UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TIKTOK INC.
Petitioner,

v.

DISTEFANO WEBSITE INNOVATIONS, LLC,
Patent Owner.

Case No. IPR2025-01061
U.S. Patent No. 11,763,316

EXPERT DECLARATION OF DR. ANDY COCKBURN

I do hereby declare and state, that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, under Section 1001 of Title 18 of the United States Code.

Dated: 30th May, 2025



Dr. Andy Cockburn

TABLE OF CONTENTS

EXHIBITS CONSIDERED ..... **iv**

LISTING OF CHALLENGED CLAIMS ..... **vii**

I. INTRODUCTION **1**

A. Background and Qualifications 1

B. Materials Considered 7

C. Summary of Opinions 9

II. LEGAL STANDARDS **9**

A. Claim Construction 9

B. Person of Ordinary Skill in the Art 11

C. Anticipation 12

D. Obviousness 12

E. *Markush* Groups 14

III. THE '316 PATENT **15**

A. Overview 15

B. Prosecution History 16

1. The Patent Family 16

2. File History of 11,763,316 19

C. LinkedIn Case 34

D. LinkedIn IPR 35

E. The Challenged Claims 39

IV. THE STATE OF THE ART **40**

A. WYSIWYG 42

B. Reciprocal Links 46

C. Internet Marketing 49

D. Social Networking 50

V. THE LEVEL OF ORDINARY SKILL IN THE ART (SKILLED ARTISAN) **52**

VI. CLAIM CONSTRUCTION 53

A. "*reciprocal link site*" 54

B. *Markush* group 58

VII. DETAILED EXPLANATION OF GROUNDS FOR INVALIDITY 59

A. Ground 1: Block Renders Claims 1-26 Obvious 59

1. Overview of Block 59

2. Claim 1 And Its Dependent Claims 2-13 78

3. Claim 14 And Its Dependent Claims 15-26 183

B. Ground 2: Arnold in view of Arora Renders Claims 1-7, 9-20 and 22-26 Obvious 197

1. Overview of Arnold 197

2. Overview of Arora 206

3. The combination of Arnold and Arora 211

4. Motivation to Combine 228

5. Claim 1 And Dependent Claims 2-7, 9-13 233

6. Claim 14 And Dependent Claims 15-20, 22-26 339

C. Ground 3: Arnold in view of Arora and Ahlberg Renders Claims 8 and 21 Obvious 355

VIII. SECONDARY CONSIDERATIONS 366

IX. CONCLUSION 366

EXHIBITS CONSIDERED

No.	Short Name	Reference
1001	316 Patent	Certified Copy of U.S. Patent 11,763,316
1002	316 File History	Certified File History of 11,763,316
1003	Cockburn Decl.	Expert Declaration of Dr. Andy Cockburn
1004	Cockburn CV	Curriculum Vitae of Dr. Andy Cockburn
1005	551 File History	Certified File History of 09/589,551
1006	Block Provisional	Provisional U.S. Patent Application 60/172,983
1007	Block	U.S. Patent Application 2003/0050976A1
1008	Arnold	U.S. Patent 6,016,504
1009	Arora	U.S. Patent 5,845,299
1010	LinkedIn IPR POPR	IPR2019-00419, Paper No. 6 (Patent Owner's Preliminary Response)
1011	WDTX Complaint	*DiStefano Website Innovations, LLC v. Bytedance Ltd. et al.*, Case no. 1:24-cv-00763, Complaint (W.D. Tex. Jul. 8, 2024)
1012	EDTX Complaint	*DiStefano Website Innovations, LLC v. Bytedance Ltd. et al.*, Case no. 2:24-cv-00874-RWS-RSP, Complaint (E.D. Tex. Oct. 29, 2024)
1013	Bailey	U.S. Patent 6,785,671
1014	Bezos	U.S. Patent 6,029,141
1015	Horstmann	U.S. Patent 5,995,099
1016	Xia	U.S. Patent 7,028,254
1017	Hoyt	U.S. Patent Application 2001/0034646

1018	Pierce	U.S. Patent 7,139,727
1019	Ross	U.S. Patent 6,629,135
1020	Six Degrees	Six Degrees, https://web.archive.org/web/19980416103152/http://sixdegrees.com
1021	Dunnington	Guide to Web Site Promotion: How Companies Can Draw More Qualified Traffic to Their World Wide Web Sites
1022	Turbo Promote	Turbo Promote, https://web.archive.org/web/19970418080213/http://www.turbopromote.com/links.html
1023	Puzzle Depot	Puzzle Depot, https://web.archive.org/web/19990417052546/http://www.puzzledepot.com:80/recips.shtml
1024	FAQ	https://www.w3.org/People/Berners-Lee/FAQ.html#browser
1025	Burners-Lee	https://www.w3.org/People/Berners-Lee/WorldWideWeb.html
1026	Macromedia	Macromedia, https://web.archive.org/web/19990223214509/http:/www.macromedia.com/software/dreamweaver/
1027	Arora 145	U.S. Patent 5,911,145
1028	RAE	RAE Technology, WIKIPEDIA, https://en.wikipedia.org/wiki/Rae_Technology
1029	Forbes	Macromedia Hums the E-Business Tune, FORBES (OCT. 7, 1999), https://www.forbes.com/1999/10/07/mu3.html
1030	Macromedia Complaint	*Macromedia, Inc. v. Adobe Sys. Inc.*, Case No. 01-03940 SI, Complaint (N.D. Cal. Oct. 19, 2001), http://www.techlawjournal.com/courts2001/macromedia_adobe/20011019com.asp
1031	Macromedia Wikipedia	Macromedia, WIKIPEDIA, https://en.wikipedia.org/wiki/Macromedia
1032	*LinkedIn* IPR	IPR2019-00419, Paper 2
1033	**RESERVED**	
1034	**RESERVED**	

1035	Cockburn 1996	Andy Cockburn, Steve Jones. Which way now? Analysing and easing inadequacies in WWW navigation. *International Journal of Human-Computer Studies*, Volume 45, Issue 1, 1996, Pages 105-129, ISSN 1071-5819, https://doi.org/10.1006/ijhc.1996.0044
1036	Cockburn 2002	A Cockburn, B McKenzie and M JasonSmith, *Pushing Back: Evaluating a New Behaviour for the Back and Forward Buttons in Web Browsers*. International Journal of Human-Computer Studies. 57(5):397-414. Academic Press. 2002.
1037	760 Patent	U.S. Patent 8,768,760
1038	CAFC Brief	Revised Opening Brief of Appellant DiStefano Patent Trust III, LLC filed in *DiStefano Patent Trust III v. LinkedIn Corporation*, Case No. 19-01210, Dkt. 25 (Fed. Cir. Mar. 27, 2019).
1039	LinkedIn Complaint	*DiStefano Pat. Tr. III, LLC v. LinkedIn Corp.*, Civ. No. 1-17-cv-01798, Dkt. 1, Complaint (D. Del. Dec. 14, 2017)
1040	LinkedIn D. Del. Decision	*DiStefano Pat. Tr. III, LLC v. LinkedIn Corp.*, 346 F. Supp. 3d 616, 623 (D. Del. 2018)
1041	Oxford English Dictionary: "site"	https://www.oed.com/dictionary/site_n
1042	**RESERVED**	
1043	Ahlberg	C.Ahlberg, C.Williamson, B.Shneiderman, *Dynamic queries for information exploration: an implementation and evaluation*. In Proceedings of the SIGCHI Conference on Human Factors in Computing Systems (CHI '92). Association for Computing Machinery, New York, NY, USA, 619–626.

LISTING OF CHALLENGED CLAIMS

Element	Claim Limitation
Claim 1	
1[pre]	A method performed within and by a server system configured to modify and serve web pages, comprising:
1[a]	receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first web site;
1[b]	receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset;
1[c]	generating, based upon the instruction, the edited web asset;
1[d]	forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system;
1[e]	receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first web site to the second web site;
1[f]	storing, within a computer database system of the server system, first information indicating that the first identification was received by the server system;
1[g]	modifying, based upon the instruction, the first website to include the edited web asset;
1[h]	modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink;
1[i]	modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site; and

1[j]	serving computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site, wherein
1[k]	the server system is configured to host the first web site and the second website,
1[l]	the editing screen is configured to display the web asset, and
1[m]	the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.
Claim 2	
2[pre]	The method of claim 1, wherein the server system is configured to:
2[a]	store, within the computer database system, second information indicating that a second identification to create the second hyperlink from the second website to the first website was received by the server system and from a second user associated with the second web site, and
2[b]	modify the second website to include the second hyperlink based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received.
Claim 3	
3	The method of claim 1, wherein the graphical user interface is configured to receive an entry associated with the first identification within an entry field of the graphical user interface.
Claim 4	
4[a]	The method of claim 1, wherein the graphical user interface is configured to present a graphical widget adjacent each of the one or more identifiers respectively associated with the one or more previously-created websites,
4[b]	the graphical widget is configured to receive a user-initiated selection, and
4[c]	the selection of the second website is based upon the user-initiated selection.

Claim 5	
5	The method of claim 1, wherein the server system is configured to identify the one or more previously-created websites based upon a receipt, by the server system, of a request generated by the graphical user interface for one or more suggested linking locations for the first website.
Claim 6	
6[a]	The method of claim 1, wherein the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface, and
6[b]	the server system is configured to select the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface.
Claim 7	
7	The method of claim 6, wherein the user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of a group consisting of: a name of the first user, an email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user.
Claim 8	
8[a]	The method of claim 6, wherein the server system is configured to select the plurality of the previously-created websites associated with the one or more identifiers by searching other user information previously-supplied by other users of the server system and stored within the server system, and

8[b]	the searching is performed by a search engine using the user information supplied by the first user within the at least one information collection field of the graphical user interface.
Claim 9	
9	The method of claim 6, wherein the first user and the second user are registered users of the server system.
Claim 10	
10	The method of claim 9, wherein the user information is supplied by the first user within the at least one information collection field of the graphical user interface during registration of the first user with the server system.
Claim 11	
11	The method of claim 1, wherein the first web site of the first user includes a plurality of web pages including a first web page.
Claim 12	
12	The method of claim 11, wherein the server is configured to serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.
Claim 13	
13[pre]	The method of claim 11, wherein the server system is configured to:
13[a]	create, in the first web page, a reciprocal link site for the first hyperlink, and
13[b]	create, in a second web page of the second website, a reciprocal link site for the second hyperlink.
Claim 14	
14[pre]	A server system configured to modify and serve web pages, comprising:
14[a]	a computer database system, and
14[b]	a hardware system configured to perform:
14[c]	receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system,

	information indicating a selection of a web asset to be used in a first website;
14[d]	receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset;
14[e]	generating, based upon the instruction, the edited web asset;
14[f]	forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system;
14[g]	receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first website to the second website;
14[h]	storing, within the computer database system of the server system, first information indicating that the first identification was received by the server system;
14[i]	modifying, based upon the instruction, the first website to include the edited web asset;
14[j]	modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink;
14[k]	modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site; and
14[l]	serving computer data associated with the first web site that includes the edited web asset and the first hyperlink from the first website to the second website, wherein
14[m]	the server system is configured to host the first web site and the second website,
14[n]	the editing screen is configured to display the web asset, and
14[o]	the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.

Claim 15	
15[pre]	The server system of claim 14, wherein the server system is configured to:
15[a]	store, within the computer database system, second information indicating that a second identification to create the second hyperlink from the second website to the first website was received by the server system and from a second user associated with the second website, and
15[b]	modify the second website to include the second hyperlink based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received.
Claim 16	
16	The server system of claim 14, wherein the graphical user interface is configured to receive an entry associated with the first identification within an entry field of the graphical user interface.
Claim 17	
17[a]	The server system of claim 14, wherein the graphical user interface is configured to present a graphical widget adjacent each of the one or more identifiers respectively associated with the one or more previously-created websites,
17[b]	the graphical widget is configured to receive a user-initiated selection, and
17[c]	the selection of the second website is based upon the user-initiated selection.
Claim 18	
18	The server system of claim 14, wherein the server system is configured to identify the one or more previously-created websites based upon a receipt, by the server system, of a request generated by the graphical user interface for one or more suggested linking locations for the first website.
Claim 19	

19[a]	The server system of claim 14, wherein the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface, and
19[b]	the server system is configured to select the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface.
Claim 20	
20	The server system of claim 19, wherein the user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of a group consisting of: a name of the first user, an email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user.
Claim 21	
21[a]	The server system of claim 19, wherein the server system is configured to select the plurality of the previously-created websites associated with the one or more identifiers by searching other user information previously-supplied by other users of the server system and stored within the server system, and
21[b]	the searching is performed by a search engine using the user information supplied by the first user within the at least one information collection field of the graphical user interface.
Claim 22	
22	The server system of claim 19, wherein the first user and the second user are registered users of the server system.
Claim 23	

23	The server system of claim 22, wherein the user information is supplied by the first user within the at least one information collection field of the graphical user interface during registration of the first user with the server system.
Claim 24	
24	The server system of claim 14, wherein the first web site of the first user includes a plurality of web pages including a first web page.
Claim 25	
25	The server system of claim 24, wherein the server is configured to serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.
Claim 26	
26[pre]	The server system of claim 24, wherein the server system is configured to:
26[a]	create, in the first web page, a reciprocal link site for the first hyperlink, and
26[b]	create, in a second web page of the second website, a reciprocal link site for the second hyperlink.

I. INTRODUCTION

1. I, Andy Cockburn, have been retained by TikTok Inc. (Petitioner) as an independent, technical expert consultant in this proceeding before the United States Patent and Trademark Office (USPTO).

2. This Declaration is in support of the Petition for *inter partes* review involving U.S. Patent 11,763,316 (the "'316 Patent" or "the Patent") (EX1001), entitled "Server system configured to provide graphical user interface for modifying web pages to include hyperlinks" and listing Thomas L. DiStefano, III as the sole inventor. I have been informed that Distefano Website Innovations, LLC ("DWI") is the Patent Owner.

3. This declaration is based on information currently available to me, including the prior art discussed herein. I may also supplement my opinions in response to any additional information that becomes available from Patent Owner and/or any opinions provided by Patent Owner or its expert(s).

4. I am being compensated at my rate of $600 per hour for my services. No part of my compensation is dependent on my opinions or on the outcome of this proceeding. I have no financial interest in any of the parties to this proceeding.

A. Background and Qualifications

5. My education and experience are described more fully in my *Curriculum Vitae,* a copy of which can be found in Exhibit 1004. I am a Professor

at the Department of Computer Science and Software Engineering at the University of Canterbury, New Zealand. I also currently head the HCI (Human-Computer Interaction) and Multi-Media research group at the University of Canterbury.

6. In 1988, I was awarded a Bachelor of Science with Honors in Computer Science from the University of York, England.

7. In 1993, I was awarded a Ph.D. from the University of Stirling, Scotland. My thesis was on "Computer Supported Cooperative Work" which relates to forms of group interaction supported on computers.

8. In 1993, I joined the University of Canterbury as a Lecturer in the Department of Computer Science (now the Department of Computer Science and Software Engineering). I was subsequently promoted to a Senior Lecturer, and then an Associate Professor, before my appointment as a Professor in 2010. I currently hold the title of Professor.

9. I have over 30 years of experience in the area of HCI. The field of HCI is generally concerned with ways of understanding and improving the interaction between humans and computers, with a view to understanding, evaluating, designing, and building new styles of interactions that improve on one or more of the end goals of making computers faster to learn, more intuitive, more efficient to use, and more subjectively satisfying.

10. Throughout my career, I have published the results of many research projects that have involved building new user interfaces or reviewing existing user interfaces for performing a particular task, and evaluating their effectiveness. This includes publications relating to:

(a) investigating user experiences with web navigation interfaces, for example when using the "back" button on web browsers;

(b) reviewing and improving various interface schemes for traversing through documents and lists in desktop and mobile computer applications, including zooming, scrolling, and other techniques;

(c) analyzing new interfaces for text entry on mobile and touch-sensitive devices;

(d) addressing the problems arising from the small form factor of mobile devices with touch-sensitive displays, including wearable technologies;

(e) examining the influence of haptic feedback on user performance with mouse and touchscreen input devices;

(f) evaluating the importance of spatially stable displays in user interfaces; and

(g) designing, analyzing and evaluating gesture-based input techniques for various user activities, including music data entry, web navigation, text entry, and scrolling.

11. I also have extensive experience in designing and building new user interfaces and reviewing existing user interfaces. This includes a number of projects regarding the design, development and evaluation of user interfaces that I have undertaken with companies in the computing and HCI industry, such as:

(a) working with Microsoft Research in 1999 on the development, evaluation and improvement of user interfaces for web browsing, in particular the mechanisms for revisiting pages (such as through the "back" button or bookmarks).

(b) working with Digit Wireless in 2002 on the evaluation of user performance for user interfaces for digital text entry on mobile devices;

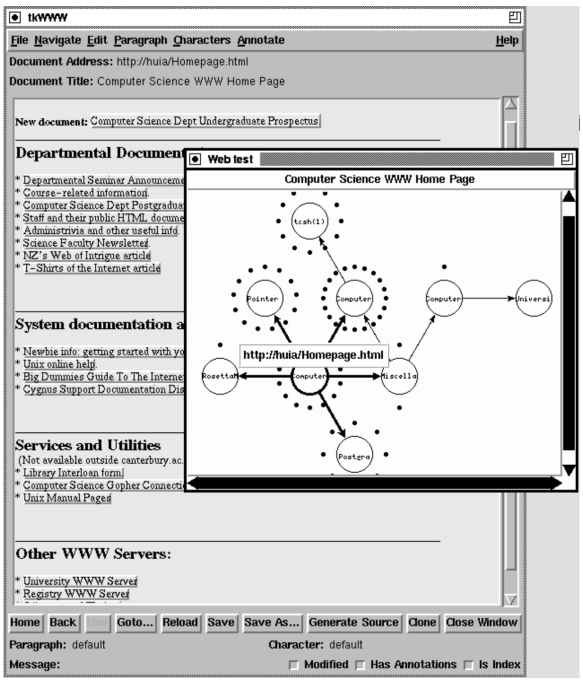
(c) working with IBM Almaden Research in 2006 on the design, development and evaluation of user interfaces for gesture-based text entry on mobile devices;

(d) a number of projects from 2006-2010 working with Logitech on the design, development, evaluation and improvement of user interfaces for next generation mice, including in relation to scrolling and window management tasks;

(e) working with Hewlett-Packard Research Labs from 2010-2012 on the design and evaluation of gesture-based pointing techniques for remote displays, such as interactive TVs; and

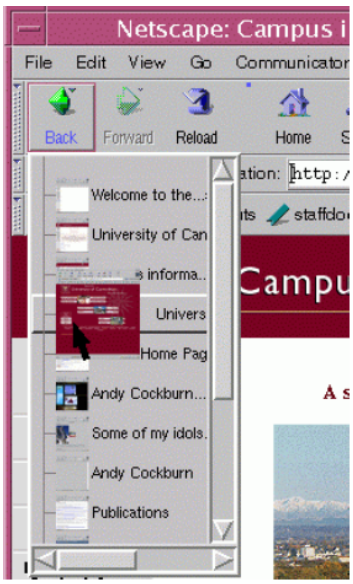
(f) working with Airbus SAS in 2016 on methods to assist pilots' gesture-based interaction with touchscreens in turbulent environments;

12. In 1996 I published a research paper that analyzed the problems that users have in understanding the navigation behavior of web browsers, particularly when returning to previously visited web pages[1]. The paper also described a user interface system that I designed and built, called WebNet, that extended web browser functionality to help users overcome these problems. A figure from that paper is shown below.



[1] Andy Cockburn, Steve Jones. Which way now? Analysing and easing inadequacies in WWW navigation. *International Journal of Human-Computer Studies*, Volume 45, Issue 1, 1996, Pages 105-129, ISSN 1071-5819, https://doi.org/10.1006/ijhc.1996.0044 (EX1035).

13. I continued to conduct research on user interfaces for web navigation for a decade. This included the design and implementation of web browser extensions that modified the behavior of the back button, such that it showed a menu of zoomable webpage thumbnails, as shown in the image below[2].



14. At the University of Canterbury, I currently teach a course on HCI for final year undergraduate students and a course on research methods in HCI for postgraduate students.

15. In the past, I have also taught introductory computer programming courses for first year students across disciplines, which included the implementation of graphical user interfaces.

[2] A Cockburn, B McKenzie and M JasonSmith, *Pushing Back: Evaluating a New Behaviour for the Back and Forward Buttons in Web Browsers*. International Journal of Human-Computer Studies. 57(5):397-414. Academic Press. 2002 (EX1036).

16. I also manage an active research lab with a number of Ph.D. students. I have previously supervised fourteen students to successful completion of their Ph.D.s in the field of HCI.

17. The Association for Computing Machinery (ACM) is the world's largest scientific and educational computing society. In 2015, I was elected to the ACM Special Interest Group on Computer-Human Interaction (CHI) Academy, which honors the principal leaders of the field of HCI.

18. I also annually attend conferences relating to the field of HCI and regularly read journals that cover research in the field of HCI.

19. To keep abreast with industry trends, I regularly read broader journals, magazines and websites related to computer science and technology, including Communications of the ACM, ACM TechNews, BBC Technology, and New York Times Technology.

20. A detailed list of my other professional activities, memberships, and speaking engagements is included in my CV.

B. Materials Considered

21. In preparing this Declaration, I have reviewed the '316 Patent (EX1001) and its prosecution history (EX1002), as well as the patents and documents cited herein, and I have considered these documents in light of the general knowledge in the art at the relevant time.

22. The ’316 Patent is generally directed to:

> creating and posting web pages to the internet, and more specifically, to a method for more easily developing web pages through the use of a graphical user interface.

EX1001, 1:26-29.

23. I am familiar with the technology described in the ’316 Patent as of the earliest possible effective filing date of June 7, 2000. For the purposes of this *inter partes* review, as I discuss later, I have been instructed to assume that the effective filing date of the Claims of the ’316 Patent is June 7, 2000, the filing date of U.S. Patent Application No. 09/589,551 (“’551 Application”) (EX1005).

24. In formulating my opinions, I have relied upon my experience in the relevant art. I have also considered the viewpoint of a person of ordinary skill in the art (“Skilled Artisan”) in the relevant field, as of June 7, 2000, who I describe below. For convenience, the materials I considered in arriving at my opinions are listed in the Materials Considered table above.

25. The opinions and comments formulated during this assessment are based on observations and information available at the time of the investigation. The findings presented herein are made to a reasonable degree of scientific certainty. My opinions reflect how one of ordinary skill in the art would have understood the ’316 patent, the prior art, and the state of the art at the time of the earliest possible effective filing date.

C. Summary of Opinions

26. For the reasons I discuss below, it is my opinion that claims 1-26 of the '316 patent are unpatentable for the following reasons:

- **Ground 1**: Claims 1-26 are unpatentable as obvious in view of U.S. Published Patent Application No. 2003/0050976A1 ("Block").
- **Ground 2**: Claims 1-7, 9-20, 22-26 are unpatentable as obvious in view of U.S. Patent No. 6,016,504 ("Arnold") in combination with U.S. Patent No. 5,845,299 ("Arora").
- **Ground 3**: Claims 8 and 21 are unpatentable as obvious in view of Arnold in combination with Arora and Ahlberg.

II. LEGAL STANDARDS

27. I am not an attorney and offer no legal opinions, but in the course of my work, I have had experience studying and analyzing patents and patent claims from the perspective of a Skilled Artisan. I have been informed by counsel of certain legal standards and have applied those standards, described below, in formulating my opinions.

A. Claim Construction

28. I understand that the claims of a patent define the limits of the patentee's exclusive rights. I understand that to determine the scope of the claimed invention, courts typically construe claim terms, the meaning of which the parties

may dispute. I understand that claim terms should generally be given their ordinary and customary meaning as understood by a Skilled Artisan at the time of filing of the patent application, after reading the patent and its prosecution history. I also understand that a basic tenet of claim construction presumes that different words in a claim have different meanings, unless there is evidence to the contrary. A claim term, for instance, will not receive its ordinary meaning if the patentee acted as his or her own lexicographer and clearly set forth a definition of the claim term in the specification. In that case, the claim term will receive the definition set forth in the patent.

29. I understand that claims must be construed in light of and consistent with the intrinsic evidence. In this context, I understand that intrinsic evidence includes the claims themselves, the written disclosure in the specification, and the patent's prosecution history, including prior art that was considered by the United States Patent and Trademark Office. I understand the specification is highly relevant to the claim construction analysis and often is the single best guide to the meaning of a disputed term. I understand that extrinsic evidence may also be considered when construing claims and may include, for example, technical dictionaries, technical publications and books, treatises, and expert testimony, though the intrinsic record will be more persuasive as to the meaning of a particular term.

30. I understand a preamble will be considered limiting if it recites essential structure or steps or is necessary to give life, meaning, and vitality to the claim. I understand a preamble is not limiting where the body of a claim defines a structurally complete invention and the preamble only states an invention's intended use.

B. Person of Ordinary Skill in the Art

31. I understand that certain issues relating to validity must be judged from the perspective of a person of ordinary skill in the art–i.e., a Skilled Artisan–with respect to the claimed subject matter of the '316 Patent. I have been informed and understand that claims are generally given their ordinary and customary meaning as understood by a Skilled Artisan at the time of the alleged invention, in light of the patent specification and prosecution history. Such an individual is presumed to be aware of all pertinent prior art, thinks along conventional wisdom in the art, and is a person of ordinary creativity. I have been informed and understand that in considering what the claims of a patent require, what was known prior to that patent, what a prior art reference discloses, and whether an invention is obvious or not, one must use the perspective of a Skilled Artisan.

32. I understand that, when there is a reason to solve a problem and there are a finite number of identified, predictable solutions, a person of ordinary skill has good reason to pursue the known options within his or her technical grasp. I further understand that, if this leads to the anticipated success, it is likely the product not of

innovation but of ordinary skill and common sense, which bears on whether the claim would have been obvious.

33. I further understand that the factors that may be considered in determining the level of skill of a Skilled Artisan include, but are not limited to, (1) the type of problems encountered in the art; (2) prior art solutions to those problems; (3) rapidity with which innovations are made; (4) sophistication of the technology; and (5) the educational level of active workers in the field.

C. Anticipation

34. I have been informed and understand that a patent claim is anticipated under 35 U.S.C. §102, and therefore unpatentable, if every element of the claimed subject matter is described by a single, prior art publication.

D. Obviousness

35. I understand that a prior art reference can render a patent claim obvious to one of ordinary skill in the art if the differences between the subject matter set forth in the patent claim and the prior art are such that the subject matter of the claim would have been obvious at the time the claimed invention was made. For example, a combination of familiar elements according to known methods is likely to be obvious if the combination does no more than produce predictable results.

36. In analyzing obviousness, I understand that it is important to consider the scope of the claims, the level of skill in the relevant art, the scope and content of

the prior art, the differences between the prior art and the claims, and any secondary considerations. I further understand that the Skilled Artisan is not an automaton but one having common sense and ordinary creativity. I also understand that a claim is not obvious simply because a combination of prior art references discloses each claim element collectively.

37. I understand that a Skilled Artisan is assumed to have knowledge of all prior art references. I also understand that when considering the obviousness of a patent claim, one should consider whether a teaching, suggestion, or motivation to combine the references exists so as to avoid impermissibly applying hindsight when considering the prior art. I understand this test should not be rigidly applied, but that the test can be important to avoiding such hindsight.

38. I understand that the claimed subject matter is obvious when an ordinary artisan would have been motivated to combine pre-existing elements and that combination yields no more than would have been expected. I also understand that in assessing whether a claim is obvious, one must consider whether the claimed improvement is more than the predictable use of prior art elements according to their established functions. I understand that a motivation to combine the references may be implicit in the prior art, and there is no requirement that there be an actual or explicit teaching to combine two references. Thus, one may take into account the inferences and creative steps that a Skilled Artisan would employ to combine the

known elements in the prior art in the manner claimed by the patent-at-issue. I understand that one should avoid "hindsight bias" and ex post reasoning in performing an obviousness analysis. I understand that in an obviousness analysis, neither the motivation nor the avowed purpose of the inventors controls the inquiry. Any need or problem known in the field at the time of the invention and addressed by the invention can provide a reason for combining elements.

39. I further understand that obviousness is a legal conclusion based on the underlying factual issues of the scope and content of the prior art, the differences between the claimed invention and the prior art, the level of ordinary skill in the art, and any objective indicia of non-obviousness. For that reason, I am not rendering a legal opinion on the ultimate legal question of obviousness. Rather, my testimony addresses the underlying facts and factual analysis that would support a legal conclusion of obviousness, and when I use the term obvious, I am referring to the perspective of a Skilled Artisan at the time of invention.

E. *Markush* Groups

40. I have been informed that a "*Markush*" group includes a disjunctive list of alternatives from which a selection is to be made. I have further been informed and understand that a *Markush* claim uses the signal "group of" and lists alternatives that fulfill the claim limitation. I have further been informed and understand that the Federal Circuit has held that "the entire element [of a *Markush* claim] is disclosed

by the prior art if one alternative in the *Markush* group is in the prior art." I have been informed and understand that based on patent law, disclosure in the prior art of one member of the group is sufficient to render the claim invalid as anticipated.

III. THE '316 PATENT

A. Overview

41. The '316 Patent, entitled "Server System configured to provide Graphical User Interface for modifying Web Pages to include Hyperlinks" relates to "creating and posting web pages to the internet." EX1001, Title, 1:26-29. In particular, the '316 Patent claims to be a "method for more easily developing web pages through the use of a graphical user interface." *Id*.

42. The '316 Patent states that websites will "not display banner ads and links for a particular website without contractual arrangements." EX1001, 2:54-56. According to the '316 Patent "[w]hat is further needed is a streamlined method for web page/website development and, in particular, a method of facilitating the development of e-commerce websites having key marketing and sales transaction features." *Id*. 3:9-12. In particular, the '316 Patent states that two web pages can form a "reciprocal arrangement" that "is established between the first web page and the second web page." EX1001, Abstract. The "reciprocal arrangement" includes elements, like "advertising messages ("banner ads")," which when placed on a second website include a "link to the first website." *Id*. 3:30-32. At its core, the

’316 Patent thus relates to a method of inserting hyperlinks into web pages—for example, inserting a hyperlink to a second web page into a first web page, and conversely inserting a hyperlink to the first web page into the second web page—to establish a reciprocal arrangement between the first web page and the second web page. EX1001, 3:16-21, 3:30-32, Abstract.

43. The ’316 Patent states that “during design of the first website” the system can “receiv[e] information at a user interface indicating a type of an element for marketing that is to be displayed at the second website, and information specifying the second website at which the element is to be displayed.” EX1001, 3:21-25. For example, “a user interface displayed at one of [a plurality of] registered user computers” can provide “information indicating a type of element for marketing that is to be displayed at the second website, and information specifying the second website at which the element is to be displayed.” EX1001, 4:30-36.

B. Prosecution History

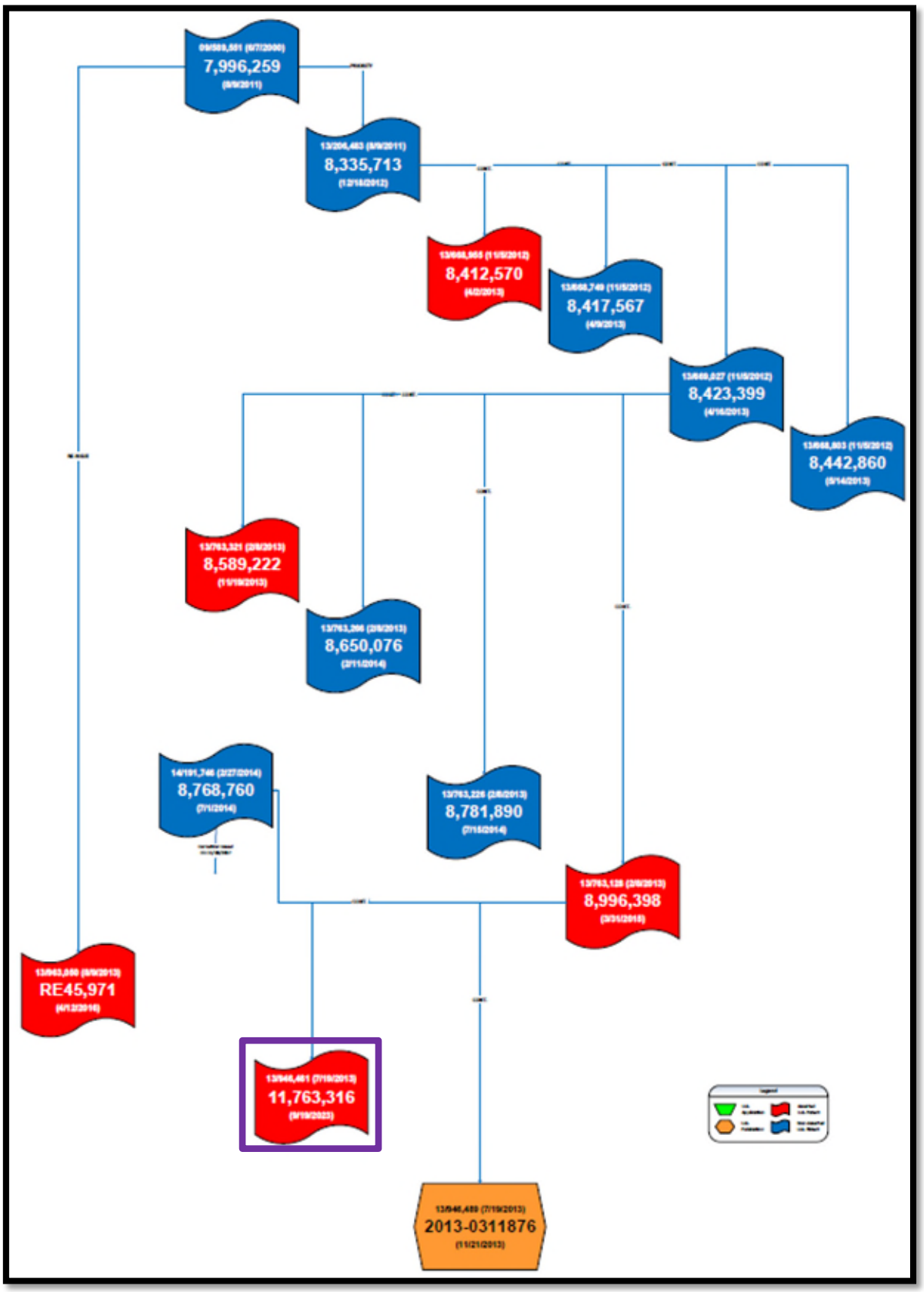
1. The Patent Family

44. The ’316 Patent is part of a patent family that includes thirteen patents, one of which is a reissued patent, and claims priority through a chain of continuation applications. Specifically, the ’316 Patent is a continuation of U.S. Patent Application No. 13/763,128, filed on February 8, 2013, now U.S. Patent No. 8,996,398, which is a continuation of U.S. Patent Application No. 13/669,027, filed

on November 5, 2012, now U.S. Patent No. 8,423,399, which is in turn, a continuation of U.S. Patent Application No. 13/206,483, filed on August 9, 2011, now U.S. Patent No. 8,335,713, which is a continuation of U.S. Patent Application No. 09/589,551, filed on June 7, 2000, now U.S. Patent No. 7,996,259 ("'259 Patent").

45. The other patents in the patent family include U.S. Reissued Patent No. 45,971 filed on August 9, 2013 (a reissue of the '259 Patent), U.S. Patent Nos. 8,417,567, 8,442,860, and 8,442,860, all filed on November 5, 2012, U.S. Patent Nos. 8,781,890, 8,650,076, and 8,589,222, all filed on February 8, 2013, and U.S. Patent No. 8,768,760 filed on February 27, 2014.

46. The '316 Patent is outlined in **purple** in the '316 Patent family tree depicted below.


7,996,259
8,335,713
8,412,570
8,417,567
8,423,399
8,442,860
8,589,222
8,650,076
8,768,760
8,781,890
8,996,398
RE45,971
11,763,316
2013-0311876

47. I understand from counsel that the following petition for Inter Partes Review concerns a patent from the same family as the ’316 Patent:

- *LinkedIn Corp. v. DiStefano Patent Trust III, LLC*, IPR2019-00419.

2. File History of 11,763,316

48. As explained above, the ’316 Patent claims an earliest possible priority date of June 7, 2000, through a series of continuation applications. The prior art references relied upon herein qualify as prior art with respect to this earliest possible priority date.

49. On August 27, 2013, the Applicant voluntarily filed a terminal disclaimer and disclaimed the “terminal part of the statutory term of any patent granted on the instant application which would extend beyond the expirations data of the full statutory term of” the following patents: 8423399, 8412570, 8442860, 8417567, 8335713, and 7996259. EX1002, 299-305.

50. In an office action dated March 24, 2016, the examiner rejected all the pending claims under 35 U.S.C. §§ 101 and 102. EX1002, 754-62. In particular, the Examiner explained that the claims merely claimed the abstract ideas of:

- establishing a reciprocal arrangement between the first web page and the second web page based upon both the first and second users opting to participate in the reciprocal arrangement;
- including, within the second web page and based upon the reciprocal arrangement, a second functional identification element associated with the first entity; and
- including, within the first web page and based upon the reciprocal arrangement, a first functional identification element associated

with the second entity, wherein the second functional identification element includes a link to the first web page, and the first functional identification element includes a link to the second web page.

EX1002, 756.

51. In particular, the Examiner explained that each of the steps above was an abstract idea because the claims simply recite "at a high level of generality" a generic computer performing "steps [that] can be performed mentally." *Id.*, 757. The Examiner also explained that the claims were anticipated by U.S. Patent 6,785,671 to Bailey ("Bailey") (EX1013). *Id.*, 757-61.

52. In response to this office action, on Aug. 24, 2016, Applicant amended the claims, as follows:

22. (Currently Amended) A method, within and by a computer hardware system that is configured to serve a first web page associated with a first user and a second web page associated with a second user, comprising:

establishing a reciprocal arrangement between the first web page and the second web page based upon both the first and second users opting to participate in the reciprocal arrangement;

including, within the second web page and based upon the reciprocal arrangement, a second link to the first web page and ~~functional identification element~~ associated with the first entity; and

including, within the first web page and based upon the reciprocal arrangement, a first link to the second web page and ~~functional identification element~~ associated with the second entity~~, wherein~~

~~the second functional identification element includes a link to the first web page, and~~

~~the first functional identification element includes a link to the second web page~~.

EX1002, 774.

53. Applicant argued that the claims were not invalid under § 101 because, according to Applicant, the claims were not directed to an abstract idea but rather to a "process, machine, manufacture or composition of matter." *Id.*, 779. Applicant summarily stated that "Claims 22-26 and 28-31 are directed to a method" and "Claims 32-36 and 38-41 are directed to a computer hardware system." *Id.* The Applicant provided no additional argument attempting to explain why, in their view the claims were not an abstract idea.

54. Applicant also argued that even if abstract, the claims were nonetheless "tied to a machine" and "require the use of a machine to implement." *Id.*, 781. Therefore, according to Applicant the "claimed invention meets the machine or transformation test." EX1002, 781-82. Applicant also argued that the Examiner failed to "consider the claimed invention 'as a whole.'" *Id.*, 787. Because, according to Applicants "the use of banner ads and links is very common" but "not always easy" and the invention is directed to addressing this problem. *Id.*

55. Regarding the Examiner's rejection of the claims based on Bailey, Applicant argued that the Examiner erred because the section of Bailey cited by the Examiner was in the "background" of Bailey. *Id.*, 789. Applicant also claimed that Bailey does not "identically disclose a second web page." *Id.*, 790. Finally,

Applicant argued that the cited portions of Bailey are "completely silent as to the claimed "users opting to participate in the reciprocal arrangement." *Id.*

56. In an office action dated February 2, 2017, the examiner maintained its rejection of all pending claims under 35 U.S.C. §§ 101 and 102. EX1002, 804-12. The Examiner explained that the claims merely claimed the abstract ideas of:

- establishing a reciprocal arrangement between the first web page and the second web page based upon both the first and second users opting to participate in the reciprocal arrangement;
- including, within the second web page and based upon the reciprocal arrangement, a second **link to the first web page** and associated with the first entity; and
- including, within the first web page and based upon the reciprocal arrangement, a first **link to the second web page and** associated with the second entity.

EX1002, 806.

57. The Examiner again explained that each of the steps above was an abstract idea because the "steps can be performed mentally," *id.*, 806, and recite a computer "at a high level of generality." *Id.*, 807. The Examiner also explained that the claims were anticipated by U.S. Patent 6,029,141 to Bezos ("Bezos") (EX1014). *Id.*, 807-09.

58. In response, on Jun. 2, 2017 Applicant filed a Notice of Appeal to the Board of Patent Appeals and Interferences. EX1002, 821-29. Applicant's Appeal Brief filed on Oct. 2, 2017 repeated Applicant's arguments from their Aug. 24, 2016, response. EX1002, 841-59.

59. Applicant also argued that even if abstract, the claims were nonetheless "tied to machines" and "require the use of a machine to implement." *Id.*, 850. Therefore, according to Applicant the "claimed invention meets the machine or transformation test." *Id.* Applicant also argued that "the technical problem addressed by the present application … pertains to the creation of reciprocal links between websites." *Id.*, 852. According to Applicant, they "have done more than claim the generation of reciprocal links between website," but rather "claimed a particular manner to accomplish this result." *Id.*

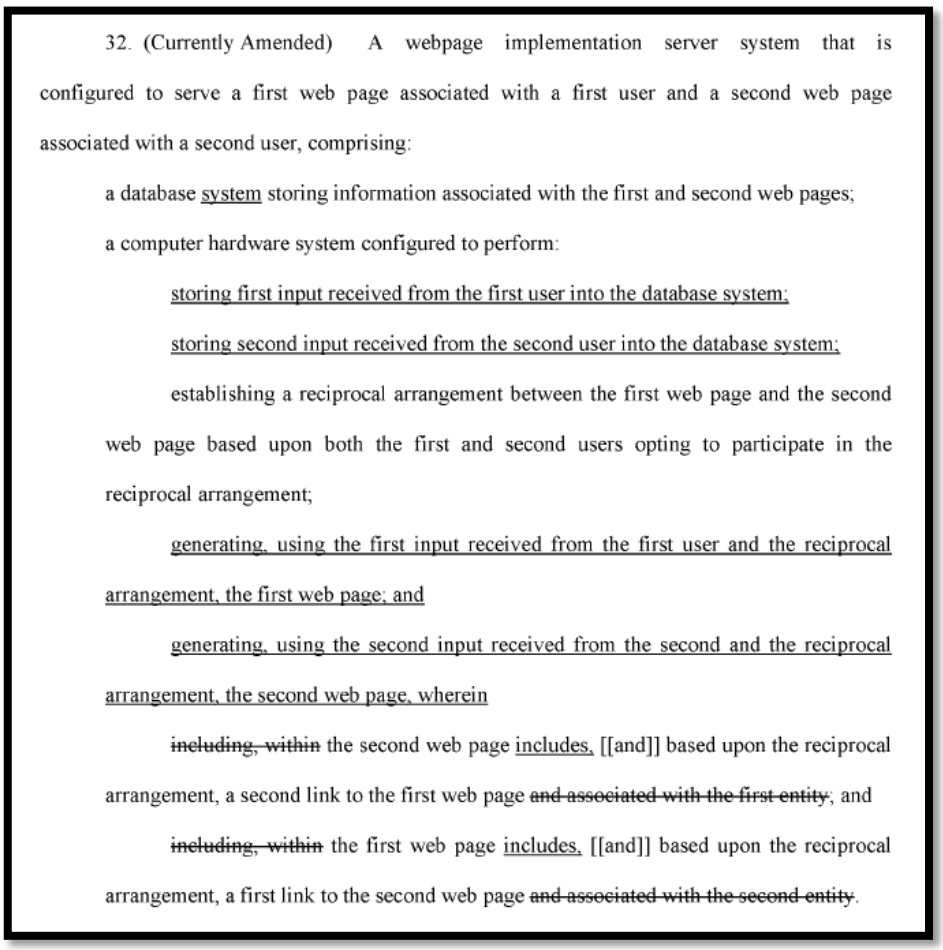
60. Regarding the Examiner's rejection of the claims based on Bezos, Applicant argued that "[w]hile Bezos contemplates two web pages and one web page including a link to the second web page, the second web page (i.e., the web page from the merchant Web site 106 that includes the product catalog) is not disclosed as having a link back to the first web page (i.e., the web page from the associate Web site 100)." *Id.*, 857. Applicant also argued that "the two web pages described by Bezos are served by separate entities (i.e., the associate web site 100 and the merchant web site 106)," and, according to Applicant, "fail[] to identically disclose the limitations at issue." *Id.*, 857-58.

61. In response to Applicant's notice of appeal, prosecution was reopened. EX1002, 909. On Dec. 21, 2017, the Examiner rejected all pending claims under 35 U.S.C. §§ 101, 102, and 112. EX1002, 908-20. The Examiner explained that claims

23, 33, 24, and 34 were indefinite because the claims recite that "two separate webpages are stored [in a] 'database', and [] the pages are generated using the 'database," but "from the claim language it is not clear if this is intended to be the same database where both pages are stored and later dynamically generated for the third user." *Id.*, 911. Likewise, the Examiner explained that claims 29 and 39 were indefinite because there was insufficient antecedent basis for the limitation "the second functional identification element … as there is no first identification element in the claims." *Id.*

62. The Examiner also explained that the claims merely claimed the abstract ideas of "creating a contractual relationship," "relaying address data (i.e. website information," and "collection, storage, and recognition of data." *Id.*, 911. The Examiner explained the claim elements were "recited at a high level of generality" and "provide[d] [by] conventional computer functions that do not add meaningful limits to practicing the abstract idea." *Id.*, 912. The Examiner explained that the "claim language simply transfers the issue of guaranteeing performance for a contract into a computing environment – a long standing problem in the pre internet area." *Id.*, 919. The Examiner also explained that the claims were anticipated by U.S. Patent 5,995,099 to Horstmann ("Horstmann") (EX1015). *Id*., 915-18.

63. In response to this office action, on Apr. 20, 2018, Applicant amended the claims, as follows:



32. (Currently Amended) A webpage implementation server system that is configured to serve a first web page associated with a first user and a second web page associated with a second user, comprising:

a database system storing information associated with the first and second web pages;

a computer hardware system configured to perform:

storing first input received from the first user into the database system;

storing second input received from the second user into the database system;

establishing a reciprocal arrangement between the first web page and the second web page based upon both the first and second users opting to participate in the reciprocal arrangement;

generating, using the first input received from the first user and the reciprocal arrangement, the first web page; and

generating, using the second input received from the second and the reciprocal arrangement, the second web page, wherein

~~including, within~~ the second web page includes, [[and]] based upon the reciprocal arrangement, a second link to the first web page ~~and associated with the first entity~~; and

~~including, within~~ the first web page includes, [[and]] based upon the reciprocal arrangement, a first link to the second web page ~~and associated with the second entity~~.

EX1002, 934.

64. Applicant argued that claims 23 and 24 were not indefinite under § 112 because, according to Applicant, "[n]either claim 23 nor claim 24 depends from one another, and consequently the interpretation of 'database' in one claim does not impact the interpretation of 'database' in the other claim." EX1002, 938. Applicant amended claim 29 "to recite 'the second link' in place of 'the second functional identification element," which, according to Applicant, "finds antecedent basis in claim 22, upon which claim 29 depends." *Id.*, 938-39.

65. Applicant repeated the same § 101 arguments it made previously. EX1002, 939. Applicant also argued that even if abstract, the claims were nonetheless "tied to a machine" and "require the use of a machines to implement." *Id.*, 946. Therefore, according to Applicant, the "claimed invention meets the machine or transformation test." *Id.* Applicant argued that "the claims of the present application do not purport to create a contractual relationship," but rather "specific operations that describe the creation and serving of web pages including reciprocal links." *Id.*, 952. According to Applicant, "this is neither some practice known from the pre-Internet world nor something that can be accomplished in the human mind," but "[r]ather, this is a technical operation that is necessarily performed by a specialized computer system." *Id.*, 953.

