (Ex. 1004, 394-407, 464-474.) There was also an appeal to the Board in which the Examiner’s rejection under 35 U.S.C. § 101 was affirmed. (*Id.*, 262-277.) During prosecution, patentee made several remarks to distinguish the claims over the prior art. (*Id.*, 478.) Those remarks limit the scope of the claims, as discussed below in Section VIII.

C. FEENEY

Feeney discloses a system 10 that includes a server 12 for managing a contest among players over the internet. (Ex. 1005, 3:5-15, 3:39-54, 4:14-28, FIG. 1; Ex. 1002, ¶¶35-37.) As shown in Figure 1 (reproduced below), a plurality of players 31, 32, and 33 participate in a contest over the internet using their respective devices 21-24. The individual players may compete as part of teams, referred to as “rings.” (Ex. 1001, 9:7-17, 9:26-29, 17:41-44, 21:51-62 (“In any or all of the contests

described herein, players can . . . compete as part of a team (sometimes referred to herein as a ‘team-ring’) in which the rings compete against each other”).)

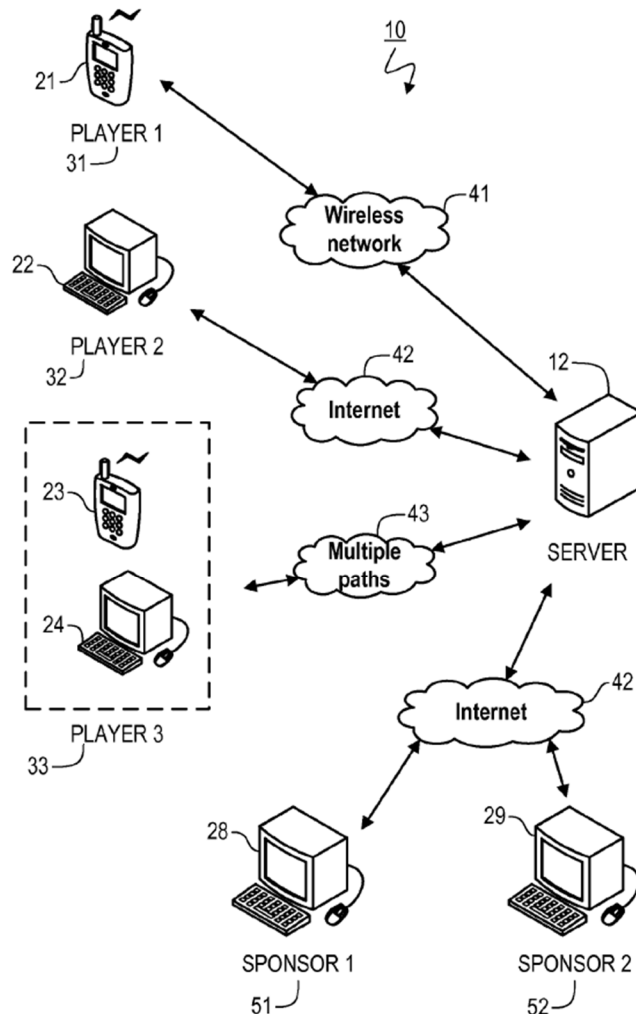
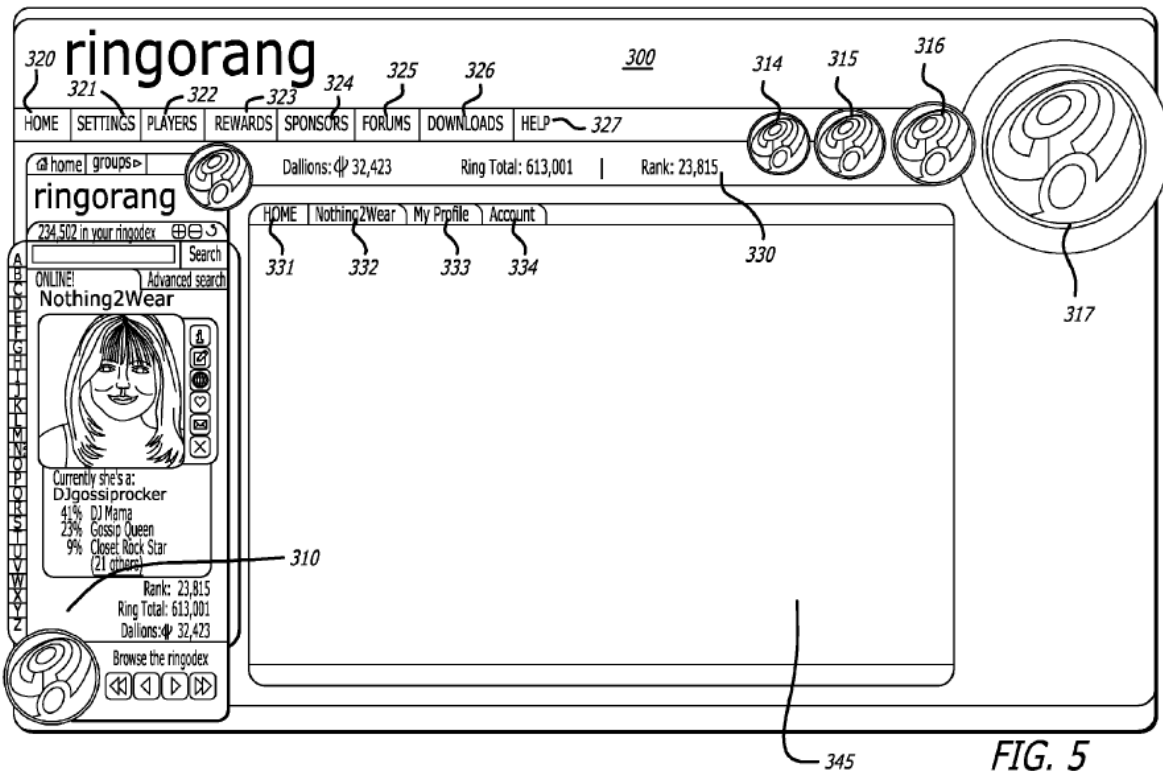


FIG. 1

(*Id.*, FIG. 1.)

As part of the contest, each of the players receives a stream of questions/problems on their respective device. (*Id.*, 3:10-15, 20:9-25, 20:47-60, 21:5-7.) Upon receiving responses to those questions, “server 12 preferably

calculates one or more performance indicia for each of the various players” or their teams; and provides such indicia for display on the player devices through a user interface. (*Id.*, 21:12-32; *see also id.*, 5:17-37, 12:55-13:24, 22:15-18.) An example of such a user interface is user interface 300 (described with reference to Figure 5 shown below), which can simply be a web page “provided entirely by server 12” or part of a stand-alone application on the user’s device. (*Id.*, 11:62-12:3, 10:54-11:62 (describing user interface 300), FIG. 5.)



(*Id.*, FIG. 5.)

VIII. CLAIM CONSTRUCTION

For IPR proceedings, the Board applies the claim construction standard set forth in *Phillips v. AWH Corp.*, 415 F.3d 1303 (Fed. Cir. 2005) (*en banc*). See 83 Fed. Reg. 51,340-59 (Oct. 11, 2018). Under *Phillips*, claim terms are typically given their ordinary and customary meanings, as would have been understood by a POSA, at the time of the invention, having taken into consideration the language of the claims, the specification, and the prosecution history of record. *Phillips*, 415 F.3d at 1313; see also *id.* at 1312-16. Other than one term identified below, the Board need not construe any other claim terms, as the claims are unpatentable under any reasonable construction. *Toyota Motor Corp. v. Cellport Systems, Inc.*, IPR2015-00633, Paper No. 11 at 16 (P.T.A.B. Aug. 14, 2015).²

Independent claim 1 recites “providing a real time scoreboard with time clock to each contestant processing device that *displays an individual contestant’s progress with respect to both the time frame for answering questions and questions answered correctly* while answering the series of questions during an academic

² Petitioner reserves all rights to raise claim construction and other arguments in other venues. Specifically, Petitioner is not conceding that each claim satisfies all statutory requirements, nor waiving any arguments concerning claim scope or grounds that can only be raised in district court.

competition.”³ (Ex. 1001, 40:63-41:1 (emphasis added).) Claim 14 recites the same limitation. (*Id.*, 42:54-59.) As explained below, displaying “*an individual contestant’s progress with respect to [] the time frame for answering questions*” while answering the series of questions presented to the contestant, should be construed as displaying the total time that is remaining or has elapsed for answering the series of questions, as opposed to displaying the time remaining or elapsed for each question in the series of questions. This construction is consistent with the claims, specification, and further supported by the patentee’s remarks during prosecution, where the patentee expressly distinguished prior art that shows the time remaining to answer an individual question instead of showing the total time remaining to answer all of an entire series of questions. (Ex. 1002, ¶¶30-34.)

The claim itself compels the proffered construction because it recites “presenting [] a *series of test questions* to the contestant processing devices of the individual contestants of competing teams for response in a *time frame allocated for the academic competition*” and “display[ing] an individual contestant’s progress with respect to [] *the time frame* for answering *questions*” (plural for the “series of test questions”) as opposed to reciting display of progress with respect to an individual question (singular). The specification also repeatedly explains that the

³ This limitation is analyzed in Section IX under [1.f].

invention allows the contestants to keep track of the time remaining to answer the entire set of questions by displaying either the time remaining or time elapsed in the *entire contest*. (Ex. 1001, 2:9-12 (“[o]f particular value, a specialized clock not only keeps track of time remaining, but alerts the student as to whether he/she is on pace to finish the questions on time.”), 17:29-38 (“The time mechanism shows where the Team Member is in relation to his/her opponent, how much time has elapsed in the test and consecutively for each question, and whether he/she is on pace to finish on time.”), 17:60-65 (“The radius line rotates around the clock figure until no time remains.”).)

Moreover, during prosecution, Patent Owner distinguished the prior art by characterizing the claim language at issue in a manner that supports the construction. Patentee’s remarks not only support but confirm the correctness of Petitioner’s construction. *Univ. of Massachusetts v. L’Oreal S.A.*, 36 F.4th 1374, 1379 (Fed. Cir. 2022) (“The prosecution history, in particular, ‘may be critical in interpreting disputed claim terms,’” and “even where ‘prosecution history statements do not rise to the level of unmistakable disavowal, they do inform the claim construction.’”) (internal citation omitted). Specifically, patentee represented that the Panetta and Lavanchy prior art do not disclose a real time scoreboard that “permits each individual contestant to track his/her and his/her opponent's progress *with respect to both the time frame for answering questions* and questions answered correctly *while*

answering the series of questions during an academic competition.” (Ex. 1004, 478 (emphases in original).)⁴ Patentee expressly emphasized that in “Panetta and Lavanchy, a separate time component operates for each question” whereas “the claimed academic competition allocates an undivided time period to all players to answer the **entire** series of questions.” (*Id.* (emphasis added).) According to patentee, these references do not disclose a feature whereby the contestant can know “how much time remains in the contest.” (*Id.*) Thus, patentee unequivocally represented and confirmed that the claim language “progress *with respect to both the time frame for answering questions . . . while answering the series of questions during an academic competition*” refers to progress with respect to the time for the entire contest (not just one question).

For the above reasons, Petitioner’s construction should be adopted.

⁴ The emphasized claim language is identical to that in issued claims 1 and 14.

IX. DETAILED EXPLANATION OF GROUNDS

As detailed below, each of the challenged claims are unpatentable.

A. Ground 1: Feeney and Rogers Render Obvious Claims 1-5, 9, 14-18, and 22

1. Claim 1

i) [1.pre] “A system for on-line academic competition, comprising:”

To the extent the preamble of claim 1 is limiting, Feeney discloses the limitations therein. (Ex. 1002, ¶¶46-49; *see also* analysis below for remaining elements of claim 1.) Feeney discloses a system 10 that includes a server 12 for managing a contest among players over the internet or web interface. (Ex. 1005, 3:5-15, 3:39-54, 4:14-28, FIG. 1.) As shown in Figure 1 (reproduced below), system 10 allows a plurality of players 31, 32, and 33 to participate in a contest over the internet 42 using their respective devices 21-24. (*Id.*) Feeney thus discloses or suggests “**a system for on-line . . . competition.**”⁵

⁵ Claim language is bolded throughout.

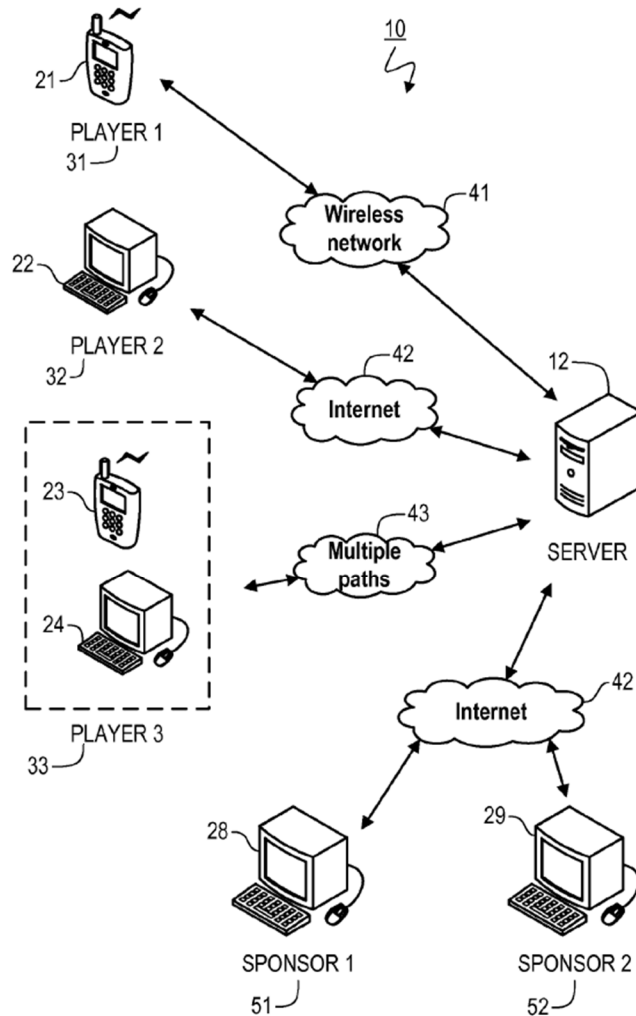


FIG. 1

(*Id.*, FIG. 1.)

Feeney further discloses that the contest can be “any kind of game in which the players *compete* against each other.” (*Id.*, 3:31-37.) Moreover, the contest can be in an academic context, such as during a school field trip. (*Id.*, 3:48-54, 25:42-49.) Thus, Feeney’s system 10 is for an “on-line **academic** competition,” as claimed.

Limiting the claimed system's use to an “**academic**” competition cannot distinguish over Feeney's system because the patentability of an apparatus claim “depends on the claimed structure, not on the use or purpose of that structure.” *Catalina Mktg. Int'l v. Coolsavings.com, Inc.*, 289 F.3d 801, 809 (Fed. Cir. 2002); *see also In re Schreiber*, 128 F.3d 1473, 1477 (Fed. Cir. 1997) (“It is well settled that the recitation of a new intended use for an old product does not make a claim to that old product patentable.”.) Here, the term “**academic**” does not add any structural limitation to the claim; instead, “**academic**” competition merely provides the context in which the system defined by the rest of the claim may be used. Given that Feeney's system is for “any kind of game in which the players compete against each other,” a POSA would have understood that system 10 can be used for an “**academic**” contest. (Ex. 1005, 3:31-37; Ex. 1002, ¶49.)

ii) [1.a] “**a database that stores test questions, team and individual contestant profiles, and test response statistics for the team and individual contestants; and**”

Feeney discloses or suggests this limitation. (Ex. 1002, ¶¶50-54.) Feeney's system 10 includes a server 12, which further includes a contest administration system 80. (Ex. 1005, 4:57-64.) Contest administration system 80 (shown below in Figure 2) includes a database management component 82 that manages contest data information stored on storage device 83. (*Id.*, 4:65-5:6; FIG. 2.) “[A]ll of the player, sponsor, and other information in connection with the contest” is “preferably []

stored in . . . storage device [] 83.” (*Id.*) Storage device 83 containing contest data constitutes “**a database**,” as claimed. (Ex. 1002, ¶50.⁶)

⁶ Feeney also refers to storage device 83 as “database” 83. (*See, e.g.*, Ex. 1005, 5:15.)

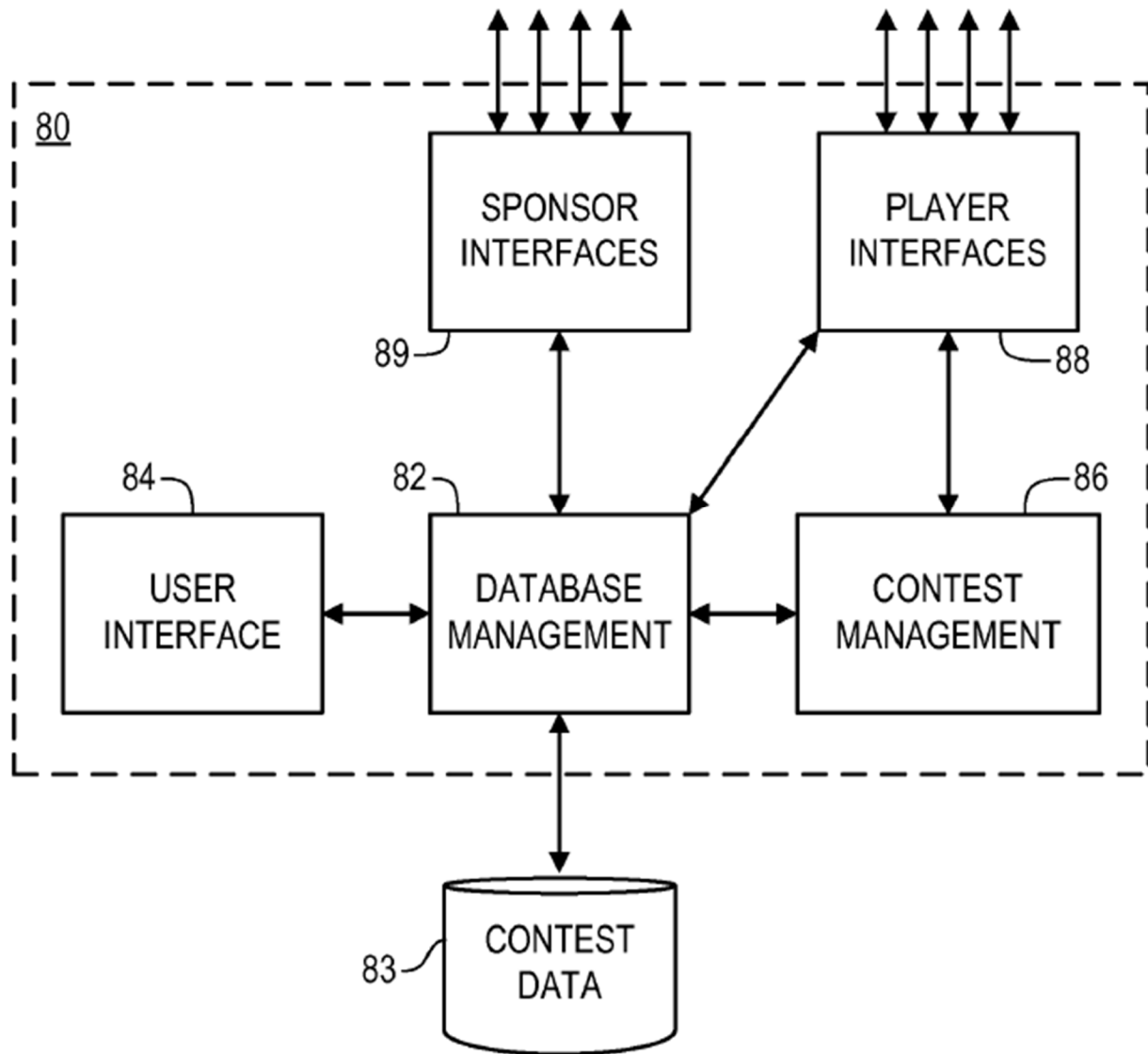


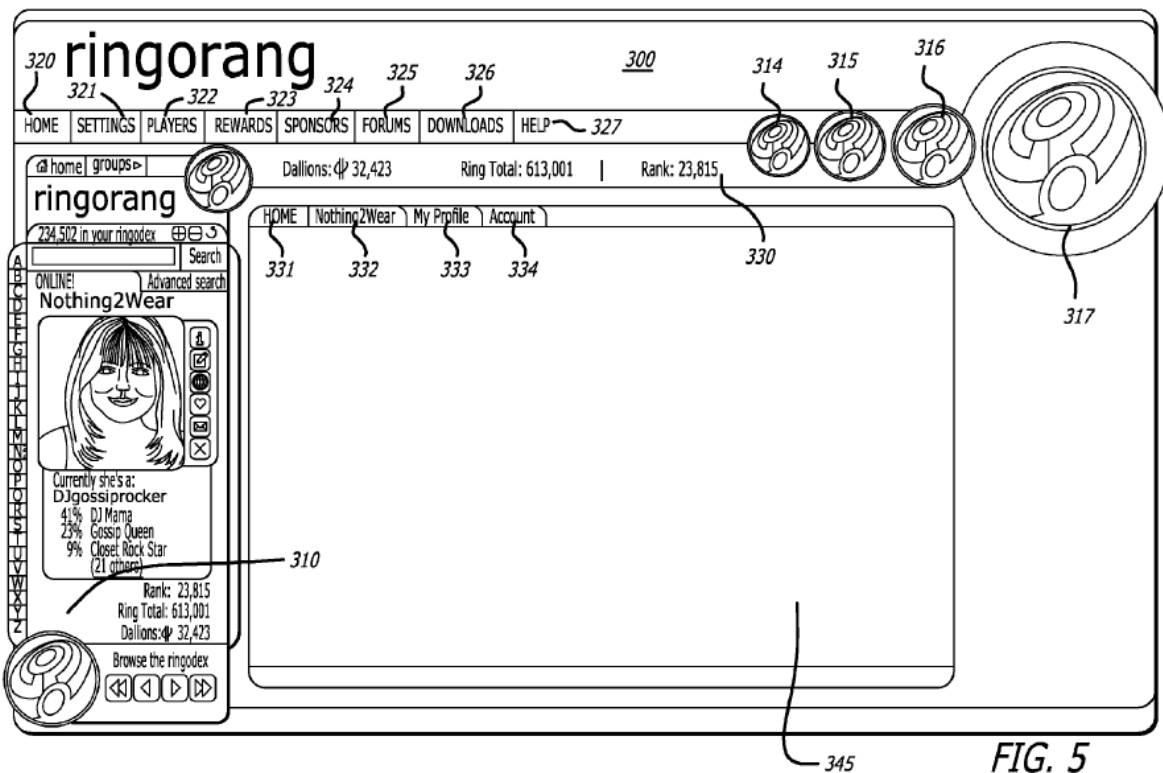
FIG. 2

(*Id.*, FIG. 2.)

The storage device 83 stores “contest questions and answers” because it stores “[a]ll content information” with respect to the contest. (Ex. 1005, 4:65-5:2, 5:7-16.)

Device 83 further stores “[a]ll profile and other information pertaining to the individual player.” (*Id.*, 5:25-37.) Thus, Feeney discloses “**a database that stores test questions, . . . and individual contestant profiles**” as claimed. (Ex. 1002, ¶51.)

Feeney further discloses or suggests that storage device 83 stores “**team . . . profiles, and test response statistics for the team and individual contestants**” because, as explained below, each of this information is displayed on the contestant’s interface after retrieval from storage device 83. Feeney discloses that server 12 “manages and runs the contest in real time” and communicates with the devices 31-34 of the individual contestants. (Ex. 1005, 3:46-54.) Each contestant accesses the contest hosted by server 12 from a user interface 300 on their device. (*Id.*, 10:54-11:5, 11:62-12:3.) User interface 300 can simply be a web page “provided entirely by server 12” or it can be a user interface that is part of a stand-alone application on the user’s device. (*Id.*, 11:62-12:3, 10:54-11:62 (describing user interface 300), FIG. 5.)



(*Id.*, FIG. 5.)

The user interface 300 includes a “player-status summary area 330,” which displays statistics regarding the contestant (e.g., statistics regarding “the player’s performance in the contest” including total number of points won or held by the player). (*Id.*, 12:55-13:24, FIG. 5.) The player-status summary area 330 also displays the “rank of a group or team . . . to which the player belongs” and the “aggregate number of points of everyone within the player’s [team].”⁷ (*Id.*) Thus, user interface 300 displays the claimed “**test response statistics for the team and individual contestants.**”

⁷ Feeney refers to a “team” as a “ring.” (Ex. 1005, *Id.*, 12:66-67.)