66. Regarding the Examiner's rejection of the claims based on Horstmann, Applicant argued that while the methodology described by Horstmann "purports to be a method that established links between pages on the Internet, it does so in a manner different than that claimed." EX1002, 961 (cleaned up). According to Applicant, unlike the claimed invention, "Horstmann requires the use of a verification process to determine whether the [first] page includes a link back to the [second] page." *Id.*, 962. Applicant also argued that Horstmann does not disclose "the reciprocal arrangement, as claimed" because Horstmann's system "allows anybody to place a link on the [second] page." *Id.*

67. The Examiner did not find Applicant's arguments persuasive and again rejected claims under 35 U.S.C. §§ 101 and 102 in an office action dated Aug. 10, 2018, based largely on the same arguments. EX1002, 976-94.

68. In response to this office action, on Feb. 11, 2019, Applicant filed a notice of appeal. EX1002, 997. Applicant argued the claims were not invalid under § 101 because, according to Applicant, the claims do "not recite matter than falls within one of the[] groupings of [abstract] subject matter (i.e., 'Mathematical concepts, 'Certain methods of organizing human activity,' and "mental processes')." EX1002, 1023. According to Applicant, "the claimed invention is directed to an improved and new set of operations that are used to generate reciprocal links in web pages – operations that are necessarily performed with and by a computer." *Id.*, 1024.

69. Applicant also argued that the invention "claims a different and specific set of operations that achieves the improved result of providing a pair of web pages that do not have the specific drawbacks found in the prior art: (1) reducing the number of required participating entities; (2) eliminating the need for reciprocal link enforcement; and (3) improving the ability to police undesirable links." *Id.*, 1028.

70. Regarding the Examiner's rejection of the claims based on Horstmann, Applicant argued that "each user has control over the links contained within the respective user's web pages, which prevents their own website from including an

unwanted link to an undesirable website. Thus, the claimed invention is an improvement over Horstmann by claiming a process that prevents undesired links before they are included in the user's website." *Id.*, 1022. Applicant also argued that "the links are not added until after the reciprocal arrangement has been established. Moreover, the reciprocal arrangement between the first and second web pages is based upon both users opting to participate in the reciprocal arrangement." *Id.*, 1042 (emphasis in original). Applicant further argued: "[t]here cannot be an 'agreement between the two parties' when one of the parties does not opt to participate in the reciprocal arrangement," *id.*, 1047, and "the bookstore owner cannot opt into an agreement between bookstore web page with the bike shop store page because the bookstore owner does not necessarily know of the bike's shop page or the bike shop owner." *Id.*, 1049 (emphasis in original).

71. In response to Applicant's notice of appeal, on Oct. 18, 2019, Examiner filed an Answer to Appeal Brief to the Board of Patent Appeals and Interferences. EX1002, 1134. The Examiner explained that the claims merely claimed the abstract ideas of "organizing human activity which include commercial or legal interaction, including agreements in the form of contracts, as well as advertising, marketing or sales activities or behaviors, and business relationships, as well as managing personal behavior or relationships." EX1002, 1137. The Examiner also explained that the "computing elements in all claims … are recited at a high-level of generality

(i.e., as a generic processor performing a generic computer function of sending/receiving data, a database used to store data/inputs, etc.) such that it amounts [to] no more than mere instructions to apply the exception using a generic computer component." *Id.*

72. In response to this Answer to Appeal Brief, on Dec. 18, 2019, Applicant filed a Petition for Review by the Technology Center Special Program Examiner. EX1002, 1187. Applicant argued that "the Examiner's Answer contains a number of findings, reasoning, or explanations that differ from the Examiner's analysis contained within the statement of the rejection provided in the Final Office Action." EX1002, 1192.

73. Prosecution was reopened, and, on Aug. 25, 2020, the Examiner rejected all the pending claims under 35 U.S.C. §§ 101 and 102. EX1002, 1216-47. The Examiner explained, for the same reasons as in their Answer to Appeal Brief, that the claims merely claimed the abstract ideas of "organizing human activity" and "managing personal behavior or relationships." *Id.*, 1219. The Examiner also explained that the claim elements are "recited at a high-level of generality," amounting to "no more than mere instructions to apply the exception using a generic computer component." *Id.*, 1220. The Examiner also explained that the claims were anticipated by Horstmann. *Id*. 1225-34.

74. In response to this office action, on Nov. 25, 2020, Applicant cancelled then-pending claims 22-26, 28-36, and 38-46 and introduced new claims 47-66:

47. (New) A method performed within and by a server system configured to modify and serve web pages, comprising:

receiving, from a first client device associated with a first user and via a graphical user interface provided by the server system, information indicating a selection of a web asset to be used in a first website associated with the first user;

receiving, from the first client device and via the graphical user interface, a first identification associated with a second website to create a first hyperlink from the first website to the second website;

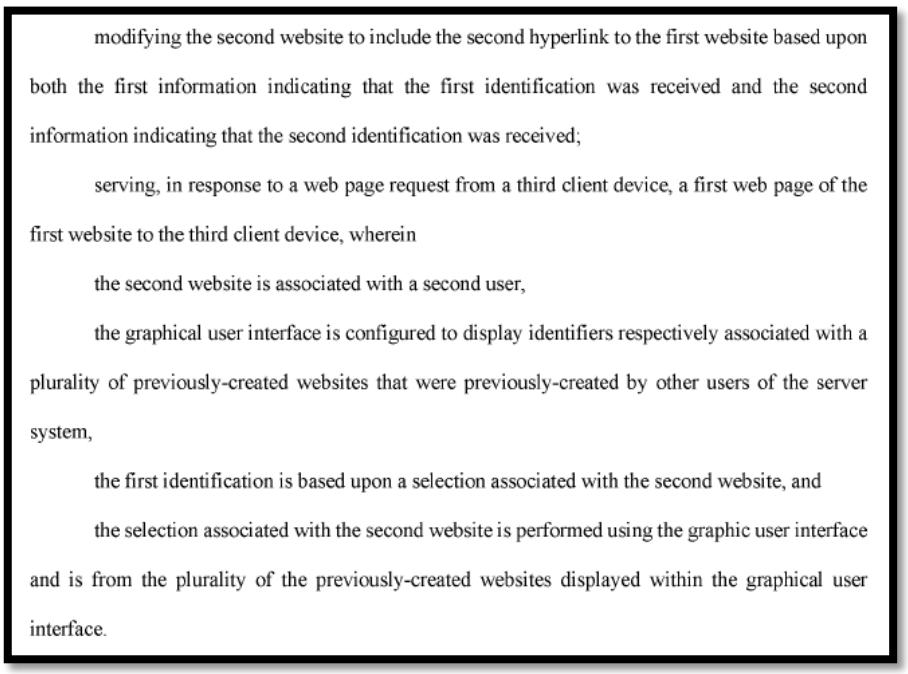
storing, within a computer database system of the server system, first information indicating that the first identification was received;

receiving, from a second client device associated with the second website, a second identification associated with the first website to create a second hyperlink from the second website to the first website;

storing, within the computer database system, second information indicating that the second identification was received;

modifying the first website to include the web asset;

modifying the first website to include the first hyperlink to the second website based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received; and



modifying the second website to include the second hyperlink to the first website based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received;

serving, in response to a web page request from a third client device, a first web page of the first website to the third client device, wherein

the second website is associated with a second user,

the graphical user interface is configured to display identifiers respectively associated with a plurality of previously-created websites that were previously-created by other users of the server system,

the first identification is based upon a selection associated with the second website, and

the selection associated with the second website is performed using the graphic user interface and is from the plurality of the previously-created websites displayed within the graphical user interface.

EX1002, 1265-66.

75. Regarding the Examiner's rejection of the claims based on Horstmann, Applicant argued that "[w]hile Hortsmann describes the creation of links between web pages, this is done 'without any intervention' from one of the users associated with these web pages." EX1002, 1258. Applicant also argued that, unlike the re-written claims, Horstmann does not "display identifiers respectively associated with a plurality of previously-created websites that were previously-created by other users of the server system." *Id.*

76. Applicant also argued that the claims were not invalid under § 101 because, according to Applicant, the claims were not directed to an abstract idea because they "recite operations relating to the generation of websites," which are "necessarily performed with the use of a computer," and "cannot practically by

performed in the mind" nor involve "organizing human activity." *Id.*, 1260-62. Applicant also argued that the re-written claims "involve[] a particular graphical user interface … serv[ing] to integrate whatever possible abstract idea recited in the claims into a practical application." *Id.*, 1263.

77. On Mar. 21, 2022, Applicant filed a Supplemental Amendment, "maintain[ing] the arguments previously presented in the Amendment dated Nov. 25, 2020," and amending the claims as follows:

47. (Currently Amended) A method performed within and by a server system configured to modify and serve web pages, comprising:

receiving, from a first client device associated with a first user and via a graphical user interface provided by the server system, information indicating a selection of a web asset to be used in a first website associated with the first user;

receiving, from the first client device and via the graphical user interface, a first identification associated with a second website to create a first hyperlink from the first website to the second website;

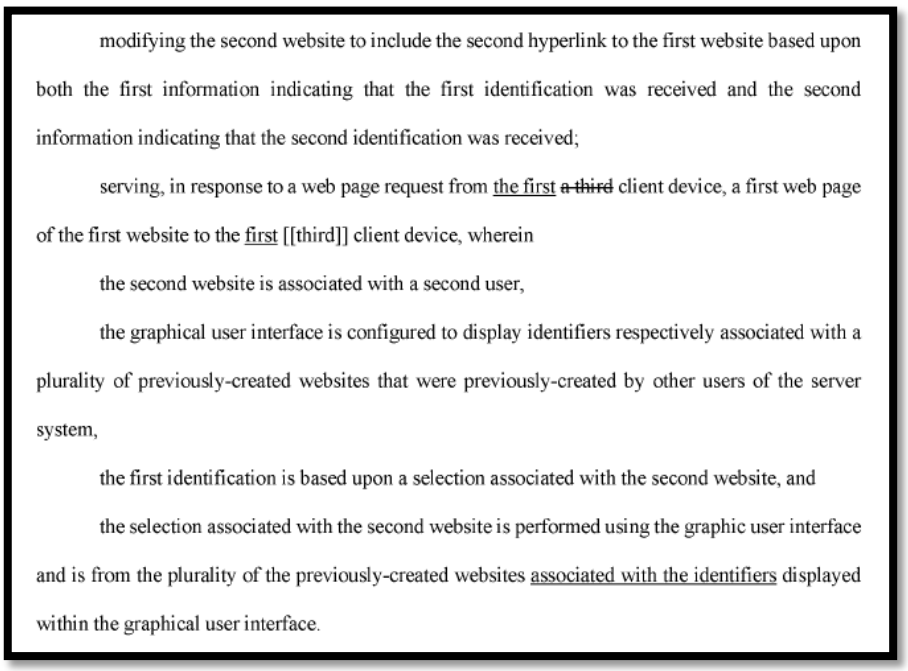
storing, within a computer database system of the server system, first information indicating that the first identification was received;

receiving, from a second client device associated with the second website, a second identification associated with the first website to create a second hyperlink from the second website to the first website;

storing, within the computer database system, second information indicating that the second identification was received;

modifying the first website to include the web asset;

modifying the first website to include the first hyperlink to the second website based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received; and



modifying the second website to include the second hyperlink to the first website based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received;

serving, in response to a web page request from the first ~~a third~~ client device, a first web page of the first website to the first [[third]] client device, wherein

the second website is associated with a second user,

the graphical user interface is configured to display identifiers respectively associated with a plurality of previously-created websites that were previously-created by other users of the server system,

the first identification is based upon a selection associated with the second website, and

the selection associated with the second website is performed using the graphic user interface and is from the plurality of the previously-created websites associated with the identifiers displayed within the graphical user interface.

EX1002, 1348-49.

78. On May 20, 2022, the Applicant filed a petition to withdraw terminal disclaimer, arguing that "the Terminal Disclaimer filed on August 27, 2013 [] with regard to U.S. Patent Nos. 7,996,259, 8,335,713, 8,417,567, 8,442,860, 8,412,570, and 8,423,399 involving the claims originally presented for prosecution are unnecessary as to the currently-presented claims." EX1002, 1391.

79. On April 13, 2023, withdrawal of the terminal disclaimer was granted, *id.*, 1531, and, on Jun. 7, 2023, a notice of allowance was issued, *id.*, 1534-40. The Examiner stated that "[t]he claims are found to be free from the art. The closest prior art is found to be Horstmann et al (US 5995099)." *Id.* 1539. The Examiner stated:

> The Examiner hereby asserts that the totality of the evidence neither anticipates nor renders obvious the particular combination of elements

> as claimed. That is, the Examiner emphasizes the claims as a whole and hereby asserts that the totality of the evidence fails to set forth, either explicitly or implicitly, an appropriate rationale for combining or otherwise modifying the available prior art to arrive at the claimed invention. The combination of features as claimed would not be obvious to one of ordinary skill in the art because any combination of the evidence at hand to reach the combination of features as claimed would require a substantial reconstruction of Applicant's claimed invention relying on improper hindsight bias.

Id. (emphasis in original).

C. LinkedIn Case

80. In December 2017, DiStefano filed suit against LinkedIn alleging infringement of the '760 Patent (EX1037). The '760 Patent is in the same patent family as the '316 Patent and shares the same specification. EX1039. In 2018, the District Court held that claims 1, 4, 5, 8, and 10 of the '760 Patent were invalid under §101 because the claims were directed to the "abstract idea of facilitating cross-marketing relationships and fail to add any inventive combination, even when considered as an ordered combination." *DiStefano Pat. Tr. III, LLC v. LinkedIn Corp.*, 346 F. Supp. 3d 616, 623 (D. Del. 2018) (EX1040).

81. DiStefano appealed, alleging that the Delaware court erred in finding that claim 1 is directed to an abstract idea when "the claims are limited to a specific, improved process, performed by a computer, for creating reciprocal links between a

pair of webpages." EX1038. The Federal Circuit affirmed the Delaware Court's decision. *DiStefano Pat. Tr. III, LLC v. LinkedIn Corp.*, 784 F. App'x 785 (Fed. Cir. 2019) (EX1040).

D. LinkedIn IPR

82. On December 14, 2018, LinkedIn Corp. filed a petition for *Inter Partes* Review of U.S. Patent No. 8,768,760 ("'760 Patent"), IPR2019-00419, Paper 2 ("*LinkedIn* IPR") (EX1032), in response to a litigation filed by Patent Owner on December 14, 2017 in the United States District Court for the District of Delaware ("Delaware Court"), asserting infringement of the '760 Patent. *DiStefano Pat. Tr. III, LLC v. LinkedIn Corp.*, Civil Action No. 1:17-cv-01798 (D. Del. Dec. 14, 2017). The '760 Patent is in the same patent family as the '316 Patent and shares the same specification. *Supra* § III.B.1.

83. In its Preliminary Response filed on March 14, 2019 in the *LinkedIn* IPR, Patent Owner acknowledged that the limitations of the '760 Patent were "comparable" and the "same or similar" to the limitations of the '316 Patent. *See* EX1010, 2 ("Examiners have also had the opportunity to review either the ***same or similar limitations***") (emphasis added); *id.* at 15-16 ("The original Examiner and five other Examiners were involved in the prosecution of applications in the '259 Family…. ***all of the Examiners examined claim limitations comparable to those limitations in the '760 Patent***") (emphasis added). Patent Owner also

acknowledged that "[t]he written descriptions of the parent '259 Patent and the downstream '760 Patent are substantively identical." EX1010, 5. The written descriptions of the parent '259 Patent, the '760 Patent, and the '316 Patent are substantively identical.

84. As acknowledged by the Patent Owner in the chart of the '316 Patent family below, U.S. Patent App. No. 13/946,461 (the "'461 Application") that issued as the '316 Patent included similar limitations to the '760 Patent claim limitations that were at issue in the *LinkedIn* IPR. EX1010, 16. While "claims 22, 32" of the '461 Application described in the chart below were canceled in an amendment in response to the Examiner's rejection, EX1002, 1265, the '316 Patent as issued includes at least the "reciprocal links" limitation.

Patent/ Application	reciprocal links	user opts into reciprocal arrangement	storing information involving reciprocal arrangement in database
7,996,259	claims 4, 5, 7	N/A	1
RE45971[10]	claims 4, 5, 7, 8, 14	claims 21, 23, 25, 27, 29	1, 3
8,335,713	claims 1, 8	N/A	N/A
8,412,570	claims 1, 11, 19	N/A	N/A
8,417,567	claims 1, 7, 14	N/A	N/A
8,423,399	claims 1, 10, 17	N/A	N/A
8,442,860	claims 1, 9, 15	N/A	N/A
8,589,222	claims 1, 7, 13	N/A	N/A
8,650,076	claims 1, 9, 15	N/A	N/A
8,768,760	claims 1, 11	claims 1, 11	claims 1, 11
8,781,890	claims 1, 7, 13	N/A	N/A
8,966,398	claims 1, 9, 17	claims 7, 15, 22	N/A
13/946,461[11]	claims 22, 32	claims 22, 32	N/A
13/946,489[12]	claims 22, 29, 35	claims 22, 29, 35	N/A

85. Patent Owner described claim limitations including the term "reciprocal," such as "reciprocal linking arrangement," "reciprocal links," and "reciprocal site." Patent Owner stated that "[t]he term 'reciprocal' itself indicates a need for a link back" as evidenced by the dictionary definitions. EX1010, 28. With respect to the claim limitations "receiving, from a first computer associated with the first user, a first indication to opt into a reciprocal linking arrangement" and "receiving, from a second computer associated with the second user, a second indication to opt into the reciprocal linking arrangement," of the '760 Patent, Patent owner stated that "[t]he limitations at issue are **mirror image operations** that describe how first and second users, via first and second computers, both opt into a reciprocal linking arrangement." EX1010, 8-9 (emphasis added). "[A] registered user identifies websites from other websites created by other registered users of the system, and the other registered users can also identify websites to which these other registered users would like to be linked." EX1010, 10. "The identification of a particular website, by a registered user, is an example of an indication to opt into a reciprocal linking arrangement." *Id*. "The reciprocal linking arrangement indicates that **reciprocal links** are to be created such that the website of user A links to the website of user B and the website of user B links to the website of user A." *Id*. 11. "As used herein by Patent Owner, the concept of two web pages, each linking to the other, can be described as 'reciprocal links.'" *Id*. 14.

86. With respect to the claim limitation "reciprocal link site," which is also recited in the '316 Patent, Patent Owner confirmed that the limitation "reciprocal link site" is equivalent to "reciprocal site" in original claim 4 of the patent application for the '259 Patent. EX1010, 27 ("the language of 'reciprocal site' in original claim 4 supplies its own written description, and this written description reflects a proper claim construction of the term 'reciprocal site' as construed consistently with the specification, which also discloses a 'reciprocal link site.'"). Patent Owner explained that the term "site" "means a location." *Id*. Patent Owner stated that a "reciprocal link site" is a location for "**displaying links to other websites**" and supports "the concept of two webpages, each linking to the other." EX1010, 14, 27. Patent Owner explained that "the specification of the '760 and '259 patents disclose **a link, at a reciprocal link site**, to another web page, and creating a link back, to the registered user's website, at this other web page." EX1010, 14; *see also id*., 30 ("the term 'reciprocal site' requires 'reciprocity.'").

87. Lastly, Patent Owner described the claim limitation "database." With respect to the claim limitation "establishing, within a **database** associated with the computer hardware system, the reciprocal linking arrangement based upon both the first and second users opting to participate in the reciprocal linking arrangement," of the '760 Patent, the Patent owner stated "the claim language does not require a specific type of database. Rather, the claim language requires a database that is

configured to having stored therein information that establishes the reciprocal linking arrangement." EX1010, 11-12. Patent Owner stated that "the claims do not necessarily require that the 'reciprocal linking arrangement' itself be stored," but rather only require "that information (i.e., in the form of a data structure) that establishes the reciprocal linking arrangement be stored within the database." *Id*. 12. Patent Owner stated that the storage of "the website selection information" which "is an indication that a user has opted into a reciprocal linking arrangement," "is an example of establishing the reciprocal linking arrangement within a database." *Id*.

E. The Challenged Claims

88. The '316 Patent includes 26 total claims, two of which (claims 1 and 14) are independent claims. The independent claims overlap significantly. The only substantive difference between claims 1 and 14 is (1) that claim 1 is a method claim and claim 14 is a system claim, and (2) that claim 14 additionally recites generic computer components.

Claim 1

1. A method performed within and by a server system configured to modify and serve web pages, comprising:

receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first web site;

receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset;

generating, based upon the instruction, the edited web asset;

forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system;

receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first web site to the second web site;

storing, within a computer database system of the server system, first information indicating that the first identification was received by the server system;

modifying, based upon the instruction, the first website to include the edited web asset;

modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink;

modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site; and

serving computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site, wherein

the server system is configured to host the first web site and the second website,

the editing screen is configured to display the web asset, and

the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.

Claim 14

~~1. A method performed within and by a~~14. A server system configured to modify and serve web pages, comprising:

a computer database system, and

a hardware system configured to perform:

receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first ~~web site~~website;

receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset;

generating, based upon the instruction, the edited web asset;

forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system;

receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first ~~web site~~website to the second ~~web site~~website;

storing, within ~~a~~the computer database system of the server system, first information indicating that the first identification was received by the server system;

modifying, based upon the instruction, the first website to include the edited web asset;

modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink;

modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site; and

serving computer data associated with the first ~~website~~web site that includes the edited web asset and the first hyperlink from the first ~~web site~~website to the second ~~web site~~website, wherein

the server system is configured to host the first web site and the second website,

the editing screen is configured to display the web asset, and

the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.

IV. THE STATE OF THE ART

89. By the early 1990s, the rapid growth of the World Wide Web led to significant developments in website creation and editing technologies. Users sought more intuitive ways to design and manage web pages, leading to the emergence of WYSIWYG (What You See Is What You Get) editors, live website editing, and dynamically created websites. These tools allowed users to create web pages visually, without needing extensive knowledge of HTML. For instance, the WorldWideWeb browser, developed by Tim Berners-Lee enabled both viewing and editing of web pages through a graphical user interface. Such innovations laid the

groundwork for more advanced web development tools and methodologies that followed.

90. During the same period, the concept of reciprocal links and internet marketing evolved, addressing the needs of webmasters to interconnect web pages and promote content effectively. As the web developed, links between pages allowed web users to navigate more seamlessly. Often, websites would include hyperlinks to other websites with overlapping audiences. However, this interconnectivity posed a challenge for many websites, as there was no guarantee that a user who navigated away would return. To address, this issue, reciprocal links (or link backs) became common place. Many websites started including forms where webmasters could request reciprocal links. *See, e.g.*, EX1015 (Horstmann), 3:27-30 ("After a period of time (typically a few days), verification software, typically on the links server, verifies (step 5) that the bike-shop owner reciprocated by providing a links back 5 to page C as requested on form 4."). This practice facilitated mutual traffic generation by ensuring that linked websites would, in turn, link back to the original site. Indeed, reciprocal links became so ubiquitous that some working groups suggested making the standard hyperlink bi-directional.

91. Additionally, the advent of social networking sites in the late 1990s introduced new paradigms for user interaction and content sharing. Platforms like

sixdegrees.com pioneered the interlinking of user profiles, setting the stage for the sophisticated social media networks that followed.

A. WYSIWYG

92. As the web became more popular, more and more people wanted to create websites who did not have a technical understanding of HTML. To address this need, various tools and applications were developed to simplify the web design process. One of the most significant advancements in this area was the introduction of WYSIWYG editors. Among these tools, Dreamweaver, released by Macromedia in 1997, quickly became the industry standard due to its robust feature set and ease of use. EX1026. Nearly 66% of professional web site developers used Dreamweaver, underscoring its dominance and influence in the market. EX1029.



Patents such as Arora (EX1009) and the related U.S Patent No. 5,911,145, played a crucial role in the functionality embodied by Dreamweaver. These patents disclosed methods for generating web pages on a WYSIWYG basis, allowing users to design web pages visually without needing to write HTML code manually.

93. The first client application for accessing the web, called WorldWideWeb and developed by Berners-Lee, provided facilities for both viewing and editing web pages. EX1024; EX1025. This browser provided a graphical user interface that allowed users to create webpages through a WYSIWYG metaphor, similar to that supported by popular word processors, but with the addition of functions that allowed users to create links by selecting items and using a "Link" menu.

94. As the world wide web rapidly grew during the early 1990s, the concept of WYSIWYG website editors became well established within the field of web development. These editors allowed users to design web pages visually, without needing to write HTML code manually. For example, Arora disclosed a method and apparatus for easily generating web pages on a WYSIWYG basis. Arora described a "draw-based editor" where "the user moves display elements to define the appearance of a web page" and, upon selecting a "publish" button, "HTML code is automatically generated." EX1009, 2:22-25. Users could "rearrange display elements by dragging and dropping them to a new location, placing the display

elements exactly where they will eventually appear with pixel level accuracy." *Id.*, 5:60-63.

95. A related application, now U.S. Patent No. 5,911,145 (Arora 145) (EX1027) titled "Hierarchical structure editor for web sites," introduced additional features for managing the hierarchical relationships between web pages. Emphasizing a "top-down" approach to designing websites, "the user can use a 'drag and drop' interface to move icons representing Web pages into a desired hierarchy of pages for the site." EX1027, 2:17-20. The system would then "automatically add, remove, and delete the appropriate links between pages of the site." *Id.*, 2:30-33. Additionally, the editor "automatically generates a layout for each page," including "a banner across the top of each page," using an HTML table that "reflects the number and placement of display elements on a corresponding page, yielding a true WYSIWYG page for the site." *Id.*, 2:26-44. Display elements include "text, image, button, etc." *Id.*, 11:39-40.

96. The development of WYSIWYG systems and the concepts of reciprocal linking were significantly influenced by innovations from well-known companies. One such influential company was RAE Technologies, a spin-off of Apple Inc. EX1028. RAE Technologies' headquarters were located on the Apple campus, and its board of directors consisted of high-ranking Apple executives. *Id.*

RAE Technologies was the original assignee of Arora and Arora 145, which later played a crucial role in the functionality of Dreamweaver.

97. Another key player in the field was Macromedia, a company renowned for its development of Flash and Dreamweaver. Macromedia acquired Arora and Arora 145 from RAE Technologies, integrating these innovations into Dreamweaver. Released by Macromedia in 1997, Dreamweaver quickly became the industry standard for web development due to its robust feature set and ease of use. According to industry reports, nearly 66% of professional web site developers used Dreamweaver. EX1029.

98. Notably, Arora and Arora 145 were central to a litigation between Adobe Systems, Inc. and Macromedia, Inc. In a complaint filed by Macromedia against Adobe on October 19, 2001, Macromedia alleged that Adobe's web creation and editing products infringed on the patents developed by Arora and colleagues, emphasizing that the patents were integral to the functionality of Dreamweaver. EX1030. Adobe later acquired Macromedia, bringing the technologies and patents under one umbrella. EX1031.

99. Similarly, Xia, originally assigned to PeopleSoft, Inc. and later acquired by Oracle Corp., disclosed WYSIWYG capabilities to enable non-technical personnel to dynamically update web pages. The system described that web pages could be designed with "marketing object containers," allowing marketing teams to

populate these containers with content without altering the underlying HTML code. EX1016, 8:5-19. The system allows personnel to manage a "management console" that enables users to select and update marketing objects within predefined containers. *Id.*

B. Reciprocal Links

100. As the internet evolved, creating interconnections between web pages through hyperlinks became a fundamental aspect of web navigation and marketing. These interconnections allowed users to easily navigate between websites with related or complementary content, enhancing the user experience and increasing web traffic. However, this practice also posed a significant challenge for website owners: once a user navigated away from their site, the user may find it difficult to return. To address this issue, the concept of reciprocal links emerged as a solution. Reciprocal links, or link backs, involved a mutual agreement between websites to link to each other, thereby encouraging users to visit both sites. This practice not only facilitated mutual traffic generation but also helped maintain user engagement by ensuring that users would have a simple method to return to the original site.

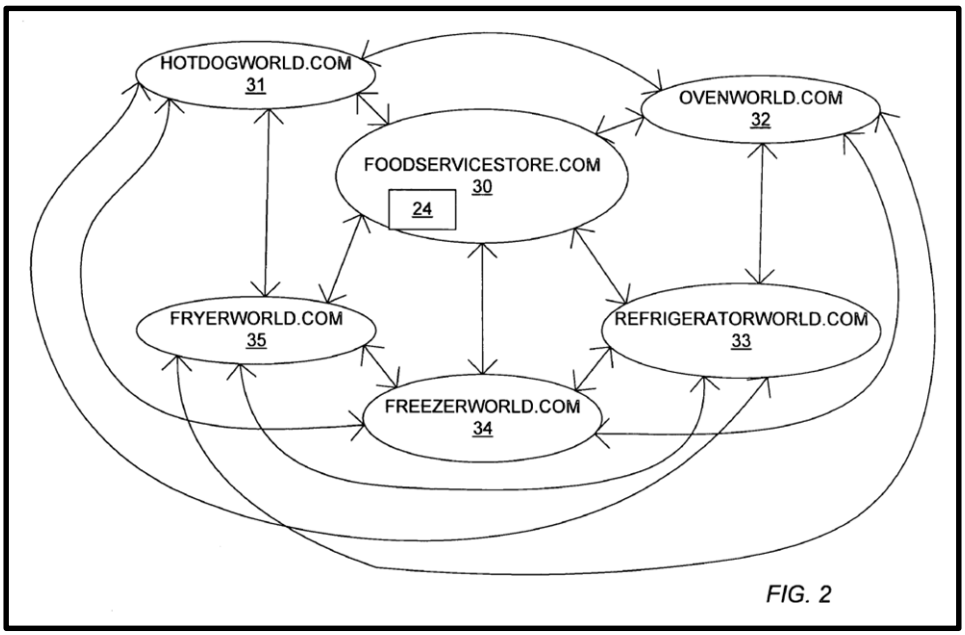
101. In the 1990s, hyperlinks were commonly used to create interconnections between web pages. For example, Hoyt described a method for extending the visual presence of a website on subsequent visited sites through the use of dynamic links. The system created a "return link" that allowed a "user at a

first web site" to "click on a link to a second web site which has allocated space for advertising by the first web site and links back to the first website." EX1017, [0009]. The user at the second web site would "continue to see indicia such as the logo, advertisement, additional message line(s), and/or links back to the first web site; thus, effectively extending the session presence of the first web site." *Id.*

102. Similarly, Horstman disclosed "reciprocal page links between pages on the Internet." EX1015, 1:60-61. The method described how web sites could include "dedicated links pages that contain lists of links, primarily to other sites. The links page associated with a given site (the first site) includes an 'add link' button that, when selected, allows an owner of a second site to add a link to the links page of the first site." *Id.*, 1:62-66. To ensure reciprocity, the owner of the second site was "prompted for a link back to a page of the first site." *Id.*, 2:1-3.

103. As another example, Pierce described a method for marketing products and services by creating "a plurality of interrelated and interconnected sites." EX1018, 2:41-42. Generally, the method involves "selecting an arbitrary word and appending the arbitrary word to a first and a second product- or service-related word to create a first and a second site name." *Id.*, 1:61-63. "Next a linkage is created between the respective site names and the electronic sites." *Id.*, 2:3-4. As shown in Fig. 2, "a central site, 'FoodServiceStore.com' 30 comprises the central processing host utilities and also hot links to the other product-specific sites." *Id.*, 2:54-56.

Since all of the sites are "'hot linked' together, it is [] a simple matter to navigate between them." *Id.*, 3:47-48.



104. Various other methods of reciprocally linking websites were well established. In 1995, Web Rings provided an alternative to search engines which, at the time, "contain[ed] so much information (often indexed so poorly) that users still [could] not find your site." EX1021, 43. In a Web Ring, "sites with a similar theme or content link together in virtual communities," providing "a way for users to quickly browse sites that fall within their interest area." *Id.* Typically, "sites about a particular subject are linked together by a graphic. Clicking on that graphic launches you on a linear tour of all the websites in that ring." *Id.*, 44. As another example, websites like Turbo Promote and Puzzle Depot offered reciprocal link

exchanges where the sites agreed to promote a user website at no cost as long as the user website agreed to link back to the exchange site. EX1022; EX1023.

C. Internet Marketing

105. Reciprocal linking was extremely important in the context of e-commerce. By the late 1990s, it was well-known for e-commerce websites to support affiliate marketing, with host web sites establishing bi-directional relations (and links) with merchants. These reciprocal links helped drive traffic between sites and supported mutual growth in online presence and sales.

106. For example, "website programmers increased visitor traffic by placing 'links' within their websites to other websites, usually related in content or function, in exchange for a reciprocal link." EX1019, 1:29-33. But by linking to a merchant, there was a low likelihood that a user would return to the host's website: "Once a visitor clicks on an affiliate ad and enters an online store, the visitor has left the affiliate's site and is gone. At best, affiliates are able to use 'frames' to keep a shell of their own website around the vendor's site" and "vendors have begun placing 'return to referring website' links on their order confirmation screens". *Id.*, at 2:28-38.

107. To address these limitations in affiliate marketing, Ross describes a system that allows hosts to register with the web system, to use a graphical user interface to create a website storefront for customers, and to browse a merchant's

web catalog and select products for inclusion on their website. *Id.*, 23:39-24:27. The system also allows merchants to register with the system and maintain a catalog of products available to hosts. *Id.*, 6:8-28, 21:50-22:9. Finally, Ross's system supports the dynamic generation of web pages and links, including the ability for the merchant to view their catalog of products as it appears when presented through the look and feel of the host's website. *Id.*, 9:4-27.

108. These features provide "Hosts with the added value and incremental revenues of traditional affiliate programs, but the company also enables Hosts to control the customer experience before, during, and after the purchase transaction. At the same time, Merchants receive the same benefits as with older affiliate programs, i.e., increased marketing potential, incremental sales, and new customer relationships, but without the restrictive limitations of affiliate programs—the loss of hard-won visitor traffic." *Id.*, 2:55-63.

D. Social Networking

109. By 1998, early social networking sites, such as sixdegrees.com, pioneered the interlinking of member profiles. With sixdegrees.com, the term "degrees" referred to a user's "proximity … to someone else." EX1020; EX1022. For example, "someone in your first degree is someone that you know directly, like your mother, husband, employer, business contact, etc. These are contacts that you list or that list you." *Id.* The website included features such as "Contact Manager"

where users could "add new contacts and take care of any changes regarding the relationships you already have. You can also view profile information like address and phone number for those contacts that have chosen to share it," allowing users to navigate between profiles based on their relationships. *Id.* Sixdegrees.com also provided a summary of contacts that would "keep track of and display the number of your confirmed relationships, relationships pending your confirmation, relationships pending the confirmation of someone you listed and relationship types that are pending confirmation." *Id.*

110. Similarly, Block described a website structure to facilitate the sharing of information between member profile pages within various community areas. A community is created "through members of the site selectively adding individuals to the community and sending out invitations for them to join the website and the specific community. EX1007, [0012]. Each individual who joins the website "gets a personal homepage" that "provides links to the different communities that the individual is part of, including teams, leagues, and the home pages of other individuals who have been granted trusted access to this individual's home page." *Id.*, [0024]. Specifically, each personal homepage contains a "My Friends list" that "provides a form of 'bookmarking' between a user's site and a Friend's site, and indicates whether the relationship is reciprocal." *Id.*, [0128]. "If a Friend is listed

in My Friends and the name is a link, then permission to view the other sites has already been granted." *Id.*

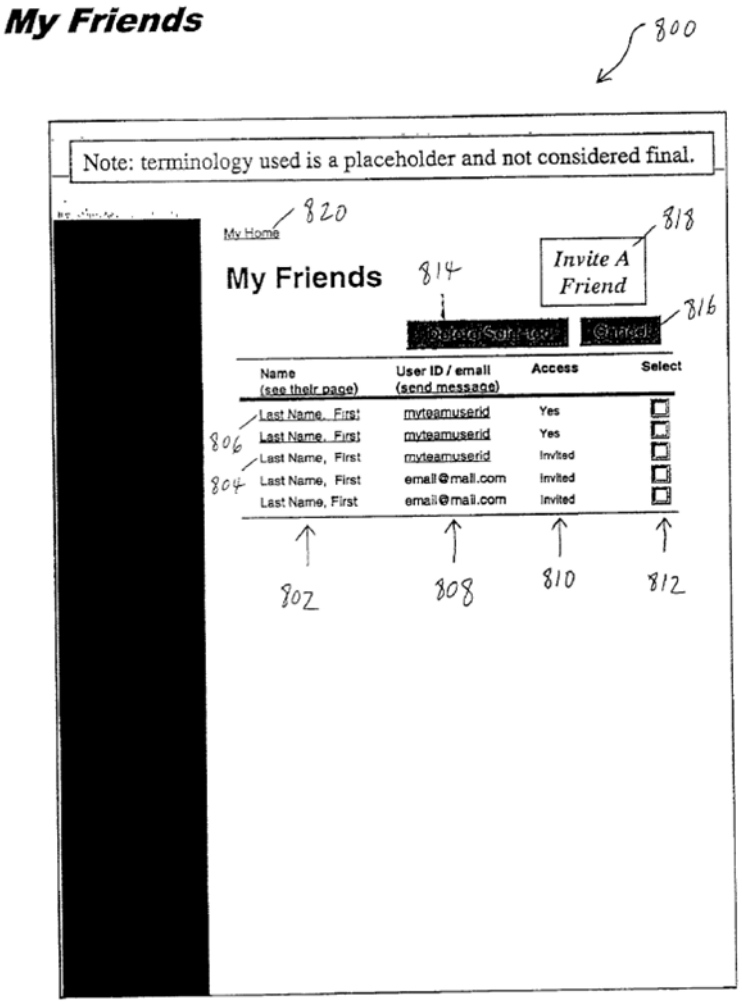


Fig. 8

V. THE LEVEL OF ORDINARY SKILL IN THE ART (SKILLED ARTISAN)

111. I understand that patents are interpreted from the perspective of a hypothetical Skilled Artisan at the time of the alleged invention. The earliest possible priority date of the '316 Patent is June 7, 2000.

112. I also understand that various factors are considered in determining the level of ordinary skill in the art. I understand that the factors include types of problems encountered in the art, prior solutions to those problems, rapidity with which innovations are made, sophistication of technology at the time of the invention, and educational levels and experience of persons working in the field and capable of understanding the applicable scientific and engineering principles. I understand that in determining the level of ordinary skill in the art, not all factors may be present, or one or more factors may predominate.

113. In my opinion a Skilled Artisan at the time of the purported inventions of the ’316 Patent would have had at least a bachelor’s degree in computer science, computer engineering, or a related field, and two to three years of experience with the design or implementation of graphical user interfaces and applications for computers: a higher level of education or skill can make up for less experience, and vice versa. I have applied this level of skill herein.

114. At least as of June 7, 2000, I satisfied and exceeded all of the above requirements for a Skilled Artisan.

VI. CLAIM CONSTRUCTION

115. I understand that claim terms should carry their “ordinary and customary meaning,” which is “the meaning that the term would have to a person of ordinary skill in the art in question” at the time of the invention. For the terms below

I provide constructions explaining how a Skilled Artisan would have interpreted the claims.

A. "*reciprocal link site*"

116. A "*reciprocal link site*" in the context of the intrinsic evidence is a space within a web page (within a website) for displaying reciprocal links to other websites. This definition is supported by the intrinsic record, and Patent Owner's statements made in connection to the other patents in the '316 Patent family.

117. First, the claims of the '316 Patent support this definition. For example, Claims 13 and 26 recite:

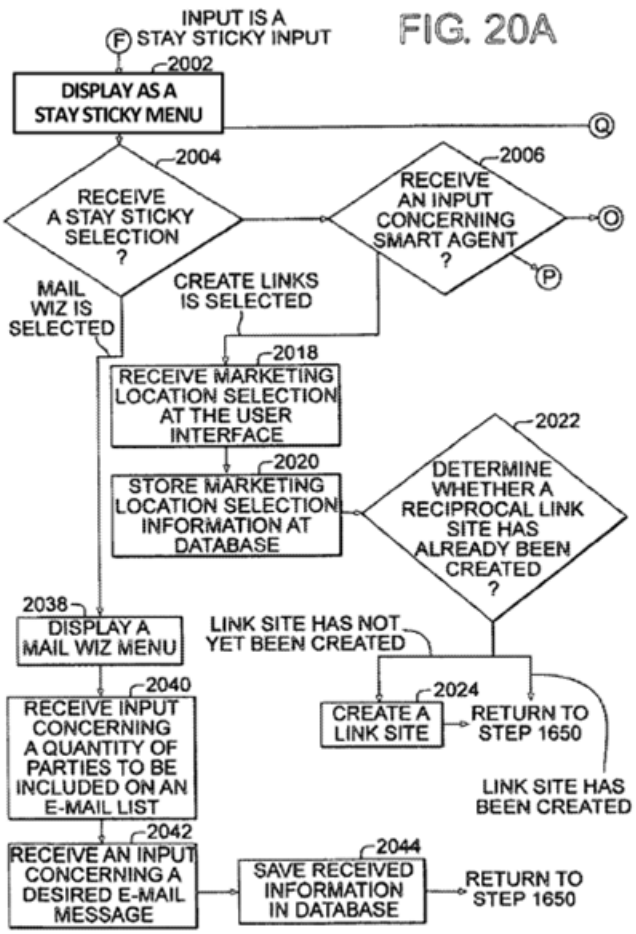
> the server system is configured to:
> create, in the first web page, a reciprocal link site for the first hyperlink, and
> create, in a second web page of the second website, a reciprocal link site for the second hyperlink.

EX1001, Claims 13, 26.

118. Claim 13 depends from claim 1. Therefore, the "*first hyperlink*" in Claim 13 is a "*hyperlink from the first web site to the second web site*." Likewise, the "*second hyperlink*" is a "*reciprocal second hyperlink [back] to the first web site*." Additionally, a Skilled Artisan would have appreciated that the "*reciprocal link site*" is "*in the [] web page*," therefore, the link site is not a web page or web site, but rather a part of the first and second web page. The "*reciprocal link site*" is also a "*site for the [] hyperlink*." Therefore, a Skilled Artisan would have understood that

the "*reciprocal link site*" is a space in the first or second website to insert the first or second hyperlink. Thus, in this context that "*creat[ing]*" a "*site for [a] hyperlink*" within a "*web page*" is creating a space within a web page where the reciprocal link to another web page will appear.

119. Second, the '316 Patent's specification also supports this reading. Fig. 20A (shown below) illustrates a flowchart of the STAY STICKY™ options. "The STAY STICKY™ features provide the registered user with special information concerning, and marketing opportunities with respect to, other registered users who have designed their websites using the system 100. That is, the STAY STICKY™ features provide special marketing benefits to registered users of the system 100 vis-a-vis one another." EX1001, 15:8-14.



EX1001, Fig. 20A.

120. Referring to Fig. 20A, the ’316 Patent states that “This stored information is later used to generate links at the selected marketing locations (i.e., websites) when the registered user's website is activated. The system 100 then proceeds to step 2022, at which the system determines whether a reciprocal link site has already been created in the registered user's website, **for displaying links to other websites**. If a link site has not yet been created, the system creates a link site on the registered user's website, at step 2024 before returning to step 1650.” EX1001, 25:28-34 (emphasis added).

121. A Skilled Artisan would have understood, based on the description that a "reciprocal link site" is created "for displaying links to other websites," that "reciprocal link site" refers to a space within a web page (within a website) for displaying reciprocal links to other websites.

122. Third, the file history also supports Petitioner's construction. During prosecution of in the parent application of the '316 Patent (App. No. 09/589,551, issued as US 7,996,259) patent examiner explained that "the limitation 'reciprocal site' simply means, . . . **providing a space** in a website such that third parties can place their ads in said website." EX1005, 506 (emphasis added). In response, the Patent Owner only challenged that "the Examiner's claim construction completely ignores the term 'reciprocal.' The term 'reciprocal site' does not simply mean a place in a website such that third parties can place their ads, as asserted by the Examiner. A reciprocal site refers to reciprocity." EX1005, 506-07 (emphasis in original). Thus, a Skilled Artisan would have understood that "reciprocal site" means a space in a web page for displaying reciprocal links.

123. Finally, in a Patent Owner's Preliminary Response in response to IPR2019-00419 challenging U.S. Patent No. 8,768,760 (the '760 Patent is in the same patent family as the '316 Patent and shares the same specification), the Patent Owner stated that a "*reciprocal link site*" is **a space** for "**displaying links to other websites**" and supports "the concept of two webpages, each linking to the other."

EX1010, 14; *id.*, 27 ("the term 'site,' which means a location."). *See also* EX1041 (dictionary definition of "site" is "[a] place of position; a location"). The Patent Owner explained that "the specification of the '760 and '259 patents disclose **a link, at a reciprocal link site**, to another web page, and creating a link back, to the registered user's website, at this other web page." EX1010, 14.

124. Thus, in the context of the '316 Patent a "*reciprocal link site*" is a space within a web page (within a website) for displaying reciprocal links to other websites.

B. *Markush* group

125. Claims 7 and 20 require that "*user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of a group consisting of…*" I understand that the claim term "*a group consisting of…*" indicates that this limitation is a Markush group and lists specified alternatives in a patent claim. Therefore, I understand that the entire Markush Group is disclosed by the prior art if one alternative in the Markush group is in the prior art. Therefore, the prior art need only disclose one of "*a name of the first user, an email address of the first user, a hobby of the first user, a business of the first user, [or] an interest of the first user*."