Interface 300 also displays a list of the team members and their summary statistics upon clicking of the View Ring button 413 in Ringodex 380 (*id.*, 17:41-53), which can be part of the user interface 300. (*Id.*, 14:46-53, FIGs. 5, 6.) Thus, interface 300 also displays the claimed “**team . . . profile**” (e.g., the list of team members and their summary statistics) when requested by a player.

A POSA would have understood that each of the above-identified information displayed by interface 300 is stored in storage device 83 (“**database**”) because device 83 stores “[a]ll profile and other information pertaining to the individual player,” including “various player-specific contest-environment information and features and other information requested to be displayed by such players.” (*Id.*, 5:25-37; Ex. 1002, ¶54.) Indeed, the user interface 300 can be “provided entirely by server 12” and therefore, a POSA would understand that the above-identified information would have been stored in the server 12’s local storage (i.e., database 83) and retrieved upon a player’s request through user interface 300. (Ex. 1002, ¶54; Ex. 1005, 11:47-53 (request to retrieve player information through user interface triggers an “immediate request for the desired information from server 12”).)

iii) [1.b] “a processor programmed to interact with the database and with individual contestant processing devices to perform the steps of:”

Feeney discloses this limitation. (Ex. 1002, ¶¶55-56.) Server 12 executes a contest administration system 80, which is implemented by one or more processors.

(Ex. 1005, 4:57-64.) As shown in Figure 2, system 80 (and hence, the processor implementing system 80) interacts with storage device 83 (“**database**”). (*Id.*, 4:65-5:2, 5:34-36.) Thus, Feeney discloses that the system includes “**a processor programmed to interact with the database.**”

The server 12 communicates with player devices 21-24 (“individual contestant processing devices”) (*id.*, 3:46-48) through the player interface 88 of contest administration system 80. (*Id.*, 5:25-37, FIG. 2.) Thus, Feeney also discloses that the processor implementing system 80 interacts “**with individual contestant processing devices.**” As further discussed below with reference to limitations [1.c]-[1.g], system 80 enables certain steps, which are executed by the processor of system 80. (*Id.*, 4:57-64.)

iv) [1.c] “enabling the creation of teams of individual contestants for participation in an academic competition;”

Feeney discloses this limitation. (Ex. 1002, ¶¶57-61.) Feeney discloses facilitating teams of individual players to compete in the contest. (Ex. 1005, 9:7-11, 9:26-29.) For example, “players can . . . compete as part of a team (sometimes referred to herein as a ‘team-ring’) in which the rings compete against each other.” (*Id.*, 21:51-59.) These rings (i.e., teams) can be created by the players themselves. (*Id.*, 21:63-22:13.) To create a team, a player can “search through the universe of contest players” and select players to join his/her ring. (*Id.*) For example, the player

can search for other players through a basic search (window 420) or an advanced search 425. (*Id.*, 18:28-19:14, FIGs. 6, 7.) This search functionality is described with reference to Ringodex 380 in Figures 6 and 7, which can be implemented as part of user interface 300 as a webpage. (*Id.*, 14:46-52.⁸)

A POSA would have understood that this search functionality is enabled by server 12 (and by extension the processor implementing contest administration system 80, *supra* Section IX.A.1.iii), because the user interface 300 can be “provided entirely by server 12.” (Ex. 1002, ¶59; Ex. 1005, 11:62-12:3, 10:54-11:62 (describing user interface 300), FIG. 5.) System 80 implemented by server 12 includes a player interface 88 that “display[s] to the respective players . . . information requested to be displayed by such players,” including profile information of the players stored in the storage device 83. (Ex. 1005, 5:25-37, 15:1-5 (“all of the profile cards typically will be maintained by server 12”).)

Moreover, a POSA would have understood that Feeney’s reference to facilitating groups of players to compete (*id.*, 9:5-29) refers to system 80 enabling the creation of teams because groups of players cannot compete unless the system allows team creation in the first place. (Ex. 1002, ¶60.) For example, a POSA would

⁸ Ringodex 380 and its corresponding search functionality is discussed further below in Section IX.A.1.v.

have understood that such team creation would be executed by a “contest administrator” through user interface component 84, which allows the “contest administrator . . . to generally manage the hosted contest(s).” (Ex. 1005, 5:7-16; Ex. 1002, ¶60.)⁹

Therefore, the processor of system 80 enables creation of teams for participation in the contest, which can be an academic competition (as discussed above in Section IX.A.1.i). Feeney thus discloses or suggests “**enabling the creation of teams of individual contestants for participation in an academic competition.**”

- v) [1.d] “**enabling a user, through a user interface connected to said database, to perform at least one of the following: (1) create a league of teams and a cycle of academic competition amongst the league of teams, (2) search for and select at least one team for participation in an inter-team academic competition, and (3) divide a team into multiple teams for an intra-team academic competition;**”

Feeney discloses limitation [1.d] by disclosing “**enabling a user, through a user interface connected to said database, to . . . 2) search for and select at least one team for participation in an inter-team academic competition.**” (Ex. 1002,

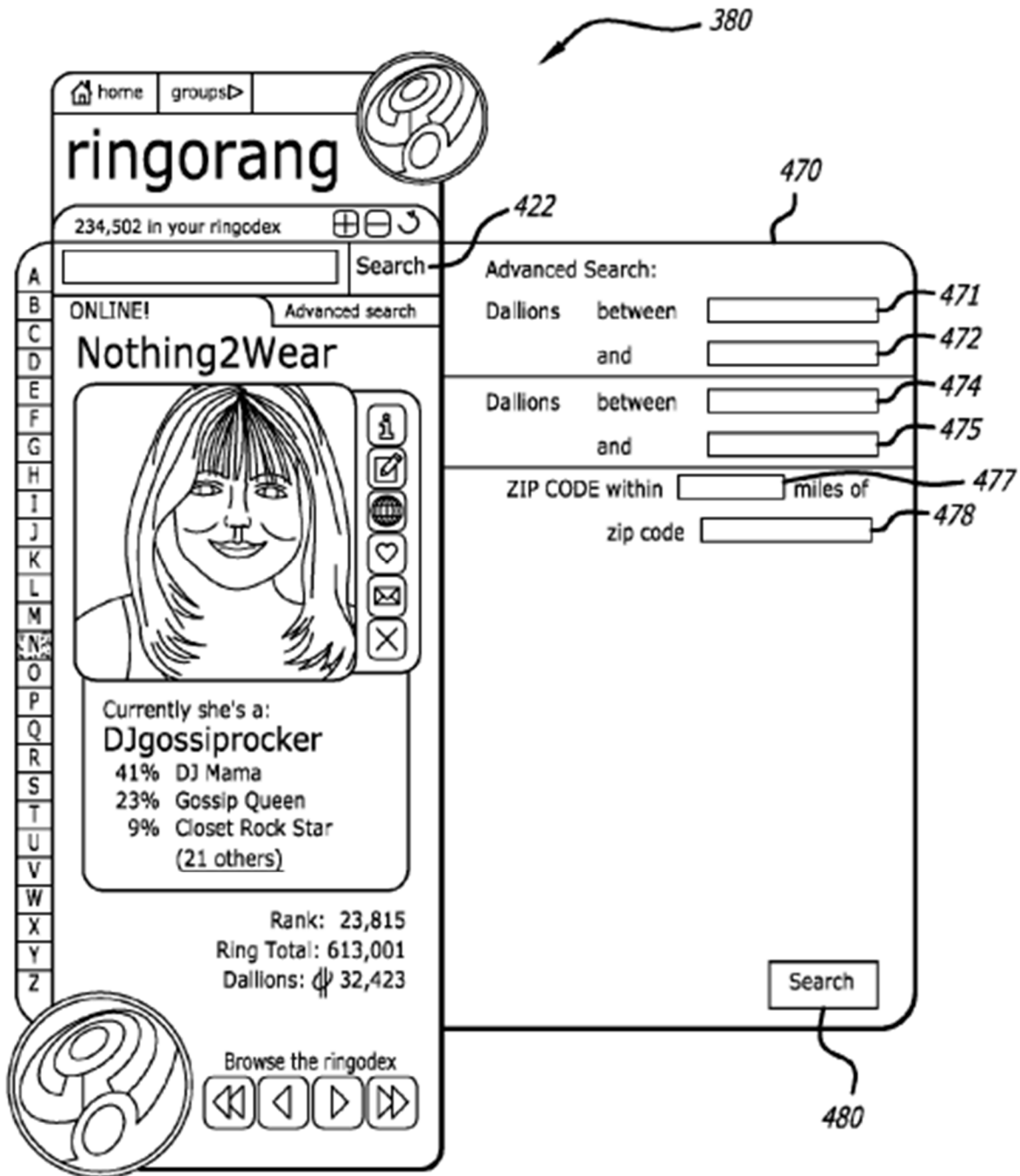
⁹ As discussed below in Section IX.D.1, Panetta is evidence that enabling team creation for an academic competition by an administrator (e.g., a teacher) was well-known.

¶¶62-66.)¹⁰ As explained below, system 80 (and thus the “**processor**”) enables a player (“**user**”) to search for and select a team through a user interface 300 (“**user interface**”), where the user interface 300 is connected to storage device 83 (“**said database**”).

Figure 7 (shown below) illustrates the Ringodex 380, which is an interface that is part of the user interface 300. (Ex. 1005, 14:50-54.)

¹⁰ Limitation [1.d] recites “at least one of the following” so limitations (1) and (3) are optional.

FIG. 7



(*Id.*, FIG. 7.)

In the Ringodex 380, a player can click the “Advanced tab 425” (*id.*, 18:28-38) to perform a search for a ring or team (*id.*, 18:45). “[A]fter the search, the player

[] can browse through the search results.” (*Id.*, 18:60-63.) The search results include profile cards for players meeting the search criteria. (*Id.*, 19:1-14.) Clicking on any search result “causes the corresponding profile card to be displayed in Ringodex 380.” (*Id.*, 19:28-38.) The player can view the selected profile card and click the Send Message button 415 to request to join the player’s ring (i.e., team). (*Id.*, 18:9-19.) A POSA would understand that the above functionality enables a player to: (a) search for a team (e.g., by specifying the “ring or team membership”), (b) view player profile cards of players in that team, and (c) contact a specific player to request to join their team. (Ex. 1002, ¶64.) The act of requesting to join a team constitutes selecting “**at least one team for participation in an inter-team academic competition.**” Thus, Feeney discloses “**enabling a user, through a user interface . . . to perform at least one of the following . . . (2) search for and select at least one team for participation in an inter-team academic competition.**”

Feeney also discloses the same feature in a slightly different manner. For example, say a player is looking to join a team but doesn’t know which team he/she wants to join. The player can run a search for players (e.g., players in a certain geographic area), browse their profiles and send a message to a selected player to join their team, as discussed above. (Ex. 1005, 18:34-46.) Thus, Feeney enables searching for and selecting a team to join, as recited in claim limitation [1.d].

Feeney further discloses that user interface 300 is “**connected to said database**” because user interface 300 displays the player profile cards that are saved in storage device 83 (“**said database**”). (*Id.*, 5:25-37.) And it is the processor of system 80 in server 12 that enables this feature. (*Id.*, 15:1-10; *supra* Section IX.A.1.iv.)

- vi) [1.e] “**presenting a series of test questions to the contestant processing devices of the individual contestants of competing teams for response in a time frame allocated for the academic competition;**”

Feeney discloses this limitation. (Ex. 1002, ¶¶67-71.) Feeney discloses that the contests “typically involve[es] questions to be answered or other problems to be solved.” (Ex. 1005, 20:2-8.) As an example, “a stream of problems . . . is provided by server 12” to the players as part of a “one-month general knowledge contest.” (*Id.*, 20:18-25.) These questions/problems can be delivered “simultaneously” to multiple participating players “as described in the ’179 Application” (*id.*, 20:47-49), which is “incorporated by reference [in Feeney] . . . in full.” (*Id.*, 2:66-3:6.) The ’179 application describes simultaneous delivery of a number of problems, which may include “multiple-choice” or other types of questions, to a user interface (illustrated below) of each player device. (Ex. 1008, ¶¶ [68], [77], [79], FIG. 8.)



FIG. 8

(*Id.*, FIG. 8.) In view of Feeney’s incorporation of the ’179 Application, Feeney discloses that the problems are delivered to each player device (e.g., 21-24) (“**presenting a series of test questions to the contestant processing devices of the individual contestants**”). In particular, the multiple questions and/or problems can be delivered on the user interface 300, e.g., by incorporating the ’179 application’s alert-based client application therein. (*Id.*, 13:62-14:6.)

As noted above, Feeney defined a time frame (e.g., 1-month) for the contest. (*Id.*, 20:18-25, 24:14-15 (“[A]fter a problem has been delivered, the players are given indications as to how much time is left to respond.”).) Feeney thus discloses or suggests that the questions are presented “**for response in a time frame allocated**

for the academic competition.”¹¹ To the extent Patent Owner incorrectly contends that Feeney does not disclose the “**time frame allocated for the academic competition,**” then Feeney in combination with Rogers discloses or suggests including a timer mechanism in Feeney that shows the total time remaining to answer the entire series of questions. (*Infra* Section IX.A.1.vii.) Such a timer mechanism discloses a “**time frame allocated for the academic competition.**”

Feeney further discloses that the individual players “can compete as part of a team” (Ex. 1005, 21:51-62), where the teams “receive questions as a group” (*id.*, 22:15-22). Even when receiving questions as a team, a POSA would have understood that the questions are delivered to *each* player device in a given team for the following reasons. (Ex. 1002, ¶70.)¹² First, Feeney does not require that the players in a team use a single device to answer questions. Rather, each player is described having their own player device. (Ex. 1005, 3:39-54 (disclosing a “plurality” of player devices 21-24, where “[e]ach such player device 21-24 typically

¹¹ As discussed above with reference to limitation [1.pre], the term “academic competition” cannot patentably distinguish Feeney from claim 1.

¹² This is relevant in case Patent Owner offers a construction or argument that requires the prior art to show that each player’s contestant device must receive the questions even if the players are competing in teams.

has a player associated with it (e.g., player 31 for device 21 and player 32 for device 22).”), 3:64-4:2, 4:6-13.) Second, Feeney explains that when a team receives questions as a group, the team earns points (referred to as “Dallions”) “based on average accuracy percentage across the ring.” (*Id.*, 22:15-18; *see also id.*, 20:29-32.) An average accuracy percentage ***across*** the ring means an average of the accuracy of the answers by the players of the ring, which indicates that each player in the ring provides an answer, and their individual accuracies are tallied and averaged to determine the average accuracy percentage across the ring. (Ex. 1002, ¶70.) Third, Feeney explains that the summary area 330 in user interface 300 shows the “aggregate number of points of everyone within the player’s ring.” (Ex. 1005, 13:6-7.) This again indicates that ***each*** member of a ring answers questions and their points are aggregated by the system. (Ex. 1002, ¶70.) For at least the above reasons, Feeney further discloses “**presenting a series of test questions to the contestant processing devices of the individual contestants of competing teams.**”

A POSA would have understood that the functionality of limitation [1.e] is provided by server 12 (and by extension the processor implementing contest administration system 80, *supra* Section IX.A.1.iii) because the user interface 300 can be “provided entirely by server 12.” (Ex. 1005, 11:62-12:3, 10:54-11:62 (describing user interface 300), FIG. 5.) System 80 implemented by server 12

includes a player interface 88 that “handles the details of the actual delivery of questions and/or problems” to the players. (*Id.*, 5:25-37.)

- vii) **[1.f] “providing a real time scoreboard with time clock to each contestant processing device that displays an individual contestant’s progress with respect to both the time frame for answering questions and questions answered correctly while answering the series of questions during an academic competition, where each correctly answered question contributes on the real time scoreboard to at least one of (1) an individual score of the individual contestant and (2) a team score of the individual contestant's team; and”**

This limitation is analyzed in two parts. Petitioner first explains how Feeney alone discloses or suggests this limitation. Petitioner then explains how Feeney in combination with Rogers discloses or suggests this limitation. (Ex. 1002, ¶¶72-88.)

- (a) Feeney alone discloses or suggests limitation [1.f] under Patent Owner’s interpretation

Feeney discloses that the interface 300 for each player device includes a player-status summary area 330 for “continuously” displaying statistics regarding a player or the player’s team’s performance in the contest (e.g., team rank, player’s

own rank, total number of points won, etc.). (Ex. 1005, 12:55-13:24.)¹³ Performance statistics (e.g., “percentage(s) or score(s)”) “are updated on a regular basis.” (*Id.*, 21:42-45.) Thus, Feeney discloses “**providing a real time scoreboard . . . to each contestant device.**”

Feeney further discloses that “after a problem has been delivered, the players are given indications as to how much time is left to respond.” (*Id.*, 24:14-15.) Such indication can be in the form of a “clock.” (*Id.*, 24:14-26.) A POSA would have understood that such a clock would have been provided in the user interface 300 because, in Feeney, “game-based information and functionality is available through a single user interface 300.” (*Id.*, 13:61-63; Ex. 1002, ¶74.) A POSA would have

¹³ Feeney’s description of interface 300 applies to *each* player device. (Ex. 1005, 4:9-14 (“In the preferred embodiments, the players 31-33 will have installed a contest interface application on the devices 21-24 that they will be using, an example of such an interface application being described in greater detail below.”).) As described and disclosed in Feeney, a POSA would have understood that the description of interface 300 is generic and applies to other player devices as well. (Ex. 1002, ¶73.) Indeed, Feeney describes interface 300 with respect to player device 21 (Ex. 1005, 11:66-12:3), and explains that the reference to player device 21 refers to each player device 21-24 (*id.*, 11:2-5).

been motivated to include the clock in the player-status summary area 330 because area 330 displays other performance indicia for the player (e.g., score, rank) that is updated on a regular basis, as discussed above. (Ex. 1002, ¶74.) Providing the clock in the player-status summary area 330 would have been desirable because it would have allowed a player to visually monitor their performance (e.g., score and time remaining) using indicators provided in one place without having to flip between multiple interfaces. (*Id.*, 13:61-63 (“game-based information and functionality is available through a *single* user interface 300”) (emphasis added).) A POSA would have a reasonable expectation of success in providing such a clock in area 330 because Feeney provides a settings page 321 through which the user can customize the parameters displayed in area 330. (Ex. 1002, ¶74; Ex. 1005, 12:55-63.) Thus, a POSITA would have found it obvious to provide a clock in the player-status summary area 330. (Ex. 1002, ¶74.) *Adapt Pharma Operations Ltd v. Teva Pharms. USA, Inc.*, 25 F.4th 1354, 1365 (Fed. Cir. 2022) (“A determination of obviousness ‘requires finding that a person of ordinary skill in the art would have been motivated to combine or modify the teachings in the prior art and would have had a reasonable expectation of success in doing so.’”) (internal citation omitted). Feeney thus discloses or at least suggests “**providing a real time scoreboard with time clock to each contestant processing device.**”

Feeney further discloses that “after a problem has been delivered, the players are given indications as to how much time is left to respond.” (*Id.*, 24:14-15.) Under Patent Owner’s interpretation of [1.f], as evidenced by its infringement allegations in the related district court litigation (*see* Ex. 1013, 9), Feeney discloses displaying **“an individual contestant’s progress with respect to [] the time frame for answering questions.”**¹⁴ Petitioner disagrees with Patent Owner’s interpretation because the claim requires indicating how much time is remaining or how much of an allotted time has elapsed for the *entire* series of questions in a contest, not just how much time is remaining to answer a single individual question. (*Supra* Section VIII.) However, to the extent the Board adopts Patent Owner’s construction, Feeney discloses the limitation at issue.

Feeney discloses displaying performance statistics, including scores for answering questions correctly. For example, Feeney discloses that correctly

¹⁴ Patent Owner has alleged that a timer in the Kahoot! system infringes the claimed **“realtime scoreboard with time clock . . . that displays an individual contestant’s progress with respect to . . . the time frame for answering questions.”** (Ex. 1013, 9.) But the timer in the Kahoot! system merely displays the time remaining to answer an individual question. The timer does not display the time remaining for answering the entire series of questions in a competition.

answering questions contributes to the number of points (called “Dallions”) earned by the player during the contest. (Ex. 1005, 12:63-13:24, 20:29-32, 22:15-18, 22:56-63, 23:3-5, 23:65-24:2.) The summary area 330 displays the player’s score (e.g., accumulated number of Dallions) during the contest. (*Id.*, 12:55-13:24, FIG. 5.) Feeney states that the “score(s)” are “updated on a regular basis. (*Id.*, 21:42-45.) Feeney thus discloses or suggests that the summary area 330 **“displays an individual contestant’s progress with respect to . . . questions answered correctly while answering the series of questions during an academic competition.”** The number of Dallions earned by the player is an **“individual score of the individual contestant.”** Feeney, therefore, also discloses **“where each correctly answered question contributes on the real time scoreboard to at least one of (1) an individual score of the individual contestant and (2) a team score of the individual contestant’s team.”**

Feeney discloses display of **“an individual contestant’s progress with respect to...questions answered correctly”** in additional ways. For example, Feeney discloses displaying the player’s progress with concentric rings that light up as the players answer problems correctly. (Ex. 1005, 24:64-25:7.) Correctly answering a first problem causes an outer ring to light up, while correctly answering a second problem causes an inner ring to light up. (*Id.*) In yet another example, Feeney discloses displaying player icons that move along a track based on whether

the players answers problems correctly or incorrectly. (*Id.*, 25:28-34.) Again, a POSA would have understood that each of the above-identified visuals would have been provided in the user interface 300 because, in Feeney, “game-based information and functionality is available through a single user interface 300.” (*Id.*, 13:61-63; Ex. 1002, ¶77.) And they would have been provided more specifically in the summary area 330, for reasons discussed above.

(b) Feeney in combination with Rogers discloses or suggests limitation [1.f] under Petitioner’s interpretation

As discussed above, Feeney discloses a time clock and discloses limitation [1.f] under Patent Owner’s construction. Feeney expressly discloses indicators that show “how much time is left to respond,” such as a digital countdown clock or an analog clock where the time is up when an indicator hand makes a full rotation. (Ex. 1005, 24:14-26; *supra* Section IX.A.1.vii.(a).) Feeney does not expressly state whether the time “left to respond” refers to the time remaining for an individual question or the time remaining for the entire series of questions in a contest. Feeney also discloses or suggests that the time clock is located within the user interface 300 (*supra* Section IX.A.1.vii.(a)) but does not expressly state where the time clock is positioned within the user interface 300. Rogers expressly discloses such aspects.

Rogers discloses “an online test platform” (Ex. 1006, 7:60-61) that “may facilitate the development, delivery, and management of educational tests” for “students, teachers, proctors, and administrators.” (*Id.*, 7:22-25.) Rogers discloses

providing a test with a series of questions to be answered within a certain time. (*Id.*, 19:15-20, FIG. 8.) FIG. 8 illustrates an introductory screen of the test:

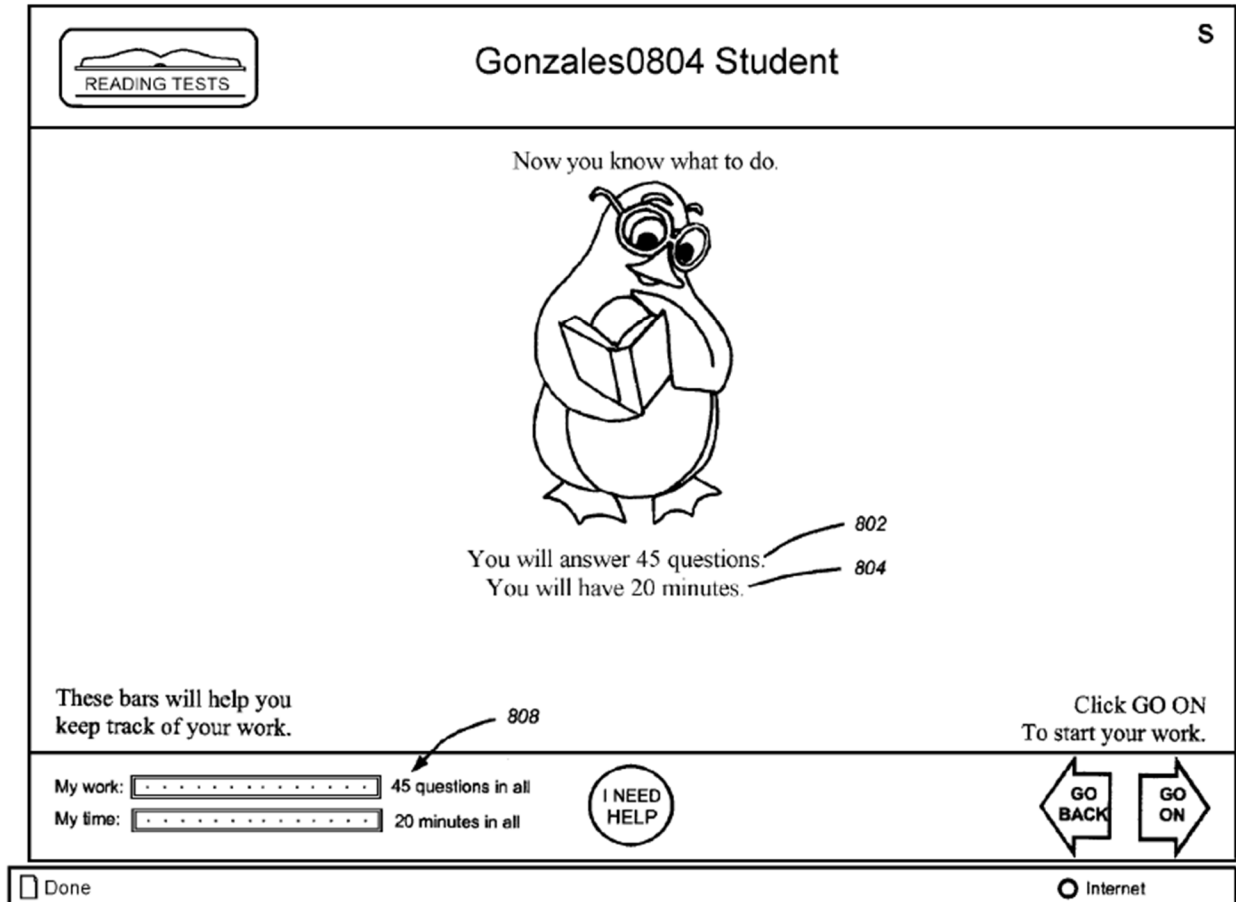


FIG. 8

(*Id.*)

FIG. 9 illustrates a test screen:

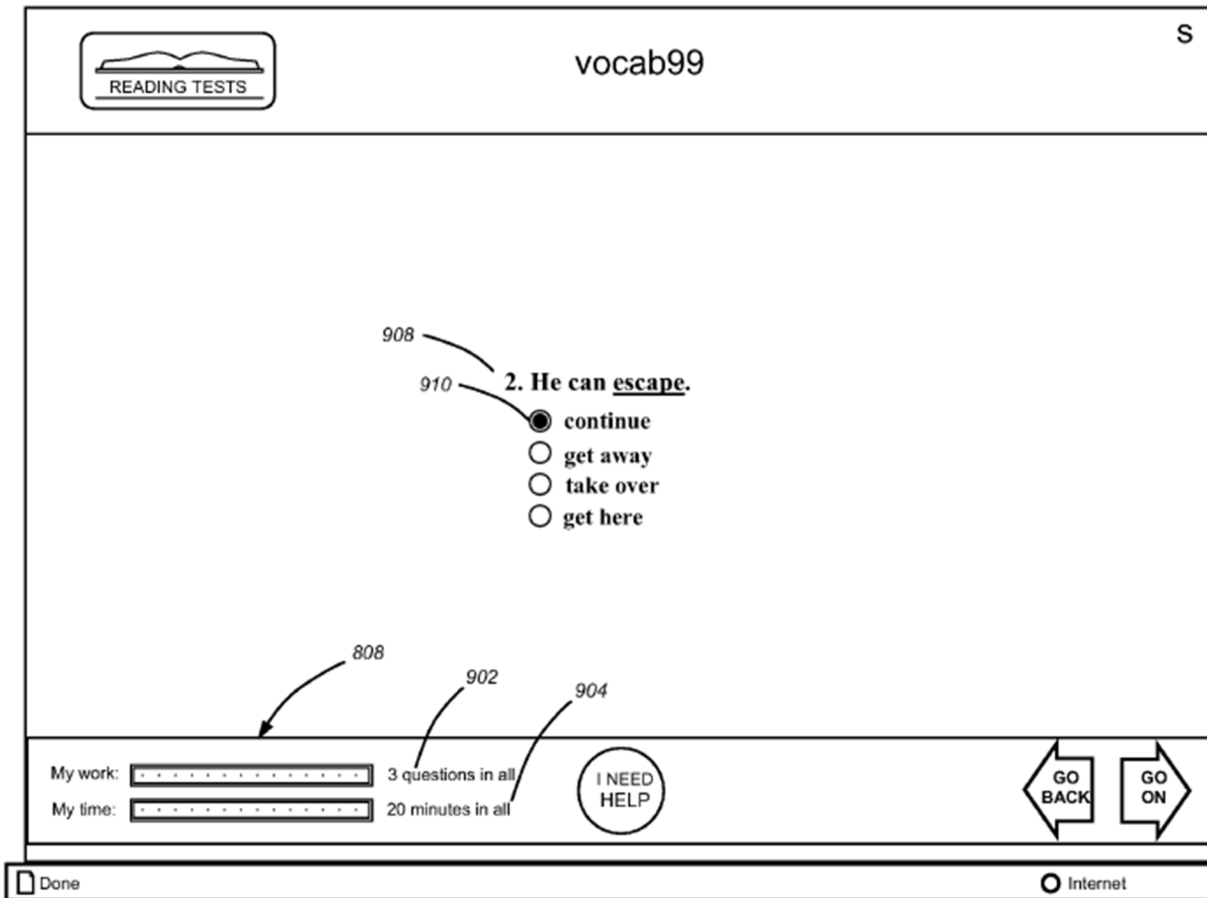


FIG. 9

(*Id.*, FIG. 9, 19:23-24.) Figure 9 illustrates that as the user progresses through the test, the progress indicators 808 indicate progress towards the total count of questions 902 and the total time allowed 904. (*Id.*, 19:56-20:15.) Examples of indications include a progress bar, a pie chart, a count, a clock, and a digital timer. (*Id.*) For example, a user can assess how many of the total questions have been answered and how much time has been used up based on the amount of the progress bar that is filled in. (*Id.*) Figures 10-12 illustrate how the progress indicators 808 indicate progression through the tests. (*Id.*, 20:42-21:16.)

Rogers thus expressly discloses a **“real-time scoreboard with a time clock”** that shows **“an individual contestant’s progress with respect to . . . the time frame for answering questions . . . while answering the series of questions during an academic competition.”** Rogers does so under Petitioner’s interpretation (*supra* Section VIII) because it indicates both how much time has elapsed and how much of the allotted time is remaining to answer the *entire* series of questions.

A POSA would have found it obvious to combine the teachings of Feeney and Rogers to apply Rogers’s timed tests and progress indicators to Feeney’s user interface 300 so that the user interface 300 includes a time clock that shows how much of the allotted time has elapsed and how much is remaining to answer the stream of multiple problems (e.g., multiple-choice questions) in Feeney. (Ex. 1002, ¶83.) A POSA would have looked to Rogers to refine Feeney’s interface because both Rogers and Feeney disclose delivery of problems for a user to answer over a network, and a user interface for displaying indicia (e.g., time remaining) for a test or quiz. (Ex. 1002, ¶83.) Both Feeney and Rogers disclose interface elements associated with a scoreboard, time clock, time for answering questions, and questions answered correctly: Feeney discloses a summary area 330, visuals, concentric rings, countdowns, icons, time, clock indicator, and number of Dallions (*see e.g.*, Ex. 1005, 13:61-14:6, 24:14-26, FIGs. 5-7); and Rogers discloses

indicators with a progress bar, a pie chart, a count, a clock, and a digital timer (*see e.g.*, Ex. 1006, 19:56-20:15, FIGs 8-12).

Having looked to Rogers, a POSA would have been motivated to combine the teachings of Rogers and Feeney to provide an indication of how much time is remaining to answer the series of questions or how much of the allotted time for answering the series of questions has elapsed. (Ex. 1002, ¶84.) Addition of such a feature in Feeney would have enhanced the applicability of Feeney's interface to other types of games (*e.g.*, those involving a speed round). (*Id.*; Ex. 1009, 3:40-5:25 (describing a game with a speed round in which "multiple contestants on one team will have the opportunity to answer as many questions as they can in the time allotted in the speed round").) In a game involving a speed round, contestants would find it useful to know how much time is left in the speed round. (Ex. 1002, ¶84.) Feeney supports such a combination because it discloses that its disclosure applies to "any kind of game in which the players compete against each other." (Ex. 1005, 3:31-37.)

A POSA would have had a reasonable expectation of success in combining the teachings of Feeney and Rogers because, as discussed above, both disclose similar software concepts for presenting questions and handling answers in a graphical user interface. (Ex. 1002, ¶85; Ex. 1005, 3:39-48; Ex. 1006, 7:22-25.) Indeed, it would take no more than basic software coding to combine the expressly

disclosed features of Rogers' clock with Feeney's clock to indicate the total remaining time for an entire series of questions in a contest. (Ex. 1002, ¶85.) Thus, it would have been obvious to combine the teachings of Feeney and Rogers, as discussed above. *Adapt Pharma*, 25 F.4th at 1365. Indeed, providing a clock like Rogers' in a system like Feeney would have been obvious because it involves the predictable application of a known technique (Roger's clock that shows the total time remaining to answer all of the questions) to a known system (Feeney's user interface), where the combination merely provides a predictable outcome (display of total time remaining to answer Feeney's series of questions). *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, 417 (2007); Ex. 1002, ¶86.

For the above reasons, Feeney in combination with Rogers discloses or suggests limitation [1.f]. The remaining aspects of Feeney (e.g., the display of the individual Dallions earned) is not affected by the combination with Rogers.

A POSA would have understood that the functionality of [1.f] is enabled by server 12 in Feeney (and by extension the processor implementing contest administration system 80, *supra* Section IX.A.1.iii) because the user interface 300 can be "provided entirely by server 12." (Ex. 1005., 11:62-12:3, 10:54-11:62 (describing user interface 300), FIG. 5.) System 80 implemented by server 12 includes a contest management component 86 that calculates Dallions to be awarded to a player and further includes a player interface 88 that "display[s] to the respective

players various player-specific contest-environment information.” (*Id.*, 5:25-37.) A player’s score and time remaining in the contests would be understood to be examples of “player-specific contest-environment information” as they are specific to a player. (Ex. 1002, ¶88.)

viii) [1.g] **“enabling teams of individual contestants to compete over a series of test questions for an allotted time period in an online format including both a test item presentation area and the real time scoreboard with time clock,”**

Feeney alone or in combination with Rogers discloses or suggests this limitation. (Ex. 1002, ¶¶89-90.) As discussed above with reference to limitations [1.pre], [1.c] and [1.e], Feeney discloses an online competition in which the processor of system 80 enables the individual players to compete as a team (Ex. 1005., 21:51-62), where the teams “receive questions as a group” (*id.*, 22:15-22). As further discussed above with reference to limitation [1.e], these questions are provided for response in an allotted time period. Thus, Feeney alone or in combination with Rogers discloses or suggests **“enabling teams of individual contestants to compete over a series of test questions for an allotted time period in an online format.”**

The online format further includes **“the real time scoreboard with time clock.”** (*Supra* Section IX.A.1.vii.) And it includes a **“test presentation area.”** As explained above in Section IX.A.1.vi, in view of Feeney’s incorporation of the ’179

application, Feeney discloses that the problems are delivered to the user interface 300 of each player device (e.g., 21-24). This is further confirmed by Feeney's disclosure that questions and/or problems can be delivered on the user interface 300 by incorporating the '179 applications' alert-based client application. (Ex. 1005, 13:62-14:6.)

- (1) **[1.g.i] “at least one of (1) live, if the teams have common time availability, wherein the real time scoreboard displays in real time at least one of (a) the individual score of the individual contestant and (b) the team scores of the competing teams, and (2) non-live, if the teams do not have common time availability, wherein the real time scoreboard displays in real time at least one of (a) the individual score of the individual contestant and (b) the team score of the individual contestant's team.”**

Feeney in combination with Rogers discloses or suggests limitation [1.g.i] by displaying the individual score of the player in summary area 330. (Ex. 1002, ¶¶91-95.)