VII. DETAILED EXPLANATION OF GROUNDS FOR INVALIDITY

126. The sections below demonstrate in detail how claims 1-26 of the '316 patent are unpatentable over prior art.

A. Ground 1: Block Renders Claims 1-26 Obvious

1. Overview of Block[3]

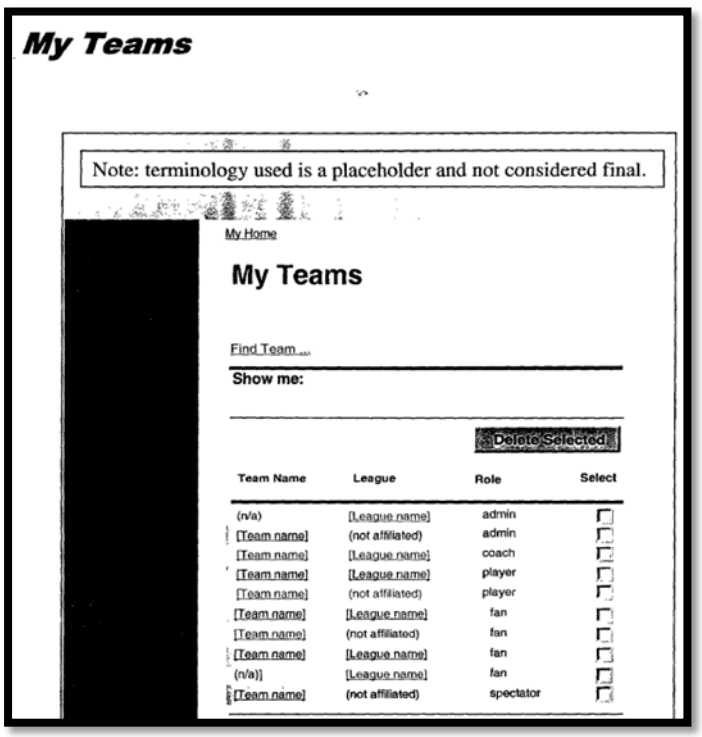
127. Block (EX1007) was filed on September 20, 2002, claiming the benefit of a previously filed U.S. Provisional Application No. 60/172,983 ("Block-Provisional") that was filed on December 10, 1999. EX1006. Block was published on March 13, 2003. Block identifies David Block, Daniel Ahlberg, John Feldmeier, and Elliot Katzman as its inventors.

a. *Block is Prior Art under at least § 102(e)*

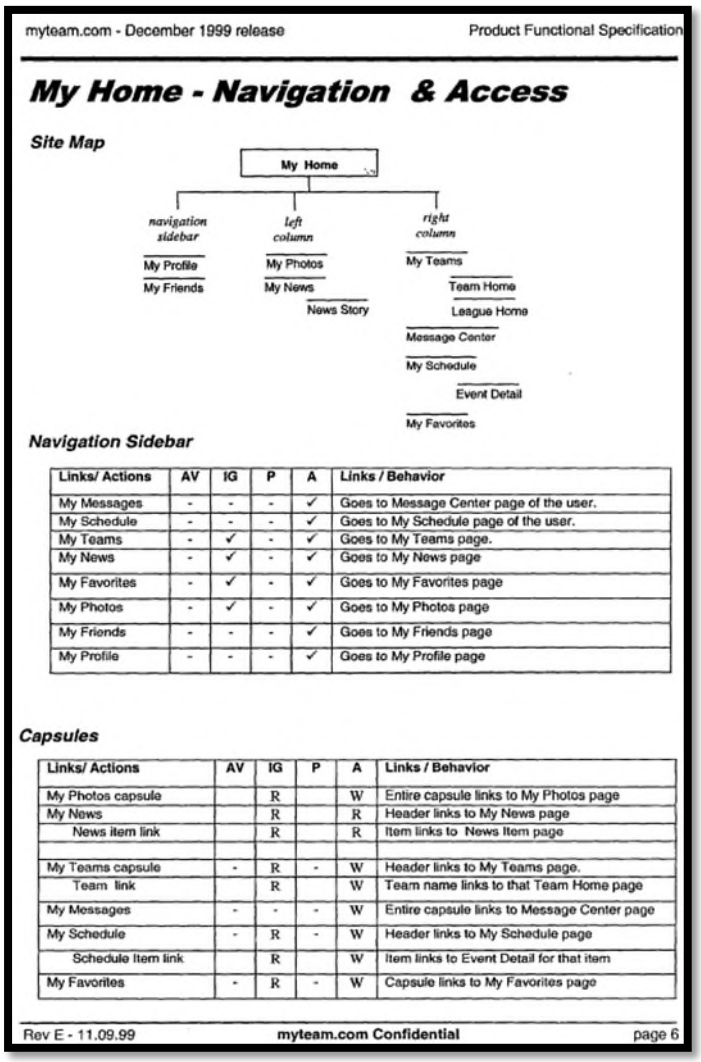
128. I understand that Block is entitled to the priority date of its provisional application (December 10, 1999) if the application provides written description support for at least one of Block's claims and the teachings of Block relied upon herein were disclosed in the Block-Provisional. As shown in the chart below, each element of Block claim 1 has written description support in the Block-Provisional:

Block, Claim 1	**Block-Provisional (EX1006)**
1. A web site structure for organizing and providing information	EX1006, 2 ("the present invention provides a website structure and method of populating the site through membership invitations to non-members, and access-

[3] General descriptions provided for this and other references and combinations thereof are incorporated into each subsection and mapping of the claims that includes citations to these references.

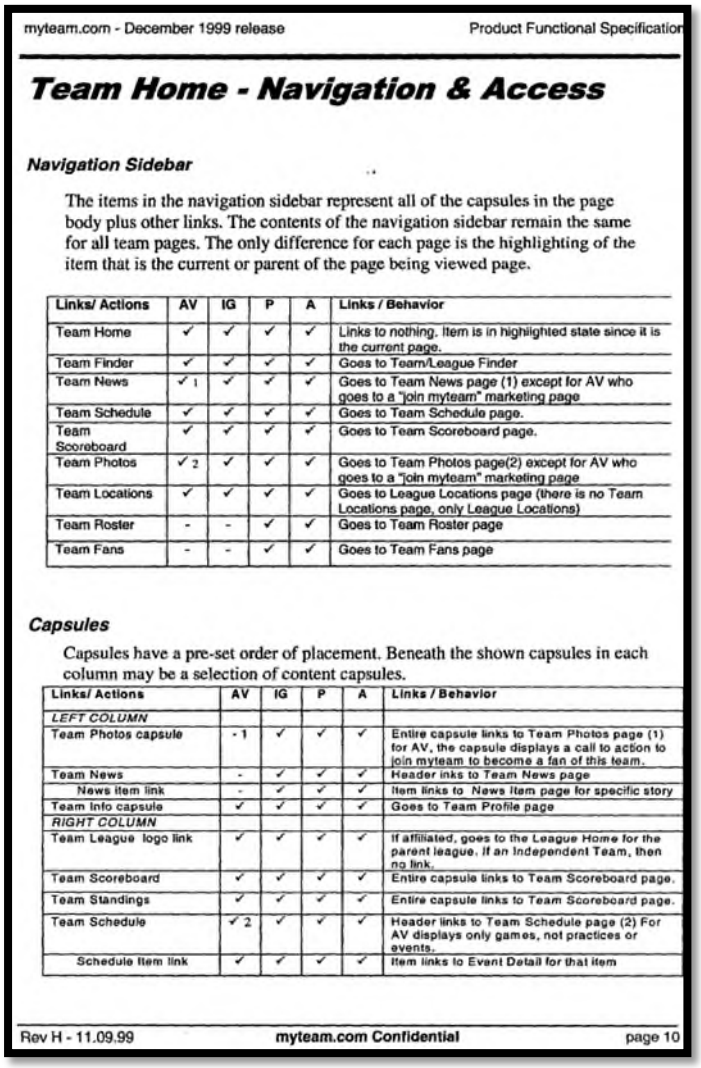
related to at least one first team registered with the web site, at least one member of said at least one first team registered with said web site, and at least one second team registered with said website, the web site structure comprising:	level change requests for members, with administrators overseeing the member lists."). EX1006, 6 ("a certain web structures and methods are provided which will allow for more secure development of a website structure, and for more secure methods of populating the website with registered users."). EX1006, 14 ("A 'Member' is an individual who has registered with the myteam.com website, and has been assigned a user identification number (or symbol) and password.") EX1006, 16 ("Upon entering the system, Members are provided access to three types of mini-site areas, namely My Home, Team Home, and League Home. Each member can have access to multiple instances of each type of mini-site, as they may have relationships with more than one team and leagues.") EX1006, 57  My Teams Note: terminology used is a placeholder and not considered final. My Home My Teams Find Team ... Show me: Delete Selected Team Name / League / Role / Select (n/a) [League name] admin [Team name] (not affiliated) admin [Team name] [League name] coach [Team name] [League name] player [Team name] (not affiliated) player [Team name] [League name] fan [Team name] (not affiliated) fan [Team name] [League name] fan (n/a)] [League name] fan [Team name] (not affiliated) spectator

(a) a personalized home page created for said at least one registered team user and operative to impart schedules and information pertaining to said at least one first team and at least one second team registered with said web site;	EX1006, 16 ("The Member will be placed (by default) in their own My Home mini-site 112. . . . Linked pages associated with the My Home mini-site include, for example: My Message, My Schedule, My Teams, My New, My Favorites, My Fans, and My Profile.") EX1006, 165  EX1006, 167

	 myteam.com - December 1999 release Product Functional Specification **My Home - Navigation & Access** **Site Map** My Home navigation sidebar: My Profile, My Friends left column: My Photos, My News, News Story right column: My Teams, Team Home, League Home, Message Center, My Schedule, Event Detail, My Favorites **Navigation Sidebar** **Capsules** Rev E - 11.09.99 myteam.com Confidential page 6 *See also* EX1006, 209, 230, 233, 241
(b) a personalized home page that is created for said at least one first team and operative to impart information and schedules regarding said at least one first team;	EX1006, 16 ("Any team that a Member belongs to, will have a Team Home page and associated linked pages therefrom. Such link pages might include: Team Finder, Team News, Team Schedule, Team Scoreboard, Team Photos, Team Locations, Team Roster, and Team Fans. Each of these links pulls up pages relating to the listed topics, and which are particularized with information pertaining to that Team.") EX1006, 22 ("Referring now to Figure 4, a representative webpage 400 is shown of the Team Home page for a particular team. The shown view is from the access vantage level of a Team Administrator.

As before, the general information tabs 402 are available on the upper border, along with a caption 403 identifying the Team (Foster City Giants). Click-through links 404 are shown for access in the navigation bar area. The various capsules on the page include Team Photos 406, Team news 408, store information 410, polls 412, Scoreboard information 414, Standing information 416, and Schedule information 418. Again, advertisements 422 can be included in available spots on the page.").

EX1006, 171



myteam.com - December 1999 release — Product Functional Specification

Team Home - Navigation & Access

Navigation Sidebar

The items in the navigation sidebar represent all of the capsules in the page body plus other links. The contents of the navigation sidebar remain the same for all team pages. The only difference for each page is the highlighting of the item that is the current or parent of the page being viewed page.

Links/ Actions	AV	IG	P	A	Links / Behavior
Team Home	✓	✓	✓	✓	Links to nothing. Item is in highlighted state since it is the current page.
Team Finder	✓	✓	✓	✓	Goes to Team/League Finder
Team News	✓ 1	✓	✓	✓	Goes to Team News page (1) except for AV who goes to a "join myteam" marketing page
Team Schedule	✓	✓	✓	✓	Goes to Team Schedule page.
Team Scoreboard	✓	✓	✓	✓	Goes to Team Scoreboard page.
Team Photos	✓ 2	✓	✓	✓	Goes to Team Photos page(2) except for AV who goes to a "join myteam" marketing page
Team Locations	✓	✓	✓	✓	Goes to League Locations page (there is no Team Locations page, only League Locations)
Team Roster	-	-	✓	✓	Goes to Team Roster page
Team Fans	-	-	✓	✓	Goes to Team Fans page

Capsules

Capsules have a pre-set order of placement. Beneath the shown capsules in each column may be a selection of content capsules.

Links/ Actions	AV	IG	P	A	Links / Behavior
LEFT COLUMN					
Team Photos capsule	- 1	✓	✓	✓	Entire capsule links to Team Photos page (1) for AV, the capsule displays a call to action to join myteam to become a fan of this team.
Team News	-	✓	✓	✓	Header inks to Team News page
News item link	-	✓	✓	✓	Item links to News item page for specific story
Team Info capsule	✓	✓	✓	✓	Goes to Team Profile page
RIGHT COLUMN					
Team League logo link	✓	✓	✓	✓	If affiliated, goes to the League Home for the parent league. If an Independent Team, then no link.
Team Scoreboard	✓	✓	✓	✓	Entire capsule links to Team Scoreboard page.
Team Standings	✓	✓	✓	✓	Entire capsule links to Team Scoreboard page.
Team Schedule	✓ 2	✓	✓	✓	Header links to Team Schedule page (2) For AV displays only games, not practices or events.
Schedule Item link	✓	✓	✓	✓	Item links to Event Detail for that item

Rev H - 11.09.99 — myteam.com Confidential — page 10

EX1006, 210, 230, 234.

(c) a personalized home page dedicated to said at least one second team and operative to provide scheduling information related to said at least one second team; and	*See* claim 1(b), above.
(d) wherein said at least one registered team member is provided access to said home pages of said first and second teams and selectively controllable access to said home page of said member.	EX1006, 5 ("A structured level of access to various community information should be provided, wherein certain users will have more access than others to a user's personal or community information. The community members themselves might be used to propagate the growth of the community through invitations to others so that they might have access to certain levels of information. Administrator(s) at different levels, might be used to ultimately decide the access levels for any given Community user."). EX1006, 6 ("Each member of the Community will have a different access level based upon their role or status in the website structure."). EX1006, 6 ("The present invention is described in terms of a sports-oriented website, namely myteam.com. This site includes a multitude of web pages, some of which are restricted to viewing only by Members and their selected invitees. A given page may be viewable in two or more versions, with elements on the page appearing or being hidden from view depending on the access level that the individual has in relation to the page. Many of the elements on the page are contained within capsules that show a summary of the information that is displayed on the page that is linked to the capsule.") EX1006, 7 ("The spirit and scope of the present invention includes, among other things, the inter-related nature of the communities, along with selectable access

	being provided based upon the status of any particular user of the website."). EX1006, 8 ("Within the interacting (and overlying) structures of the various Communities -- i.e. League/ Team/ Personal (or My) Community structure -- persons can have access to different information based upon the particular access level assigned to that person. The person can request a change of access from the administrator in order to be allowed to see more information on the various sites. If deemed appropriate, the administrator will then invoke that particular change of status in the myteam.com system"). *See also* EX1006, 14, 18, 19, 27, 55, 70.

129. Moreover, the teachings of Block relied upon herein were carried forward from Block-Provisional to Block:

Citation to Block (EX1007)	**Corresponding Block-Provisional Citation (EX1006)**
Abstract	2, 6
[0011]	6, 14
[0012]	6
[0016]	6-7
[0017]	7-8
[0020]	14, 18-19, 54
[0025]	163-164, 167, 230
[0042]	6, 8, 263
[0051]	9
[0052]	9
[0090]	14
[0091]	14, 15, 19, 164
[0093]	263, 264, 267
[0094]	19, 23, 24
[0095]	16, 17, 21, 164
[0097]	16

[0098]	16, 163-164, 200, 230
[0101]	17, 164
[0103]	17, 163-164, 200, 230
[0108]	19
[0113]	21
[0116]	68-69, 80-81, 163-164, 230, 233
[0119]	7, 39, 212-218
[0121]	22
[0122]	17, 164
[0125]	23
[0127]	23
[0128]	23, 24
[0129]	24
[0132]	25
[0133]	25, 26
[0134]	26
[0136]	27
[0138]	27
[0156]	33
[0157]	34
[0169]	37
[0170]	37, 91
[0171]	37, 38
[0204]	47
[0207]	48, 49
[0208]	49, 50
[0209]	49, 50
Fig. 1	14-18, 163, 200, 233
Fig. 2	54
Fig. 2A	68-69, 80-81, 163-164, 230, 233
Fig. 2D	7, 39, 212-218
Fig. 3	22, 165
Fig. 5	172
Fig. 7	23-25, 167
Fig. 8	25, 26, 55, 70
Fig. 9	26
Fig. 22	63, 78
Fig. 29	91
Fig. 45	131

Fig. 46A	48, 49
Fig. 46B	48, 49

130. I, therefore, understand that Block is entitled to its earliest effective filing date of December 10, 1999 and is prior art to the '316 Patent pursuant to 35 U.S.C. § 102(e).

b. *Overview of Block*

131. Block discloses a social media website structure with "a plurality of community areas." EX1007, Abstract. In particular, when each user registers with the system of Block they receive a "home page with personal information." *Id*. The user can then join, or be invited to, "community areas" based on their interests. *Id*. For example, Block explains that "invitations" can be "sent to known and trusted individuals who are either not yet members of the website or who are members of the website but not yet a part of the specific community." EX1007, [0012]. "An individual's access to a community is enabled once they have accepted the invitation." EX1007, [0020].

132. In this manner, "[a] community of inter-related users is created through the website structure, with the community growing through members of the site selectively adding individuals to the community and sending out invitations for them to join the website and the specific community." EX1007, [0012]. Block describes three types of communities:

1) Member's own "Home page," which "contains personalized material pertaining to that Member and summary information from the community websites in which the Member is an invited participant";
2) "Team Home page," which "contains Team information";
3) "League Home page," which "contains League information."

EX1007, [0016].

133. In Figure 1, Block describes a block diagram 100 which shows "certain representative elements comprising a site map for the myteam.com website." EX1007, [0090]. Block describes the My Home mini-site 112, the "Team Home mini-site 114, and the League Home mini-site 116." EX1007, [0098]. Block explains that the "information displayed on the My Home mini-site pages will include information that was originally posted on a Team Home mini-site or League Home mini-site when that information is relevant to and otherwise accessible by the individual when they are on the respective Team Home or League Home mini-site." *Id*. Block describes the "continuous line 134, with bi-directional arrows between the mini-sites Team Home and League Home" which "indicates that Schedule information will be shared between the mini-sites." EX1007, [0103]. "The continuous line 136 spanning the Team Home and League Home mini-sites indicates that Scoreboard information will be shared between the Team Home mini-site and

the League Home mini-site." EX1007, [0103]. Note that although Block's Figure 1 shows a "discontinuous line 130 associated with Photos information 118," Block also states that "[v]aring levels of photo crossover are intended to be included within the scope of the present invention." EX1007, [0103].

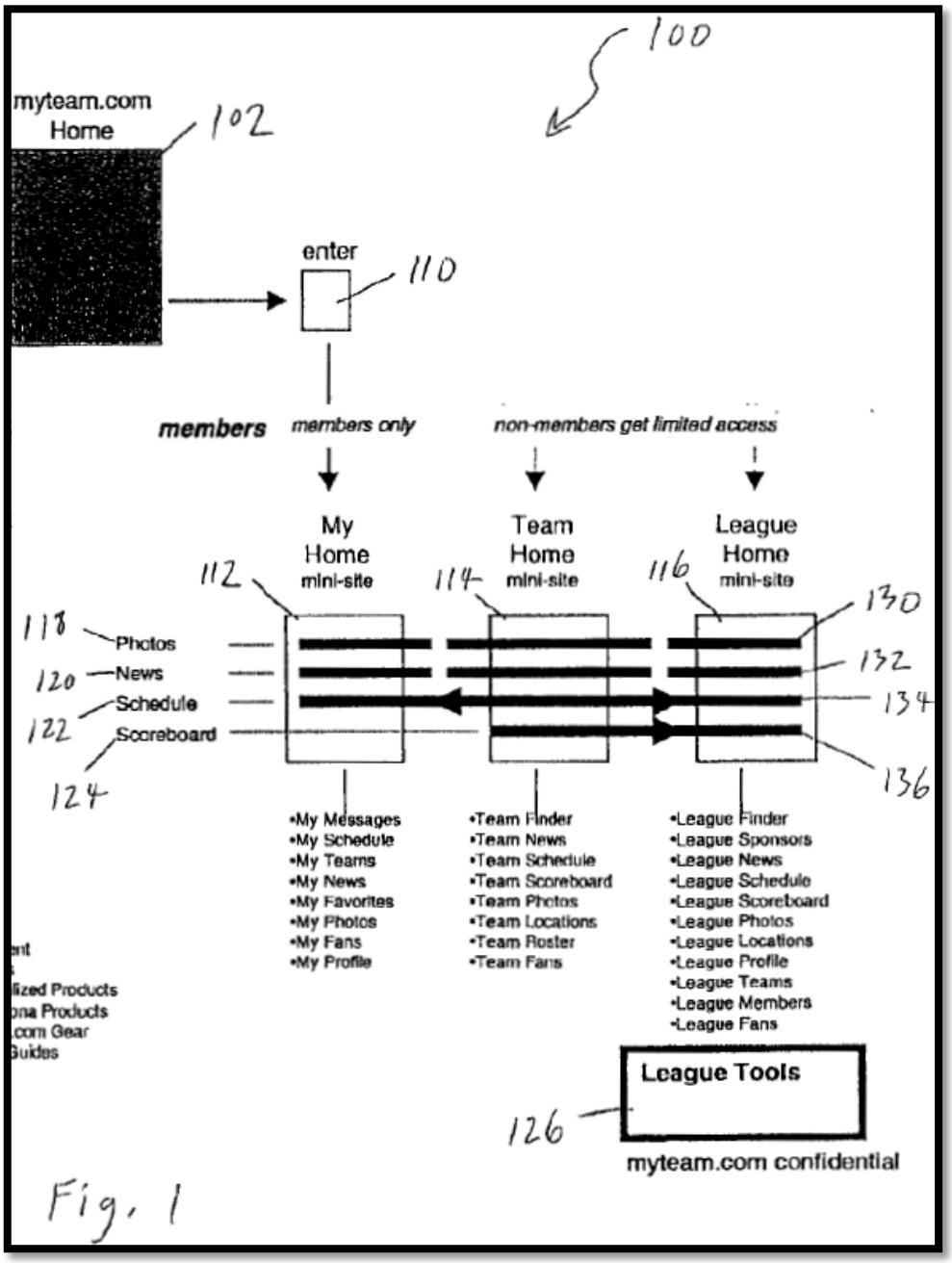


Fig. 1

EX1007, Fig. 1 (extract).

134. Block describes that once an individual joins myteam.com and becomes a "Member", the "Member will be placed (by default) in their own My Home mini-site 112." EX1007, [0098]. In Fig. 3, Block illustrates a representative webpage 300 of the My Home page. EX1007, [0121]. Block describes that "[i]nformation displayed on Home pages is organized into 3 distinct views—a "Capsule", a page and a detail page for a specific item of information." EX1007, [0095]. Block describes that a "Capsule is shown on a Home page and lists a summary of the most relevant content that is displayed on the page and to which the Capsule itself links." EX1007, [0095]. For example, in Figure 3, Block describes various capsules "shown on the page, including news 306, online games 308, store 310, polls 312, My Teams 314, My Messages 316, My Schedule 318, My Favorites 320, and instructional information 322." EX1007, [0121].

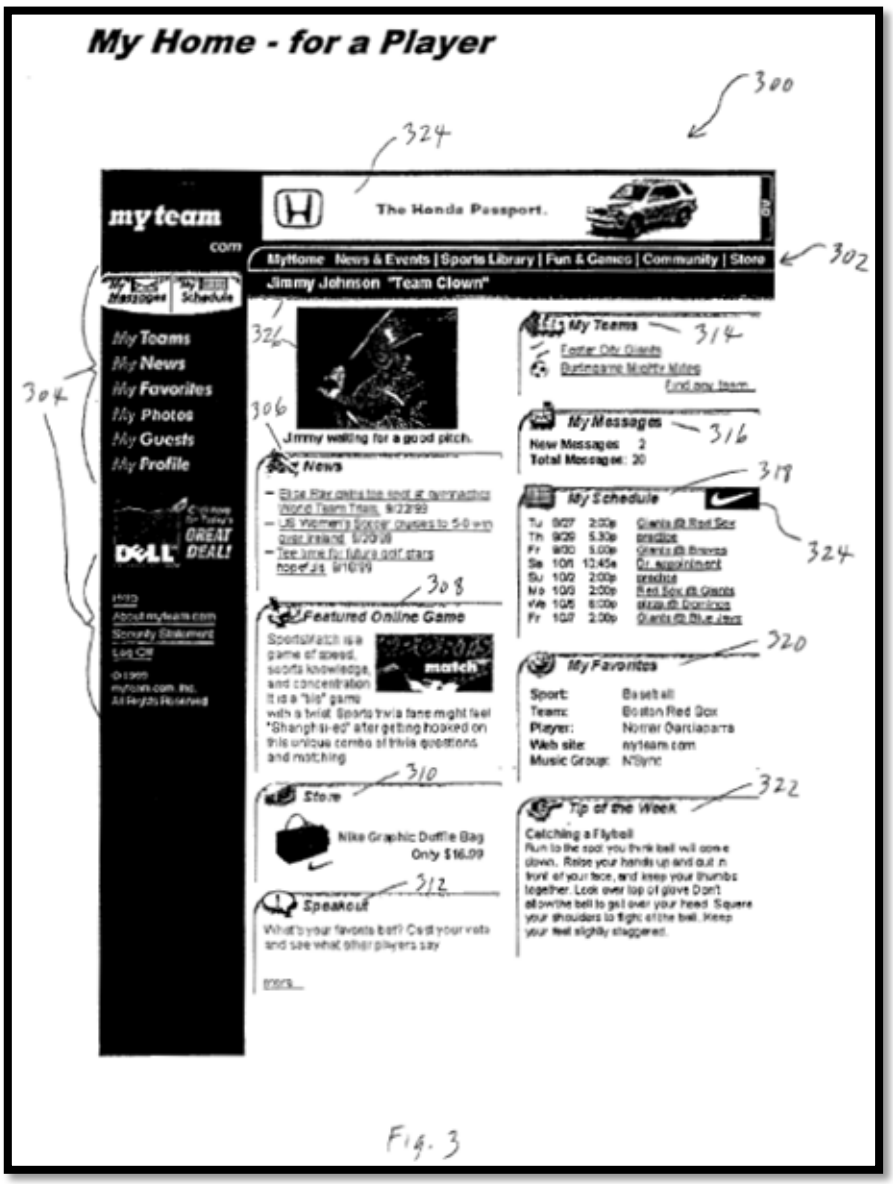


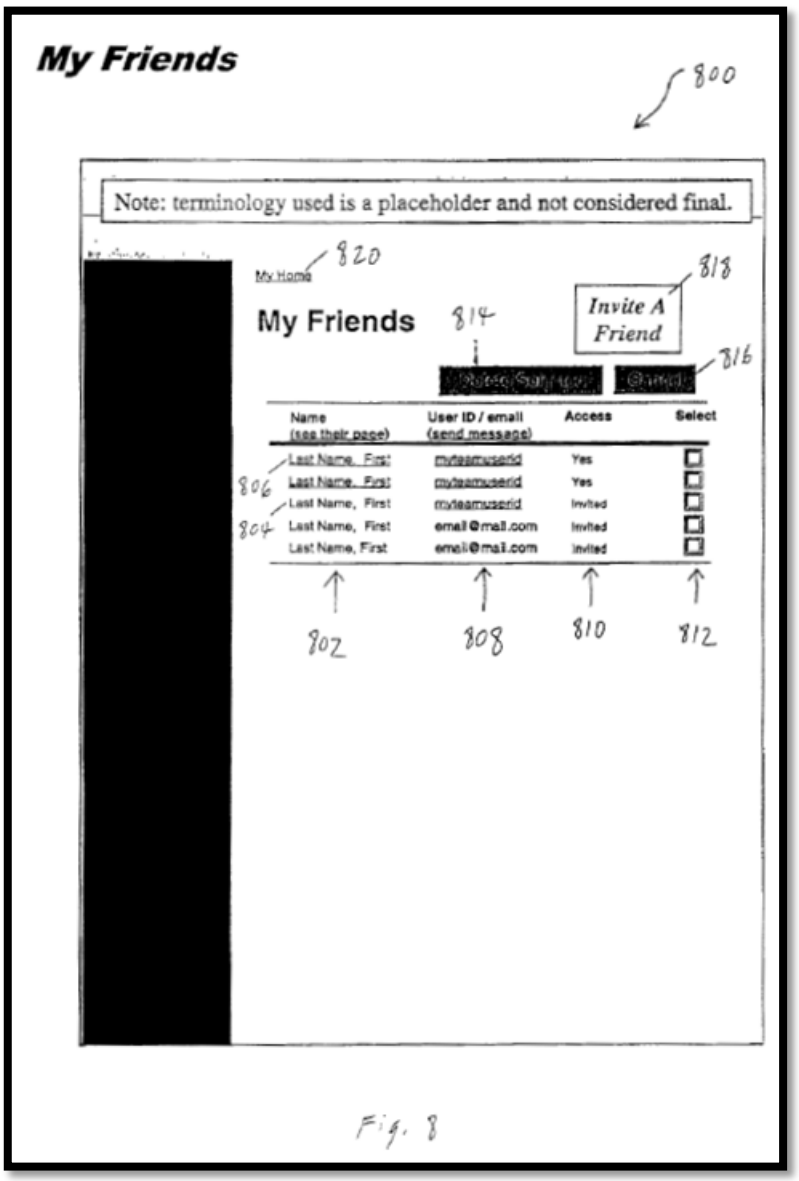
Fig. 3

EX1007, Fig. 3.

135. Block explains that a myteam.com Member can send out invitations for other individuals to join the website and the specific community. EX1007, [0012]. "These invitations are sent to known and trusted individuals who are either not yet members of the website or who are members of the website but not yet a part of the specific community." EX1007, [0012]. "By expanding the registration base of the

website, and/or access to personal information through invitations to trusted persons, a website can be expanded in a relatively secure manner." EX1007, [0017].

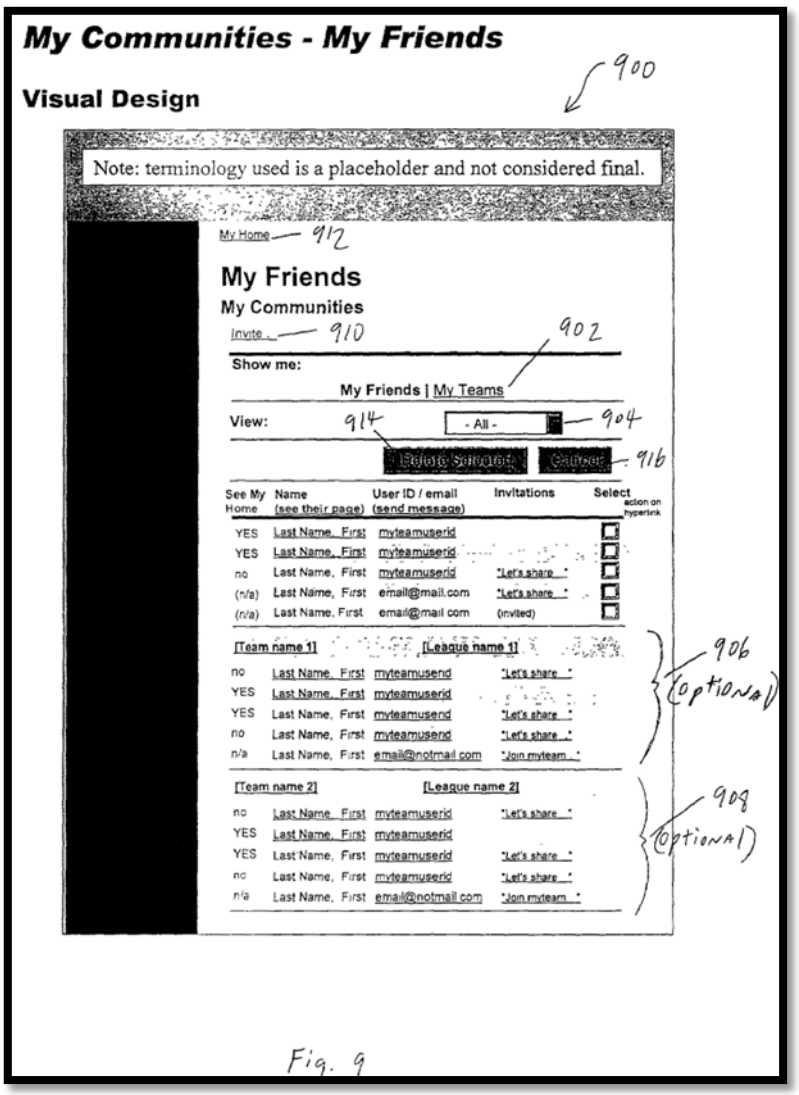
136. In Figure 8, Block explains that each mini-site includes "a My Friends web page listing 800." EX1007, [0132]. This My Friends page "shows a first table which displays 'friends' who are people that the user has invited to be myteam.com Members, or other myteam.com Members with which the user has a relationship." EX1007, [0132]. "These 'friends' are people that can see the user's My Home page, and vice versa." EX1007, [0132]. "This My Friends list provides a form of 'bookmarking' between a user's site and a Friend's site, and indicates whether the relationship is **reciprocal**, a Friend only sharing with user, or the user only sharing with Friend." EX1007, [0128] (emphasis added). "When an individual accepts an Invitation to a My Home page, the link to the invitor's My Home page is on their My Fans page." EX1007, [0094]. In Figure 8 below, Block describes column 802 with a listing of the names of the persons on the My Friends list. EX1007, [0133]. For example, "[i]f a name is not underlined or highlighted, i.e. name 804, then a click-through cannot be performed." *Id.* "If the name is underlined or highlighted, i.e. name 806, then permission has been granted by that person to see their My Home page." *Id*.



EX1007, Fig. 8.

137. In Figure 9, Block describes "an alternative My Friends web page listing 900," where "the user is given the option to select between a showing of My Friends or the listing of Teams the user is involved with via the click-through selector 902." EX1007, [0134]. "A drop-down menu 904 is also shown for selecting

which grouping to view. The drop-down values might include: All, Friends, Team1, Team2, and so forth." *Id.*



EX1007, Fig. 9.

138. Block further describes editing web pages. Block explains that "[f]or those individuals with Administrator access to the specific information, a 'edit' link is displayed that goes to an editable version of the detail information page for that item." EX1007, [0095]. "If the individual has edit access rights to the information

being displayed, an ‘edit’ access link will be displayed that will lead to an editable version of the page.” EX1007, [0122].

139. In Fig. 29, Block illustrates an example “web page 2900 for editing League Home page 500. EX1007, [0169], [0170], Figs. 5, 9. “This page [2900] generally permits the user to edit the data associated with the league itself.” EX1007, [0169]. Block explains that “[w]elcome messages to the league can be entered via 2906,” and a user can upload an image file of a league logo via box 2908. EX1007, [0170]. “The message and logo allow the league to customize their home page with their league logo and a short message welcoming the people to the league site.” EX1007, [0170]. “This logo is displayed at the top of the League Profile page, in addition to being displayed on the league home page.” EX1007, [0170].

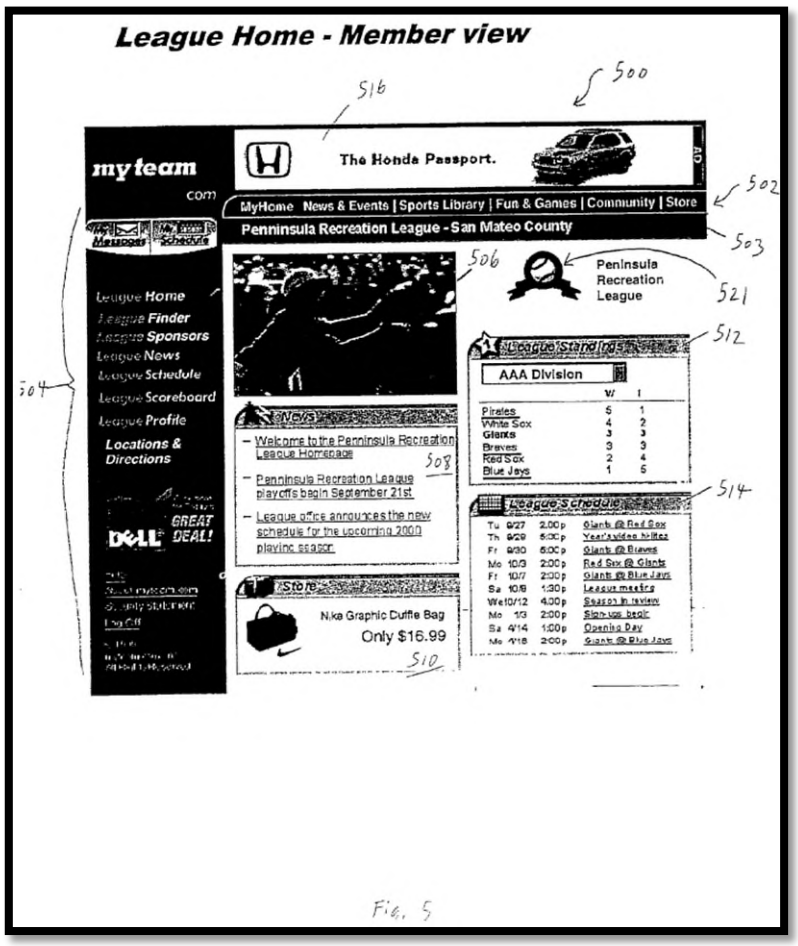
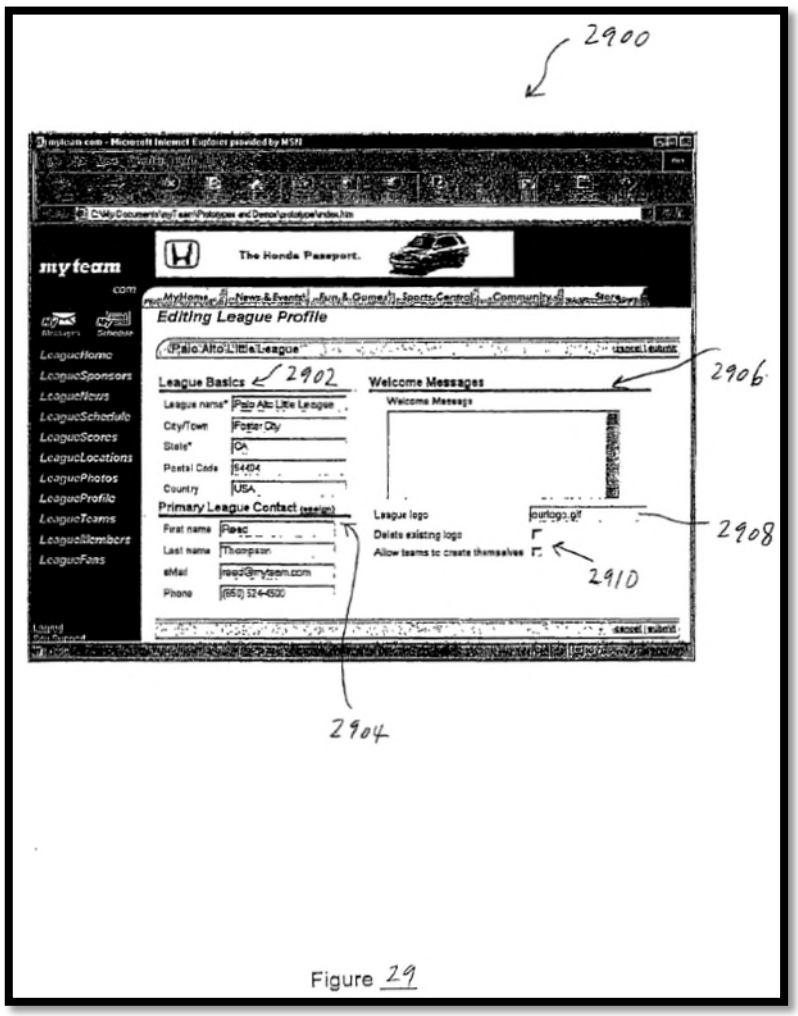


Fig. 5

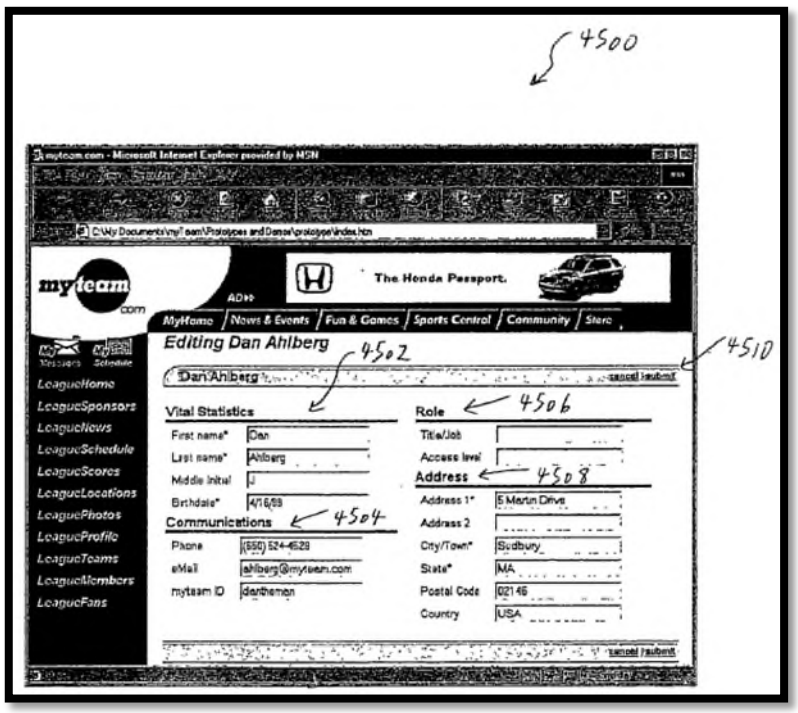
EX1007, Fig. 5.



EX1007, Fig. 29.

140. In Fig. 45, Block illustrates a web page 4500 "which permits editing of an existing individual in the league and/or team." EX1007, [0204]. Block further explains that a "similar page provides the means to add an individual to the league and/or team." EX1007, [0204]. The editing layout allows a user with write access to the individual's record to provide user information such as name, birthdate, communications information 4504, which includes the person's phone number,

email and myteam-id, the individual's role (including title/job, and access level) 4506, and the address 4508. EX1007, [0204].



EX1007, Fig. 45.

2. Claim 1 And Its Dependent Claims 2-13

a. *1[pre]: A method performed within and by a server system configured to modify and serve web pages, comprising:*

141. In my opinion, Block discloses or renders obvious a "*method performed within and by a server system configured to modify and serve web pages.*"

142. Block discloses a "*server system*." Block describes "a computer system" where "[a] website or webpage can be hosted on computers and **servers**."

EX1007, [0207] (emphasis added). Block further discloses that the "*server system*" is configured to perform the claimed "*method*" as described in more detail below.

143. Block discloses a "*server system configured to . . . **serve web pages.***" Block describes that a "website or webpage can be hosted on computers and servers." EX1007, [0207]. Block describes "providing access to **post/retrieve** information" **in** an information structure such as **"a website, as comprised of webpages**." EX1007, [0011] (emphasis added). A Skilled Artisan would have understood that hosting, posting and retrieving a web page from a server or computer is an example of "serving" a web page.

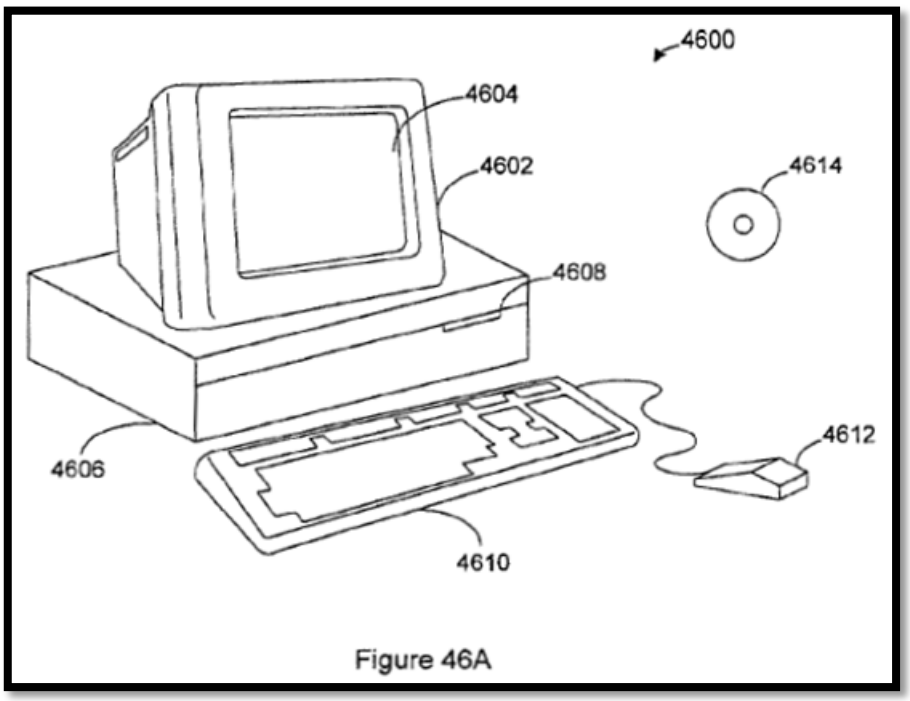
144. Block discloses a "*server system configured to **modify** . . . **web pages***." Block describes that an individual such as an "administrator" with "**edit rights**" or "primary **edit control over the web pages**" can have access to "an editable version of the page." EX1007, [0091], [0122] (emphasis added). Block explains that several of the web pages within the website "themselves have links to **editable versions of the pages** or other tools that **modify the contents of these pages**." EX1007, [0101] (emphasis added). A Skilled Artisan would have understood that since a user is capable of editing websites through the "*server system*" of Block, Block discloses the "*server system configured to **modify** . . . **web pages***."

145. Accordingly, Block discloses or renders obvious a "*method performed within and by a server system configured to modify and serve web pages.*"

b. *1[a]: receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first web site;*

146. In my opinion, Block discloses or renders obvious "*receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first web site.*"

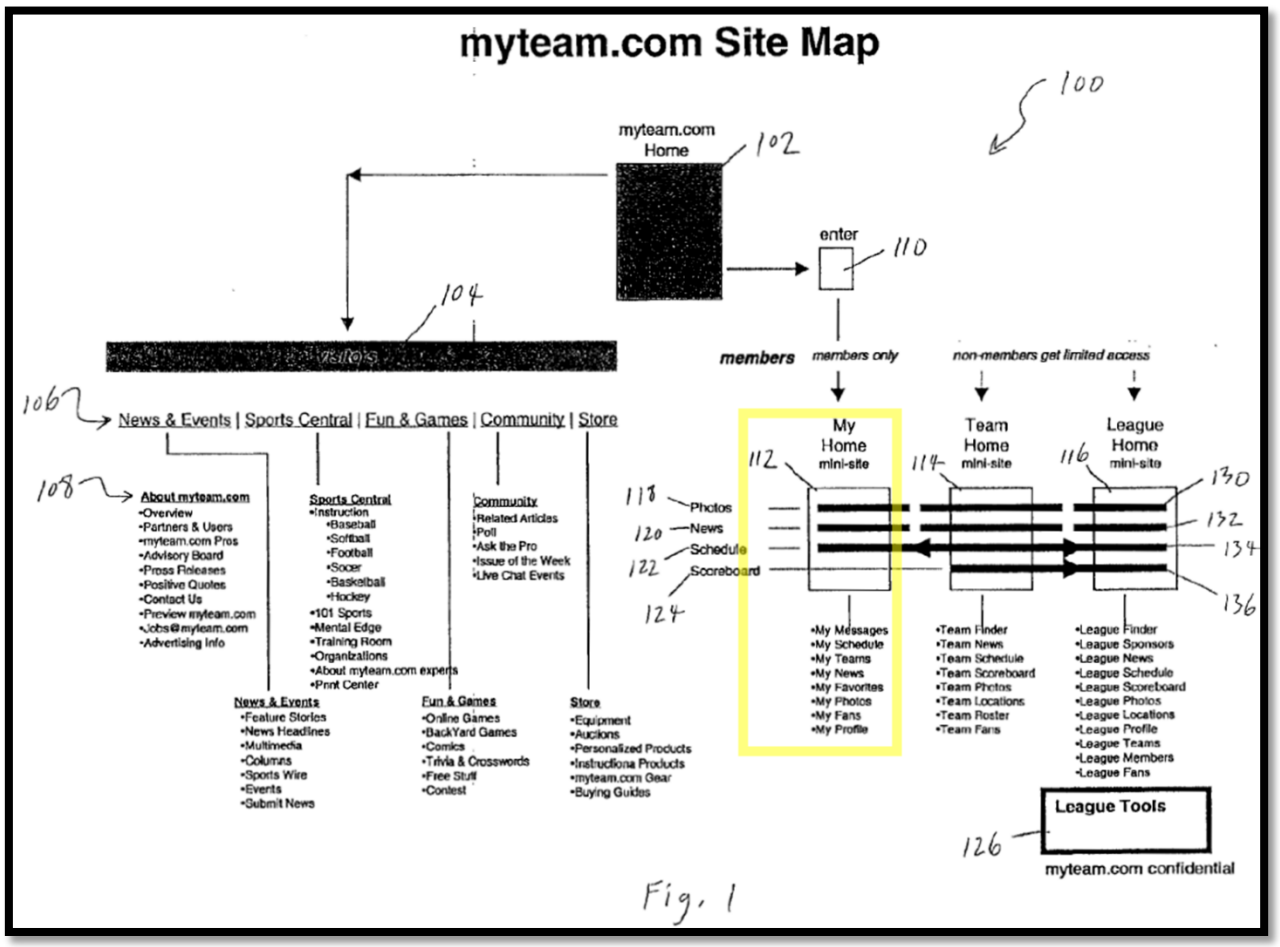
147. Block discloses "*a first client device associated with a first user*." Block describes "a computer system 4600" where "[a] website or webpage can be hosted on computers and servers." EX1007, [0207]. "[I]ndividual who has registered with the myteam.com website" (i.e., "members") **"use similar computers** to access such websites and webpages." EX1007, [0207] (emphasis added), [0091]; [0208] ("Fig. 46A shows one possible physical form of the computer system."); [0209] ("Fig. 46B is an example of a Block diagram for computer system 4600."). Therefore, a registered user (e.g., "*a first user*") accessing the myteam.com website uses a "similar" computer ("*a first client device associated with a first user*").



EX1007, Fig. 46.

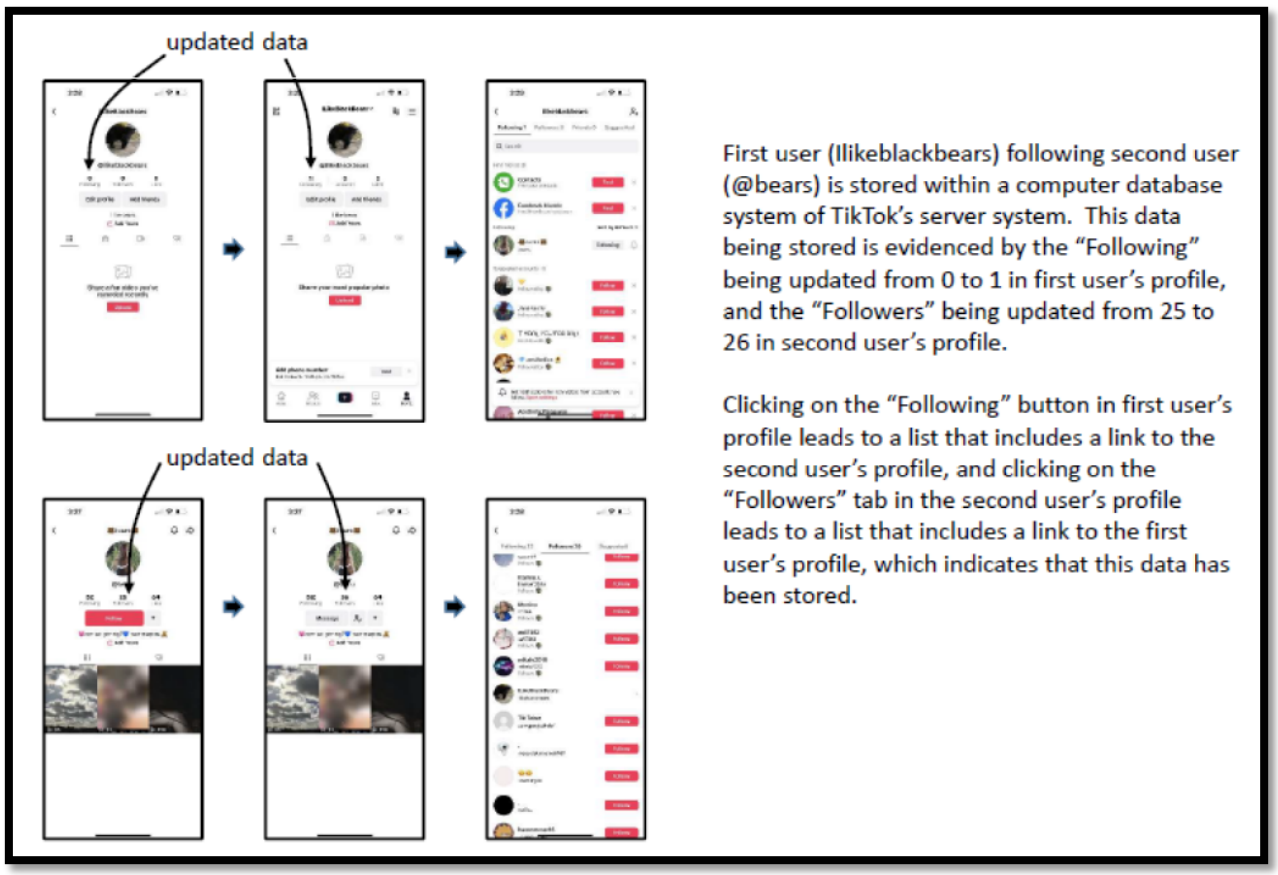
148. Block discloses "*a first web site*." Block describes that once an individual joins myteam.com and become a "Member" ("*a first user*"), the "Member will be placed (by default) in their own **My Home mini-site 112**" (annotated in **yellow** below, from Block's Figure 1). EX1007, [0098] (emphasis added), Fig. 1. The mini-site includes multiple sub-pages including a My Home page, My Fans page, and a My Teams page. EX1007, [0094]. *See also id*., [0098] ("Linked **pages** associated with the My Home mini-site include, for example: My Messages, My Schedule, My Teams, My New, My Favorites, My Fans, and My Profile. . . . The information displayed on the My Home mini-site **pages** will include information that was originally posted on a Team Home mini-site or League Home mini-site when

that information is relevant to and otherwise accessible by the individual when they are on the respective Team Home or League Home mini-site.") (emphasis added). Any registered user of myteam.com is "*a first user*," who owns a My Home mini-site. A Skilled Artisan would have understood that each "My Home mini-site" is a "*web site*." Therefore, the "My Home mini-site" of "*a first user*" is "*a first web site*."



EX1007, Fig. 1 (annotated).

149. Indeed, for the purposes of infringement, Patent Owner argues that a "*first website*" is the user profile associated with a first TikTok user:



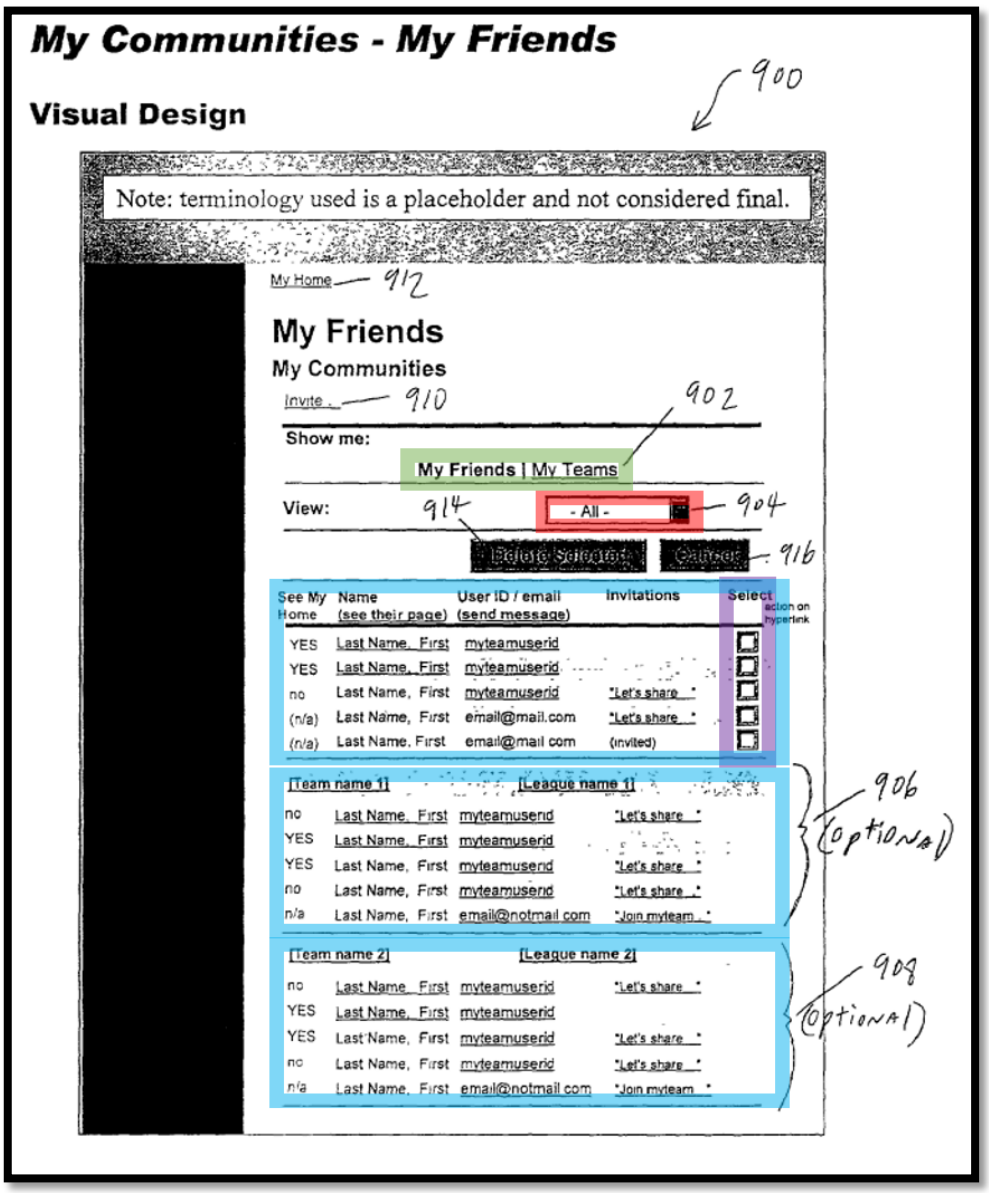
EX1012, 30, 53, 26; *see also* EX1011.

150. Patent Owner then argues that a "*second website*" is the user profile associated with a second TikTok user. A Skilled Artisan would appreciate that "mini-site" of Block operates in the same manner as the accused first and second websites on TikTok.

151. Block discloses "*receiving from a first client device associated with a first user and via a graphical user interface associated with the server system,*

information indicating a selection of a ***web asset*** *to be used in a first web site*." The '316 Patent explains "[w]eb assets can include JAVA applets, scripts (including moving scripts and scripts written in a variety of internet languages such as PERL, CGI, SQL, JAVA, XML and HTML), stock art, clip art, digital art, background images, textures, GIF, JPEG, TIF, BMP, chat rooms, message boards, web objects, buttons, templates, themes, fading color, mouse over effects, borders, buttons, shadows, icons, internet designs, sounds, music, etc." EX1001, 7:40-47. "In general, web assets are graphic images, including text and related color, sound and animation features, which can be displayed on a website." EX1001, 7:47-50. Thus, "*web asset*" is in general, but not limited to graphic image, text and related color, sound and animation features, JAVA applets and scripts, message boards, web objects, and templates which can be displayed on a website.

152. As one example, Block explains that each "My-Home mini-site" includes a "My-Friends (Fans)" page which includes a "list of people with whom the user has a relationship." EX1007, [0128]. In Figure 9, Block describes a My Friends web page 900 (below) with different tables of grouped listings for Friends, Team 1 (906), and Team 2 (908) (annotated below in **blue**). EX1007, [0134], Fig. 9. A Skilled Artisan would have understood that Block's tables such as Friends, Team 1 (906), and Team 2 (908) are web objects which can include text and templates and, therefore, are "***web asset[s]*** *to be used in a first web site*."



EX1007, Fig. 9 (annotated)

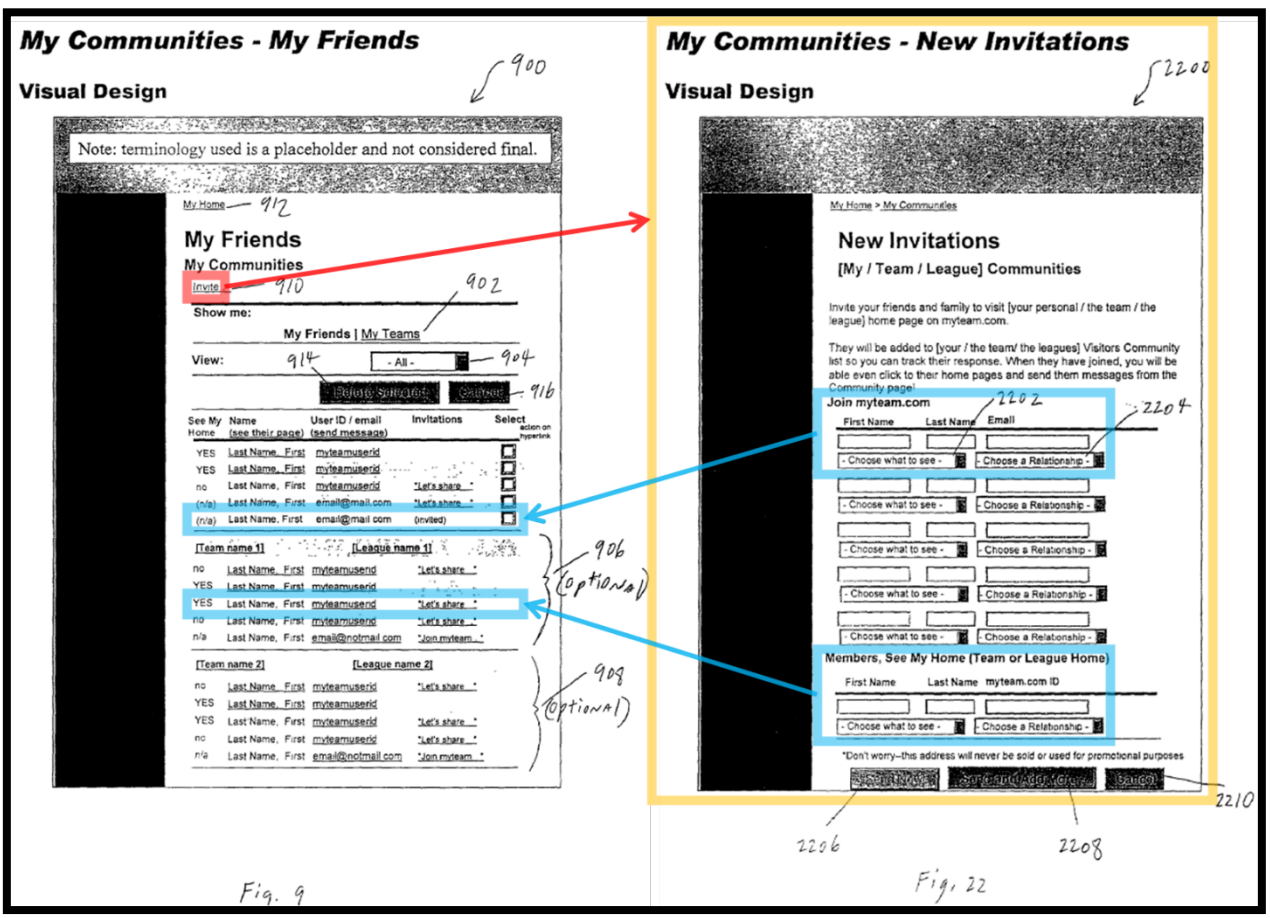
153. Block describes that in the arrangement in exemplary My Friends web page 900 in Fig. 9, "the user is given the option to select between a showing of My Friends or the listing of Teams the user is involved with via **the click-through selector 902**," (**green**) and the option to select "which grouping to view" via the "drop-down menu 904" (**red**) which includes values such as "All, Friends, Team1,

Team2, and so forth." EX1007, [0134] (emphasis added), Fig. 9. The "*first user*" can also use the "corresponding selection boxes and control tabs" (**purple**) in Fig. 9 to "delete" names from the My-Friends page. *Id*. Since the "*first user*" can interact with controls available in My Friends page 900 such as the click-through selector 902 and the drop-down menu 904 to select which grouping or listing of users to display in the My Friends page 900, a Skilled Artisan would have understood that the My Friend page 900 is "*a graphical user interface*."

154. The My Friends page 900 is also "*a graphical user interface associated with the server system*." The My-Friends page 900 is part of the myteams.com "*server system*." EX1007, Fig. 1. Likewise, My-Friends page 900 is a "representative webpage" and would be displayed on the browser of "*first client device associated with a first user*" and, therefore, the user's commands ("*information indicating a selection*") are received from the "*first client device*." EX1007, [0052].

155. Block also describes an "invite" hyperlink 910 (in Fig. 9, annotated in **red** below) which "links to the Invitations page" (e.g., Fig. 22, annotated in **orange** below) "where additional friends can be invited." EX1007, [0134], Figs. 9, 22. Since "*a first user*" using "*a first client device*" can select which names to add or remove from the listings via the invite hyperlink 910 (**red**) and the connected Invitations page 2200 (**orange**), a Skilled Artisan would have understood that the

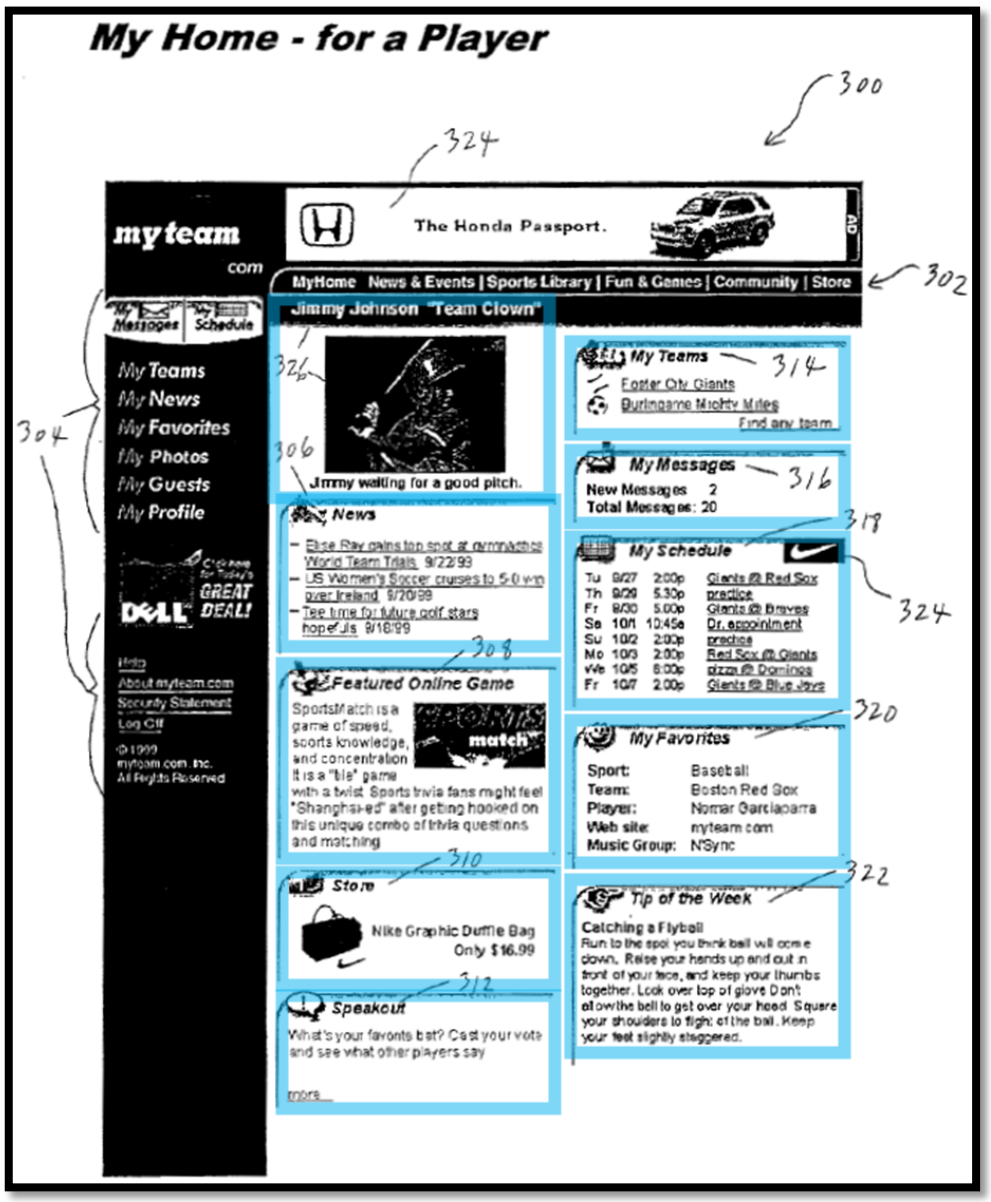
New Invitation web page 2200 in Fig. 22 provide "*a graphical user interface*" for a "*first user*" to indicate "*a selection of a web asset*" (e.g., member information) to be added to the My Friends page 900 ("*to be used in a first web site*"). Therefore, a Skilled Artisan would have understood that Block discloses or renders obvious "*receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first web site*."



EX1007, Figs. 9 & 22 (annotated).

156. The New Invitations page 2200 is "*a graphical user interface associated with the server system*" for the same reasons as above. As shown in Figure 2D, the invitation sent using the New Invitations page 2200 is "*received*" by the "central website & database." EX1007, Fig. 2D, [0119].

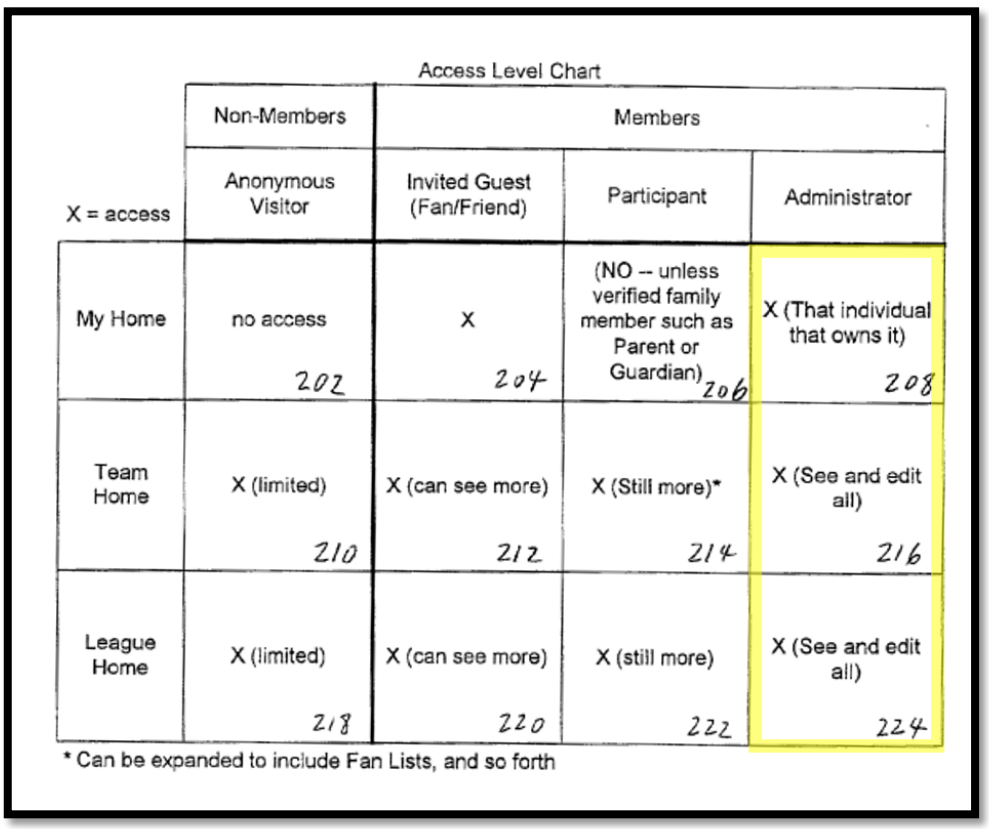
157. As another example, Block describes that "**[i]nformation** displayed on Home pages is organized into 3 distinct views—a 'Capsule', a page and a detail page for a specific item of information." EX1007, [0095] (emphasis added). Block describes that a "Capsule is shown on a Home page and lists a summary of the most relevant content that is displayed on the page and to which the Capsule itself links." EX1007, [0095]. For example, in Figure 3, Block describes various capsules "shown on the page, including news 306, online games 308, store 310, polls 312, My Teams 314, My Messages 316, My Schedule 318, My Favorites 320, and instructional information 322." EX1007, [0121], Fig. 3. A Skilled Artisan would have understood that Block's capsule such as "news 306, online games 308, store 310, polls 312, My Teams 314, My Messages 316, My Schedule 318, My Favorites 320, and instructional information 322," and other personalized information 326 (e.g., photo and name of Jimmy Johnson) (annotated below in **blue**) and "specific items of information displayed in a Capsule" includes at least "graphic image, text and related color, sound and animation features" and, therefore, is "***a web asset** to be used in a first web site*." EX1007, [0095], [0121], Fig. 3.



EX1007, Fig. 3 (annotated).

158. Block explains that an individual with "edit access rights" will get "an 'edit' access link … that will lead to an editable version of the page." EX1007, [0122]; *see also* EX1007, [0095] ("For those individuals with Administrator access to the specific information, a 'edit' link is displayed that goes to an editable version

of the detail information page for that item."). In "Box 208" of Figure 2 (annotated in yellow), Block "indicates that the Administrator of the My Home page is the owner, and hence full access is allowed." EX1007, [0108], Fig. 2. Therefore, a Skilled Artisan would have understood that because each registered user has "full access" and "edit access rights to the information being displayed" on their My Home mini-site, as such "an 'edit' access link will be displayed that will lead to an editable version of the page." EX1007, [0122].



Access Level Chart

X = access	Non-Members	Members		
	Anonymous Visitor	Invited Guest (Fan/Friend)	Participant	Administrator
My Home	no access 202	X 204	(NO -- unless verified family member such as Parent or Guardian) 206	X (That individual that owns it) 208
Team Home	X (limited) 210	X (can see more) 212	X (Still more)* 214	X (See and edit all) 216
League Home	X (limited) 218	X (can see more) 220	X (still more) 222	X (See and edit all) 224

* Can be expanded to include Fan Lists, and so forth

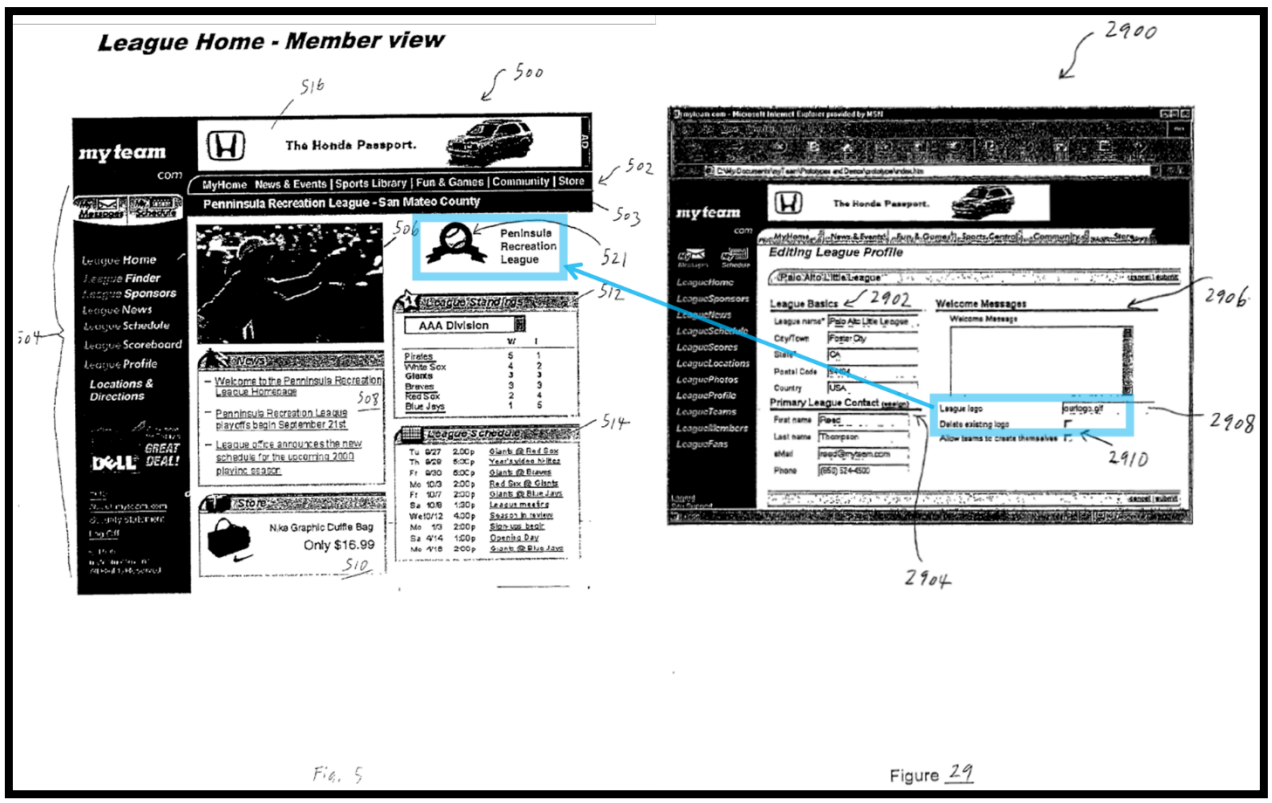
EX1007, Fig. 2 (annotated).

159. Since a registered member ("*first user*") has Administrator access to at least its own My Home mini-site ("*a first web site*") as its owner, a Skilled Artisan

would have understood that the "*first user*" may select information being displayed on its own My Home mini-site ("*information indicating a selection of a web asset to be used in a first web site*") via the "editable version of the page" accessed "*from a first client device associated with a first user*." Since a user with edit access rights can interact with the "editable version of the page," a Skilled Artisan would have understood that such "editable version of the page" shows "*a graphical user interface associated with the server system*" that allows "*a first user*" of "*a first client device*" with "edit access rights to the information being displayed" to edit that page and provide "*information indicating a selection of a web asset to be used in a first web site*."

160. In Fig. 29, Block illustrates an example of an editable web page: "Editing League Profile" page 2900 for editing League Home page 500 (in Fig. 5). EX1007, [0169], Figs. 5, 29. Block explains that page 2900 "is only available to league administrators," who are "users with write access to the page." EX1007, [0171]. *See also id*. Fig. 2, [0113] ("The League Administrator has a large realm of responsibility, and box 224 [(annotated in **green** in Fig. 2 above)] shows the League Administrator having full access to the League Home page."). "This page [2900] generally permits the user to edit the data associated with the league itself." EX1007, [0169]. Block explains that "[w]elcome messages to the league can be entered via 2906," and a user can upload an image file of a league logo via box 2908 (annotated

in **blue**). EX1007, [0170]. "The message and logo allow the league to customize their home page with their league logo and a short message welcoming the people to the league site." EX1007, [0170]. "This logo is displayed at the top of the League Profile page, in addition to being displayed on the league home page" 500 as shown in 521 in Fig. 5 (annotated in **blue**). EX1007, [0169], [0170], Fig. 5.



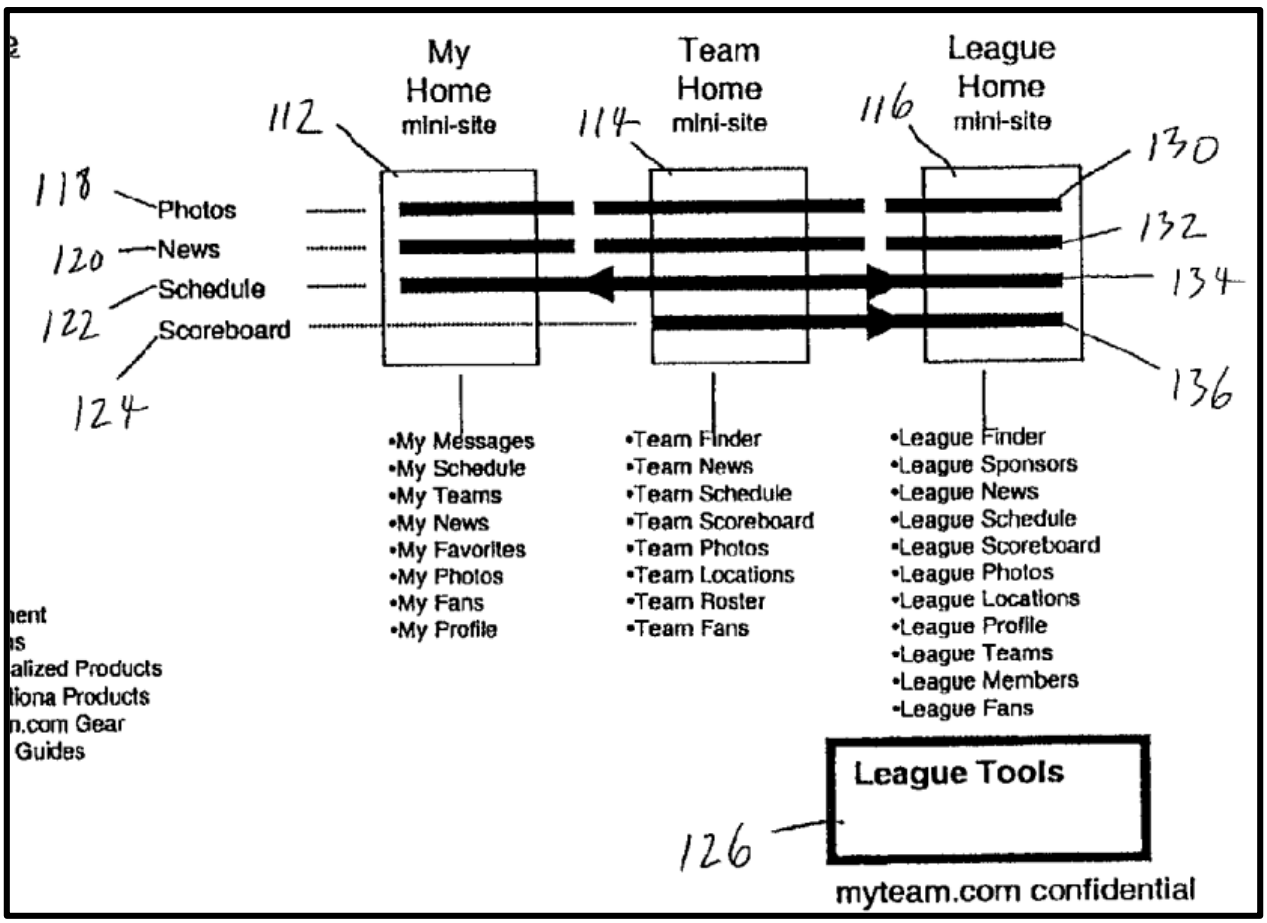
EX1007, Figs. 5 & 29 (annotated).

161. Since page 2900 provides a user interface for the "*first user*" (e.g., a league administrator with access to the "Editing League Profile" page 2900), a Skilled Artisan would have appreciated that Figure 29 shows "*a graphical user interface associated with the server system*." A Skilled Artisan would have also

understood that information such as "welcome message" and "league logo" which the user with write access (e.g., a league administrator) can enter via the page 2900 are examples of "*a web asset*" which the "*first user*" can "*select*" to be used in a web page.

162. A Skilled Artisan would have further understood that a selection of a web asset via page 2900 includes "*a selection of a web asset to be used in*" a My Home mini-site ("*a first web site*"). As shown in Figure 1 of Block, for example, Schedules posted on the league home page "crossover" to each user's mini-site 112. EX1007, [0103], Fig. 1. *See also id*., [0098] ("The information displayed on the My Home mini-site pages will include information that was originally posted on a Team Home mini-site or League Home mini-site when that information is relevant to and otherwise accessible by the individual when they are on the respective Team Home or League Home mini-site."). For example, in Figure 1, "[t]he continuous line 134, with bi-directional arrows between the mini-sites Team Home and League Home, indicates that Schedule information will be shared between the mini-sites." *Id*., [0103]. *See also* EX1007, Fig. 2A, [0116] ("Upon accepting the invitation, the Father is afforded the opportunity to register with the website and thereby be granted a Home Page 270 as a registered member of the website. This home page can contain a variety of configurable capsules and/or window areas for information. Example capsules shown include My Schedule, My Teams, and My Leagues. . . . the Father

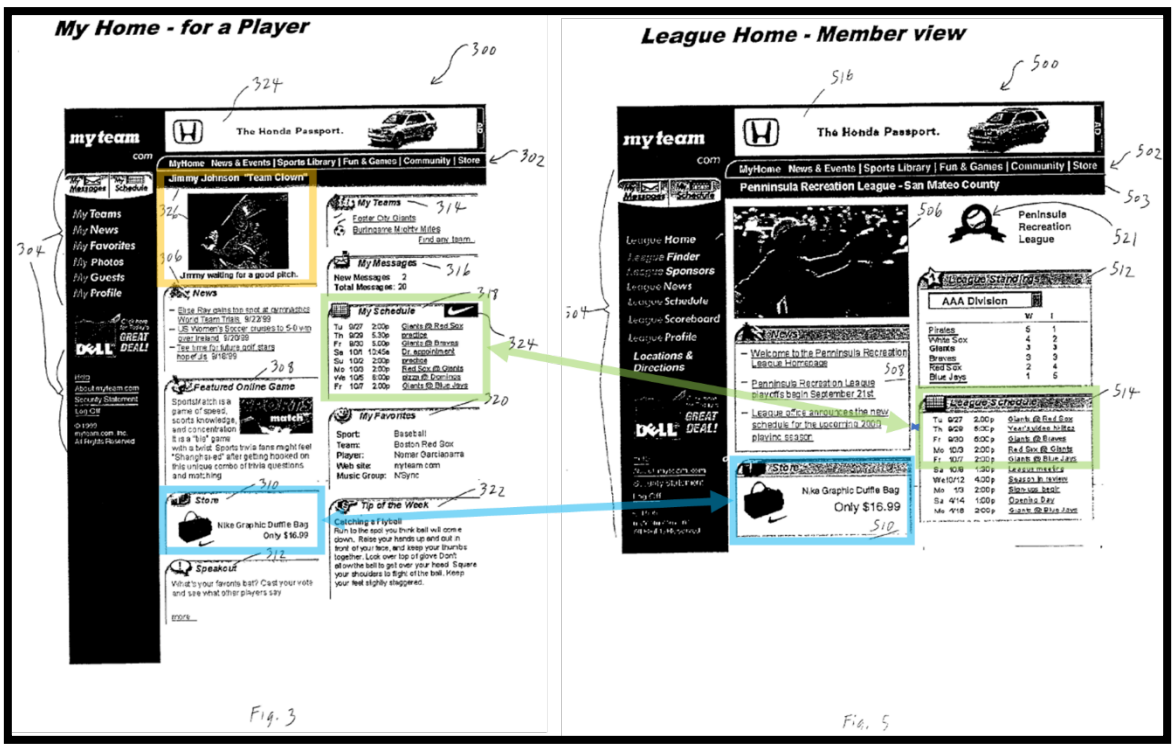
will be able to view—in one convenient location, as a registered member of the website with his own Home Page—information such as practice and/or game schedules for his children, and/or any other information the Father deems of interest. **As each team or league changes such schedules the information will be accurately reflected on the Father's Home Page**") (emphasis added).



EX1007, Fig. 1. (extract)

163. Just like the capsules on the My Home page described above, a Skilled Artisan would have understood that capsules on the League Home page 500 such as "League photographs 506, League News 508, store information 510, League

Standings 512, and the League Schedule 514," "Advertisements 516," and "League logo 518" and information therein includes at least "graphic image, text and related color, sound and animation features" and, therefore, is "***a web asset***." EX1007, [0125]. Block explains that "[t]he specific items of information displayed in a Capsule and on its linked page can come from another Home page mini-site." EX1007, [0095]. Annotated figures 3 and 5 below describe that web assets such as Store (annotated in **blue**) and Schedule (annotated in **green**) posted on the league home page "crossover" to a member's My Home mini-site ("*first web site*"). *Id*. Figs. 3, 5. Therefore, a Skilled Artisan would have understood that a selection of web assets to be used on the League page is essentially an "*a selection of a web asset to be used*" on each user's mini-site.



EX1007, Figs. 3 & 5 (annotated).

164. Block explains that the My Home page 300 ("*a first web site*") includes "[p]ersonalized information 326" "regarding the owner of this page (Jimmy Johnson), including for instance pictures of the Player in action, or captions regarding the Player's nickname." (annotated in **orange** above). EX1007, [0121]. Even for such personalized information that is unique in the My Home page 300, a Skilled Artisan would have understood that Block's system would include "*a graphical user interface*" for "*receiving, from a first client device associated with a first user . . . information indicating a selection of a web asset*" (e.g., "[p]ersonalized information 326" regarding the owner of this page (Jimmy Johnson), including "pictures of the Player in action, or captions regarding the Player's nickname") "*to be used in a first web site*" (e.g., the "My Home mini-site" of "*a first user*") similar to the "*graphical user interface*" in Fig. 29. Moreover, it would have been obvious to use the GUI described in Fig. 29 of Block to edit the "league home page" to also edit the My Home page as it would be cost effective and efficient to use the same tools to perform the same functions on a website. *See e.g.*, EX1007, [0025].

165. Accordingly, Block discloses or renders obvious "*receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first web site*."

c. *1[b]: receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset;*

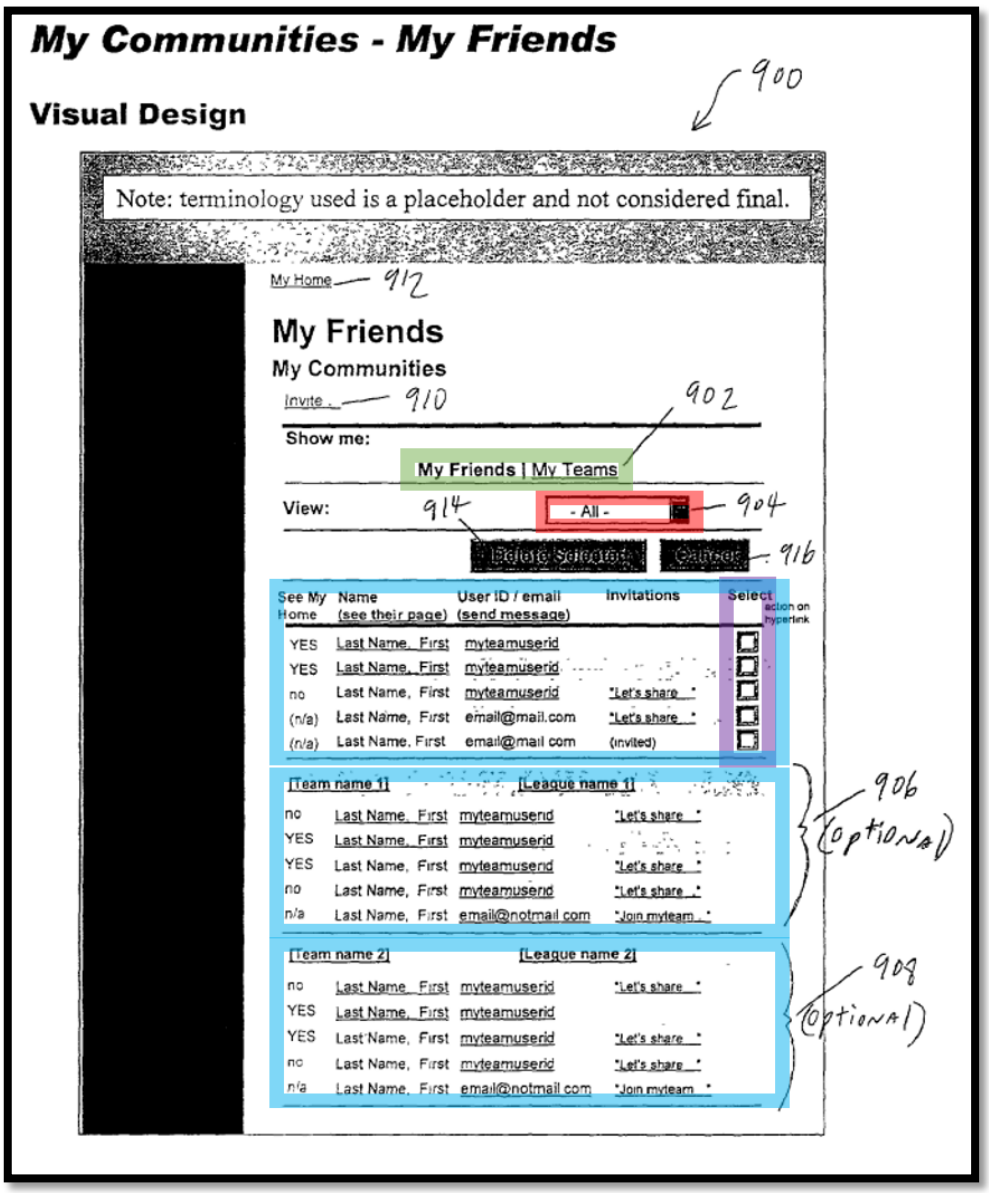
166. In my opinion, Block discloses or renders obvious "*receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset.*"

167. As explained above in Section VII.A.2.b, Block discloses the "*first client device*" which is a computer used by the "*first user*" to access and edit the user's "My Home mini-site." EX1007, [0091], [0098], [0207]. As explained above in Section VII.A.2.b, Block discloses a "*web asset*," which may include capsules and information displayed in a capsule or tables of listings. *See* EX1007, [0095], [0121], [0134], Figs. 3, 9.

168. As also explained in Section VII.A.2.b, for individuals with "edit access rights to the information being displayed, an 'edit' access link will be displayed that will lead to an editable version of the page" and individuals have "full access" to their own mini-site. EX1007, [0122]; *see also* EX1007, [0095] ("For those individuals with Administrator access to the specific information, a 'edit' link is displayed that goes to an editable version of the detail information page for that item."). A Skilled Artisan would have understood that such "an editable version of the page" with an "edit" link is "*an editing screen of the graphical user interface*" that allows a first user of "*the first client device*" with "edit access rights to the

information being displayed" to provide "*an instruction to modify the web asset to generate an edited web asset*."

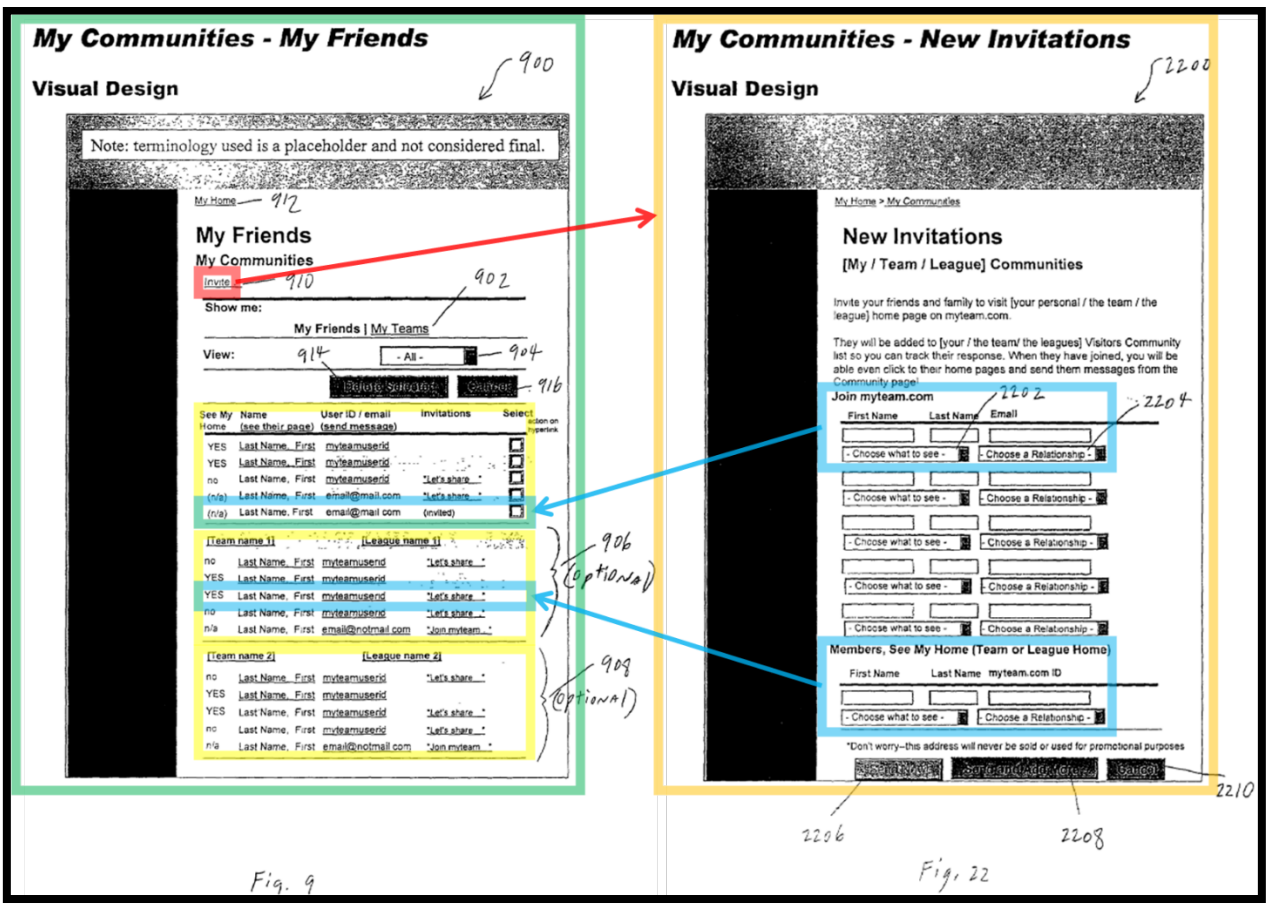
169. Block illustrates examples of "*an editing screen of the graphical user interface*" which allow a user to provide "*an instruction to modify the web asset to generate an edited web asset.*" As discussed above in Section VII.A.2.b, in Figure 9, Block describes a My Friends web page 900 with various tables with a group of listings for Friends, Team 1 (906), and Team 2 (908), where each table such as Friends, Team 1 (906), and Team 2 (908) and the text within the table is the "*web asset*." Block describes that in My Friends web page 900 of Fig. 9, "the user is given the option to select between a showing of My Friends or the listing of Teams the user is involved with via the click-through selector 902" and a user is given the option to select "which grouping to view" via the "drop-down menu 904," which includes values such as "All, Friends, Team1, Team2, and so forth." EX1007, [0134]. "[T]he click-through selector 902," (**green**), "drop-down menu 904" (**red**), and the "selection boxes and control tabs" (**purple**) can be used to generate "*an instruction to modify the web asset*." EX1007, [0134], Fig. 9. When the "*first user*" selects a "selection box" and presses "delete selected" button 914, a new table will be generated ("*generate an edited web asset*") which will not include the selected user. EX1007, [0134]. The "*first user['s]*" selection is "*an instruction to modify the web asset*."