While limitation 1.g recites certain steps to be performed by a processor, limitation [1.g.i], does not recite a verb. To the extent limitation [1.g.i] may be understood as reciting an additional step, it uses the language “at least one of” indicating that only one of the recited conditions must be satisfied. For example, in the case of live competition, either an individual score or team scores of competing teams must be displayed. In the case of non-live competition, either an individual

score or team score of the contestant's team must be displayed. And the processor need not enable both live and non-live competitions. Thus, limitation [1.g.i] can be satisfied if, for example, the scoreboard displays an individual score (like in Feeney) regardless of the mode of the competition (live or non-live).

Feeney discloses the interface 300 has a summary area 330 (**“the real time scoreboard”**) that displays **“the individual score of the individual contestant.”** (*Supra* Section IX.A.1.vii.) Thus, Feeney satisfies limitation [1.g.i] because display of an individual score is an option common to both live and non-live competition. That is, Feeney displays an individual score if the competition is live, and displays the same if the competition is not live.

Regardless, a POSA would have understood that Feeney discloses the above individual score during live competition because Feeney discloses that the questions are delivered “simultaneously” to “tens of thousands” of “geographically dispersed” players, where the players are competing as part of teams. (Ex. 1005, 3:10-14, 19:61-67, 20:47-52, 21:51-62, 28:66-29:57.) In other words, Feeney discloses live competition between teams, which is only possible when the teams have common time availability. Thus, Feeney discloses **“live, if the teams have common time availability, wherein the real time scoreboard displays in real time at least one**

of (a) the individual score of the individual contestant and (b) the team scores of the competing teams.”¹⁵

Feeney also discloses “**non-live, if the teams do not have common time availability, wherein the real time scoreboard displays in real time at least one of (a) the individual score of the individual contestant and (b) the team score of the individual contestant's team**” because, as discussed above, a contestant’s individual score is displayed if the contestant is participating in a contest. Thus, even if live competition is not occurring, the real time scoreboard displays in real time the “**individual score of the individual contestant.**”

2. Claim 2: The system as in claim 1, wherein the processor calculates a winner of the academic competition between teams or between respective individual contestants.

Feeney alone or in combination with Rogers discloses or suggests this claim. (Ex. 1002, ¶¶96-97.) Feeney’s summary area 330 can display the rank of a team or individual player relative to other teams and players. (Ex. 1005, 12:55-13:24.) The rank is calculated based on the accuracy of the answers, such as percentage of answers correct versus incorrect. (*Id.*, 13:17-24.) This rank is calculated by the contest administration system 80 because system 80 (specifically, contest

¹⁵ Given the claim’s “at least one of” language, Feeney satisfies this limitation by satisfying the live feature.

management component 86) evaluates the responses to the questions and awards contest points (e.g., Dallions) from which the rank is determined. (*Id.*, 5:17-24, 6:19-25, 21:11-50.¹⁶) A player earning the most Dallions is the “winner.” (*Id.*, 28:17-20.)

A POSA would have understood that determining the rank of a team during a contest discloses calculating a winner. (Ex. 1002, ¶97.) For example, determining the team with the highest rank (e.g., #1 team) would disclose the winner of the competition. Thus, Feeney discloses claim 2.

3. Claim 3: The system as in claim 1, wherein the processor enables a contestant to elect to conceal his/her identity from a competing contestant or to permit the display of his/her name and photo on the scoreboard of the competing contestant.

Feeney alone or in combination with Rogers discloses or suggests this claim. (Ex. 1002, ¶98.) Feeney discloses that a player’s profile card includes various information about the contestant (e.g., a photograph of the contestant). (Ex. 1005, 15:36-42.) But a contestant can choose to prohibit other players from “access[ing]” *any* “information in the player’s profile card.” (*Id.*, 15:23-35.) Thus, if a contestant chooses, another contestant/player cannot view the username or photo in the player’s

¹⁶ System 80 is implemented by the “processor.” (*Supra* Section IX.A.1.iii.)

profile card. Feeney's system 80 (implemented by a processor) enables a contestant to **"elect to conceal his/her identity from a competing contestant."**¹⁷

4. **Claim 4: The system as in claim 1, wherein each contestant processing device presents the scoreboard with a clock face component that alerts the contestant as to whether he/she is on pace to finish the test questions in the allocated time frame.**

Feeney alone or in combination with Rogers discloses or suggests this claim. (Ex. 1002, ¶99.) Feeney discloses or suggests that the scoreboard includes a clock that alerts the player as to how much time is left to answer to respond. (*Supra* Section IX.A.1.vii.) Feeney in combination with Rogers discloses or suggests that the same clock alerts the player as to how much time is left to finish the entire series of questions. (*Id.*) Thus, Feeney alone or in combination with Rogers discloses or suggests that **"wherein each contestant processing device presents the scoreboard with a [] component that alerts the contestant as to whether he/she is on pace to finish the test questions in the allocated time frame."** Feeney further discloses that the clock can be "an analog clock where the time is up when an

¹⁷ A POSA would have understood that a player would use the user interface 300 provided by system 80 (*supra* Section IX.A.1.iv) to manage access to their profile because player interface 88 (included in system 80) "receive[s] player information for storage by data management component 82." (Ex. 1005, 5:25-27.)

indicator hand . . . makes a full rotation.” (Ex. 1005, 24:14-20.) In other words, the clock in Feeney alone or in combination with Rogers is a **“clock face component,”** as claimed.

5. **Claim 5: The system as in claim 1, wherein each contestant processing device displays on the scoreboard an individual score as determined by a number of questions answered correctly by each of matched individual contestants, a team score as determined by calculating a total number of individual victories or by taking a running average of all or a number of individual contestant scores from the respective teams, or both the individual score and the team score.**

Feeney alone or in combination with Rogers discloses or suggests this claim. (Ex. 1002, ¶100.) Feeney discloses, *inter alia*, displaying a player’s own rank or score within a particular contest against the other contestants (**“an individual score as determined by a number of questions answered correctly by each of matched individual contestants”**) (Ex. 1005, 12:55-13:5, 21:12-50), a team score determined by calculating an aggregate score of the team members (**“a team score as determined by calculating a total number of individual victories”**) (*id.*, 13:6-7) or based on average accuracy percentage of the team members (**“or by taking a running average of all or a number of individual contestant scores from the respective teams”**) (*Id.*, 22:15-18). Feeney further discloses that each contestant device displays the above scores. (*Id.*, 21:48-50 (explaining that the rank(s) are

“provided to the players” (plural), 10:53-11:5 (explaining that the disclosures pertaining to player device 21 applies to the other player devices).)

6. **Claim 9: The system as in claim 1, wherein the processor further enables an administrator or a coach to create and save questions, including the assignment of images to the questions, or to choose questions from a database of questions submitted by other administrators or coaches for utilization in an academic competition.**

Feeney alone or in combination with Rogers discloses or suggests this claim. (Ex. 1002, ¶¶101-102.) Feeney discloses that the server 12 includes a tool that allows inputting “problems created by the contest’s administrators” and provides an “interface for tagging [the] problems with player-designated categories.” (Ex. 1005, 28:45-58.) The same tool “accepts new contest problems (e.g., trivia questions)” from the contest administrators. (*Id.*) A POSA would have understood that this tool correlates with “user interface 84,” which “enables individuals associated with the contest administrator to provide contest questions and answers” saved in storage device 83. (*Id.*, 5:7-16; Ex. 1002, ¶101.)¹⁸ Thus, Feeney discloses that **“the processor further enables an administrator or a coach to create and save questions.”**

¹⁸ User interface 84 is implemented by the processor executing the functions of system 80. (Ex. 1005, FIG. 2; *supra* Section IX.A.1.iii.)

Feeney further discloses that the questions can include images. (Ex. 1005, 24:41-47.) Feeney therefore discloses that the questions created and saved by the administrator includes **“the assignment of images to the questions.”** Feeney thus discloses or suggests claim 9.¹⁹

7. Claim 14:

- i) [14.pre] “A method for on-line academic competition, comprising:”**

Feeney discloses this limitation for the reasons discussed above with reference to limitation [1.pre]. (Ex. 1002, ¶103.)

- ii) [14.a] “enabling, using a processing device, the creation of teams of individual contestants for participation in an academic competition;”**

Feeney discloses this limitation for the reasons discussed above with reference to limitations [1.b] and [1.c]. (Ex. 1002, ¶104.)

- iii) [14.b] “enabling a user, through a user interface, to perform at least one of the following: (1) create a league of teams and a cycle of academic competition amongst the league of teams, (2) search for and select at least one team for participation in an inter-team academic competition, and (3) divide a team into multiple teams for an intra-team academic competition;”**

¹⁹ The limitation “to choose questions from a database of questions submitted by other administrators or coaches for utilization in an academic competition” is optional as it is preceded by an “or.”

Feeney discloses this limitation for the reasons discussed above with reference to limitation [1.d]. (Ex. 1002, ¶105.)

- iv) **[14.c] “presenting, using a processing device, a series of test questions to the contestant processing devices of the individual contestants of competing teams for response in a time frame allocated for the academic competition;”**

Feeney discloses this limitation for the reasons discussed above with reference to limitation [1.e]. (Ex. 1002, ¶106.)

- v) **[14.d] “providing a real time scoreboard with time clock at each contestant processing device that displays an individual contestant's progress with respect to both the time frame for answering questions and questions answered correctly while answering the series of questions during an academic competition, where each correctly answered question contributes on the real time scoreboard to at least one of (1) an individual score of the individual contestant and (2) a team score of the individual contestant's team; and”**

Feeney alone or in combination with Rogers discloses or suggests this limitation for the reasons discussed above with reference to limitation [1.f]. (Ex. 1002, ¶107.)

- vi) **[14.e] “enabling teams of individual contestants to compete over a series of test questions for an allotted time period in an online format including both a test item presentation area and the real time scoreboard with time clock, at least one of”**
 - (1) **[14.e.i] “(1) live, if the teams have common time availability, wherein the real time**

scoreboard displays in real time at least one of (a) the individual score of the individual contestant and (b) the team scores of the competing teams, and (2) non-live, if the teams do not have common time availability, wherein the real time scoreboard displays in real time at least one of (a) the individual score of the individual contestant and (b) the team score of the individual contestant's team.”

Feeney alone or in combination with Rogers discloses or suggests this limitation for the reasons discussed above with reference to limitation [1.g] and [1.g.i]. (Ex. 1002, ¶108.)

- 8. Claim 15: The method as in claim 14, further comprising the processing device calculating a winner of the academic competition between teams or between respective individual contestants.**

Feeney alone or in combination with Rogers discloses or suggests this claim for the reasons discussed above with respect to claim 2. (Ex. 1002, ¶109; *supra* Section IX.A.2.)

- 9. Claim 16: The method as in claim 14, further comprising the processing device enabling a contestant to elect to conceal his/her identity from a competing contestant or to permit the display of his/her name and photo on the scoreboard of the competing contestant.**

Feeney alone or in combination with Rogers discloses or suggests this claim for the reasons discussed above with respect to claim 3. (Ex. 1002, ¶110; *supra* Section IX.A.3.)

10. **Claim 17:** The method as in claim 14, wherein each contestant processing device presents the scoreboard with a clock face component that alerts the contestant as to whether he/she is on pace to finish the test questions in the allocated time frame.

Feeney alone or in combination with Rogers discloses or suggests this claim for the reasons discussed above with respect to claim 4. (Ex. 1002, ¶111; *supra* Section IX.A.4.)

11. **Claim 18:** The method as in claim 14, wherein each contestant processing device displays on the scoreboard an individual score as determined by a number of questions answered correctly by each of matched individual contestants, a team score as determined by calculating a total number of individual victories or by taking a running average of all or a number of individual contestant scores from the respective teams, or both the individual score and the team score.

Feeney alone or in combination with Rogers discloses or suggests this limitation for the reasons discussed above with respect to claim 5. (Ex. 1002, ¶112; *supra* Section IX.A.5.)

12. **Claim 22:** The method as in claim 14, further comprising the processor enabling an administrator or a coach to create and save questions, including the assignment of images to the questions, or to choose questions from a database of questions submitted by other administrators or coaches for utilization in an academic competition.

Feeney alone or in combination with Rogers discloses or suggests this claim for the reasons discussed above with respect to claim 9. (Ex. 1002, ¶113; *supra* Section IX.A.6.)