EX1007, Fig. 9 (annotated).

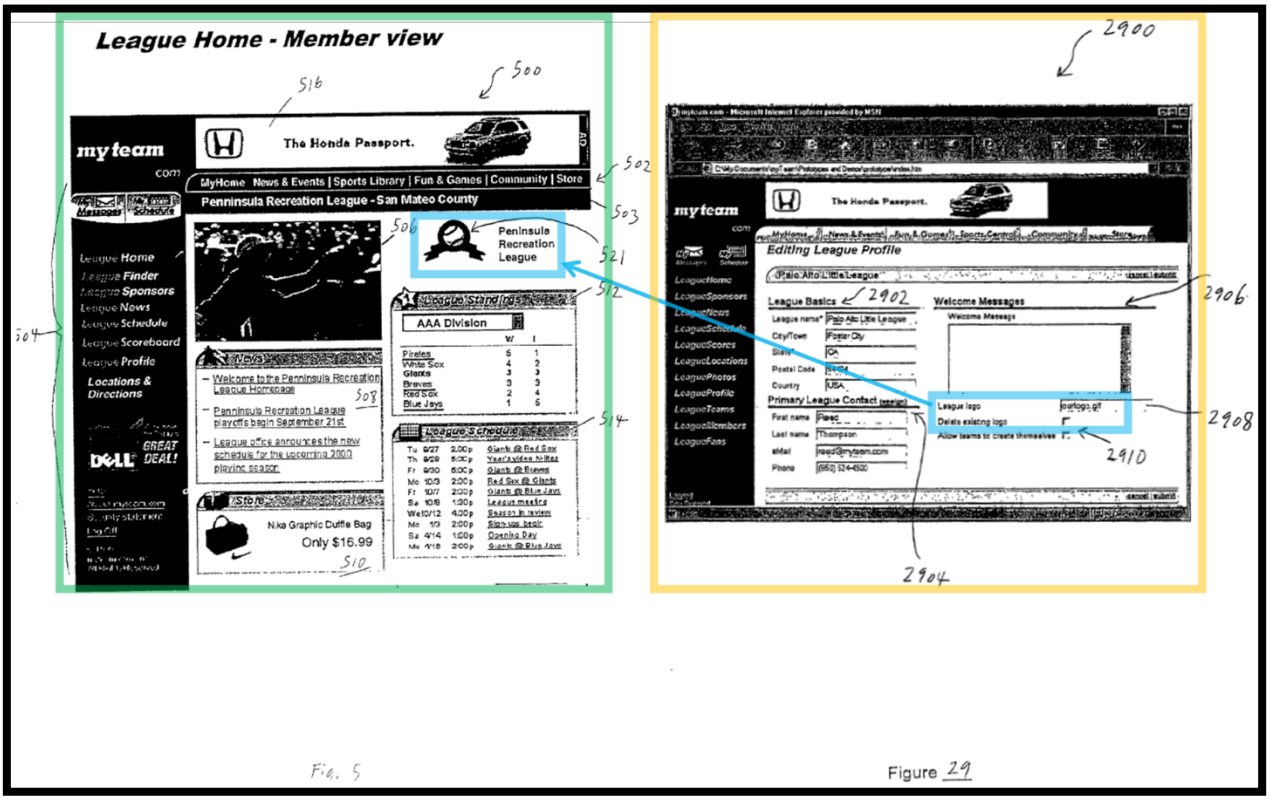
170. Block further describes an "invite" hyperlink 910 which "links to the Invitations page" (e.g., Fig. 22), "where additional friends can be invited," and the "delete selected" button 914 which "removes the people that were selected from the table." EX1007, [0134], [0156] ("Fig. 22 shows a first representative version 2200 of a New Invitations web page as would be accessed from an individual's My Home

page"), [0157]. Fig. 22. Since "*a first user*" using the "*first client device*" who owns a My Home page can provide instruction to modify the listings ("*web asset*" annotated in **yellow**) via the invite hyperlink 910 (annotated below in **red**) and the boxes (e.g., annotated in **blue**) in the associated Invitations page (e.g., Fig. 22 illustrating "*an editing screen of the graphical user interface*" annotated below in **orange**) which allows a user to enter information of an invitee, a Skilled Artisan would have understood that Block discloses or renders obvious "*receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset.*"



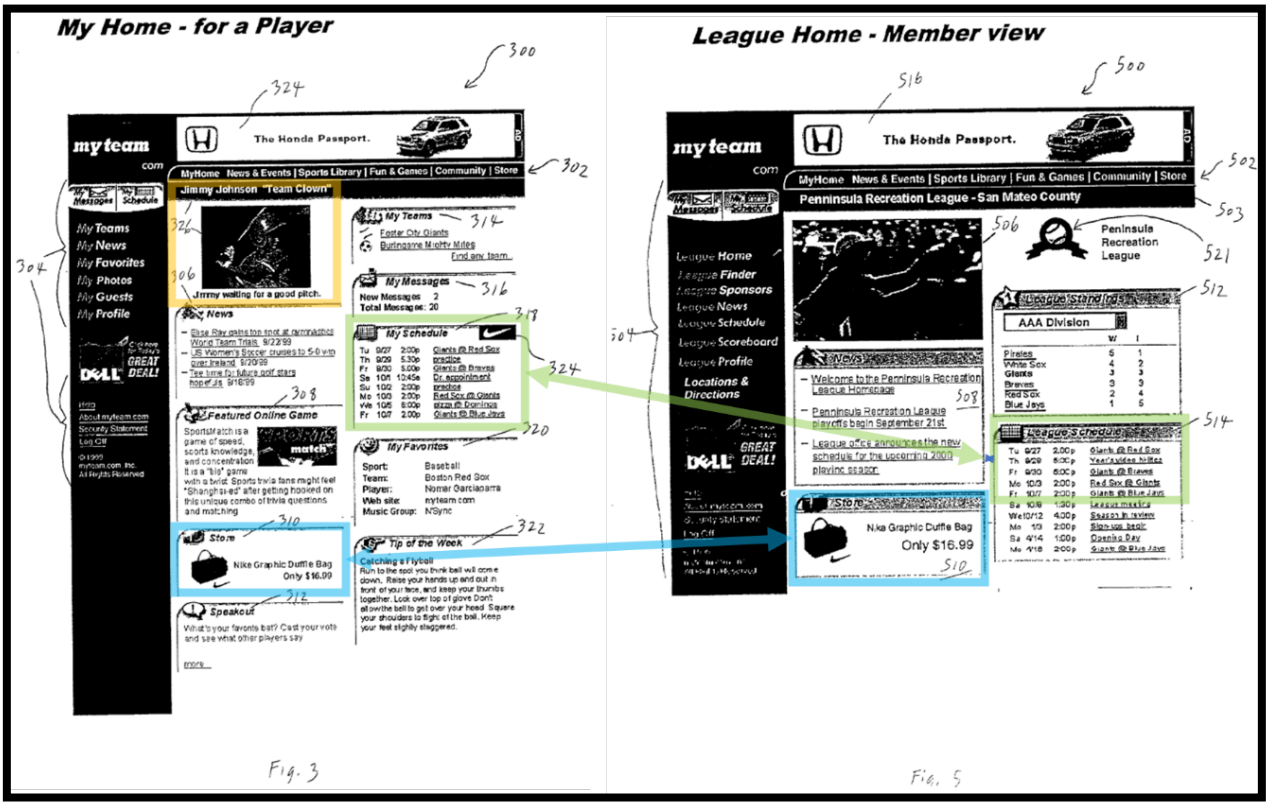
EX1007, Figs. 9 & 22 (annotated).

171. As another example, Fig. 29 of Block illustrates "a web page 2900" for editing the League Home page. EX1007, [0169], [0170], Figs. 5, 29. As explained above, an individual with edit access to the League Home page 500 (e.g., league administrator) can modify capsules (i.e., "*web assets*") on the League home page 500 by providing instructions in the web page 2900 (annotated in **orange** below in Figure 29), for example, via box 2908 to select an image file for a "Logo" and checkbox 2910 to "Delete existing logo" to modify the logo displayed on the League Home page 500 (annotated in **blue**). EX1007, [0169]-[0171], Figs. 5, 29. Therefore, when the "first user" is a league administrator, the web page 2900 (annotated in **orange** below in Figure 29) is an "*editing screen of the graphical user interface*" which allow the first user of "*the first client device*" to provide "*an instruction to modify the web asset to generate an edited web asset.*"



EX1007, Figs. 5 & 29 (annotated).

172. As explained in Section VII.A.2.b, a Skilled Artisan would have understood that a specific item of information ("*web assets*") posted on the league home page "crossover" to each user's mini-site 112, including the My Home page 300 ("*first website*") in Fig. 3. EX1007, [0103], [0121], Fig. 1. *See also id*. [0116], Fig. 2A, [0095]. Therefore, a Skilled Artisan would have understood that the League editing page (shown in Fig. 29), is an "*editing screen of the graphical user interface*" which allows a first user of "*the first client device*" to provide "*an instruction to modify the web asset to generate an edited web asset*" to be used on the "*first website*."



EX1007, Figs. 3 & 5 (annotated).

173. In addition, as explained in Section VII.A.2.b, similar to the example in Fig. 29 which describes "*an editing screen of the graphical user interface*" for "*receiving . . . an instruction to modify the web asset to generate an edited web asset*" used in the "league home page," and crossed over to the My Home page, a Skilled Artisan would have understood that Block's system would include "*an editing screen of the graphical user interface*" for "*receiving, from the first client device . . . an instruction to modify the web asset to generate an edited web asset*" that is unique in the My Home page (e.g., "[p]ersonalized information 326" regarding the owner of this page (Jimmy Johnson), including "pictures of the Player in action, or

captions regarding the Player's nickname") of the "*first web site*" (e.g., the "My Home mini-site" of "*a first user*")." As explained in Section VII.A.2.b, it would have been obvious to use the same GUI interface to edit the mini-site as the League-site. Therefore, a Skilled Artisan would have understood that Block's mini-sites include "*an editing screen of the graphical user interface*" for "*receiving, from the first client device . . . an instruction to modify the web asset to generate an edited web asset.*"

174. Accordingly, Block discloses or renders obvious "*receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset.*"

d. *1[c]: generating, based upon the instruction, the edited web asset;*

175. In my opinion, Block discloses or renders obvious "*generating, based upon the instruction, the edited web asset.*"

176. As explained above in Section VII.A.2.c, Block discloses a user providing "***an instruction** to modify the web asset **to generate an edited web asset.***" For example, as explained above in Section VII.A.2.c, Block explains that a user can provide "*an instruction*" to modify each of the listings in the My Friends web page 900 of Fig. 9 ("*to modify the web asset*") by entering information of invitees to add to the list via the invite hyperlink 910 and the connected Invitations page (e.g., Fig. 22), which would then generate an edited listings according to the instruction ("*to*

generate an edited web asset"). Moreover, when the "*first user*" selects a "selection boxes and control tabs" and presses "delete selected" button 914 in Fig. 9, a new table will be generated ("*the edited web asset*") based on the user's command. EX1007, [0134], Fig. 9. Likewise, once invited by the "*first user*," new users will be added to the My-Friends page. EX1007, [0132].

177. As another example, Block explains that a user can upload an image file of a league logo via box 2908 (shown in Fig. 29), which would then be displayed as a league logo 521 in the League Home page 500, which may then crossover to a My Home page 300. EX1007, [0170], Fig. 29. Therefore, it would have been obvious that once Block's server system receives "*an instruction to modify the web asset to generate an edited web asset*," it edits the web asset based on the instruction to generate the edited web asset which is then "viewable" on the web page.

178. Thus, a Skilled Artisan would have understood that Block discloses or renders obvious "*generating, based upon the instruction, the edited web asset.*"

e. *1[d]: forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system;*

179. In my opinion, Block discloses or renders obvious "*forwarding, to the first client device and to be displayed by the graphical user interface, one or more*

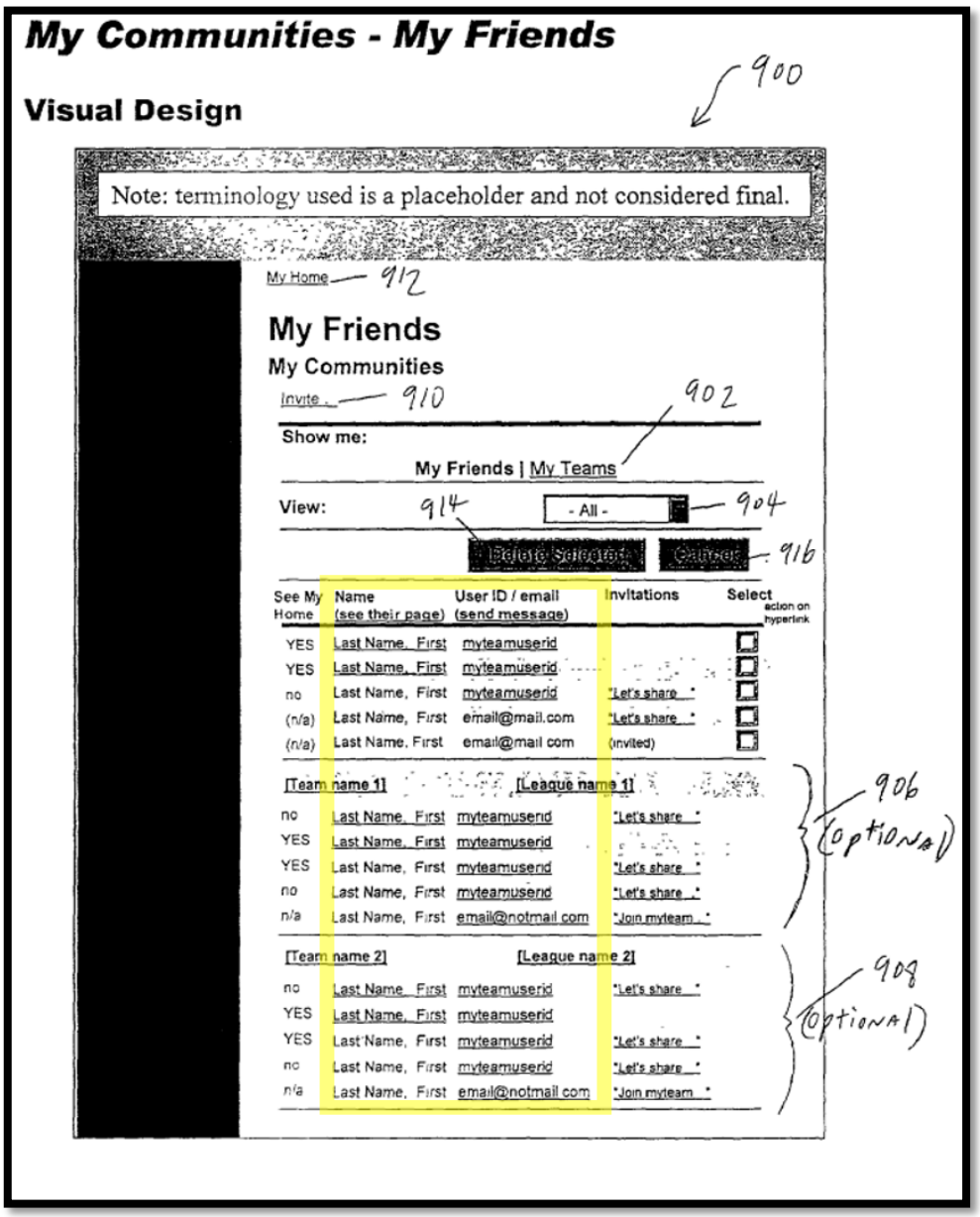
identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system."

180. As discussed above in Section VII.A.2.b, Block discloses a "*first client device*" which is a computer used by a "*first user*" who is a "Member" "who has registered with the myteam.com website." EX1007, [0091], [0207]. As discussed above in Section VII.A.2.b, Block discloses a "*first web site*" which can be a "My Home mini-site" of a "*first user*" and a "*graphical user interface*" such as "an editable version of the page" with an "edit" link. EX1007, [0098], [0122].

181. Block explains that access to the myteam.com community is "a result of ownership, or via an Invitation from the owner." EX1007, [0098]. Block explains that once an individual joins myteam.com, "[t]he Member will be placed (by default) in their own My Home mini-site 112." EX1007, [0098]. Therefore, each user has their own My Home mini-site 112. Therefore, other mini-sites of users who previously joined myteam.com would be "*one or more previously-created websites that were previously-created by one or more other users of the server system.*" *See* EX1007, [0012] ("A community of inter-related users is created through the website structure. . . ."); EX1007, [0097] ("Members are provided access to three types of mini-site areas, namely My Home, Team Home, and League Home.").

182. Block illustrates examples of web pages "*forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers*

respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system." EX1007, Figs. 8, 9. For example, in Fig. 9, Block illustrates an arrangement of "My Friends web page listing 900" in which "the user is given the option to select between a showing of My Friends or the listing of Teams the user is involved with via the click-through selector 902." EX1007, [0134]. "The listing of My Friends includes **click-through** names to see that person's My Home page." EX1007, [0134] (emphasis added). As illustrated in Fig. 9, clicking on the name of a user on the listing (annotated in **yellow**), would connect to that person's My Home mini-site if that person is a current member of Myteam.com. Since the example arrangement of the My Friends web page 900 displays **names** of members associated with link to "that person's My Home page," a Skilled Artisan would have understood that Block describes "*display[ing] . . . one or more **identifiers** respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system*." A Skilled Artisan would have further understood that "*one or more identifiers*" displayed on the pages such as the My Friends page 900 is "*forward[ed]*" to the "*first client device*" because such "identifiers" are displayed in the web browser of the "*first client device*."



EX1007, Fig. 9 (annotated).

183. Accordingly, Block discloses or renders obvious "*forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system.*"

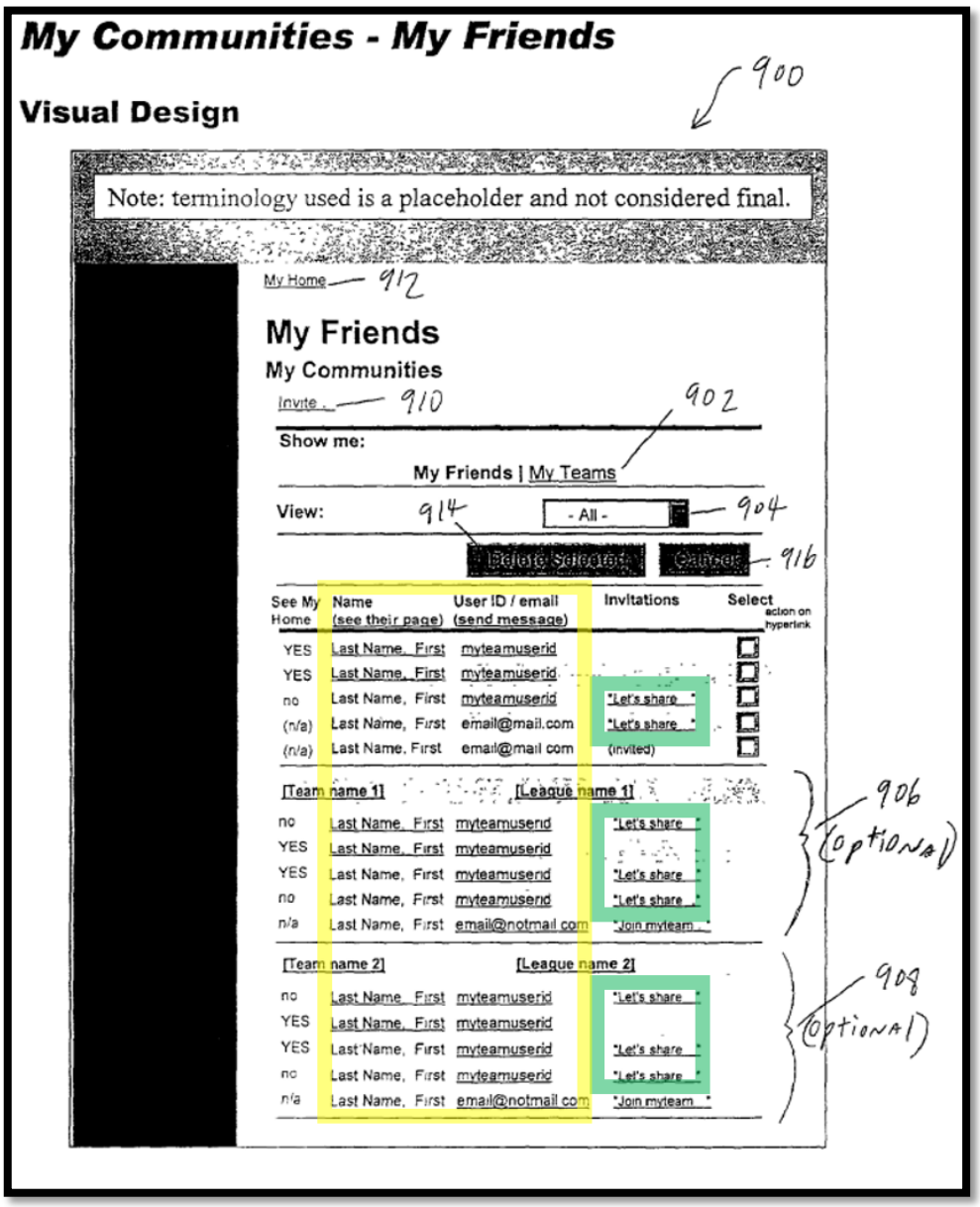
f. *1[e]: receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first web site to the second web site;*

184. In my opinion, Block discloses or renders obvious "*receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first web site to the second web site.*"

185. As explained above in Section VII.A.2.e, "*the one or more previously-created websites*" are My Home mini-sites of "*one or more other users*" who previously joined myteam.com. As explained above in Section VII.A.2.e, Block describes My Friends web page 900 in Fig. 9 as an example of "***the graphical user interface*** *[displaying] one or more identifiers respectively associated with* ***one or more previously-created websites***." As explained above in Section VII.A.2.b, Block discloses the "*first client device*" which is a computer used by the "*first user*" who is a "Member" "who has registered with the myteam.com website," and the "*first web site*" which is a "My Home mini-site" of the "*first user*."

186. Block discloses "*receiving, from the first client device and via the graphical user interface,* ***a first identification indicating a selection of a second website*** *from the one or more previously-created websites.*" Block explains that a myteam.com Member (e.g., "*a first user*" using the "*first client device*") can send an

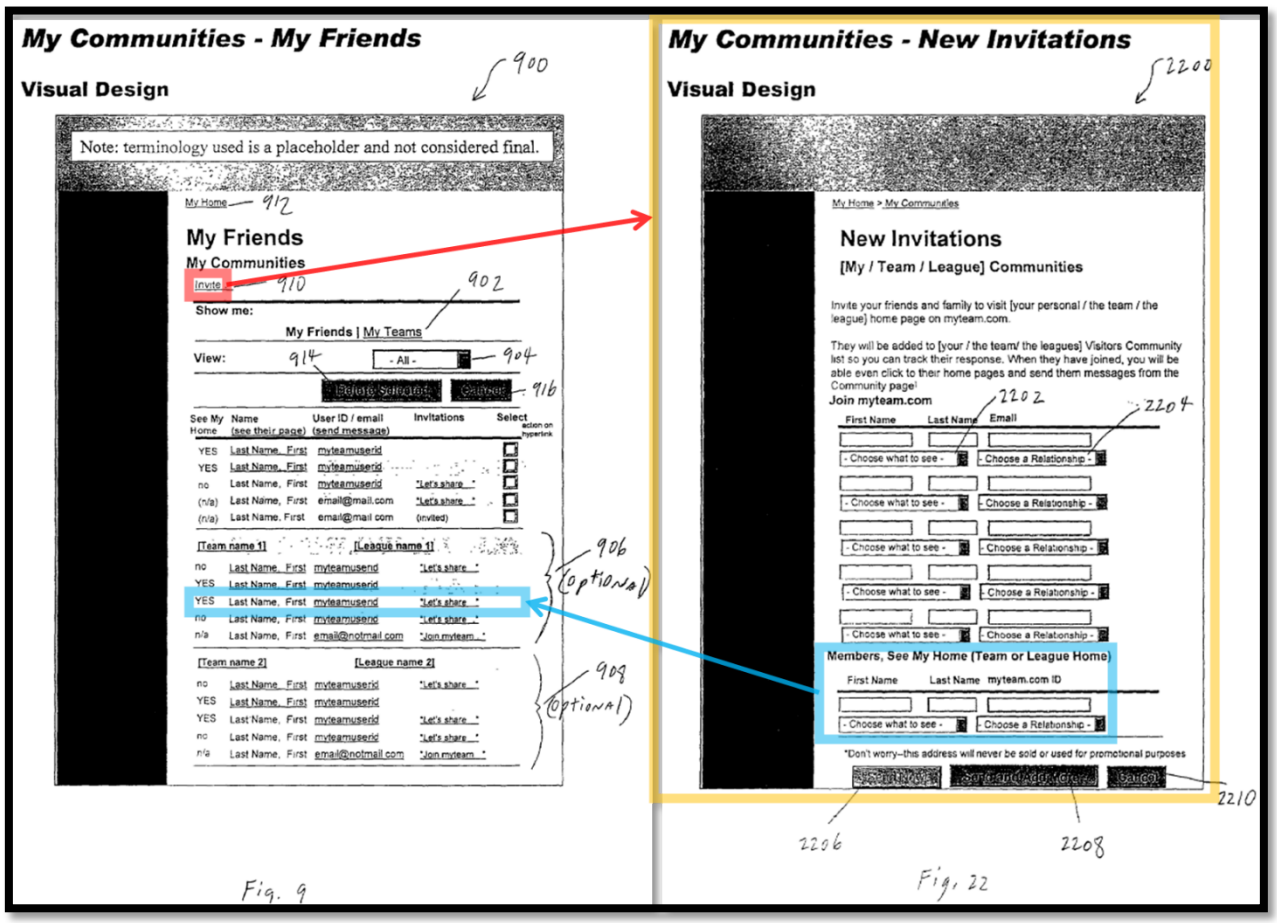
invitation to another Member. EX1007, [0094]. For example, in Fig. 9, Block describes the Invitation column which includes "the type of Invitation (and indication of status)." EX1007, [0134], Fig. 9. The Invitation column of Fig. 9 describes rows with entries "Let's share" (annotated in **green**) next to current member's names. *See* EX1007, Fig. 9. Block explains that the "My Friends list can also be used . . . to send out a new Invitation 712 to persons on the list. The Invitation might be in the form of: 'see my page,' or '**let's share pages**,' or 'join myteam.com.'" EX1007, [0129] (emphasis added). Thus, a Skilled Artisan would have understood that "Let's share" entries (annotated in **green**) in Fig. 9 are used to send out invitations to current members. "The Invitations are forwarded (or handled) through the message center 710." EX1007, [0129]; *see also id*. [0119], Fig. 2D (describing message center 283).



EX1007, Fig. 9 (annotated).

187. In addition, Block describes that "invite" hyperlink 910 (annotated in **red** below) in the My Friends page 900 "links to the Invitations page" (e.g., Fig. 22, annotated in **orange** below), "where additional friends can be invited." EX1007, [0134], [0156] ("Fig. 22 shows a first representative version 2200 of a New

Invitations web page as would be accessed from an individual's My Home page"). The New Invitations web page 2200 includes a second table (annotated below in **blue**) which "allows a Member to invite friends and family whom are already Members to visit the home page of themselves, their team, or their league (i.e. My Home, Team Home, and League Home pages) on myteam.com." EX1007, [0156], Figs. 9, 22.

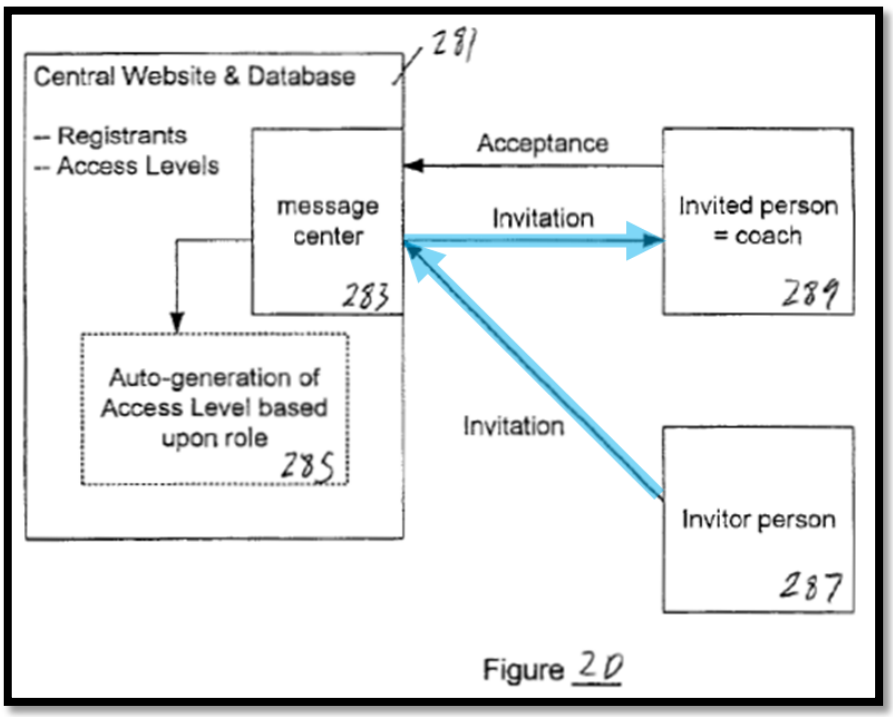


EX1007, Figs. 9 & 22 (annotated).

188. Since Block's My Friends page listing 900 ("*the graphical user interface*") displays names and user ids of users including current members

(annotated in **yellow**) ("*one or more identifiers respectively associated with* ***one or more previously-created websites***"), where a first user using the "*first client device*" can select a person to send out an invitation ("*a first identification indicating a selection of a second website*"), a Skilled Artisan would have understood that Block discloses "*receiving, from the first client device and via the graphical user interface,* ***a first identification indicating a selection of a second website*** *from the one or more previously-created websites*."

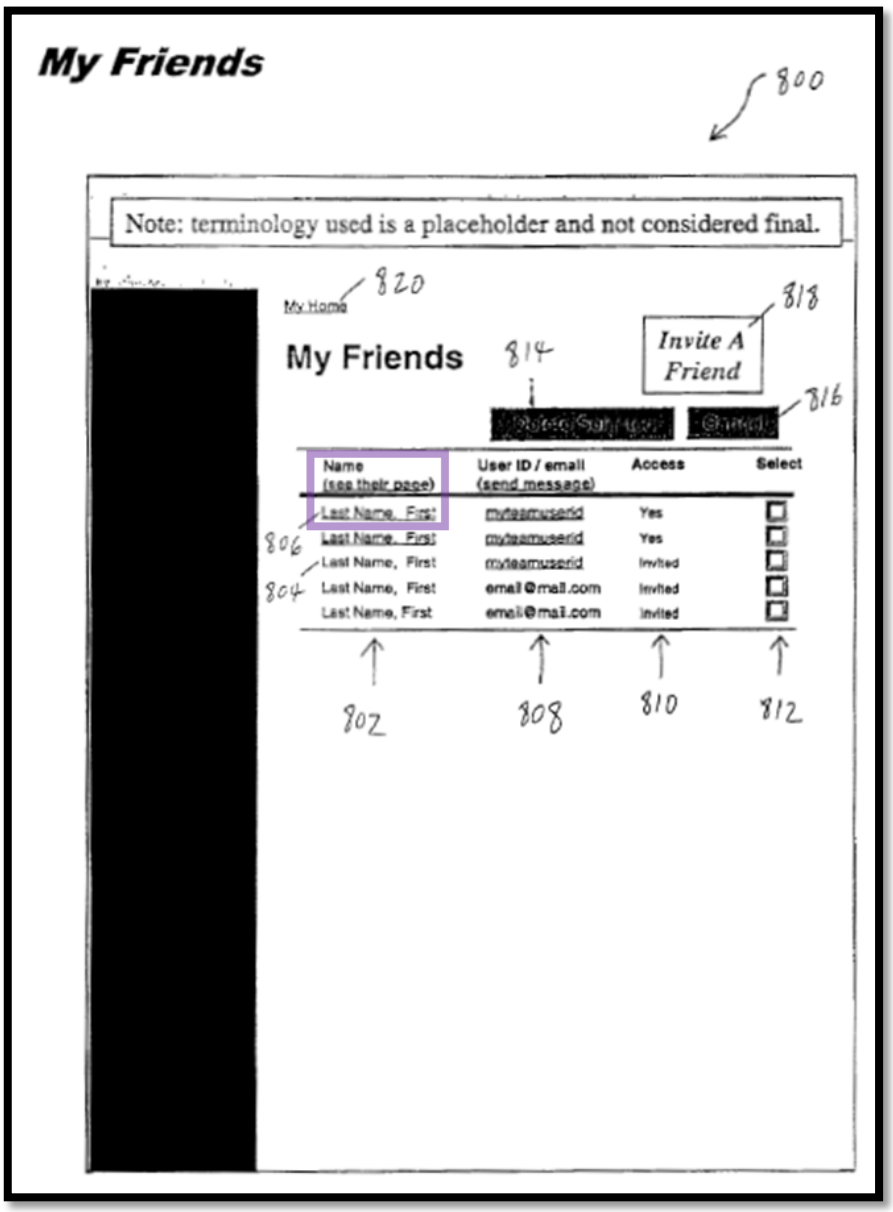
189. Fig. 2D of Block shows how a user can send an invitation to an "invited person." EX1007, Fig. 2D. Block explains that an invitor's invitation "passes through the website's message center 283 and is routed to the invited person 289." EX1007, [0119]. A Skilled Artisan would have known that the invitation to an invited person (annotated below in Fig. 2D in **blue**) is "*a first identification indicating a selection of a second website*."



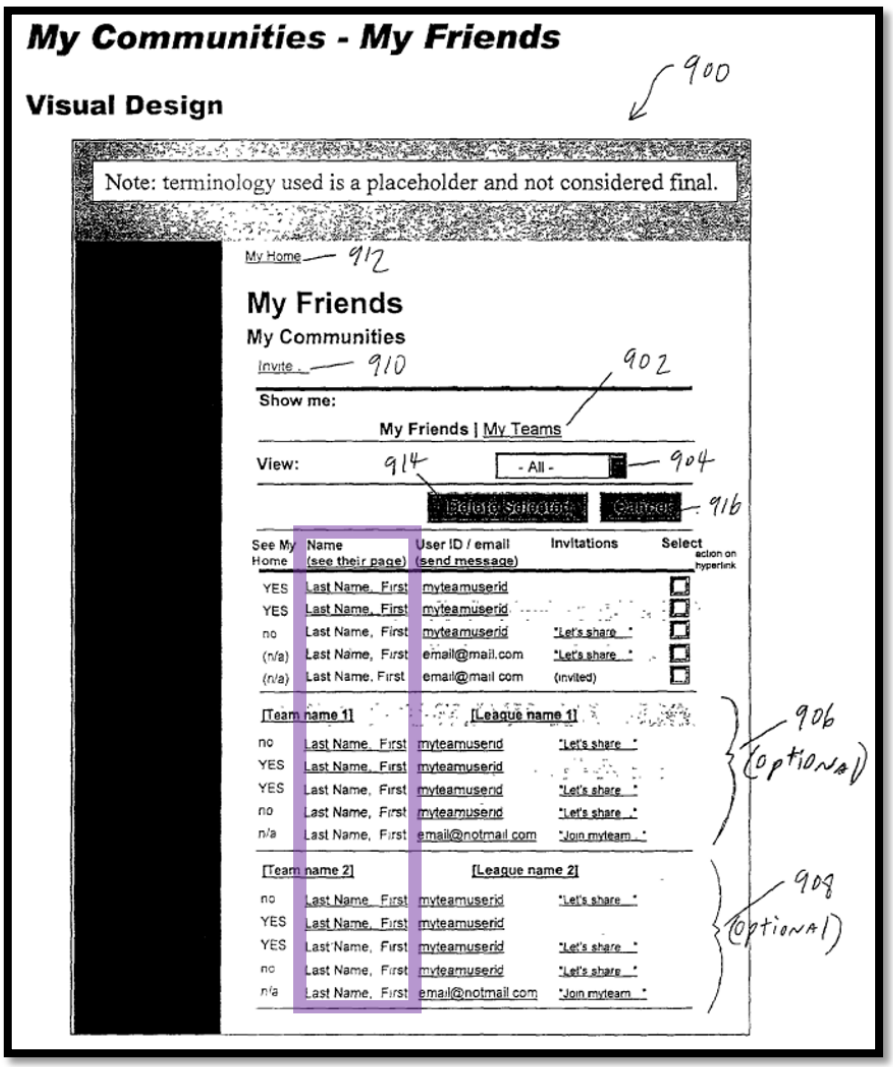
EX1007, Fig 2D (annotated).

190. Block discloses that the invitation is "*a first identification indicating a selection of a second website . . . to create a first hyperlink from the first web site to the second web site.*" For example, in Figure 8, Block describes an alternative version of "a My Friends web page listing 800." EX1007, [0132], Fig. 8. This My Friends page "shows a first table which displays 'friends' who are people that the user has invited to be myteam.com Members, or other myteam.com Members with which the user has a relationship. . . These 'friends' are people that can see the user's My Home page, and vice versa." EX1007, [0132]. In Figure 8 below, Block describes a name 806 with a click-through link (e.g., "Last Name, First" (annotated in **purple**)) on the "My Friends list" of a Member's My Home (e.g., the "*first*

website"). EX1007, [0133], Fig. 8. ("The user can thereby click-through on the name [806] in order to see that person's My Home page."); *see also id.* Fig. 9, [0134] (explaining that Fig. 9 operates in the same way). Thus, Block discloses that such a name 806 (e.g., name of the second user who owns the "*second website*") includes a link to that person's My Home page (e.g., the "*second website*") from the first user's My Home ("*first website*"). Since a first user's invitation to the second user of a "*second website*" adds the second user's name to the My Friends list of the "*first website*" with a link to the "*second website,*" Block discloses that invitation is "*a first identification indicating a selection of a second website . . . to create a first hyperlink from the first web site to the second web site.*"



EX1007, Fig. 8 (annotated).



EX1007, Fig. 9 (annotated).

191. Additionally, the "*first identification*" is received by Block's server system. As shown in Figure 2D of Block (shown above), "[t]he invitor person 287 sends out an invitation that passes through the website's message center 283 and is routed to the invited person 289." EX1007, [0119], Fig. 2D. As explained above, the invitation is a "*first identification*." The invitation passes through "the website's message center 283" which is part of a "central website system and/or database" that

stores "information such as the registrants and their access levels." EX1007, [0119]. Therefore, Block's server system "*receives*" the "*first identification*."

192. Block discloses or renders obvious "*receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first web site to the second web site.*"

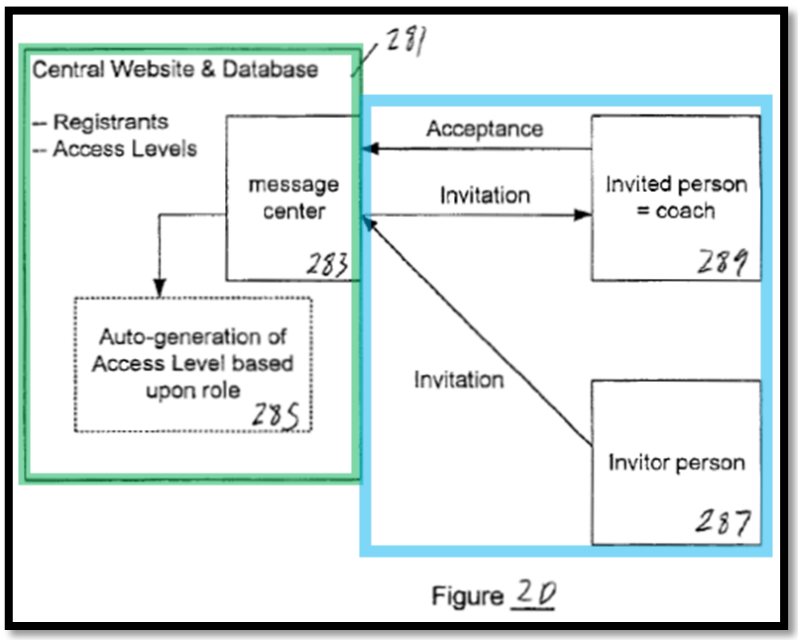
g. *1[f]: storing, within a computer database system of the server system, first information indicating that the first identification was received by the server system;*

193. In my opinion, Block discloses or renders obvious "*storing, within a computer database system of the server system, first information indicating that the first identification was received by the server system.*"

194. As explained above in Section VII.A.2.f, Block discloses "***receiving*** . . . ***a first identification*** *indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first web site to the second web site*." As an example, Block describes that each invitation to the persons on the lists such as the My Friends page 900 is "*the first identification*." EX1007, [0129], [0134].

195. As also explained in Section VII.A.2.f, Block describes in Fig. 2D "the concept of **the central website system and/or database** providing for (optional) auto-generation of an access level based upon the role of the person being invited to

join the website." EX1007, [0119] (emphasis added), Fig. 2D. "**The central website and database 281 will store information** such as the registrants and their access levels." EX1007, [0119] (emphasis added). Block explains that the invitor's invitation "passes through the website's message center 283 [of the central website and/or database 281] and is routed to the invited person." EX1007, [0119]. The invited person's acceptance is then sent back to the message center 283 of the central website and/or database 281 to generate the access level. EX1007, [0119]. A Skilled Artisan would have known that the database (annotated in **green**) stores information regarding the invitation and acceptance (annotated in **blue**) at least during the process described in Fig. 2D. A Skilled Artisan would have understood that the "*first information indicating that the first identification was received*" is the information indicating that an invitor person (e.g., a "first user") sent an invitation to the invited person (e.g., a "second user"). *See e.g.*, EX1007, Abstract ("The membership database for the website is built via invitations from member users to non-member users.")



EX1007, Fig. 2D (annotated).

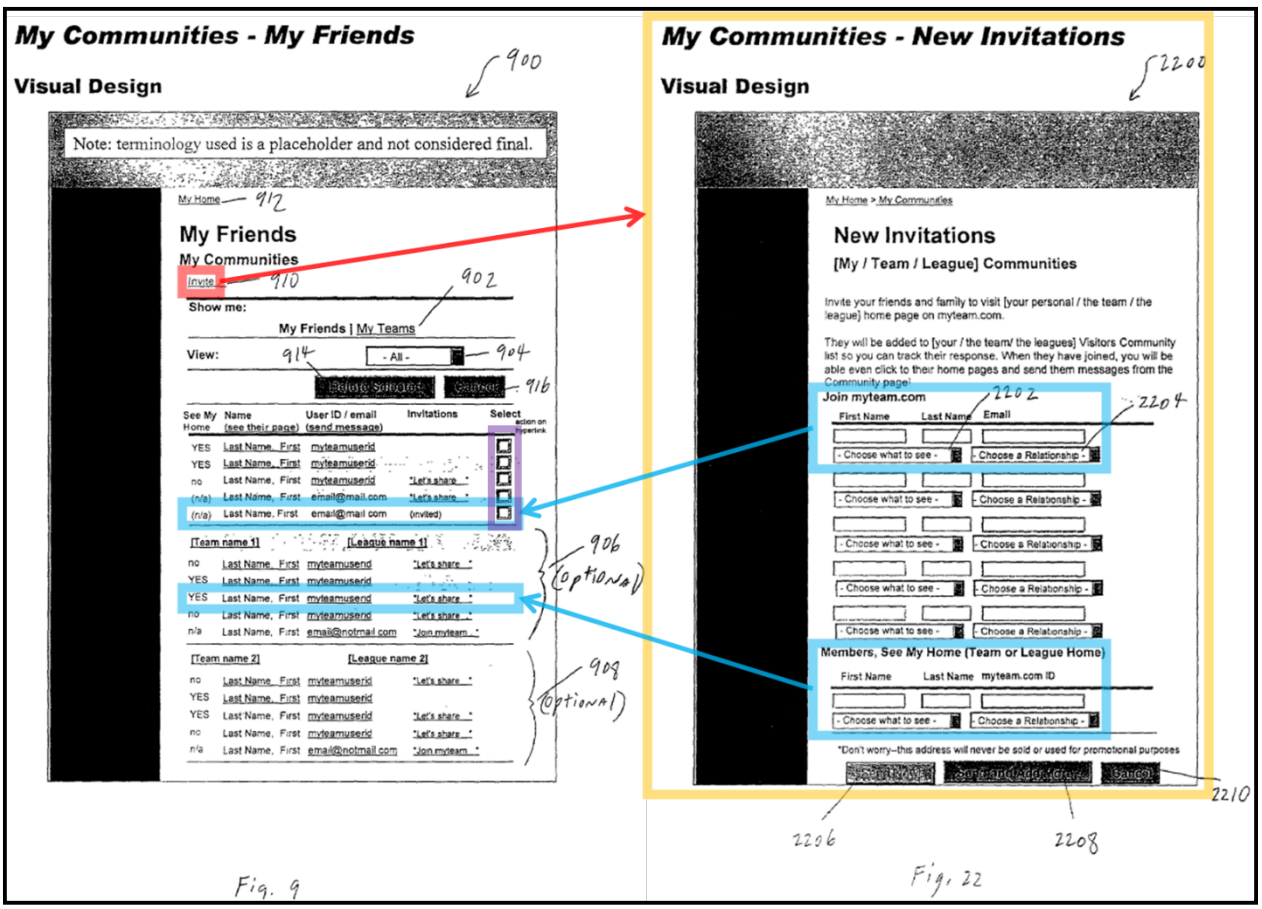
196. Accordingly, Block discloses or renders obvious "*storing, within a computer database system of the server system, first information indicating that the first identification was received by the server system.*"

h. *1[g]: modifying, based upon the instruction, the first website to include the edited web asset;*

197. In my opinion, Block discloses or renders obvious "*modifying, based upon the instruction, the first website to include the edited web asset.*"

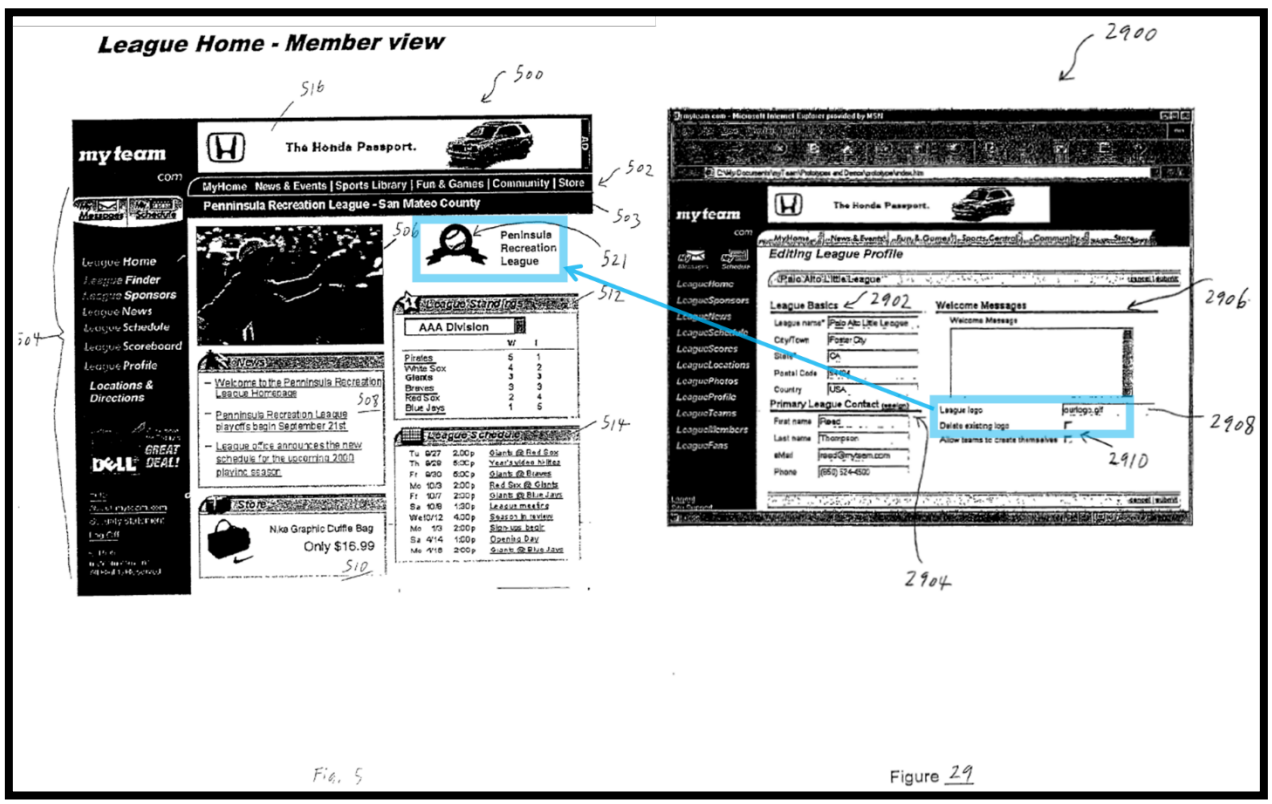
198. As discussed above in Section VII.A.2.c and VII.A.2.d, Block discloses "*receiving . . . an instruction to modify the web asset to generate an edited web asset*" from a user and "*generating, based upon the instruction, the edited web asset*." For example, as explained above in Section VII.A.2.c, Block explains that a user can provide "*an instruction*" to modify each of the listings in the My Friends

web page 900 of Fig. 9 ("*modifying, based upon the instruction*") by selecting which names to add to the listings via the invite hyperlink 910 and the associated Invitations page (e.g., Fig. 22), which would then generate an edited listings according to the instruction ("*the first website to include the edited web asset*"). Block also explains that when the "*first user*" selects a "selection boxes and control tabs" (**purple**) and presses "delete selected" button 914, a new table ("*edited web asset*") will be generated based on the user's command and displayed on the "*first website*." EX1007, [0134], Figs. 9, 22.