B. Ground 2: Feeney, Rogers, and Downs Render Obvious Claims 9 and 22

1. **Claim 9: The system as in claim 1, wherein the processor further enables an administrator or a coach to create and save questions, including the assignment of images to the questions, or to choose questions from a database of questions submitted by other administrators or coaches for utilization in an academic competition.**

Feeney and Rogers in combination with Downs disclose or suggest claim 9 by disclosing “**wherein the processor further enables an administrator or a coach...to choose questions from a database of questions submitted by other administrators or coaches for utilization in an academic competition.**”²⁰ (Ex. 1002, ¶¶115-121.)

As discussed above in Section IX.A.6, Feeney discloses that the server 12 includes a tool that allows inputting “problems created by the contest’s administrators” and provides an “interface for tagging [the] problems with player-designated categories.” (Ex. 1005, 28:45-58; *see also id.*, 5:7-10.) The same tool “accepts new contest problems (e.g., trivia questions)” from the contest administrators and also “maintains a database of problems previously presented to

²⁰ Claim 9 uses the term “or” indicating that the phrase “to create and save questions, including the assignment of images to the questions” is optional.

the players.” (*Id.* at 28:53-55.) Thus, Feeney discloses a **“database of questions.”** (*See also supra* Section IX.A.1.ii.)

To the extent that Feeney does not expressly disclose that the contest administrator can **“choose questions from”** Feeney’s **“database of questions”** and/or that Feeney’s **“database of questions”** does not include questions **“submitted by other administrators or coaches for utilization in an academic competition,”** Downs discloses such a feature.

Downs discloses an “interactive learning system . . . that can provide simultaneous competitions between participants at remote locations.” (Ex. 1010, 1:8-15.) A school is an example of a “remote location.” (*Id.*, 3:1-4.) For example, a teacher at a remote location can execute a competition by “creat[ing] a competition on an interactive control unit 106,” which “stores competitions and displays them on the display television set 102” to the students. (*Id.*, 3:5-39.) The teacher can either create their own competition on unit 106 or unit 106 can receive competitions created by employees at a central broadcast facility. (*Id.*, 3:31-43.) A competition consists of questions (e.g., multiple-choice questions) and answers, and a teacher can edit the competition provided by the central broadcast facility by adding or deleting questions therefrom. (*Id.*, 7:16-65, 8:46-49.) Downs thus discloses or suggests that a teacher at a remote location (**“an administrator or a coach”**) is able to choose questions, stored in unit 106, prepared by other employees (**“to choose questions**

from a database of questions submitted by other administrators or coaches”)
for utilization in an academic competition. Because unit 106 stores the questions, it is a **“database of questions.”**

A POSA would have looked to Downs to refine the functionality of the Feeney-Rogers combination because Downs also relates to an online system for managing a test or competition. (Ex. 1002, ¶119.) Having looked to Downs, a POSA would have been motivated to add a functionality like in Downs to the processor of server 12 in the Feeney-Rogers combination to allow the administrator in Feeney to choose questions from a database of questions prepopulated with questions and answers prepared by other administrators or employees. (Ex. 1002, ¶119.) Feeney already provides functionality via the user interface component 84 in system 80 of server 12 whereby the administrator can provide contest questions and answers. (Ex. 1005, 5:7-10.) The combination with Downs would have merely required adding functionality in system 80 so that the administrator can select questions created and stored in the database by other coaches or administrator. Doing so would have, for example, minimized the need for the administrator to create new questions for the contest; the administrator could simply reuse or repurpose old questions. (Ex. 1002, ¶119.)

A POSA would have had reasonable expectation of success in combining the teachings of Feeney, Rogers, and Downs in the manner described above. For

example, as discussed above, Feeney discloses a database of questions, including database of problems previously presented to the contestants, and tools for accepting new problems from contest administrators. Thus, it would be within ordinary skill to further provide a database of questions previously prepared by other administrators or employees, and allow a contest administrator to create contests from such a database. (Ex. 1002, ¶120.) Indeed, it would take no more than basic software coding to implement such features in the Feeney-Rogers system. (Ex. 1002, ¶120.)

Thus, combining Downs with the Feeney-Rogers system would have been obvious. *Adapt Pharma*, 25 F.4th at 1365. Indeed, the above combination would have been obvious because it involves the predictable application of a known technique (selecting questions from a database of questions populated by others) to a known system (the Feeney-Rogers system), where the combination merely provides a predictable outcome (the administrator being able to create new contests or competitions by selecting previously created questions). *KSR*, 550 U.S. at 417.

2. **Claim 22:** The method as in claim 14, further comprising the processor enabling an administrator or a coach to create and save questions, including the assignment of images to the questions, or to choose questions from a database of questions submitted by other administrators or coaches for utilization in an academic competition.

Feeney in combination with Rogers and Downs discloses or suggests claim 22 for the reasons discussed above with respect to claim 9. (Ex. 1002, ¶122; *supra* Section IX.B.1.)

C. Ground 3: Feeney, Rogers, and Siddique Render Obvious Claims 11 and 24

- 1. Claim 11: The system as in claim 1, wherein a contestant processing device enables an individual contestant to upload a photo, or select from collection of photos, to be used as a background on a display to the questions presented in an academic competition.**

The Feeney-Rogers-Siddique combination discloses or suggests claim 11. (Ex. 1002, ¶¶124-129.)

Feeney discloses presenting content (e.g., questions (*id.*, 6:33, 47, 24:41-43)) in the main display area 345 of the interface 300 (*id.*, 13:25-28, FIG. 5). Feeney also discloses the functionality of uploading photos, as system 10 enables players to upload a photo for their player card. (*Id.*, 15:36-40, FIG. 6.) As explained below, a POSA would have been motivated to improve Feeney’s interface to also upload a background for other portions of the interface 300, such as in the main display area 345 where the questions are presented. (Ex. 1002, ¶125.)

Siddique discloses how a user can set a background photo (e.g., of a beach) to simulate how their character looks with certain apparel (e.g., a bracelet) before buying the apparel. (Ex. 1011, FIGs. 14, 15.) Siddique discloses a system to “collaborate with other users in the online environment” (*id.*, Abs.) to create

customized user models of a person (*id.*, [98]). The user can then add apparel items to the user models to see how the apparel would look on the person before buying the apparel. (*Id.*) Modeling apparel enables interactive shopping and the “user models may be exported to gaming environments including third party games.” (*Id.*) The user can also use background photos to simulate how the user model and apparel would look in various environments. (*Id.*, [187], FIG. 14.) In particular, as shown below in figure 14, Siddique provides the user an option to “upload[] an image” as a backdrop for their user model or select from “default backgrounds.” (*Id.*)

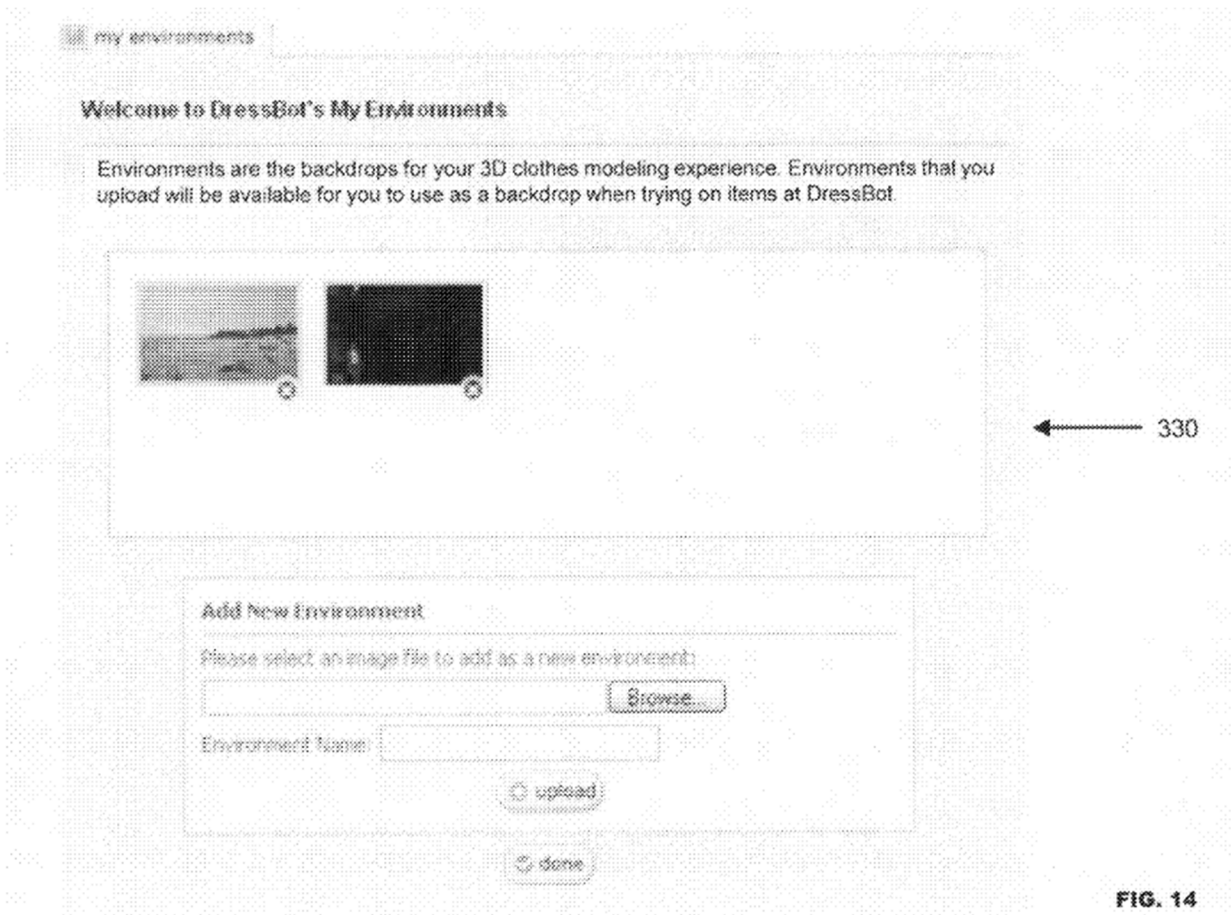
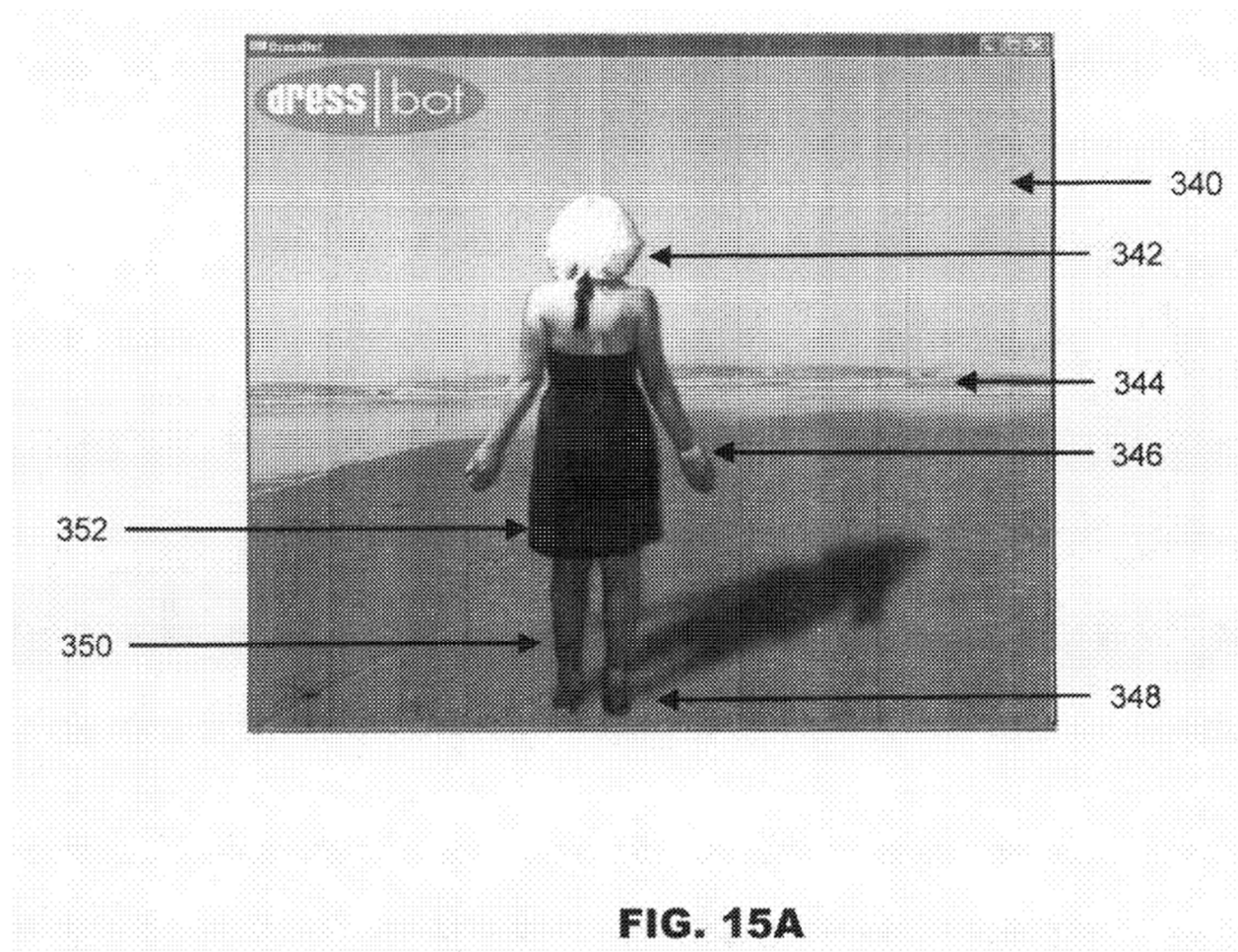


FIG. 14

(*Id.*, FIG. 14).

After selecting or uploading a background image, the user can simulate how their user model and apparel would look in the environment specified by the background image. (*Id.*, [188], FIG. 15A.) For example, the user can simulate how their user model looks with a certain bracelet and hairstyle while on the beach. (*Id.*)



(*Id.*, FIG. 15A.)

Thus, Siddique discloses or suggests **“upload a photo, or select from collection of photos, to be used as a background on a display.”**

The combination of Feeney and Rogers discloses presenting questions in an interface. As explained above, Siddique discloses adding a background photo to a user interface for interactive shopping and games (e.g., the user interface set forth in figure 15A). After looking at Feeney and Rogers for presenting questions in an interface, a POSA would have been motivated to use Siddique's teachings in the Feeney-Rogers combination to further enable a player to customize the ornamental look of the user interface 300. (Ex. 1002, ¶128.) For example, a POSA would have been motivated to adopt Siddique's functionality for selecting or uploading images in the Feeney-Rogers system to enable a user to choose a preferred background image for the series of questions. (Ex. 1002, ¶128.) Indeed, choosing a preferred background (e.g., a home screen) was a commonly available functionality across computing devices before 2012. (*Id.*)

A POSA would have had reasonable expectation of success in combining the teachings of Feeney, Rogers, and Siddique. (Ex. 1002, ¶129.) As discussed above, Feeney already discloses functionality for a user to upload a photo. Thus, it would take no more than basic software coding to implement Siddique's background selection in the Feeney-Rogers interface for presenting questions. (Ex. 1002, ¶129.)

Thus, it would have been obvious to combine the teachings of Feeney and Rogers with Siddique. *Adapt Pharma*, 25 F.4th at 1365. Indeed, the combination would have been obvious because it involves the predictable application of a known

technique (Siddique system's disclosed functionality that allows a user to select a background photo) to a known system (the Feeney-Rogers' user interface), where the combination merely provides a predictable outcome (display of a background photo behind Feeney's series of questions). *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, 417 (2007); Ex. 1002, ¶129.

Hence, the Feeney-Rogers-Siddique combination discloses or suggests that “**a contestant processing device enables an individual contestant to upload a photo, or select from collection of photos, to be used as a background on a display to the questions presented in an academic competition.**”

2. **Claim 24:** The method as in claim 14, further comprising a contestant processing device enabling an individual contestant to upload a photo, or select from collection of photos, to be used as a background on a display to the questions presented in an academic competition.

Feeney in combination with Rogers and Siddique discloses or suggests claim 24 for the reasons discussed above with respect to claim 11. (Ex. 1002, ¶130; *supra* Section IX.C.1.)

D. Ground 4: Feeney, Rogers, Panetta, and Maurseth Render Obvious Claims 1-5, 9, 14-18, and 22

Ground 4 incorporates the analysis of Ground 1 for claims 1-5, 9, 14-18, and 22. However, it includes additional analysis to address two limitations of claims 1 and 14 based on Panetta and Maurseth. Thus, except for the additional analysis below, Ground 4 is identical to Ground 1.

1. “Academic Competition”

To the extent Patent Owner argues that Feeney does not disclose an “academic competition,” Panetta discloses such a feature. Panetta discloses “a method of practicing educational exercises” in which “teams of students [] compete against each other.” (Ex. 1012, Abs.) For example, “questions are posed to competing teams of students who compete against each other in a baseball game format.” (*Id.*, [0022].) A teacher “establishes teams of students” and “each player logs in with their password.” (*Id.*, [0033].) The players from opposing teams take turns answering questions. (*Id.*, [0044].)

A POSA would have looked to Panetta because like Feeney and Rogers, Panetta involves a competition or test where questions are provided to the user. (Ex. 1002, ¶133.) Having looked to Panetta, a POSA would have recognized that academic competitions involving teams of students can be useful as a learning aid. (Ex. 1012, [0003]-[0004].) Given Feeney’s teachings of a comprehensive system for hosting contests, where the contest can be “any kind of game in which the players compete against each other” (Ex. 1005, 3:31-37), a POSA would have been motivated to combine the teachings of Panetta with Feeney and Rogers to allow the Feeney-Rogers combined system to be utilized for academic competitions. (Ex. 1002, ¶133.) Doing so would have expanded the applicability of the Feeney-Rogers combined system. (*Id.*) For example, a POSA would have been motivated to

configure Feeney's system such that teachers can serve as administrators to create academic contests with students as the players. (*Id.*) This would have allowed teachers and students the ability to take advantage of the vast number of contest features presented by Feeney. (*Id.*)

Configuring the Feeney-Rogers combined system to allow an academic competition would have been within ordinary skill and would not have required much (if any) change to the underlying system configuration. (Ex. 1002, ¶134.) This is supported by Feeney, which states that the contest can be "any kind of game in which the players compete against each other." (Ex. 1005, 3:31-37.)

Thus, combining Panetta's teachings with Feeney and Rogers, as discussed above, would have been obvious. *Adapt Pharma*, 25 F.4th at 1365.

2. "enabling a user, through a user interface connected to said database, to perform at least one of the following: . . . (3) divide a team into multiple teams for an intra-team academic competition"

As discussed above in Section IX.A.1.v, Feeney discloses one of the three options listed in limitation [1.d]. Maurseth additionally discloses the third option: dividing a team into multiple teams for an intra-team academic competition. Maurseth discloses a method of playing an educational game in which an organization is divided into aggregate teams, which are then further divided into "mini-teams." (Ex. 1007, Abs., [0033].) "Each mini-team plays [] the educational game with other mini-teams from the same team." (*Id.*, [0039].)

A POSA would have looked to Maurseth because it relates to games involving teams like Feeney. (Ex. 1002, ¶136.) Having looked to Maurseth, a POSA would have recognized that contest administrators need the flexibility to be able to divide teams into mini-teams depending on the needs of a contest. (*Id.*) For example, if teams get too large, the administrator could need the ability to divide the teams into sub-teams and host the competition between the sub-teams. (*Id.*) Thus, a POSA would have been motivated to configure the Feeney-Rogers system to provide the ability for the administrator to divide teams through Feeney's user interface 84. (*Id.*) And a POSA would have a reasonable expectation of success in providing such a feature in the Feeney-Rogers system. (*Id.*) Indeed, providing such a feature would take no more than basic software coding. (*Id.*)

Thus, combining Maurseth's teachings with Feeney and Rogers, as discussed above, would have been obvious. *Adapt Pharma*, 25 F.4th at 1365.

**E. Ground 5: Feeney, Rogers, Panetta, Maurseth, and Downs
Render Obvious Claims 9 and 22**

Feeney, Rogers, Panetta, Maurseth, and Downs disclose or suggest claims 9 and 22 for reasons similar to those discussed in Section IX.B. (Ex. 1002, ¶137.) A POSA would have found it obvious to combine the Feeney-Rogers-Panetta-Maurseth system and method set forth in Section IX.D with the teachings of Downs for reasons similar to those discussed above in Section IX.B. (*Id.*) Indeed, the

addition to Panetta and Maurseth for the independent claims, as in Section IX.D, does not impact the analysis for claims 9 and 22 set forth in Section IX.B. (*Id.*)

F. Ground 6: Feeney, Rogers, Panetta, Maurseth, and Siddique Render Obvious Claims 11 and 24

Feeney, Rogers, Panetta, Maurseth, and Siddique disclose or suggest claims 11 and 24 for reasons similar to those discussed in Section IX.C. (Ex. 1002, ¶138.) A POSA would have found it obvious to combine the Feeney-Rogers-Panetta-Maurseth system and method set forth in Section IX.D with the teachings of Siddique for reasons similar to those discussed above in Section IX.C. (*Id.*) Indeed, the addition to Panetta and Maurseth for the independent claims, as in Section IX.D, does not impact the analysis for claims 11 and 24 set forth in Section IX.C. (*Id.*)

X. DISCRETIONARY DENIAL UNDER FINTIV IS NOT APPROPRIATE

The *Fintiv* factors do not justify denying institution. 35 U.S.C. §314(a); *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 (P.T.A.B. Mar. 20, 2020) (precedential).

The **first factor** (stay) is neutral because Kahoot! has not yet moved to stay the district court proceedings pending IPR, and the PTAB will not infer how the district court would rule should a stay be requested. *See Hulu LLC v. SITO Mobile R&D IP, LLC et al.*, IPR2021-00298, Paper 11 at 10-11 (P.T.A.B. May 19, 2021).

The **second factor** (proximity of trial dates) weighs in favor of institution because trial is not yet scheduled.

The **third factor** (investment in parallel proceedings) weighs in favor of institution. There is not even a Scheduling Order and no discovery has started. (Nor have there been any substantive orders in this case.

The **fourth factor** (overlap in parallel proceedings) weighs in favor of institution. Petitioner hereby stipulates that, if the IPR is instituted, Petitioner will not pursue the IPR grounds in the district court litigation. Thus, “[i]nstituting trial here serves overall system efficiency and integrity goals by not duplicating efforts and by resolving materially different patentability issues.” *Apple, Inc. v. SEVEN Networks, LLC*, IPR2020-00156, Paper 10 at 19 (P.T.A.B. June 15, 2020); *see also Sand Revolution II, LLC v. Continental Intermodal Group-Trucking LLC*, IPR2019-01393, Paper 24 at 12 (P.T.A.B. June 16, 2020).

The **fifth factor** (parties) is neutral because although the Petitioner and Patent Owner are the same parties as in district court, under the “holistic view” of whether integrity of the system and efficiency is best served, the factors here indicate that institution is proper. *Samsung Elecs. Co. Ltd. v. Dynamics Inc.*, IPR2020-00505, Paper 11 at 15 (P.T.A.B. Aug. 12, 2020).

The **sixth factor** (merits) weighs in favor of institution. As argued herein, the Petition presents a compelling, meritorious challenges that would plainly lead to a

conclusion that one or more claims are unpatentable by a preponderance of the evidence.. *See CommScope Technologies LLC v. Dali Wireless, Inc.*, IPR2022-01242, Paper 23 (P.T.A.B. Feb. 27, 2023) (precedential).

XI. CONCLUSION

Petitioner requests institution of IPR for claims 1-5, 9, 11, 14-18, 22, and 24 of the '825 patent based on the grounds specified in this petition.

Respectfully submitted,

Dated: March 7, 2025

By: /Chetan Bansal/
Chetan Bansal (Reg. No. 81,590)
Counsel for Petitioner

CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that the foregoing Petition for *Inter Partes* Review of U.S. Patent No. 10,339,825 contains, as measured by the word-processing system used to prepare this paper, 12,812 words. This word count does not include the items excluded by 37 C.F.R. § 42.24 as not counting towards the word limit.

Respectfully submitted,

Dated: March 7, 2025

By: /Chetan Bansal/
Chetan Bansal (Reg. No. 81,590)
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2025, I caused a true and correct copy of the foregoing Petition for *Inter Partes* Review of U.S. Patent No. 10,339,825 and supporting exhibits to be served via express mail on the Patent Owner at the following correspondence address of record as listed on PAIR:

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