EX1007, Figs. 9 & 22 (annotated).

199. As another example, Block describes an "Editing League Profile" page in Fig. 29 where a user can upload an image file of a league logo via box 2908. EX1007, [0170]. "The message and logo allow the league to customize their home page with their league logo and a short message welcoming the people to the league site." EX1007, [0170]. For example, a user can provide an "*instruction*" via the boxes in the "Editing League Profile" page in Fig. 29 to "*modify*" the "League Home" page in Fig. 5 "*to include the edited web asset*" such as a league logo (annotated in **blue**). EX1007, [0169], Figs. 5, 29; EX1007, [0170] ("This logo is displayed at the top of the League Profile page, in addition to being displayed on the league home page.").



EX1007, Figs. 5 & 29 (annotated).

200. As explained in Section VII.A.2.b, a Skilled Artisan would have understood that web assets posted on the league home page "crossover" to each user's mini-site 112. EX1007, [0103], Fig. 1. *See also id*. [0095], [0116], Fig. 2A. Likewise, when League administrator modified schedule 514, and updated schedule with "crossover" to schedule 318 on the "*first website*." *Supra* §VII.A.2.b. Therefore, modifying the League page via the League editing site (shown in Fig. 29) also modifies the My Home mini-site ("*first website*").

201. In Fig. 3 showing an example web page 300 of the My Home page ("*a first web site*"), Block explains that "**[p]ersonalized information 326** is shown regarding the owner of this page (Jimmy Johnson), including for instance **pictures of the Player in action, or captions regarding the Player's nickname**." EX1007, [0121] (emphasis added), Fig. 3. Similar to the examples in Figs. 5 and 29 which describe "*modifying, based upon the instruction*" the "League Home" page in Fig. 5 "*to include the edited web asset*," a Skilled Artisan would have understood that Block's system can "*modify[], based upon the instruction,*" the My Home mini-site of a "*first user*" ("*the first website*") "*to include the edited web asset.*" (e.g., "personalized information 326" regarding the owner of this page (Jimmy Johnson), including "pictures of the Player in action, or captions regarding the Player's nickname").

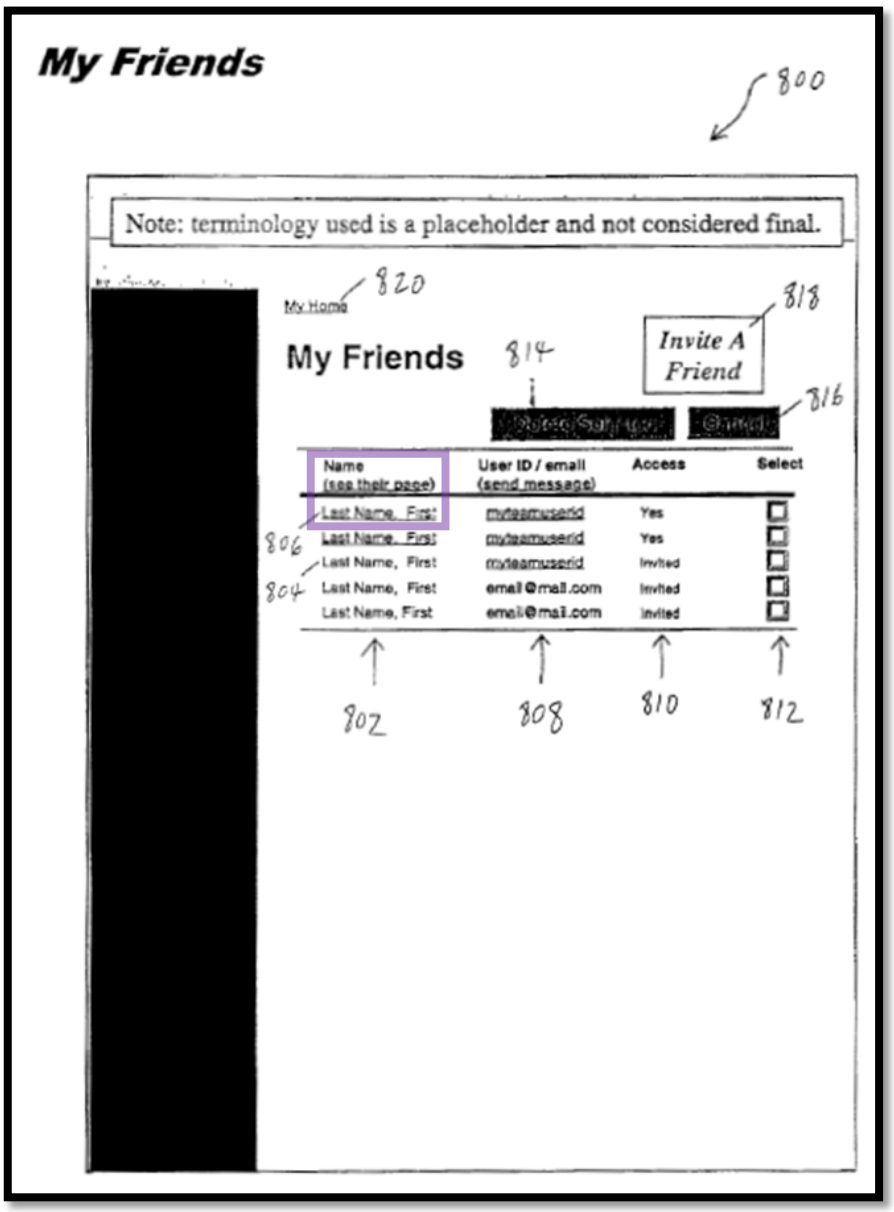
202. Accordingly, Block discloses or renders obvious "*modifying, based upon the instruction, the first website to include the edited web asset.*"

i. *1[h]: modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink;*

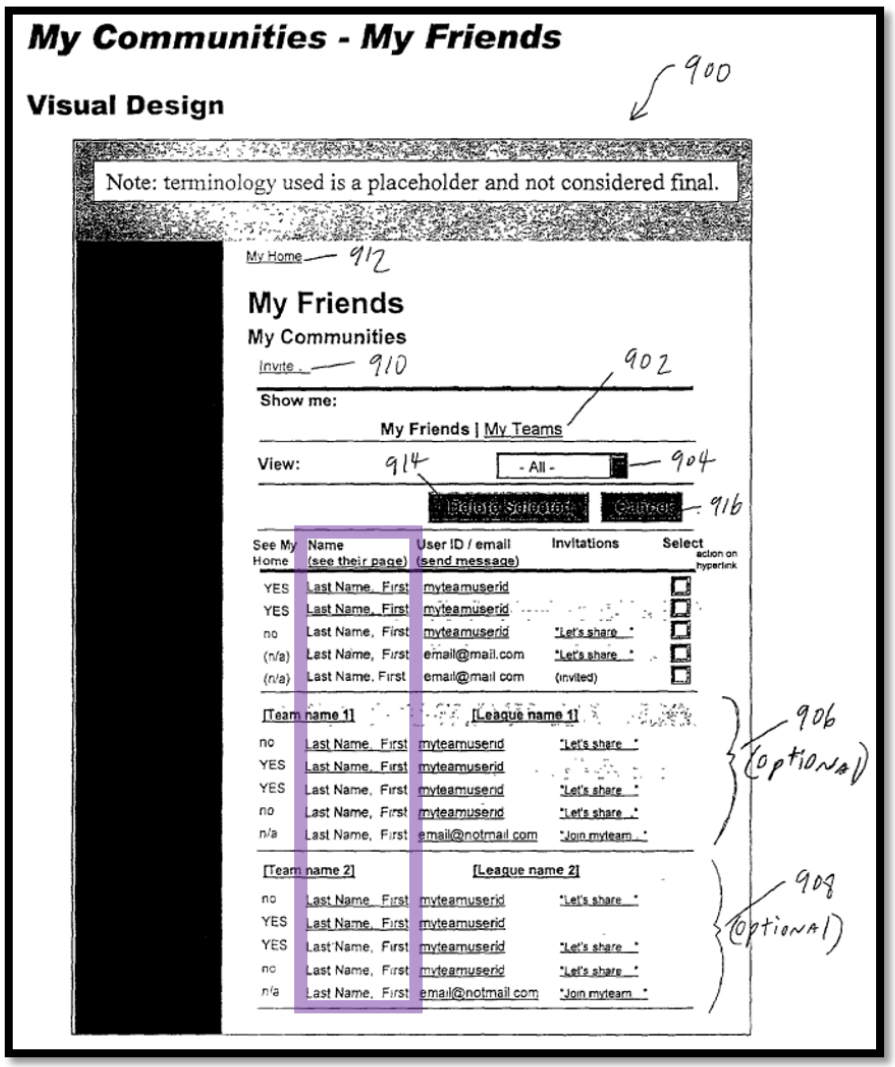
203. In my opinion, Block discloses or renders obvious "*modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink.*"

204. As discussed above in Section VII.A.2.g, Block discloses "*storing . . . first information indicating that the first identification was received,*" where the "*first information*" is information indicating that an invitor sent an "invitation" to the invited person. As discussed above in Section VII.A.2.f, Block discloses "*receiving . . . a first identification indicating a selection of a second website . . . to create a first hyperlink from the first web site to the second web site,*" where the "*first identification*" is the invitation. Since a first user provides "*a first identification indicating a selection of a second website*" "*to create a first hyperlink from the first web site to the second web site,*" a Skilled Artisan would have understood that "*based upon the first information indicating that the first identification [indicating a selection of a second website] was received*" Block's server system would "*modify[] . . . the first web site to include the first hyperlink.*"

205. For example, in Figure 8, Block describes "a My Friends web page listing 800." EX1007, [0132], Fig. 8. This My Friends page "shows a first table which displays 'friends' who are people that the user has invited to be myteam.com Members, or other myteam.com Members with which the user has a relationship." EX1007, [0132]. In Figure 8 below, Block describes a name 806 with a click-through link (e.g., "Last Name, First" (annotated in **purple**)) on the "My Friends list" of a Member's My Home (e.g., the "*first website*"). EX1007, [0133]. ("The user can thereby click-through on the name [806] in order to see that person's My Home page."); *see also id.* Fig. 9, [0134] (explaining that Fig. 9 operates in the same way). A Skilled Artisan would have understood that such a name 806 (e.g., name of the second user who owns the "*second website*") includes a "*first hyperlink*" to that person's My Home page (e.g., the "*second website*") from the first user's My Home ("*first website*"). A Skilled Artisan would have understood that when the "*first user*" invites another user, that other user's (second user) information and hyperlink to the "*second website*" would be added to the My Friends page.



EX1007, Fig. 8 (annotated).



EX1007, Fig. 9 (annotated).

206. As described above in Section VII.A.2.f, since Block's system receives a first user's invitation to the second user of a "*second website*" ("*the first information indicating that the first identification [indicating a selection of a second website]*") and would then add the second user's name on the My Friends list of the "*first website*" with a "*first hyperlink*" to the "*second website*," Block discloses or

renders obvious "*modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink.*"

j. *1[i]: modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site; and*

207. In my opinion, Block discloses or renders obvious "*modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site.*"

208. As discussed above in Section VII.A.2.i, Block discloses "*modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink.*" As discussed above in Section VII.A.2.f, the "*first hyperlink*" is a link "*from the first web site to the second web site*." Based upon the "*first information indicating that the first identification was received*," i.e., that the first user of the "*first website*" sent an invitation to the second user of the "*second website*," Block's system adds the second user's name with the "*first hyperlink*" "*from the first web site to the second web site*" to the My Friends list of the "*first web site*."

209. Block explains that "[w]hen an individual accepts an Invitation to a My Home page, the link to the invitor's My Home page is [added to] their My Fans page." EX1007, [0094]. Block further explains that "My Friends (Fans)" which "is a list of people with whom the user has a relationship" "provides a form of

'bookmarking' between a user's site and a Friend's site, and indicates whether the relationship is **reciprocal**, a Friend only sharing with user, or the user only sharing with Friend." EX1007, [0128] (emphasis added); EX1007, [0132] ("These "friends" are people that can see the user's My Home page, and vice versa.").

210. Since the link ("*second hyperlink*") to the invitor's My Home page ("*the first web site*") is "reciprocally" included on the invited individual's My Fans page ("*the second web site*") when the invitor (e.g., the "*first user*") invites the individual and the individual accepts that invitation, Block discloses or renders obvious "*modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site.*"

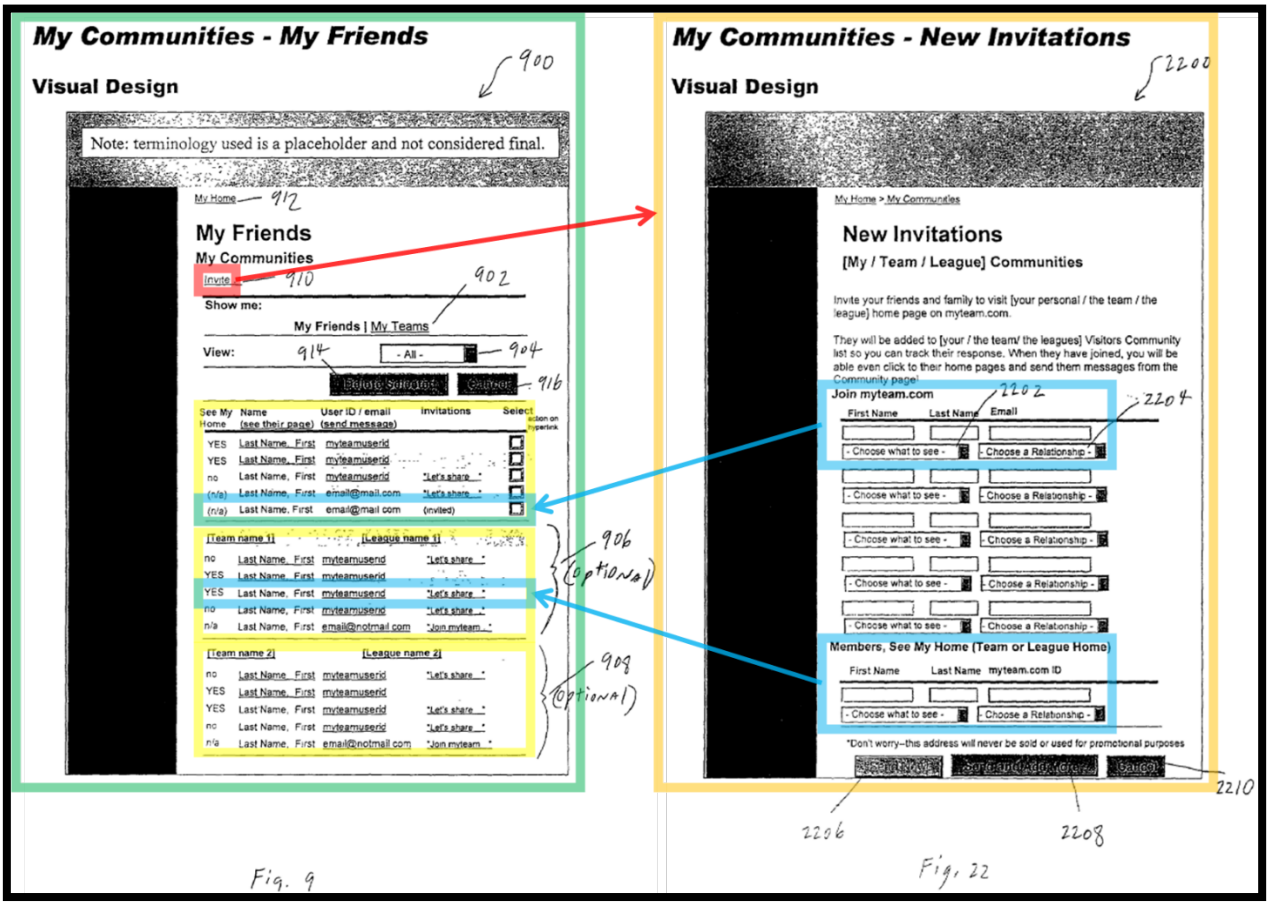
k. *1[j]: serving computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site, wherein*

211. In my opinion, Block discloses or renders obvious "*serving computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site.*"

212. As explained above in Section VII.A.2.h, Block discloses "*modifying . . . the first website to include **the edited web asset**,*" and as explained above in Sections VII.A.2.f and VII.A.2.i, Block discloses "*modifying, . . . the first web site to include **the first hyperlink" "from the first web site to the second web site**,*" where

the "*first website*" is the My Home mini-site of a first user. Thus, Block discloses "*modifying*" "*the first website*" "*to include the edited web asset and the first hyperlink from the first web site to the second web site*."

213. As explained above in Section VII.A.2.h and shown in examples in Figs. 9 and 22 below, Block discloses that once the web page is modified based on the instruction from the user via "invite" hyperlink 910 and the linked "Invitations page" (e.g., Fig. 22), "where additional friends can be invited," the modified listings become viewable to a user (Fig. 9). As explained above in Section VII.A.2.a, Block discloses a "*server system*" configured to perform a "*method*" "*to modify and serve web pages*." Block describes that a "**website or webpage can be hosted** on computers and servers." EX1007, [0207] (emphasis added). Block describes "providing access to **post/retrieve information**" in "**an information structure**" which **"includes a website, as comprised of webpages**." EX1007, [0011] (emphasis added). Since Block's server system modifies and serves web pages by posting information in an information structure ("*computer data*") which includes a website, a Skilled Artisan would have understood that Block's system "*serv[es] computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site*."



EX1007, Figs. 9 & 22 (annotated).

214. Accordingly, Block discloses or renders obvious "*serving computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site.*"

l. *1[k]: the server system is configured to host the first web site and the second website,*

215. In my opinion, Block discloses or renders obvious "*the server system is configured to host the first web site and the second website.*"

216. As explained above in Section VII.A.2.a, Block discloses a "*server system*" where a website or webpage of the users "can be **hosted on** computers and

servers." EX1007, [0207] (emphasis added). As explained above in Section VII.A.2.b and VII.A.2.f, Block discloses the "*first web site*" which is a "My Home mini-site" of the "*first user*," and the "*second web site*" which is a "My Home mini-site" of the "*second user*." Both mini-sites are hosted as part of the exemplary myteam.com described by Block. *See, e.g.*, EX1007, [0042] ("Fig. 2B shows an example viewpoint of the Home Page, as created for each registered website user, interacting with different communities."). Accordingly, Block discloses or renders obvious "*the server system is configured to host the first web site and the second website*."

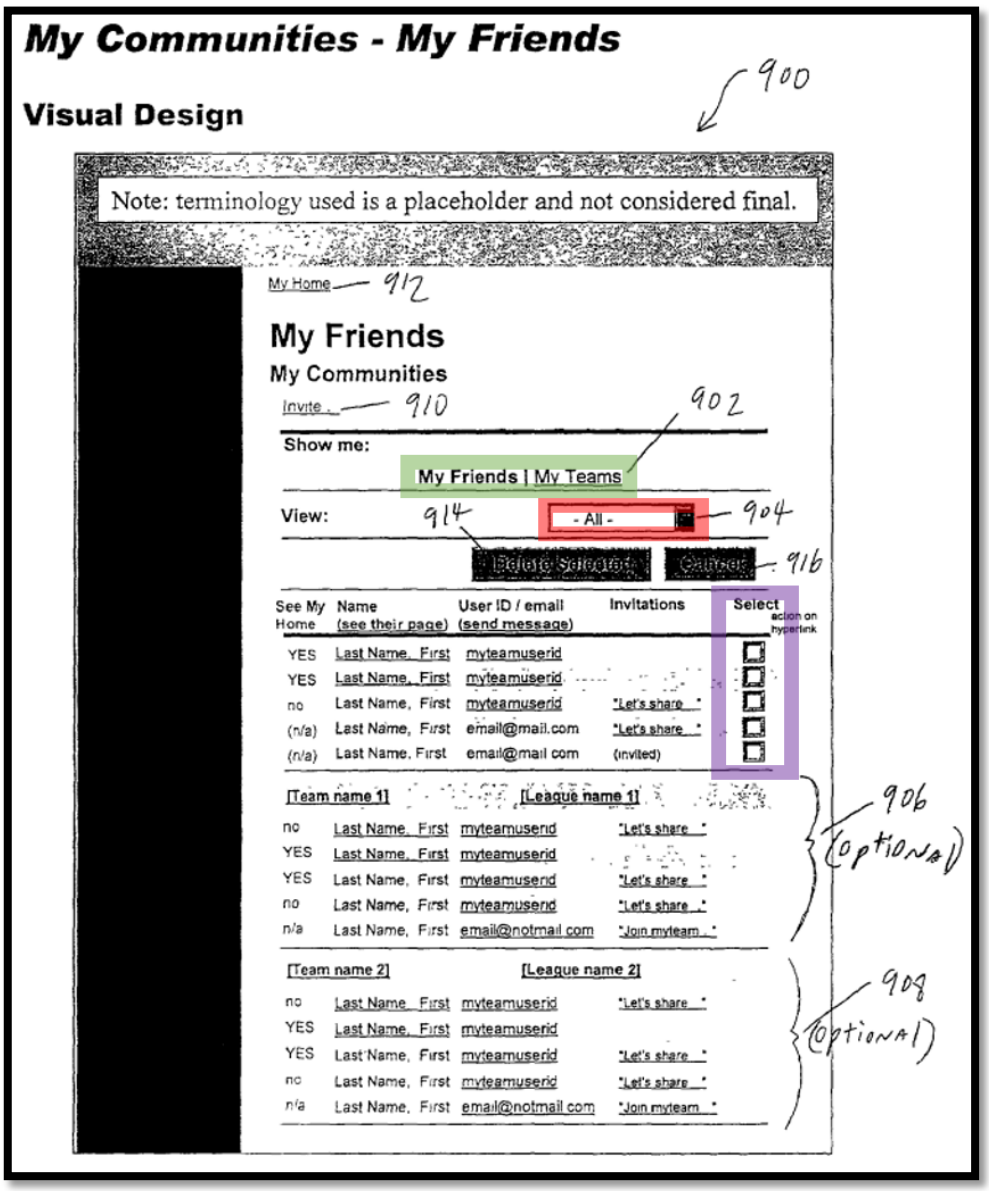
m. *1[l]: the editing screen is configured to display the web asset, and*

217. In my opinion, Block discloses or renders obvious "*the editing screen is configured to display the web asset.*"

218. As discussed above in Section VII.A.2.c, Block discloses an "*editing screen.*" Block explains that for an individual with "edit access rights to the information being displayed, **an 'edit' access link will be displayed that will lead to an editable version of the page**." EX1007, [0122] (emphasis added). *See also* EX1007, [0095] ("For those individuals with Administrator access to the specific information, **a 'edit' link is displayed that goes to an editable version of the detail information page for that item**.") (emphasis added). A Skilled Artisan would have understood that such "an editable version of the page" is the "*editing screen []*

configured to display the web asset" since it would display "the information" to be edited.

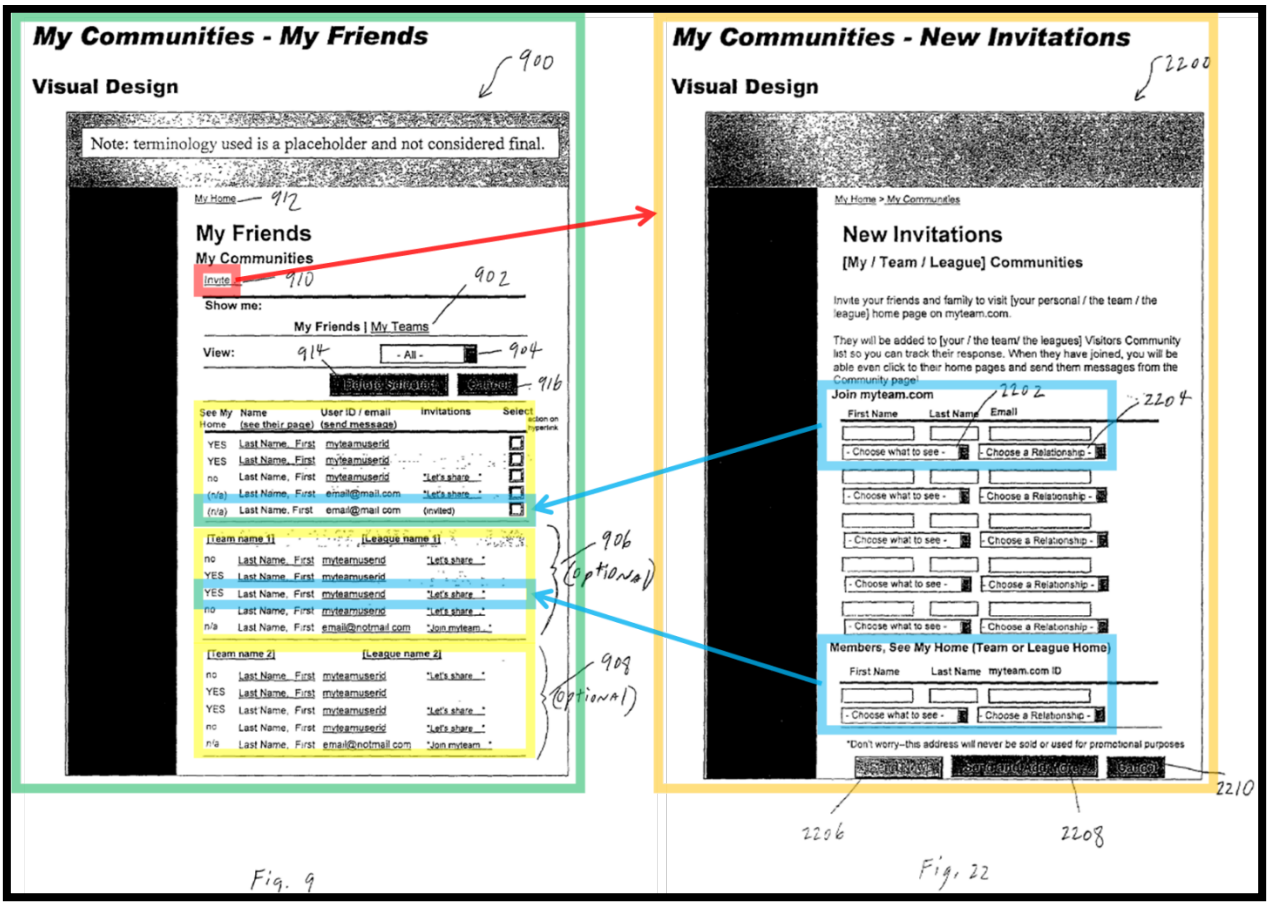
219. For example, as explained above in Section VII.A.2.c, My-Friends page 900 is an "*editing screen*" and includes a "click-through selector 902," (**green**), "drop-down menu 904" (**red**), and the "selection boxes and control tabs" (**purple**). EX1007, [0134], Fig. 9. The "*editing screen*" (My-Friends page 900) also displays tables of grouped listings for Friends, Team 1 (906), and Team 2 (908) ("*the web asset*").



EX1007, Fig. 9 (annotated).

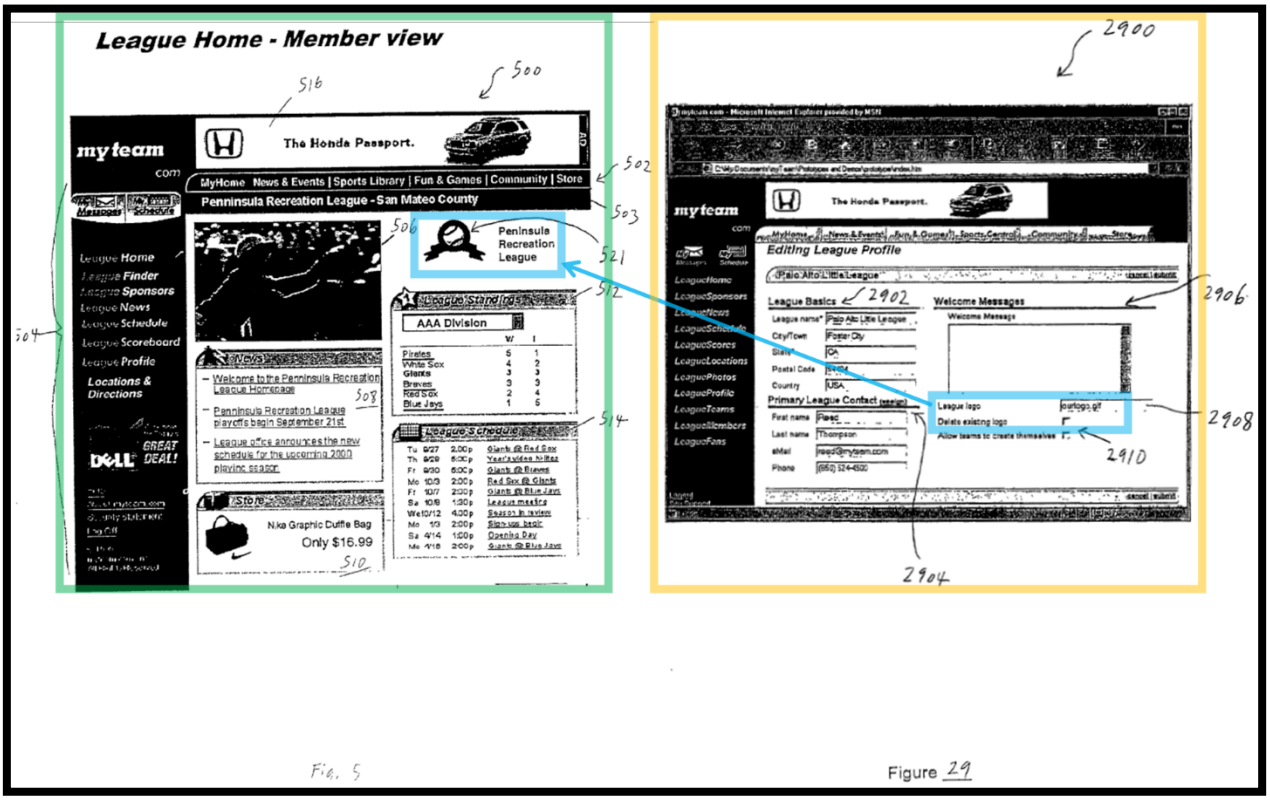
220. For example, as explained above in Section VII.A.2.c, Fig. 22 of Block shows an "*editing screen*" (annotated in **orange**) which allows the user to enter information of individuals to invite, to choose "what the invitee is allowed to see," to specify "the relationship between the invitor and the invitee," and to add the invitee to a community page. EX1007, [0156]. A Skilled Artisan would have found

it obvious to have the "*editing screen*" display the edited web asset because it would allow the editing user to view the information as it was entered into the system.



EX1007, Figs. 9 & 22 (annotated).

221. As another example, as explained above in Section VII.A.2.c, Fig. 29 of Block shows an "*editing screen*" (annotated in **orange**). *See also* EX1007, [0169]-[0170], Figs. 5, 29. A Skilled Artisan would have also found it obvious to have the "*editing screen*" display the edited web asset so the user can see the information as it is entered and ensure the information is correct (e.g., checking that the correct image file was selected).



EX1007, Figs. 5 & 29 (annotated).

222. Accordingly, Block discloses or renders obvious "*the editing screen is configured to display the web asset.*"

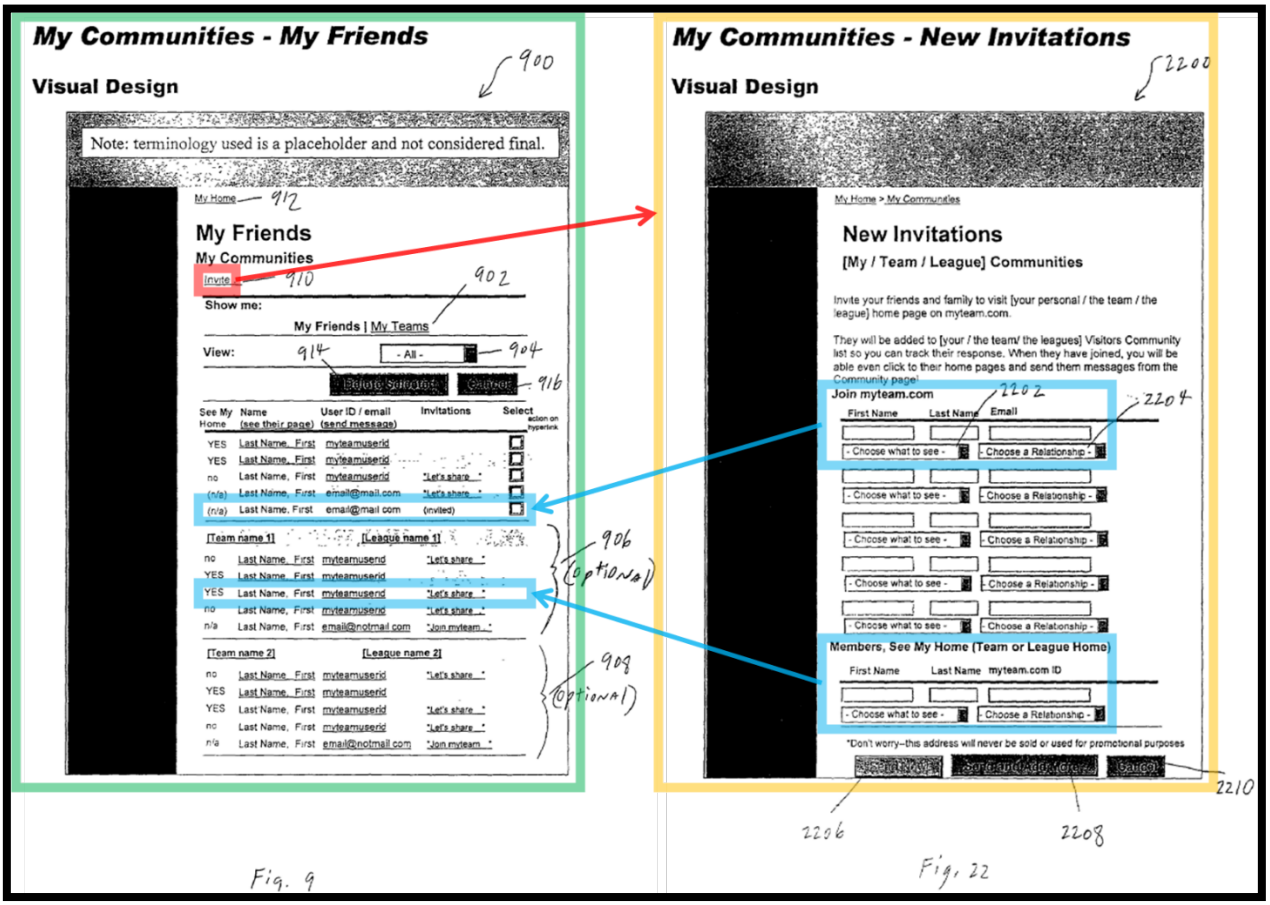
n. *1[m]: the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.*

223. In my opinion, Block discloses or renders obvious "*the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.*"

224. As explained above in Section VII.A.2.h, Block discloses "*modifying, **based upon the instruction**, the first website to include **the edited web asset**.*" When

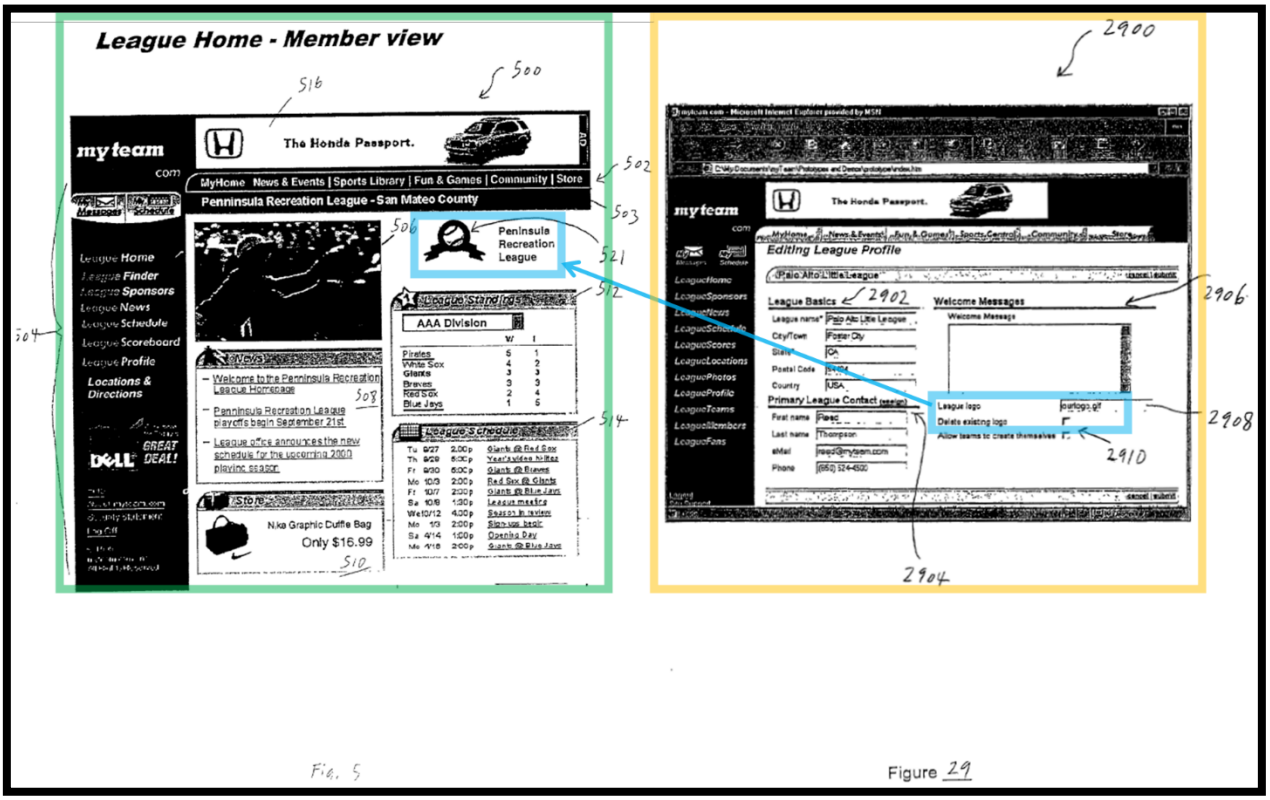
the "*first user*" selects a "selection boxes and control tabs" and presses "delete selected" button 914, a new table will be generated based on the user's command and will be displayed. EX1007, [0134]. Therefore, the "*graphical user interface*" includes "*a primary display screen configured to display the edited web asset based upon the instruction*." Alternatively, "click-through selector 902," and "drop-down menu 904" can be used to change what information is displayed on My-Friends page 900. Therefore, the My-Friends page 900 ("*graphical user interface*") include sub-screens ("*a primary display screen*") displaying a "selected" "grouping to view" ("*the edited web asset*") such as: "All, Friends, Team1, Team2, and so forth." EX1007, [0134], Fig. 9.

225. Block also explains in Figure 9 below that, for example, a user can click on the "invite" hyperlink 910 (annotated in **red**) which links to the Invitations page, such as the Invitations web page 2200 in Fig. 22 (annotated in **orange**). Then a user can provide an "*instruction*" via the boxes in the New Invitations page 2200 ("*editing screen*" annotated in **orange**) "*to display the edited web asset*" such as a name and userid of the invitee on the My Friends page 900 ("*a primary display screen*" annotated in **green**) in Fig. 9. EX1007, [0134], [0156], Figs. 9, 22.



EX1007, Figs. 9, 22 (annotated).

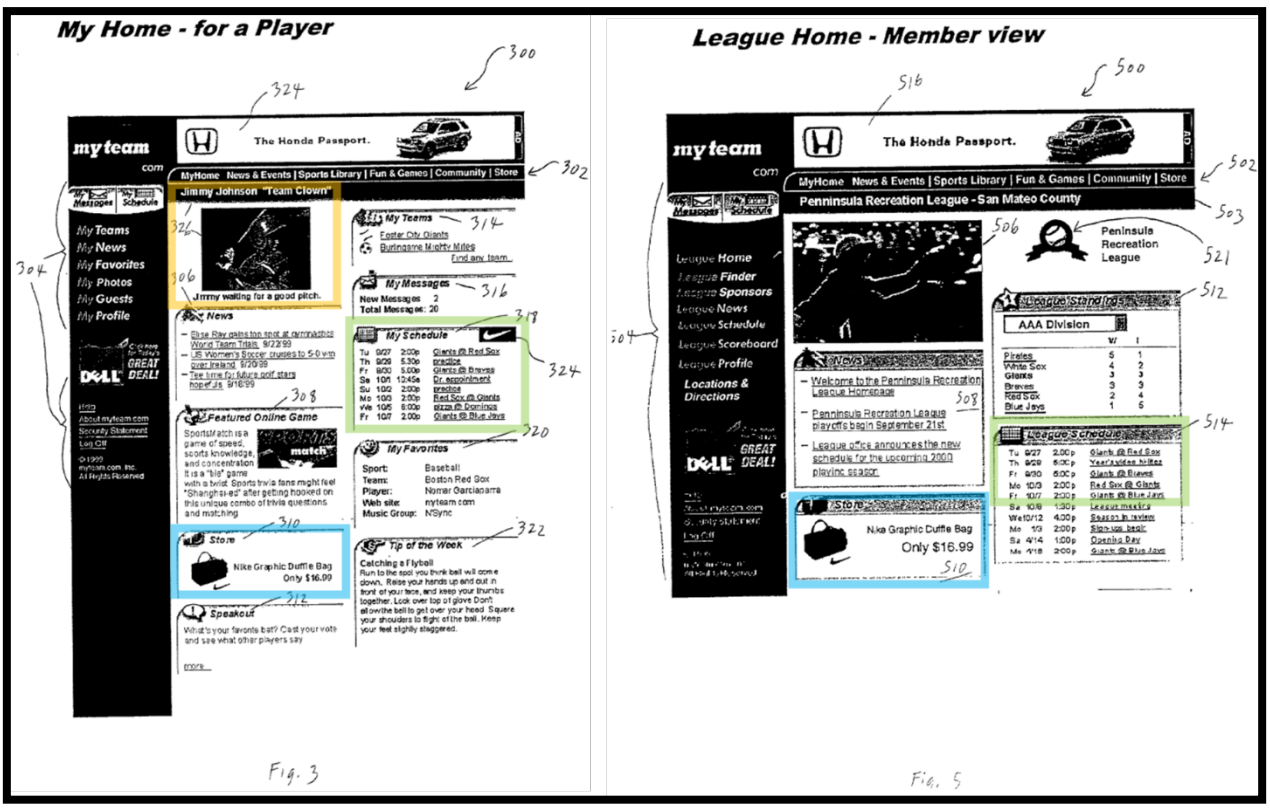
226. As another example, Block explains that a user can provide an "*instruction*" via the box 2908 in the "Editing League Profile" page 2900 ("*editing screen*" annotated in **orange**) in Fig. 29 "*to display the edited web asset*" such as a league logo on the "League Home" page in Fig. 5 ("*a primary display screen*" annotated in **green**). EX1007, [0169], Figs. 5, 29. *See also id.* [0170] ("This logo is displayed at the top of the League Profile page, in addition to being displayed on the league home page.").



EX1007, Figs. 5 & 29 (annotated).

227. In Fig. 3, which shows an example web page 300 of the My Home page ("*a first web site*"), Block explains that "**[p]ersonalized information 326** is shown regarding the owner of this page (Jimmy Johnson), including for instance **pictures of the Player in action, or captions regarding the Player's nickname**." EX1007, [0121] (emphasis added). Similar to the screen in Figure 5 which displays "*the edited web asset based upon the instruction,*" a Skilled Artisan would have understood that My Home page 300 in Fig. 3 is another example of "*a primary display screen configured to display the edited web asset*" (e.g., "[p]ersonalized information 326" regarding the owner of this page (Jimmy Johnson), including

"pictures of the Player in action, or captions regarding the Player's nickname") "*based upon the instruction*." Moreover, as explained in Section VII.A.2.b, a Skilled Artisan would have understood that Store (annotated in **blue**) and Schedules (annotated in **green**) posted on the league home page "crossover" to each user's mini-site 112, as described in annotated Figs. 3 and 5 below. EX1007, [0103], Fig. 1. *See also id*. [0116], Fig. 2A. Therefore, the My Home mini-site also "*display the edited web asset based upon the instruction*" provided via the League editing site (shown in Fig. 29).



EX1007, Figs. 3 & 5 (annotated).

228. Accordingly, Block discloses or renders obvious "*the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.*"

o. *2[a]: The method of claim 1, wherein the server system is configured to: store, within the computer database system, second information indicating that a second identification to create the second hyperlink from the second website to the first website was received by the server system and from a second user associated with the second web site, and*

229. In my opinion, Block discloses or renders obvious "*the server system is configured to: store, within the computer database system, second information indicating that a second identification to create the second hyperlink from the second website to the first website was received by the server system and from a second user associated with the second web site.*"

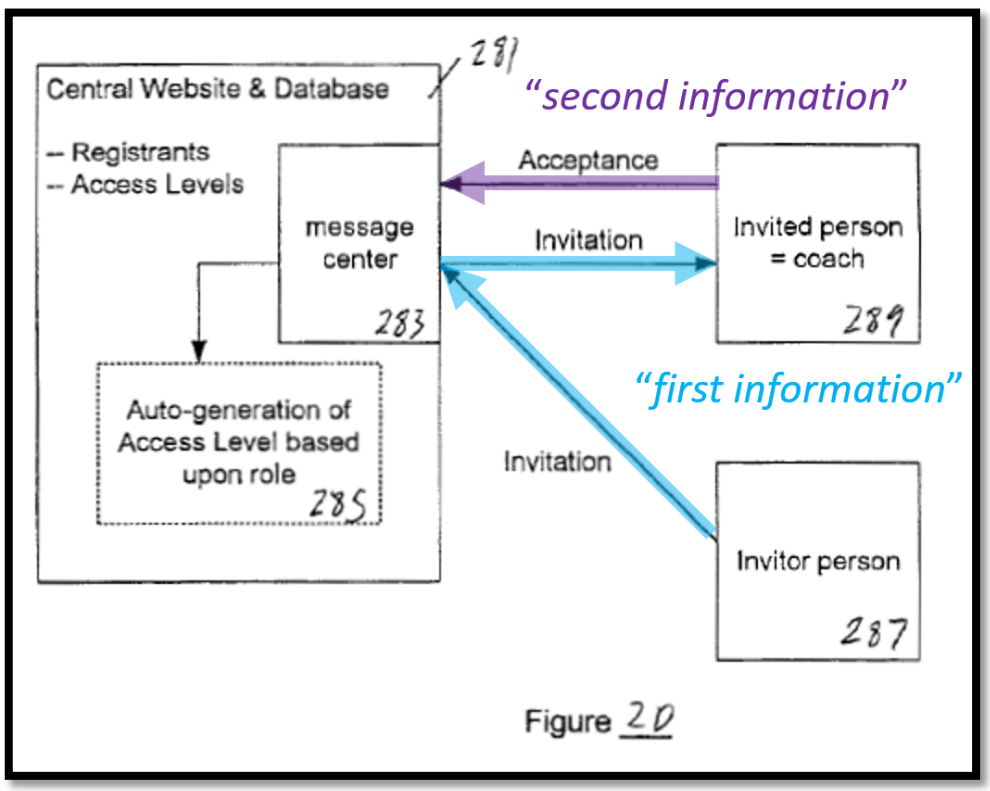
230. As explained above in Sections VII.A.2.f and VII.A.2.g, Block discloses "*storing, within a computer database system of the server system, first information indicating that the first identification [to create a first hyperlink from the first web site to the second web site] was received by the server system*" and "*from the first client device*," where the "*second website*" is a "My Home mini-site" of the "*second user*," and the "*first website*" is a "My Home mini-site" of the "*first user*." As explained above in Section VII.A.2.j, Block discloses "*modifying . . . the*

second web site to include a reciprocal second hyperlink to the first web site" "*based upon the first information indicating that the first identification was received*."

231. Block explains that "**[w]hen an individual accepts an Invitation** to a My Home page, the link to the invitor's My Home page is on their My Fans page." EX1007, [0094] (emphasis added). *See also* EX1007, [0128] ("My Friends (Fans) is a list of people with whom the user has a relationship."). Since the link from the invited individual's ("*second user*") My Fans page to the invitor's My Home page ("*the second hyperlink from the second website to the first website*") is "reciprocally" included on the invited individual's My Fans page "*create[d]*" when the invitor invites the individual and the individual **accepts** that invitation, Block discloses receiving "*from a second user associated with the second web site*" "***second information*** *indicating that a second identification to create the second hyperlink from the second website to the first website*."

232. Block describes in Fig. 2D "**the central website system and/or database**" which will "**store** information such as the registrants and their access levels." EX1007, [0119], Fig. 2D. Block explains that the invitor's invitation (**blue**, "*first information*") "passes through the website's message center 283 [of the central website and/or database 281] and is routed to the invited person." EX1007, [0119]. The invited person's acceptance (**purple**, "*second information*") is then sent back to the message center 283 of the central website and/or database 281 to generate the

access level. EX1007, [0119]. A Skilled Artisan would have known that the database stores information regarding the invitation and acceptance at least during the process described in Fig. 2D. A Skilled Artisan would have understood that the "*second information indicating that a second identification to create the second hyperlink from the second website to the first website*" is the information indicating that an invited person accepted the invitor's invitation.



EX1007, Fig. 2D (annotated).

233. Accordingly, Block discloses or renders obvious "*the server system is configured to: store, within the computer database system, second information indicating that a second identification to create the second hyperlink from the second*

website to the first website was received by the server system and from a second user associated with the second web site."

p. ***2[b]: modify the second website to include the second hyperlink based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received.***

234. In my opinion, Block discloses or renders obvious "*modify the second website to include the second hyperlink based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received*."

235. As explained above in Section VII.A.2.j, Block discloses "*modifying . . . the second web site to include a reciprocal second hyperlink*" "*based upon the first information indicating that the first identification was received*. As explained above in Section VII.A.2.o, Block further discloses receiving "*second information indicating that a second identification to create the second hyperlink from the second website to the first website*." As explained above in Section VII.A.2.j, the link from the invited individual's My Fans page to the invitor's My Home page ("*the second hyperlink from the second website to the first website*") is "reciprocally" included on the invited individual's My Fans page ("*second website*") when **both** the invitor **invites** the individual **and** the individual **accepts** that invitation, EX1007, [0094]. *See also* EX1007, [0128] ("My Friends (Fans) is a list of people with whom the user

has a relationship."). Accordingly, Block discloses or renders obvious that the server system is configured to "*modify the second website to include the second hyperlink based upon* ***both the first information*** *indicating that the first identification* ***was received and the second information*** *indicating that the second identification* ***was received***."

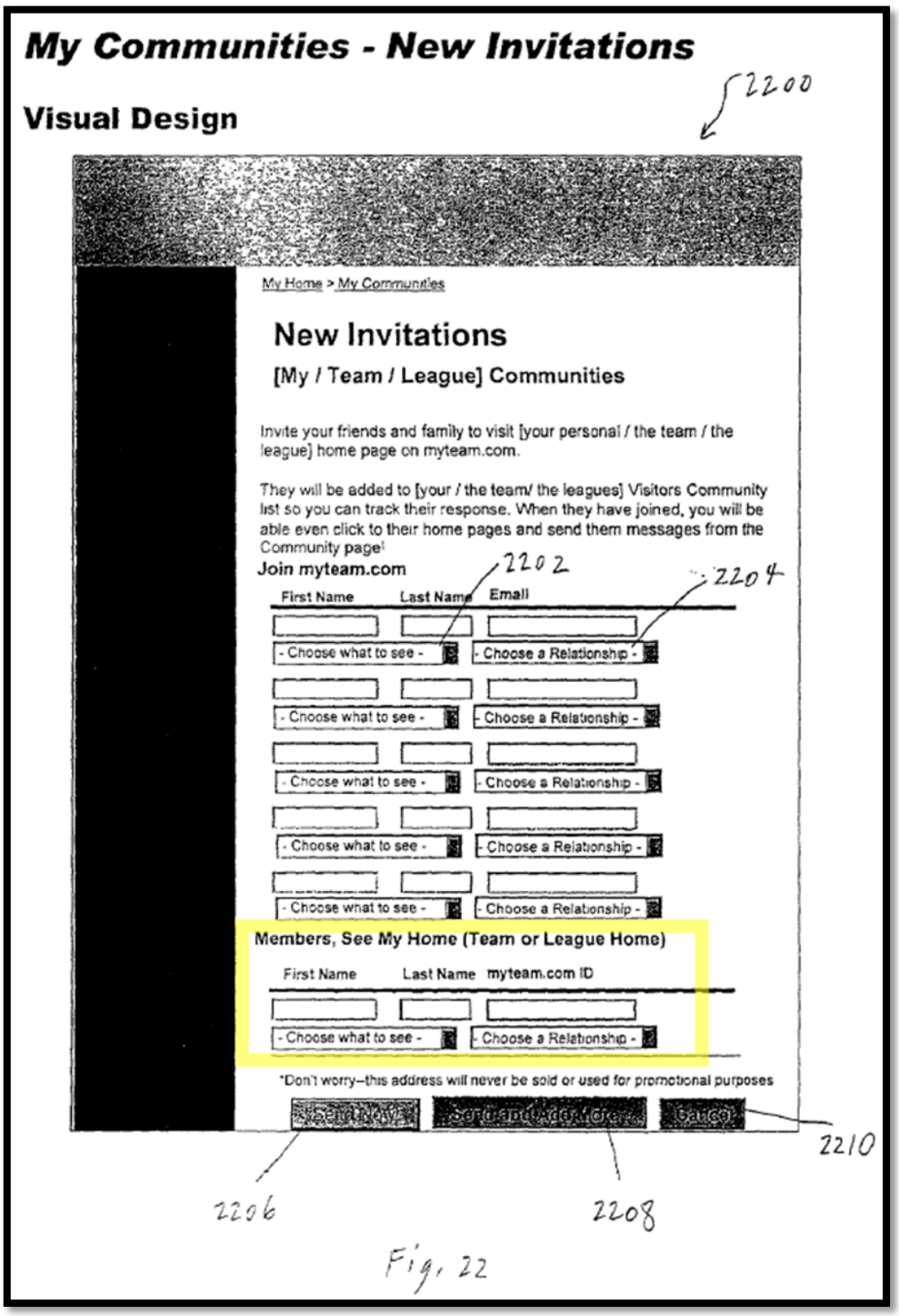
q. ***3: The method of claim 1, wherein the graphical user interface is configured to receive an entry associated with the first identification within an entry field of the graphical user interface.***

236. In my opinion, Block discloses or renders obvious "*the graphical user interface is configured to receive an entry associated with the first identification within an entry field of the graphical user interface.*"

237. As explained above in Section VII.A.2.f, Block discloses "***receiving****, from the first client device and* ***via the graphical user interface, a first identification*** *indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first web site to the second web site*." A "*first identification*" indicates an invitation from a first user to a second user of a "second website."

238. For example, in Fig. 22, Block illustrates a "representative version 2200 of a New Invitations web page as would be accessed from an individual's My Home page." EX1007, [0156], Fig. 22. Block explains that a "second table allows a Member to invite friends and family whom are already Members to visit the home

page of themselves" (i.e. My Home) on myteam.com. EX1007, [0156]. Thus, a Skilled Artisan would have understood that the entry fields in the second table (annotated in **yellow**) in the New Invitations web page is "*an entry field of the graphical user interface*" which a member can enter names ("*an entry associated with the first identification*") of members who previously joined myteam.com to send out invitations to them.



EX1007, Fig. 22 (annotated).

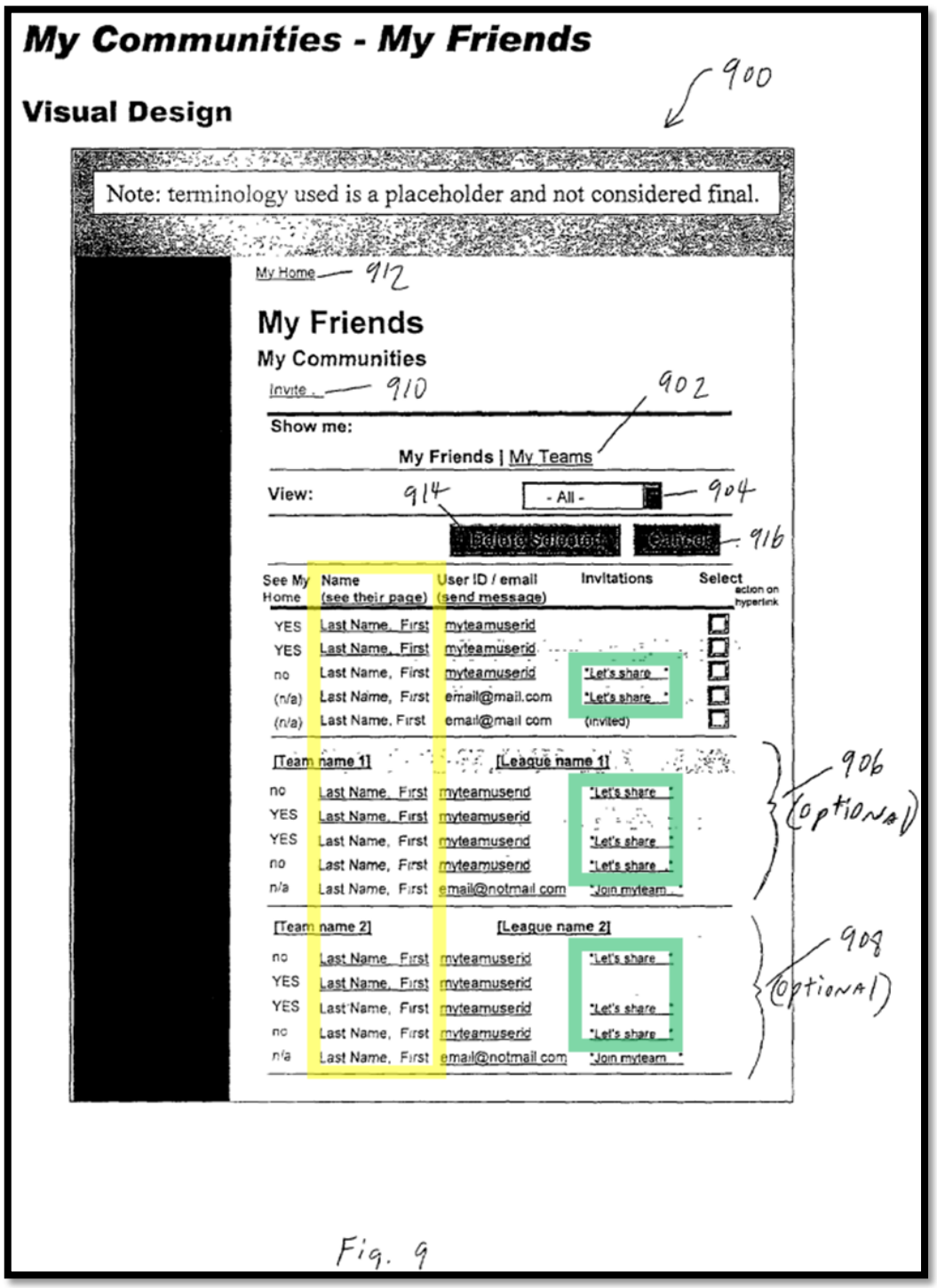
239. Accordingly, Block discloses or renders obvious "*the graphical user interface is configured to receive an entry associated with the first identification within an entry field of the graphical user interface.*"

r. *4[a]: The method of claim 1, wherein the graphical user interface is configured to present a graphical widget adjacent each of the one or more identifiers respectively associated with the one or more previously-created websites,*

240. In my opinion, Block discloses or renders obvious "*wherein the graphical user interface is configured to present a graphical widget adjacent each of the one or more identifiers respectively associated with the one or more previously-created websites.*"

241. As explained above in Section VII.A.2.e, Block describes My Friends web page 900 in Fig. 9 as an example of "***the graphical user interface*** *[displaying]* ***one or more identifiers respectively associated with one or more previously-created websites***." For example, in Fig. 9, Block illustrates a Name Column (annotated in **yellow**) which "includes click-through names to see that person's My Home page" ("*one or more identifiers respectively associated with one or more previously-created websites*"). EX1007, [0134], Fig. 9. The My Friends web page 900 in Fig. 9 further describes "User ID/email" column with "click-through Member-ID ('myteamuserid') to send that person a message", Invitation column with entries such as "Let's share" (annotated in **green**) to send out invitations to that person, and

selection boxes to select, delete or cancel an action, adjacent each of the names. EX1007, [0134]. *See also* EX1007, [0129] (emphasis added) ("My Friends list can also be used . . . to send out a new Invitation 712 to persons on the list. The Invitation might be in the form of: 'see my page,' or '**let's share pages**,' or 'join myteam.com.'" The plain meaning of a "graphical widget" is an element of interaction such as a button in a graphical user interface.



EX1007, Fig. 9 (annotated).

242. Since Block describes click-through links or buttons adjacent to each of the names in the Name column which a user can interact with to send messages

or invitations, a Skilled Artisan would have understood that the My Friends web page 900 ("*the graphical user interface*") "*is configured to present a graphical widget adjacent each of the one or more identifiers respectively associated with the one or more previously-created websites*." Accordingly, Block discloses or renders obvious "*wherein the graphical user interface is configured to present a graphical widget adjacent each of the one or more identifiers respectively associated with the one or more previously-created websites.*"

s. *4[b]: the graphical widget is configured to receive a user-initiated selection, and*

243. In my opinion, Block discloses or renders obvious "*the graphical widget is configured to receive a user-initiated selection.*"

244. As explained above in Section VII.A.2.e, Block describes My Friends web page 900 in Fig. 9 as an example of "***the graphical user interface*** *[displaying]* ***one or more identifiers respectively associated with one or more previously-created websites***." As explained above in Section VII.A.2.f, Block discloses that "***the graphical user interface***" is configured to receive "***a first identification indicating a selection of a second website from the one or more previously-created websites***." As explained above in Section VII.A.2.r, the "***graphical user interface is configured to present a graphical widget*** *adjacent each of the one or more identifiers respectively associated with the one or more previously-created websites*." As explained above in Section VII.A.2.r, each of the Name column, "User ID / email"

column, Invitations column, and the Select column ("*the graphical widget*") "*is configured to receive a user-initiated selection*" such as the "Let's share" (**green**, above) button.

245. Accordingly, Block discloses or renders obvious "*the graphical widget is configured to receive a user-initiated selection.*"

t. *4[c]: the selection of the second website is based upon the user-initiated selection.*

246. In my opinion, Block discloses or renders obvious "*the selection of the second website is based upon the user-initiated selection.*"

247. As explained above in Sections VII.A.2.e and VII.A.2.r, Block describes My Friends web page 900 in Fig. 9 as an example of "***the graphical user interface*** *[displaying] one or more identifiers respectively associated with one or more previously-created websites*," "***configured to present a graphical widget*** *adjacent each of the one or more identifiers*." As explained above in VII.A.2.s, Block discloses "***the graphical widget is configured to receive a user-initiated selection***." As explained above in Section VII.A.2.f, Block discloses that "***the graphical user interface***" is configured to receive "*a first identification indicating* ***a selection of a second website from the one or more previously-created websites***" by clicking "Let's share" (**green**) in the Invitations column of the corresponding user to send out an invitation to that user. As explained above in Sections VII.A.2.r and VII.A.2.s, the Invitations column is one of "*the graphical widget*" which is

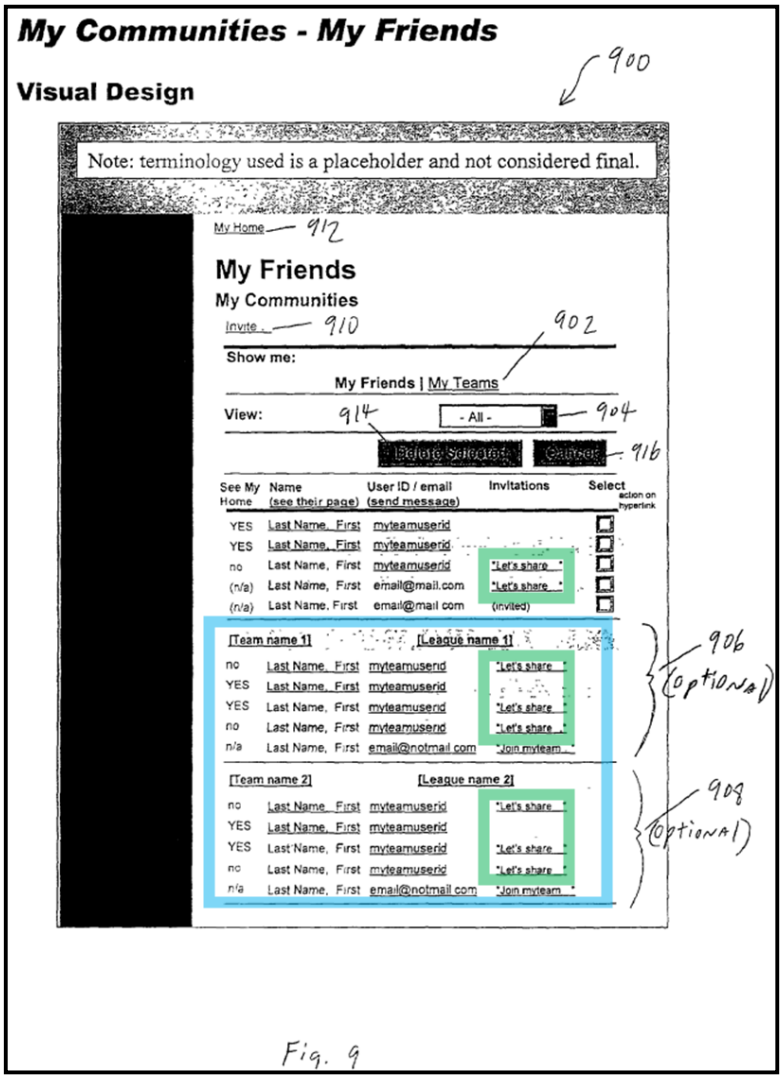
configured to receive "*the user-initiated selection*" of "*the second website*" to send out an invitation. EX1007, [0134], Fig. 9.

248. Accordingly, Block discloses or renders obvious "*the selection of the second website is based upon the user-initiated selection.*"

u. ***5: The method of claim 1, wherein the server system is configured to identify the one or more previously-created websites based upon a receipt, by the server system, of a request generated by the graphical user interface for one or more suggested linking locations for the first website.***

249. In my opinion, Block discloses or renders obvious "*the server system is configured to identify the one or more previously-created websites based upon a receipt, by the server system, of a request generated by the graphical user interface for one or more suggested linking locations for the first website*."

250. As explained above in Section VII.A.2.e, Block describes My Friends web page 900 in Fig. 9 as an example of "*the graphical user interface [displaying] one or more identifiers respectively associated with* ***one or more previously-created websites***." EX1007, [0134], Fig. 9. The My-Friends web page listing 900 can include a "listing of Teams the user is involved with via the click-through selector 902." EX1007, [0134]. Additionally, "[a] drop-down menu 904 is also shown for selecting which grouping to view. The drop-down values might include: All, Friends, Team1, Team2, and so forth." *Id*.



EX1007, Fig. 9 (annotated).

251. As explained above in Sections VII.A.2.f, VII.A.2.i, and VII.A.2.j, Block discloses "*receiving … a first identification indicating a selection of* ***a second website from the one or more previously-created websites*** *to create a first hyperlink from the first web site to the second web site*," modifying "*the first web site to include the first hyperlink*" and modifying "*the second website to include a reciprocal second hyperlink to the first web site*." Since the server system modifies "*the first*

web site to include the first hyperlink" "*to the second website*" and "*the second website to include a reciprocal second hyperlink to the first web site*" upon receiving "*a first identification indicating a selection of a second website*," a Skilled Artisan would have understood that the "*second website*" is a "*linking location[] for the first website*." As explained above in Section VII.A.2.f, the "Let's share" button (**green**) on My-Friends web page listing 900 can be used to send invitations to existing users. Once the "invited person" accepts the invitation the "first" and "second hyperlink" are created. Since the My-Friends web page listing 900 suggests other users that the first user can send invitations to (so that the other can have a link back to the first website), a Skilled Artisan would have understood that the My-Home mini-sites of the users with "Let's share" button activated are "*one or more suggested linking locations for the first website*."

252. Block describes generating "*a request*" "*for one or more suggested linking locations for the first website*" by "*the graphical user interface*." For example, Block describes that a My Friends web page listing "is the initial page that comes up when a user clicks on 'My Communities' in the navigation column (i.e. the left-most column) on the My Home page." EX1007, [0132], [0128]. Since the My Friends web page which "*identif[es] the one or more previously-created websites*" is brought up when the user clicks on the link on the My Communities click-through area on the My Home page, a Skilled Artisan would have understood

that the user's action clicking on the link (e.g., "My Communities" button) to access My Friends page is "a *request generated by the graphical user interface for one or more suggested linking locations for the first website*."

253. As another example, Block explains that a new member invited to myteam.com "must complete the **registration form**, which is pre-populated with the general information that was entered when the individual was added to a community." EX1007, [0093] (emphasis added). "When the registration form is successfully completed and submitted, the Shell Account is replaced with a 'Member Account' which references the Member-ID and which contains the primary information about this website Member and all security access relationships to all communities in which the Member is a Participant." *Id*. As explained above, the My-Friends web page listing 900 shows "My Friends or the listing of Teams the user is involved with" and provides "*one or more suggested linking locations*." EX1007, [0134]. Since the list in My-Friends web page listing 900 is populated based on the invitor's invitation and the new member's submission of the registration form, a Skilled Artisan would have understood that the submission of a registration form is "a *request generated by the graphical user interface for one or more suggested linking locations for the first website*."

254. A Skilled Artisan would have additionally understood that the first user can choose to join a team. EX1007, [0127], [0138]. When the user joins a team

suggested users from that team are added to "drop-down menu 904," so that the user can see the team members on the My-Friends page (**blue**, above). EX1007, [0134]. A Skilled Artisan would have understood that the user joins a team using a "*graphical user interface*" associated the myteam.com site. EX1007, [0127]. Therefore, joining a team is also "a *request generated by the graphical user interface for one or more suggested linking locations for the first website*."

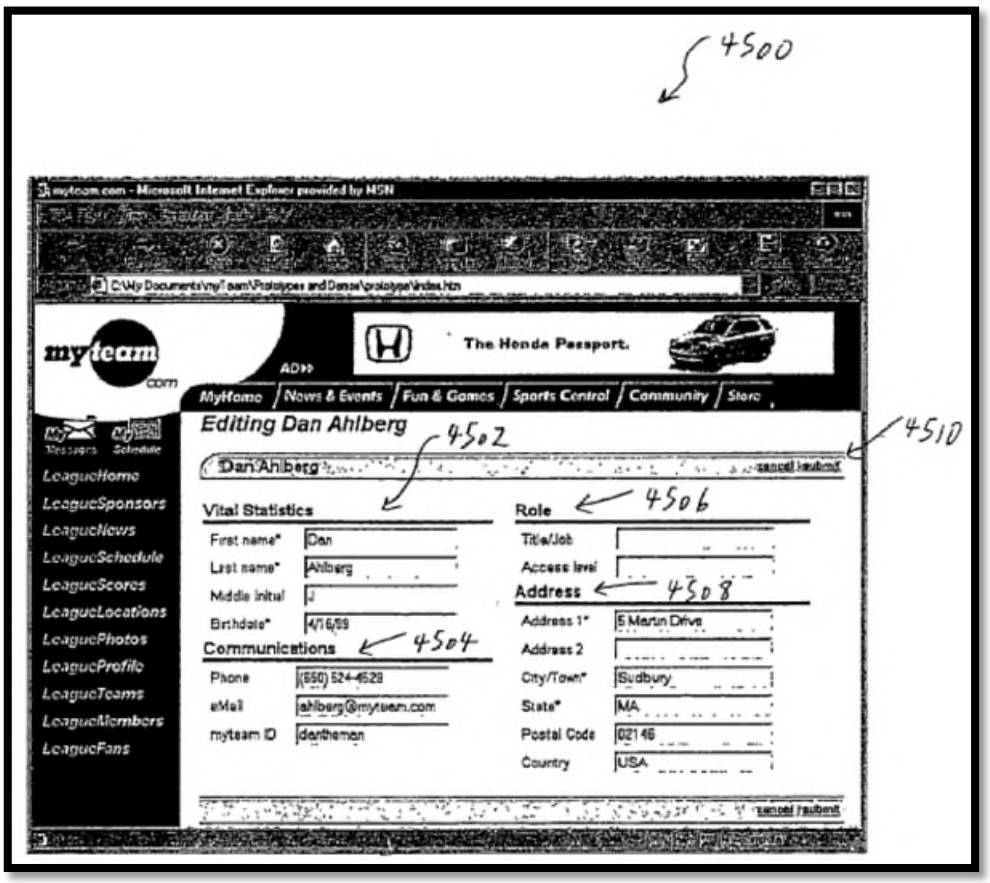
255. Accordingly, Block discloses or renders obvious that "*the server system is configured to identify the one or more previously-created websites based upon a receipt, by the server system, of a request generated by the graphical user interface for one or more suggested linking locations for the first website.*"

v. *6[a]: The method of claim 1, wherein the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface, and*

256. In my opinion, Block discloses or renders obvious "*the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface.*"

257. For example, in Fig. 45, Block illustrates a web page 4500 "which permits editing of an existing individual in the league and/or team." EX1007, [0204], Fig. 45. Block further explains that a "similar page provides the means to add an individual to the league and/or team." EX1007, [0204]. The editing layout allows a user with write access to the individual's record to provide user information such as

name, birthdate, communications information 4504, which includes the person's phone number, email and myteam-id, the individual's role (including title/job, and access level) 4506, and the address 4508. *Id*.



EX1007, Fig. 45.

258. As explained below in section VII.A.2.bb, the "*user information supplied by the first user within at least one information collection field of the graphical user interface*" is supplied "***during registration*** *of the first user with the server system*." Block explains that a new member, upon accepting the Invitation, "must complete the **registration form**, which is pre-populated with the general

information that was entered when the individual was added to a community." EX1007, [0093] (emphasis added). "When the registration form is successfully completed and submitted, the Shell Account is replaced with a 'Member Account' which references the Member-ID and which contains the primary information about this website Member and all security access relationships to all communities in which the Member is a Participant." *Id*. A Skilled Artisan would have understood that Block's registration form is "*configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface*" similar to the "graphical user interface" shown in Fig. 45.

259. Accordingly, Block discloses or renders obvious "*the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface.*"

w. *6[b]: the server system is configured to select the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface.*

260. In my opinion, Block discloses or renders obvious "*the server system is configured to select the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface.*"

261. As explained above in Section VII.A.2.e, Block discloses forwarding "*to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites*." For example, in Fig. 9, Block illustrates My Friends web page 900 with a list of "click-through names to see that person's My Home page." EX1007, [0134], Fig. 9. As explained above in Section VII.A.2.v, Block discloses "*the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface*" in the registration form which the first user fills out to join myteam.com. *See also* EX1007, [0093]. Block explains the registration form includes "primary information about this website Member and all security access relationships to all communities in which the Member is a Participant." EX1007, [0093].

262. The My Friends web page 900 shows My Friends and "the listing of Teams the user is involved with." EX1007, [0134]. The individuals or Team members on the My Friends web page 900 (e.g., 906, 908 in Fig. 9) are selected based on "the primary information about this website Member and all security access relationships to all communities in which the Member is a Participant" populated when the registration form is successfully completed and submitted by the first user. EX1007, [0093], [0134]. As shown in Figure 2 of Block different "access levels" allow the user to view and edit different information. EX1007, Fig. 2. Therefore

the member listings in My-Friends web page 900 ("*the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user*") is selected "*based upon the user information supplied*" (i.e., the access level and all security relationships to all communities) "*by the first user within the at least one information collection field of the graphical user interface*" (i.e., the registration form).

263. Accordingly, Block discloses or renders obvious "*the server system is configured to select the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface.*"

x. ***7: The method of claim 6, wherein the user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of a group consisting of: a name of the first user, an email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user.***

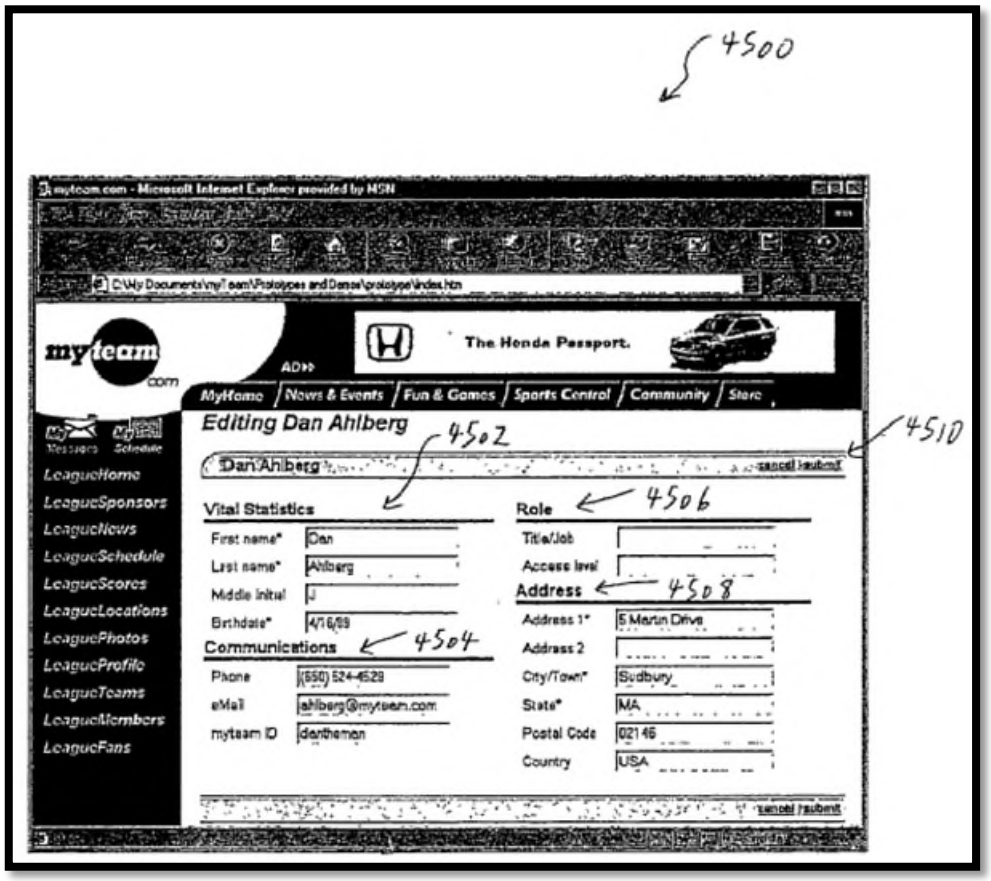
264. In my opinion, Block discloses or renders obvious "*wherein the user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of*

a group consisting of: a name of the first user, an email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user."

265. I understand that this claim limitation is a *Markush* group and lists specified alternative "*identifiers*" that can be associated with "*the previously-created websites*." I address each "*identifier*" in more detail in this Section. I understand that the entire *Markush* group is disclosed by the prior art if one alternative in the *Markush* group is in the prior art. Therefore, the prior art need only disclose one of "*a name of the first user, an email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user*."

266. As discussed above in Section VII.A.2.w, Block discloses "*the server system is configured* ***to select the one or more the previously-created websites associated with the one or more identifiers*** *to be displayed to the first user* ***based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface***." In particular, Block discloses "***the user information*** *supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers*," for example, a registration form that a new user completes and submits to become a member of myteam.com. EX1007, [0093], [0204] ("A [page similar to web page 4500] provides the means to add an individual to the league and/or team."), Fig. 45.

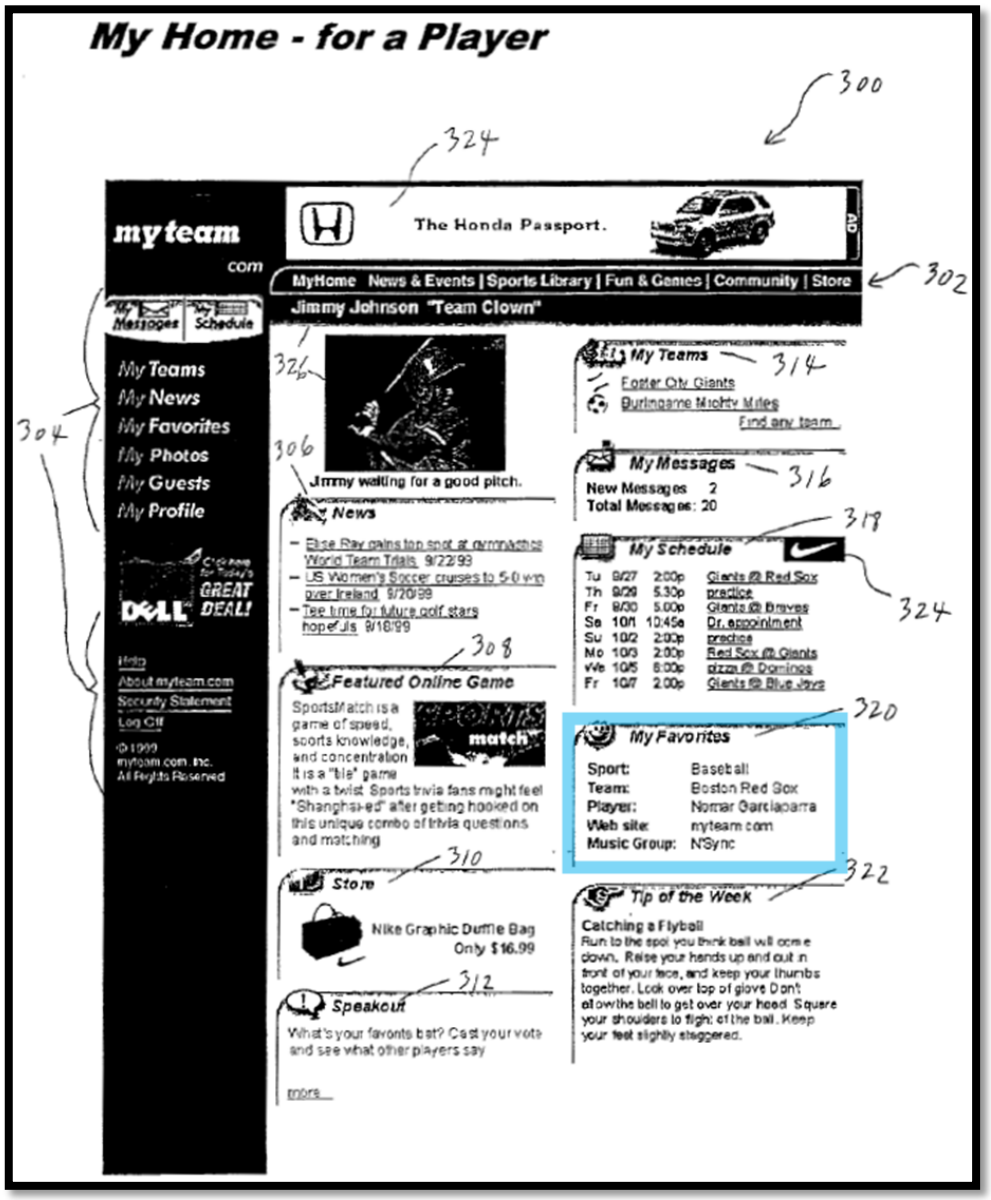
267. As shown below in Fig. 45, Block describes the web page 4500 allows a user to provide user information such as **name** and the person's **email** ("*a name of the first user, an email address of the first user*") and the individual's role (including **title/job**, and access level) 4506 ("*a business of the first user*").



EX1007, Fig. 45.

268. Moreover, in Fig. 3 below, a user's My Home page includes a My Favorites 320 capsule (annotated in **blue**) which describes the user's favorite sport, team, player, and music group ("*a hobby of the first user*" and "*an interest of the first user*."). A Skilled Artisan would have understood the user information shown

in the My Favorites capsule is "*supplied by the first user*," just like the other information provided by the registration form. Therefore, the user interests and hobbies, such as what sport they play, can be "*used to select one or more the previously-created websites*."



EX1007, Fig. 3 (annotated).

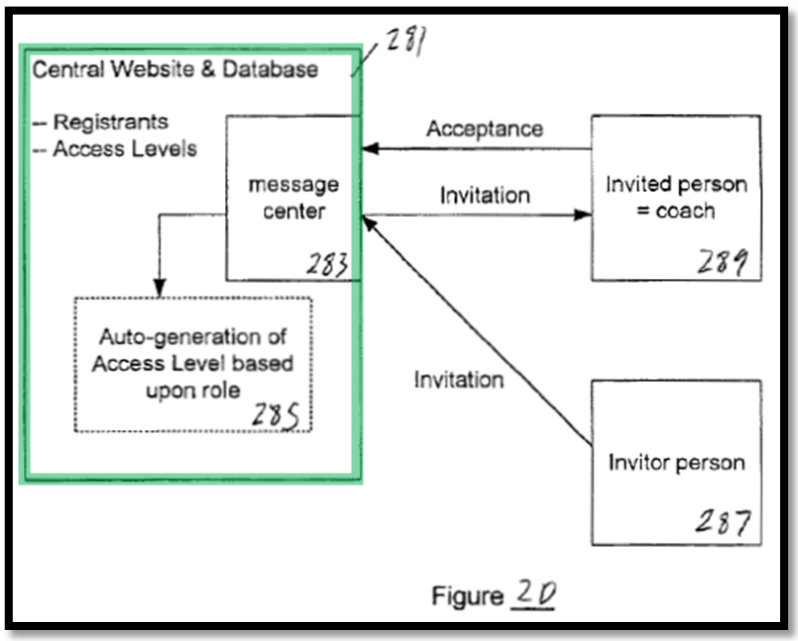
269. Accordingly, Block discloses or renders obvious "*wherein the user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of a group consisting of: a name of the first user, an email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user.*"

y. *8[a]: The method of claim 6, wherein the server system is configured to select the plurality of the previously-created websites associated with the one or more identifiers by searching other user information previously-supplied by other users of the server system and stored within the server system, and*

270. In my opinion, Block discloses or renders obvious "*the server system is configured to select the plurality of the previously-created websites associated with the one or more identifiers by searching other user information previously-supplied by other users of the server system and stored within the server system.*"

271. As discussed above in Section VII.A.2.v, Block discloses "*receiv[ing] user information supplied by the first user within at least one information collection field of the graphical user interface*." In particular, the first user can provide user information, for example, via a registration form to join myteam.com. EX1007, [0093]. A Skilled Artisan would have understood that "*other users of the server system*" "*previously-supplied*" their own "*user information*" when they joined myteam.com, just like the first user supplied user information via a registration form.

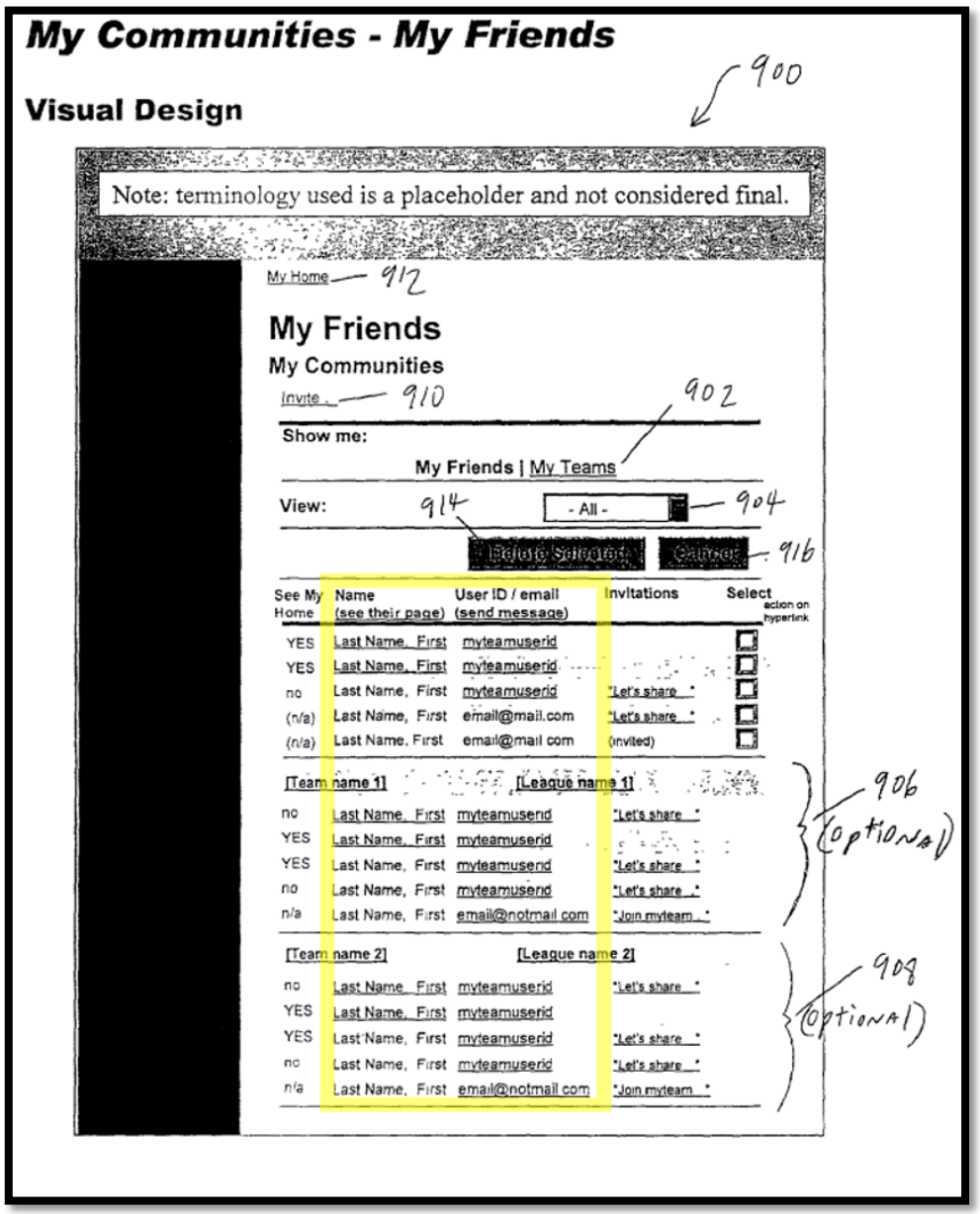
Block explains that such "*other user information*" is "*stored within the server system*" since "[t]he central website and database 281 will store information such as the registrants and their access levels." EX1007, [0119], Fig. 2D.



EX1007, Fig. 2D (annotated).

272. As explained above, Block's My-Friends web page 900 displays the selected list of individuals ("*the previously-created websites associated with the one or more identifier*"). *Supra* §VII.A.2.e; EX1007, [0134], Fig. 9. A Skilled Artisan would have understood that "*the plurality of the previously-created websites associated with the one or more identifiers*" are selected by searching "*other user information previously-supplied by other users of the server system and stored within the server system*" because such "*other user information*" (e.g., name, user id, email, **yellow**) is displayed on the first user's My-Friends web page 900. A

Skilled Artisan would have understood that this "*other user information*" is "*previously-supplied by the other users*" when they joined myteam.com and was "*stored within the server system*" in "[t]he central website and database 281." Moreover, each of the "*one or more previously-created websites*" displayed on the My-Friends page 900 is selected based on searching "*other user information previously-supplied by other users*" because each user previously joined Team 1 or Team 2 and set their Access Level. Block's use of a database of "*other user information previously-supplied by other users*" to generate web content, such as the My-Friends page 900 is consistent with the '316 Patent's use of a user database for the same purposes. *See also* EX1001, 15:30-37 (stating the server computer 140 determines linking locations "based upon the information provided by the registered user during the log in process," and searching "the information stored in third party user database 160"); EX1001, 6:26-28 ("The third party user database 160 preferably includes a listing of all third party users registered to access the server computer 140").



EX1007, Fig. 9 (annotated).

273. Accordingly, Block discloses or renders obvious "*the server system is configured to select the plurality of the previously-created websites associated with the one or more identifiers by searching other user information previously-supplied by other users of the server system and stored within the server system.*"

z. *8[b]: the searching is performed by a search engine using the user information supplied by the first user within the at least one information collection field of the graphical user interface.*

274. In my opinion, Block discloses or renders obvious "*the searching is performed by a search engine using the user information supplied by the first user within the at least one information collection field of the graphical user interface.*"

275. As explained above in Section VII.A.2.v, Block discloses "*the graphical user interface is configured to receive* ***user information supplied by the first user within at least one information collection field of the graphical user interface***," for example via a registration form similar to the editing page 4500 which receives user information such as name, birthdate, the person's phone number, email and **myteam-id**, the individual's role (including title/job, and access level) 4506, and the address 4508. EX1007, [0093], [0204], Fig. 45. As explained above in Section VII.A.2.y, Block "selects" the "*plurality of the previously-created websites associated with the one or more identifiers*" by "*searching*" the "*other user information previously-supplied by other users of the server system and stored within the server system.*"

276. A Skilled Artisan would have understood that Block's server system includes "*a search engine*" which performs the searching of "[t]he central website and database 281" to search for, for example, the person's phone number, email or myteam-id, or access relationships to communities "*to select the plurality of the*

previously-created websites associated with the one or more identifiers" shown in My-Friends page 900 since such "search engines" were well known in the art, including their use to search content within databases. EX1007, [0119]; EX1001, 8:40-44 (emphasis added) (the system "searches the web assets database 170 for web assets that meet the search criteria. System 100 employs **any of a number of conventional search engines to perform the searches**.")

277. Block describes a "Team Finder in the navigation bar of a Team Home page," and "League Finder in the navigation bar of a League Home page" used to search and locate a team or a league "as was specified by the user." EX1007, [0127]. Block explains that when "selecting a league, a list of the teams in that league are displayed," so that the user can "browse through a listing of Leagues, sorted by geographical location (country, state), sport, and alphabetically." EX1007, [0138]. A Skilled Artisan would have understood that Block's server system would use the same "*search engine*" used for the "Team Finder" (or a similar search engine used to search for My Homes) to locate "*the plurality of the previously-created websites*" to display on My-Friends web page 900 "*using the user information supplied by the first user within the at least one information collection field of the graphical user interface*" via the first user's registration form. *Supra* §VII.A.2.v.

278. Accordingly, Block discloses or renders obvious "*the searching is performed by a search engine using the user information supplied by the first user within the at least one information collection field of the graphical user interface.*"

aa. *9: The method of claim 6, wherein the first user and the second user are registered users of the server system.*

279. In my opinion, Block discloses or renders obvious "*the first user and the second user are registered users of the server system.*"

280. As explained above in Sections VII.A.2.b and VII.A.2.o, Block describes that the "*first user*" and the "*second user*" are individuals "who has registered with the myteam.com website." EX1007, [0091]. *See also* EX1007, [0108] ("The My Home page is the most private of the mini-sites, as it contains the personal information of the registered Member of the myteam.com site"); EX1007, Abstract ("Each registered user will have a home page with personal information.")

281. Accordingly, Block discloses or renders obvious "*the first user and the second user are registered users of the server system.*"

bb. *10: The method of claim 9, wherein the user information is supplied by the first user within the at least one information collection field of the graphical user interface during registration of the first user with the server system.*

282. In my opinion, Block discloses or renders obvious "*wherein the user information is supplied by the first user within the at least one information collection*

field of the graphical user interface during registration of the first user with the server system."

283. As explained above in Section VII.A.2.v, Block discloses "*the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface*," such as a registration form similar to the example web page 4500 in Fig. 45 which allows a user to provide user information such as name, communications information 4504, which includes the person's phone number, email, and myteam-id and the individual's role (including title/job, and access level) 4506. EX1007, [0093], [0204], Fig. 45.

284. Block explains that "[a] similar page provides the means to **add an individual to the league and/or team**." EX1007, [0204] (emphasis added). Block describes that upon accepting an invitation to join myteam.com, "the user must complete **the registration form, which is pre-populated with the general information that was entered** when the individual was added to a community." EX1007, [0093] (emphasis added). Block also explains that the recipient of an invitation can "go to the **myteam.com registration page**, which prompts for the Invitation-Number." EX1007, [0094] (emphasis added). A Skilled Artisan would have understood that a registration page ("*graphical user interface*") similar to the

example web page 4500 will be used "*during registration of the first user with the server system*" so that the first user can provide user information to the server system.

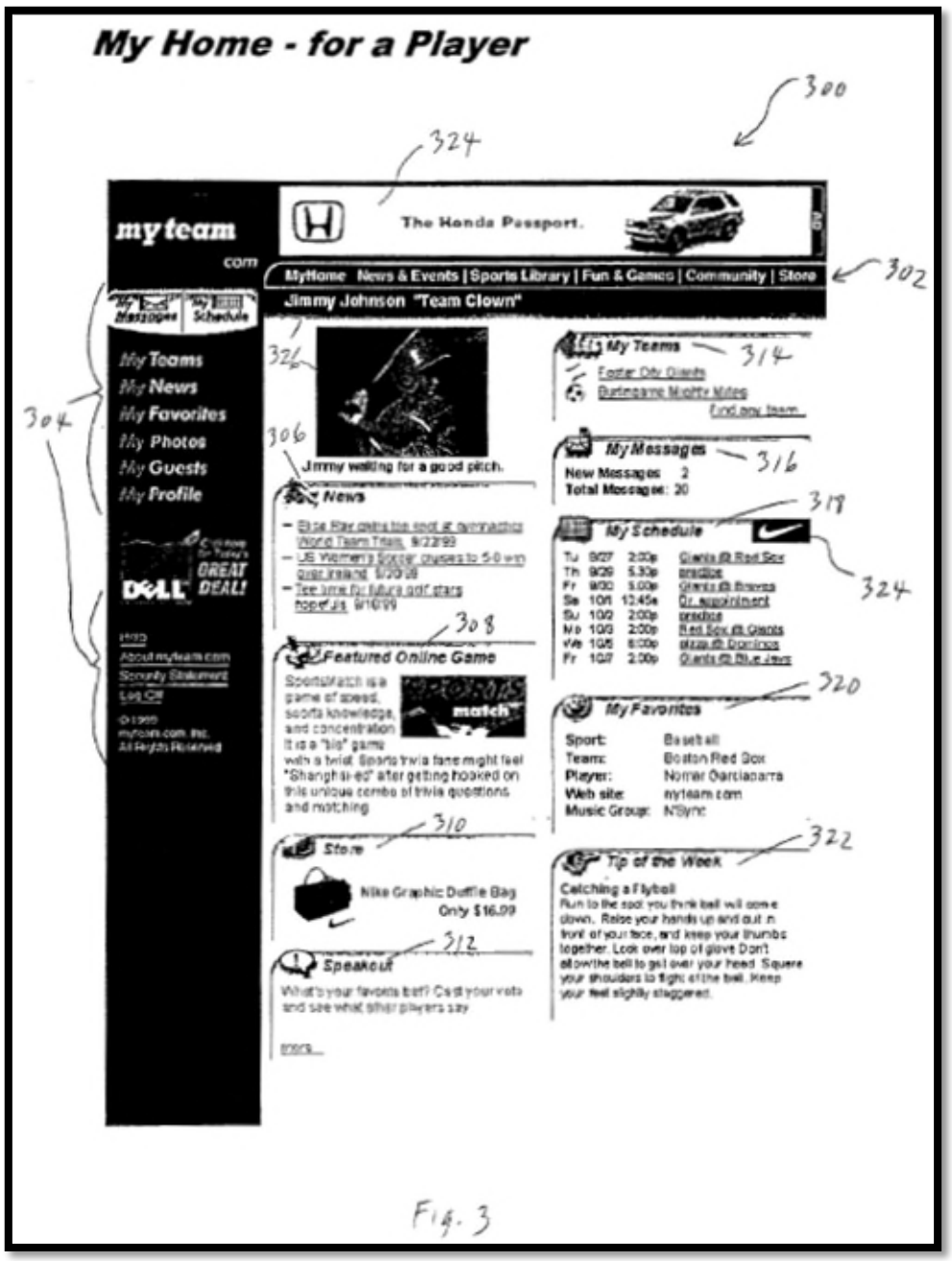
285. Accordingly, Block discloses or renders obvious "*wherein the user information is supplied by the first user within the at least one information collection field of the graphical user interface during registration of the first user with the server system.*"

cc. *11: The method of claim 1, wherein the first web site of the first user includes a plurality of web pages including a first web page.*

286. In my opinion, Block discloses or renders obvious "*wherein the first web site of the first user includes a plurality of web pages including a first web page.*"

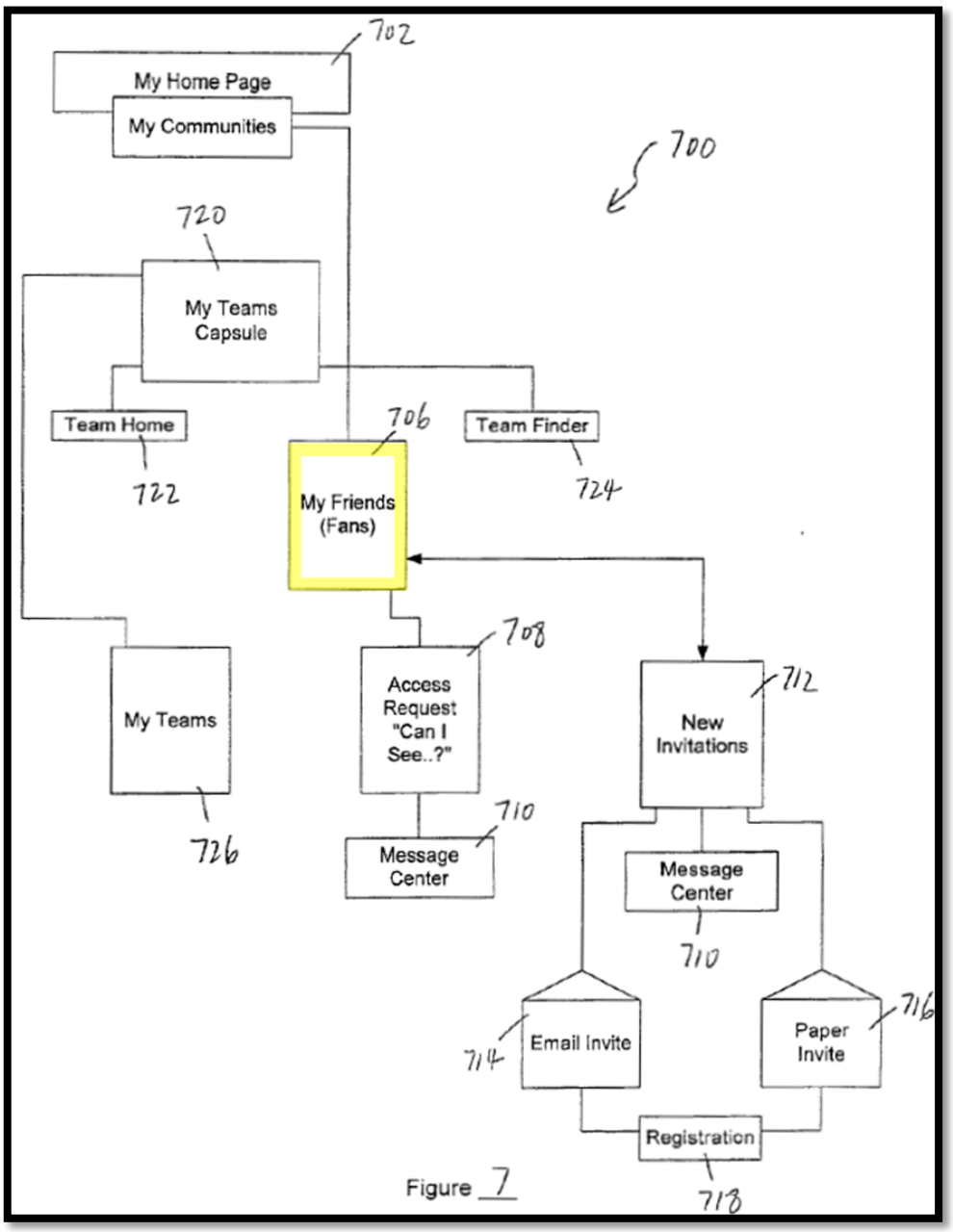
287. As explained above in Section VII.A.2.b, Block discloses the "*first web site*" which is a "My Home mini-site" of the "*first user*." Block explains that a "Member will be placed (by default) in their own My Home mini-site 112." EX1007, [0098]. Block explains that the "My Home mini-site" includes a plurality of linked pages. EX1007, [0098] ("Linked pages associated with the My Home mini-site include, for example: My Messages, My Schedule, My Teams, My New, My Favorites, My Fans, and My Profile. Each of these links pulls up pages relating to the listed topics, and which are particularized with information pertaining to the mini-site owner."). In Fig. 3, Block describes "[c]lick-through hyperlinks 304 to the

other pages of" an example My Home mini-site, "available on the left border, or navigation bar." EX1007, [0121].



EX1007, Fig. 3.

288. For example, as illustrated by the site flow map 700 in Fig. 7, "My Friends (Fans)" page (e.g., Figs. 8, 9) of the My Home mini-site can be "*a first web page*."



EX1007, Fig. 7 (annotated).

289. Accordingly, Block discloses or renders obvious "*wherein the first web site of the first user includes a plurality of web pages including a first web page.*"

dd. *12: The method of claim 11, wherein the server is configured to serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.*

290. In my opinion, Block discloses or renders obvious "*wherein the server is configured to serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.*"

291. As explained above in Section VII.A.2.b, Block discloses the "*first web site*" which is a "My Home mini-site" of the "*first user*." As explained above in Section VII.A.2.cc, Block discloses that "*the first web site of the first user includes a plurality of web pages including a first web page,*" where the "*first web page*" can be the My Friends (Fans) page of the first user's "My Home mini-site."

292. Block explains that a member or a visitor who is invited can see another member's My Home Page. EX1007, [0091]. For example, a person can click-through on the name of the persons on the My Friends list, shown in Fig. 8, "in order to see that person's My Home page." EX1007, [0133], Fig. 8. "If the name is underlined or highlighted, i.e. name 806, then permission has been granted by that person to see their My Home page." EX1007, [0133]. Block explains that the "My Home page" includes links to My Friends (or My Fans) page. EX1007, [0132], [0128], [0098]; *see also e.g.*, EX1007, [0051] (emphasis added) ("Fig. 8 shows a

first representative webpage of certain elements, according to one aspect of the present invention, of **the My Friends selection from the My Home page**.").

293. If a third user who is a member of myteam.com or is a visitor invited by a member viewing the member's My Friends page "*from a third client device*" clicks on the name of the "first user" who owns the "*first web site*" Block's system would serve the first user's My Home page with a link to the first user's My Friend page ("*the first web page of the first web site*") "*to the third client device*." A series of actions of a third user viewing the member's My Friends page "*from a third client device*" which includes clicking on the name of the "first user" who owns the "*first web site*" to access the first user's My Home page and then clicking on the link to the first user's My Friend page is a "*a web page request,*" which would allow the server to "*serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.*"

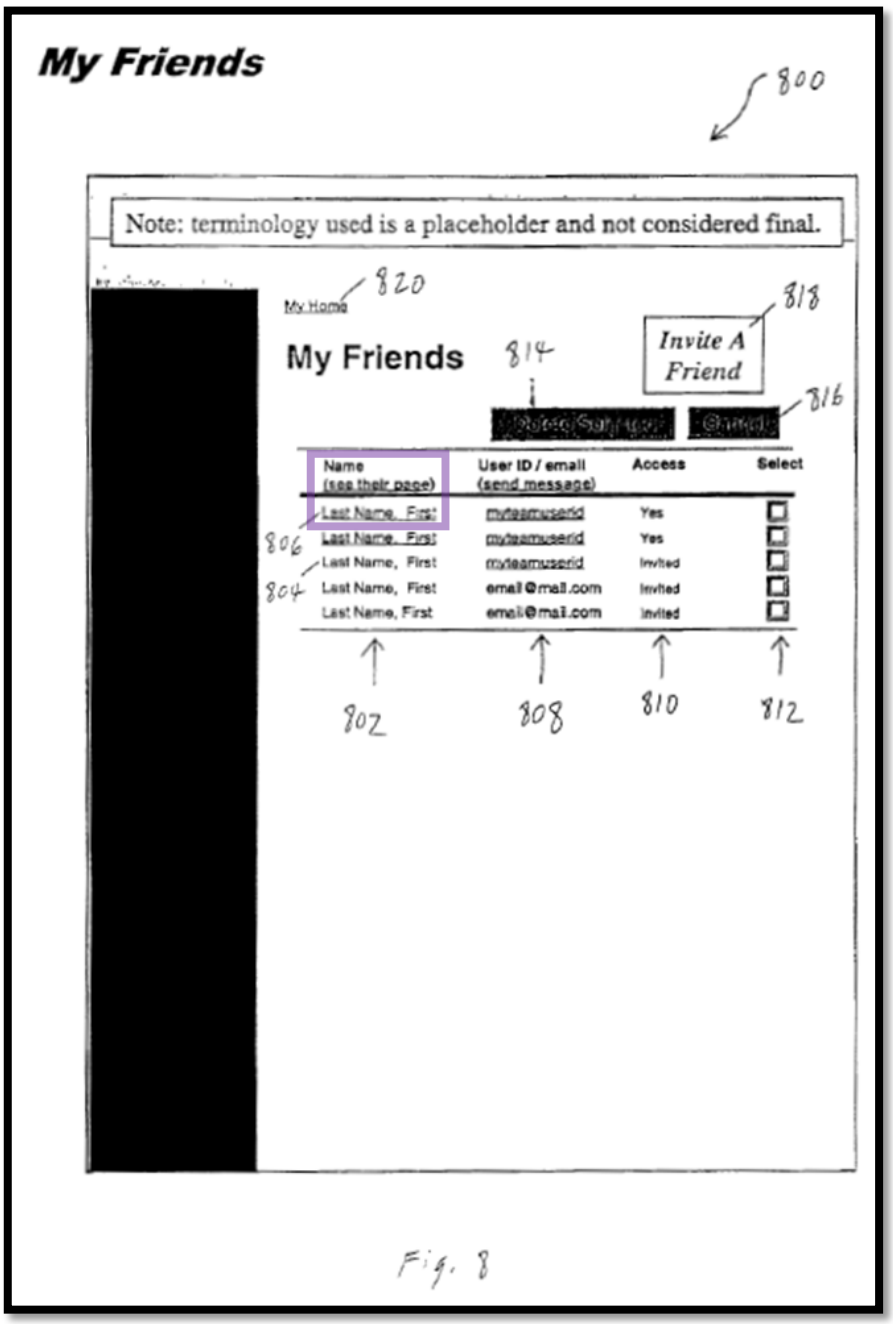


Fig. 8

EX1007, Fig. 8 (annotated).

294. Accordingly, Block discloses or renders obvious "*wherein the server is configured to serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.*"

ee. *13[a]: The method of claim 11, wherein the server system is configured to: create, in the first web page, a reciprocal link site for the first hyperlink, and*

295. In my opinion, Block discloses or renders obvious "*wherein the server system is configured to: create, in the first web page, a reciprocal link site for the first hyperlink.*"

296. As described above in VII.A.2.cc, Block discloses "*the first web site of the first user includes a plurality of web pages including a* ***first web page***," where the "first web page" is the My Friends page of the first user's "My Home mini-site." As discussed above in Section VII.A.2.f, the "*first hyperlink*" is a link "*from the first web site to the second web site.*" As discussed above in Section VII.A.2.o, the "*second hyperlink*" is a reciprocal link "*from the second web site to the first web site*."

297. As explained above in Section VI.A, a "reciprocal link site" a space within a web page (within a website) for displaying reciprocal links to other websites.

298. Block discloses the "*first web page*" which is the My Friends page listing 800 of the first user's "My Home mini-site," as shown in Fig. 8. This My Friends page "shows a first table which displays 'friends' who are **people that the user has invited to be myteam.com Members**, or other myteam.com Members with which the user has a relationship." EX1007, [0132] (emphasis added), Fig. 8.

Block explains that "[w]hen an individual accepts an Invitation to a My Home page, **the link to the invitor's My Home page is on their My Fans page**." EX1007, [0094] (emphasis added). *See also* EX1007, [0128] ("This My Friends list provides a form of 'bookmarking' between a user's site and a Friend's site, and indicates whether the relationship is **reciprocal**, a Friend only sharing with user, or the user only sharing with Friend."); EX1007, [0133]. ("The user can thereby click-through on the name [806] in order to see that person's My Home page."). Since the relationship between the first user and the second user whose name is, for example, "Last Name, First" (annotated in **purple**)) shown on the My Friends page of the first user's My Home mini-site (the "*first web page*"), can be reciprocal, Block discloses "*wherein the server system is configured to: create, in the first web page, a reciprocal link site for the first hyperlink.*"

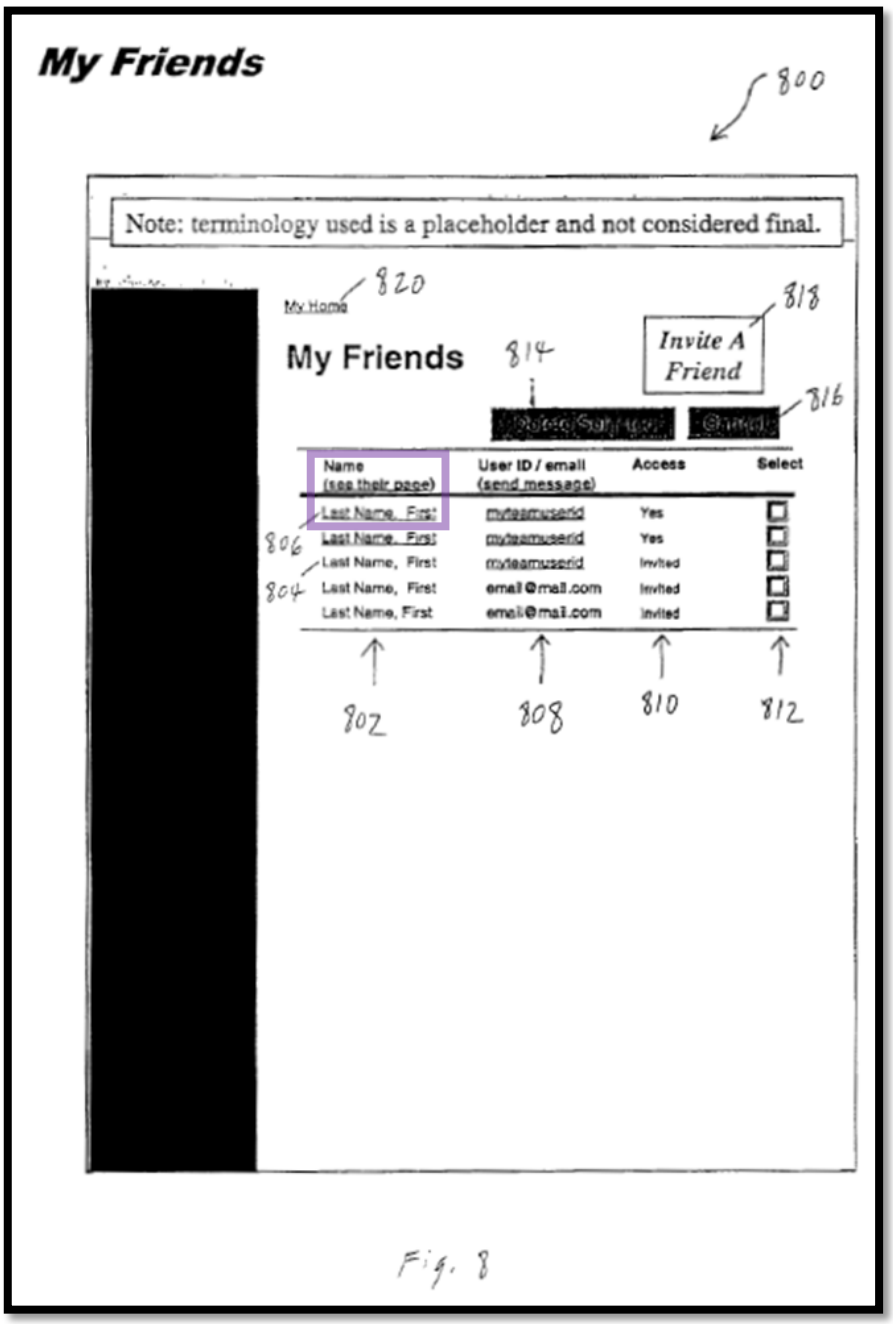


Fig. 8

EX1007, Fig. 8 (annotated).

299. Therefore, Block disclose a space within a web page (within a website) for displaying reciprocal links to other websites. Accordingly, Block discloses or

renders obvious "*wherein the server system is configured to: create, in the first web page, a reciprocal link site for the first hyperlink.*"

ff. *13[b]: create, in a second web page of the second website, a reciprocal link site for the second hyperlink.*

300. In my opinion, Block discloses or renders obvious "*create, in a second web page of the second website, a reciprocal link site for the second hyperlink.*"

301. As described above in VII.A.2.cc, Block discloses that "*the first web site of the first user includes a plurality of web pages including a* ***first web page***," where the "first web page" is the My Friends page of the first user's "My Home mini-site." Just like the first user, Block describes that the second user also has its own My Friend page (a "*second web page*"). *See* EX1007, [0094] (emphasis added) ("When an individual accepts an Invitation to a My Home page, **the link to the invitor's My Home page is on their My Fans page**.").

302. As discussed above in Section VII.A.2.o, the "*second hyperlink*" is a reciprocal link "*from the second web site to the first web site.*" As described above in VII.A.2.ee, Block discloses "*wherein the server system is configured to: create, in the first web page, a reciprocal link site for the first hyperlink,*" where a "reciprocal link site" is a location within a website for displaying reciprocal links to other websites. Since the second web site includes a link back to the first web site, a second web page would include "a reciprocal link site" which is a location in a

second web site for displaying a link to the first web site which includes another link back to the second web site.

303. Therefore, Block disclose a space within a web page (within a website) for displaying reciprocal links to other websites. Accordingly, Block discloses or renders obvious "*creat[ing], in a second web page of the second website, a reciprocal link site for the second hyperlink.*"

3. Claim 14 And Its Dependent Claims 15-26

a. *14[pre]: A server system configured to modify and serve web pages, comprising:*

304. In my opinion, Block discloses or renders obvious a "*server system configured to modify and serve web pages.*"

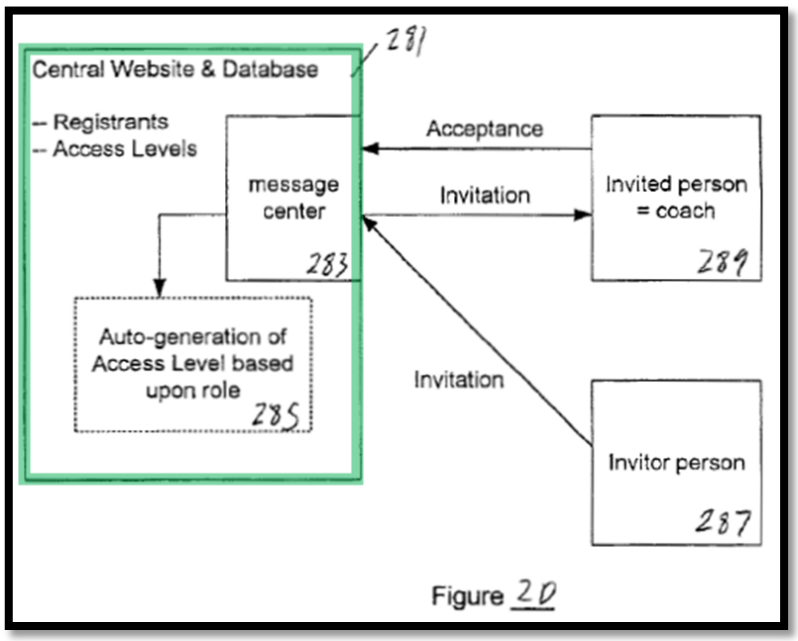
305. For all the reasons stated above in Section VII.A.2.a, Block would meet this limitation.

b. *14[a]: a computer database system, and*

306. In my opinion, Block discloses or renders obvious "*a computer database system.*"

307. Block discloses "membership database" ("*computer database system*") that is "built via invitations from member users to non-member users." EX1007, Abstract. For example, Block describes in Fig. 2D "the concept of **the central website system and/or database** providing for (optional) auto-generation of an access level based upon the role of the person being invited to join the website."

EX1007, [0119] (emphasis added), Fig. 2D. "**The central website and database 281** will store information such as the registrants and their access levels." EX1007, [0119] (emphasis added).



EX1007, Fig. 2D (annotated).

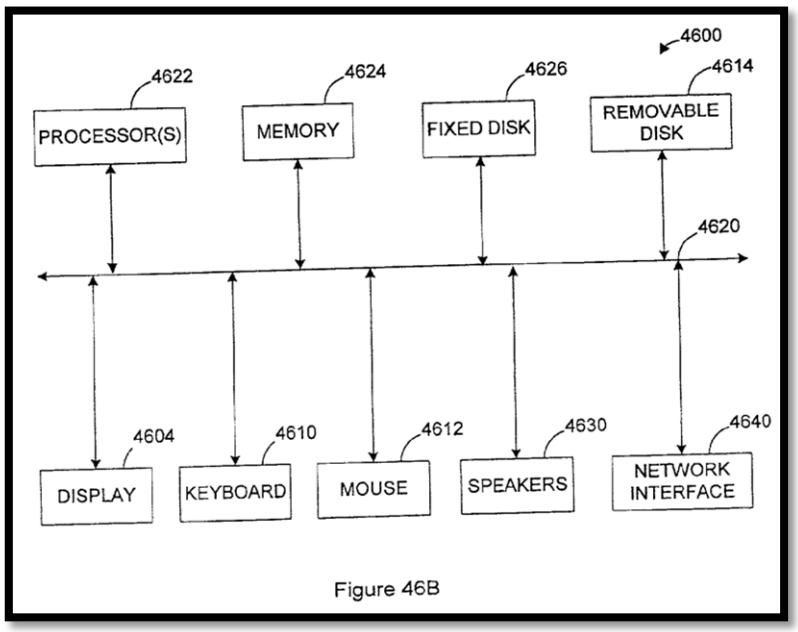
308. Accordingly, Block discloses or renders obvious "*a computer database system.*"

c. *14[b]: a hardware system configured to perform:*

309. In my opinion, Block discloses or renders obvious "*a hardware system.*"

310. As discussed above in Section VII.A.2.a, Block discloses a "*server system*." Block describes "a computer system," illustrated in Fig. 46B below, where "[a] website or webpage can be hosted on **computers and servers**" and users "use

similar **computers** to access such websites and webpages." EX1007, [0207] (emphasis added), Fig. 46B. Thus, Block's computer system including user computers and servers is a "*hardware system*."



EX1007, Fig. 46B.

311. Accordingly, Block discloses or renders obvious "*a hardware system.*"

d. *14[c]: receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first website;*

312. In my opinion, Block discloses or renders obvious "*receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first website.*"

313. For all the reasons stated above in Section VII.A.2.b, Block would meet this limitation.

e. *14[d]: receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset;*

314. In my opinion, Block discloses or renders obvious "*receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset.*"

315. For all the reasons stated above in Section VII.A.2.c, Block would meet this limitation.

f. *14[e]: generating, based upon the instruction, the edited web asset;*

316. In my opinion, Block discloses or renders obvious "*generating, based upon the instruction, the edited web asset.*"

317. For all the reasons stated above in Section VII.A.2.d, Block would meet this limitation.

g. *14[f]: forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system;*

318. In my opinion, Block discloses or renders obvious "*forwarding, to the first client device and to be displayed by the graphical user interface, one or more*

identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system."

319. For all the reasons stated above in Section VII.A.2.e, Block would meet this limitation.

h. *14[g]: receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first web site to the second website;*

320. In my opinion, Block discloses or renders obvious "*receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first web site to the second web site.*"

321. For all the reasons stated above in Section VII.A.2.f, Block would meet this limitation.

i. *14[h]: storing, within a computer database system of the server system, first information indicating that the first identification was received by the server system;*

322. In my opinion, Block discloses or renders obvious "*storing, within a computer database system of the server system, first information indicating that the first identification was received by the server system.*"

323. For all the reasons stated above in Section VII.A.2.g, Block would meet this limitation.

j. *14[i]: modifying, based upon the instruction, the first website to include the edited web asset;*

324. In my opinion, Block discloses or renders obvious "*modifying, based upon the instruction, the first website to include the edited web asset.*"

325. For all the reasons stated above in Section VII.A.2.h, Block would meet this limitation.

k. *14[j]: modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink;*

326. In my opinion, Block discloses or renders obvious "*modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink.*"

327. For all the reasons stated above in Section VII.A.2.i, Block would meet this limitation.

l. *14[k]: modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site; and*

328. In my opinion, Block discloses or renders obvious "*modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site.*"

329. For all the reasons stated above in Section VII.A.2.j, Block would meet this limitation.

m. *14[l]: serving computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site, wherein*

330. In my opinion, Block discloses or renders obvious "*serving computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site.*"

331. For all the reasons stated above in Section VII.A.2.k, Block would meet this limitation.

n. *14[m]: the server system is configured to host the first web site and the second website,*

332. In my opinion, Block discloses or renders obvious "*the server system is configured to host the first web site and the second website.*"

333. For all the reasons stated above in Section VII.A.2.l, Block would meet this limitation.

o. *14[n]: the editing screen is configured to display the web asset, and*

334. In my opinion, Block discloses or renders obvious "*the editing screen is configured to display the web asset.*"

335. For all the reasons stated above in Section VII.A.2.m, Block would meet this limitation.

p. ***14[o]: the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.***

336. In my opinion, Block discloses or renders obvious "*the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.*"

337. For all the reasons stated above in Section VII.A.2.n, Block would meet this limitation.

q. ***15[a]: The server system of claim 14, wherein the server system is configured to: store, within the computer database system, second information indicating that a second identification to create the second hyperlink from the second website to the first website was received by the server system and from a second user associated with the second website, and***

338. In my opinion, Block discloses or renders obvious "*the server system is configured to: store, within the computer database system, second information indicating that a second identification to create the second hyperlink from the second website to the first website was received by the server system and from a second user associated with the second website.*"

339. For all the reasons stated above in Section VII.A.2.o, Block would meet this limitation.

r. ***15[b]: modify the second website to include the second hyperlink based upon both the first information indicating that the first identification was received and***

the second information indicating that the second identification was received.

340. In my opinion, Block discloses or renders obvious "*modify the second website to include the second hyperlink based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received.*"

341. For all the reasons stated above in Section VII.A.2.p, Block would meet this limitation.

s. *16: The server system of claim 14, wherein the graphical user interface is configured to receive an entry associated with the first identification within an entry field of the graphical user interface.*

342. In my opinion, Block discloses or renders obvious "*the graphical user interface is configured to receive an entry associated with the first identification within an entry field of the graphical user interface.*"

343. For all the reasons stated above in Section VII.A.2.q, Block would meet this limitation.

t. *17[a]: The server system of claim 14, wherein the graphical user interface is configured to present a graphical widget adjacent each of the one or more identifiers respectively associated with the one or more previously-created websites,*

344. In my opinion, Block discloses or renders obvious "*the graphical user interface is configured to present a graphical widget adjacent each of the one or*

more identifiers respectively associated with the one or more previously-created websites."

345. For all the reasons stated above in Section VII.A.2.r, Block would meet this limitation.

u. *17[b]: the graphical widget is configured to receive a user-initiated selection, and*

346. In my opinion, Block discloses or renders obvious "*the graphical widget is configured to receive a user-initiated selection.*"

347. For all the reasons stated above in Section VII.A.2.s, Block would meet this limitation.

v. *17[c]: the selection of the second website is based upon the user-initiated selection.*

348. In my opinion, Block discloses or renders obvious "*the selection of the second website is based upon the user-initiated selection.*"

349. For all the reasons stated above in Section VII.A.2.t, Block would meet this limitation.

w. *18: The server system of claim 14, wherein the server system is configured to identify the one or more previously-created websites based upon a receipt, by the server system, of a request generated by the graphical user interface for one or more suggested linking locations for the first website.*

350. In my opinion, Block discloses or renders obvious "*the server system is configured to identify the one or more previously-created websites based upon a*

receipt, by the server system, of a request generated by the graphical user interface for one or more suggested linking locations for the first website."

351. For all the reasons stated above in Section VII.A.2.u, Block would meet this limitation.

x. *19[a]: The server system of claim 14, wherein the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface, and*

352. In my opinion, Block discloses or renders obvious "*the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface.*"

353. For all the reasons stated above in Section VII.A.2.v, Block would meet this limitation.

y. *19[b]: the server system is configured to select the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface.*

354. In my opinion, Block discloses or renders obvious "*the server system is configured to select the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface.*"

355. For all the reasons stated above in Section VII.A.2.w, Block would meet this limitation.

z. ***20: The server system of claim 19, wherein the user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of a group consisting of: a name of the first user, an email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user.***

356. In my opinion, Block discloses or renders obvious "*wherein the user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of a group consisting of: a name of the first user, an email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user*."

357. For all the reasons stated above in Section VII.A.2.x, Block would meet this limitation.

aa. ***21[a]: The server system of claim 19, wherein the server system is configured to select the plurality of the previously-created websites associated with the one or more identifiers by searching other user information previously-supplied by other users of the server system and stored within the server system, and***

358. In my opinion, Block discloses or renders obvious "*the server system is configured to select the plurality of the previously-created websites associated with*

the one or more identifiers by searching other user information previously-supplied by other users of the server system and stored within the server system."

359. For all the reasons stated above in Section VII.A.2.y, Block would meet this limitation.

bb. *21[b]: the searching is performed by a search engine using the user information supplied by the first user within the at least one information collection field of the graphical user interface.*

360. In my opinion, Block discloses or renders obvious "*the searching is performed by a search engine using the user information supplied by the first user within the at least one information collection field of the graphical user interface.*"

361. For all the reasons stated above in Section VII.A.2.z, Block would meet this limitation.

cc. *22: The server system of claim 19, wherein the first user and the second user are registered users of the server system.*

362. In my opinion, Block discloses or renders obvious "*the first user and the second user are registered users of the server system.*"

363. For all the reasons stated above in Section VII.A.2.aa, Block would meet this limitation.

dd. *23: The server system of claim 22, wherein the user information is supplied by the first user within the at least one information collection field of the graphical*

user interface during registration of the first user with the server system.

364. In my opinion, Block discloses or renders obvious "*wherein the user information is supplied by the first user within the at least one information collection field of the graphical user interface during registration of the first user with the server system.*"

365. For all the reasons stated above in Section VII.A.2.bb, Block would meet this limitation.

ee. ***24: The server system of claim 14, wherein the first web site of the first user includes a plurality of web pages including a first web page.***

366. In my opinion, Block discloses or renders obvious "*wherein the first web site of the first user includes a plurality of web pages including a first web page.*"

367. For all the reasons stated above in Section VII.A.2.cc, Block would meet this limitation.

ff. ***25: The server system of claim 24, wherein the server is configured to serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.***

368. In my opinion, Block discloses or renders obvious "*wherein the server is configured to serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.*"

369. For all the reasons stated above in Section VII.A.2.dd, Block would meet this limitation.

gg. *26[a]: The server system of claim 24, wherein the server system is configured to: create, in the first web page, a reciprocal link site for the first hyperlink, and*

370. In my opinion, Block discloses or renders obvious "*wherein the server system is configured to: create, in the first web page, a reciprocal link site for the first hyperlink.*"

371. For all the reasons stated above in Section VII.A.2.ee, Block would meet this limitation.

hh. *26[b]: create, in a second web page of the second website, a reciprocal link site for the second hyperlink.*

372. In my opinion, Block discloses or renders obvious "*create, in a second web page of the second website, a reciprocal link site for the second hyperlink.*"

373. For all the reasons stated above in Section VII.A.2.ff, Block would meet this limitation.

B. Ground 2: Arnold in view of Arora Renders Claims 1-7, 9-20 and 22-26 Obvious

1. Overview of Arnold

374. Arnold (EX1008) was filed on August 8, 1996, and identifies John K. Arnold, John R. Bennett, Peter O. Claar, Kurt D. Dahl, Jennifer L. Dobson, Charles A. Fontaine, Philip H. Johanson, Donald G. McGuire, Mary Swanson, David G.

Wagner and Steve Wainright as its inventors. Arnold was published on January 18, 2000.

375. I understand that Arnold is prior art to the ’316 Patent at least because it was filed before the filing date of the ’316 Patent.

376. Arnold explains that “the [World Wide Web] today has several problems in supporting large scale commerce. One of the key problems is simply putting the buyers and sellers in contact. Because of the vastness of the WWW, even if a person knows what they want, they may not be able to find it. And, even more importantly, the WWW lacks in the ability to create "impulse" type buying in which a customer stumbles upon a product or service that appeals to them at that moment, and then allows them to make an immediate purchase.” EX1008, 2:30-39.

377. Arnold explains that one “existing method” of advertising is “plac[ing a banner] ad in a prominent position on a Web page of the content-rich site. The banner ad has a hot link to the selling site. A Web surfer (i.e., potential customer) will notice the ad, then "click" on it and thereby pass through to the selling site, where a purchase may be made.” EX1008, 2:55-63.

378. Arnold explains that a “problem” with “banner advertising” “is that when the Web surfer clicks on the banner ad, the surfer leaves the content-rich site and goes to the selling site and possibly will not return. This is a strong disincentive

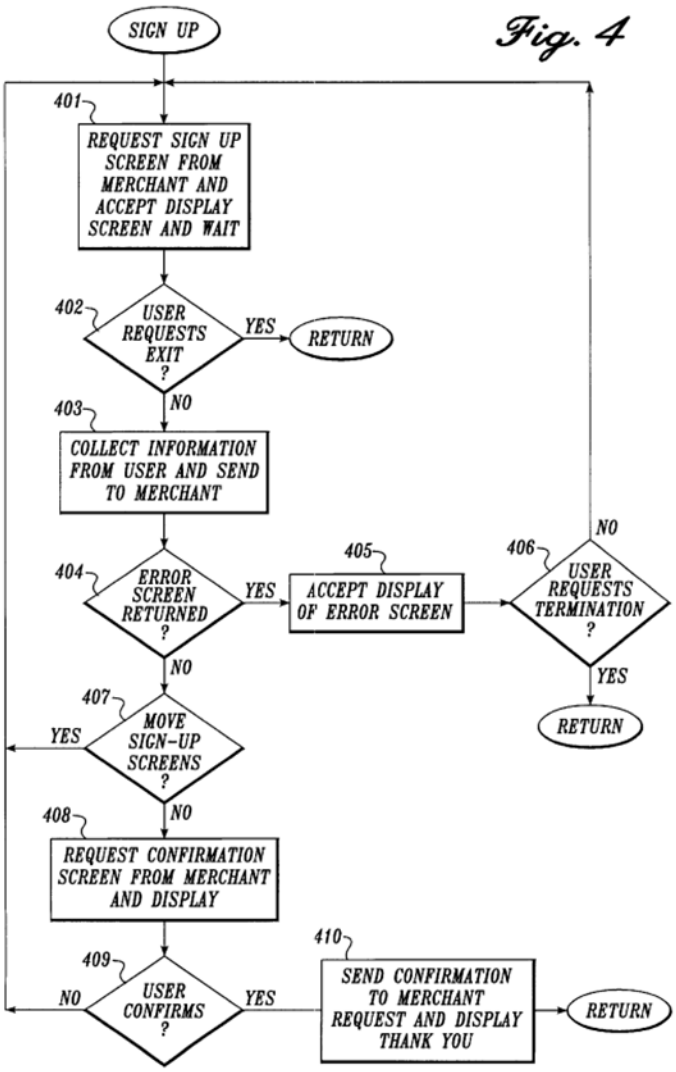
for the content-rich site owner because the owner wants the Web surfer to explore and to stay at its site for as long as possible." EX1008, 3:1-7.

379. As explained in more detail in the section below, Arnold offers a solution to this problem, disclosing a "flexible method for establishing a computer-based relationship between a content-rich site and a selling site" by "tracking a purchase by a customer of a product supplied by a merchant through what is referred to as a 'virtual outlet.'" EX1008, 5:24-26.

380. Arnold describes "a sign-up mechanism that allows a virtual outlet ("VO") owner to Sign up to offer a merchant's products for Sale through the VO" and a "a purchase mechanism that allows a customer to see what products are being offered for sale by the VO and to place an order directly with the merchant to purchase a product using the merchant Web site." EX1008, 5:26-33.

381. Arnold describes that a "prospective VO first establishes the relationship [with a merchant] through a sign-up procedure... Once the relationship has been established, a representative of the VO can login to the merchant computer's account management component, which provides to the representative the ability to change the VO's password, to review and change account information, to browse the merchant's catalog to select items to sell, to change the merchant's order Web page display characteristics, and to perform other necessary tasks to maintain the retail relationship." EX1008, 6:18-34.

382. Arnold displays, in Fig. 4 (shown below), "a flow control diagram for the Sign-up routine." EX1008, 4:43.



EX1008, Fig. 4

383. Arnold describes editing web pages. In Figs. 5 and 6 (shown below), Arnold illustrates "example sign-up Web pages. The Web page of Fig. 5 inputs such information as the mailing address and email address of the VO, as well as a proposed password for use if the merchant decides to establish a relationship with

the VO. The Web page of Fig. 6 inputs information concerning the appearance that the VO expects for a merchant order Web page that will be displayed." EX1008, 9:10-16, Figs. 5, 6.

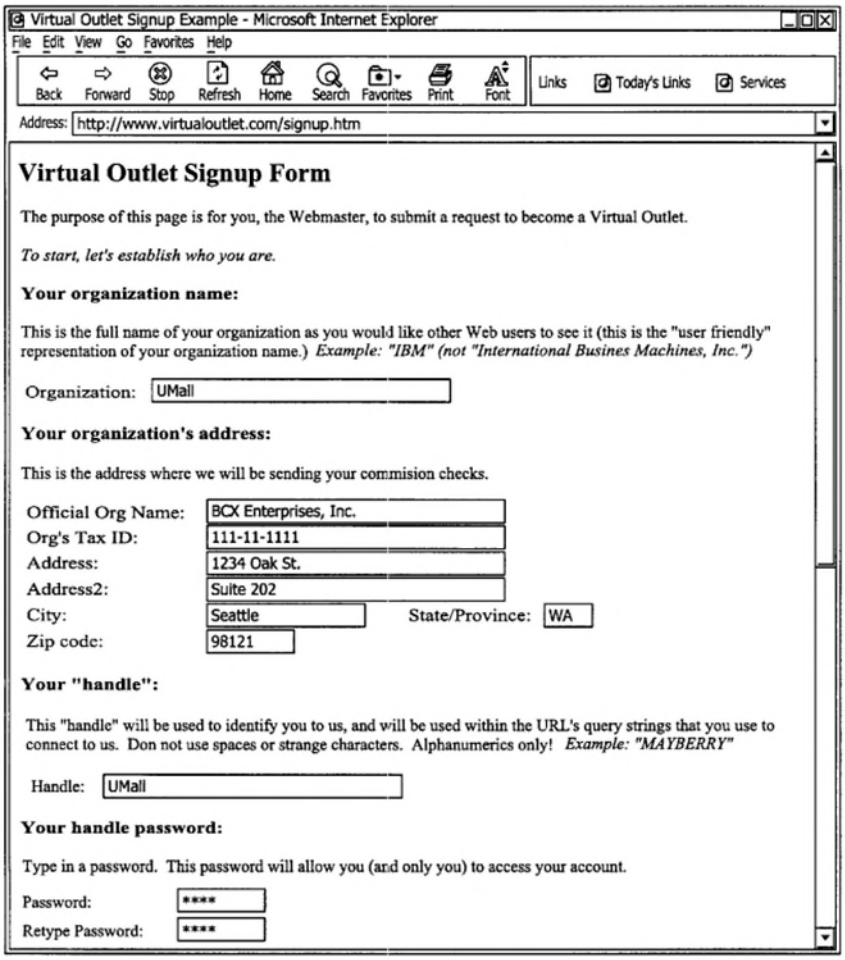


Fig. 5

EX1008, Fig. 5.

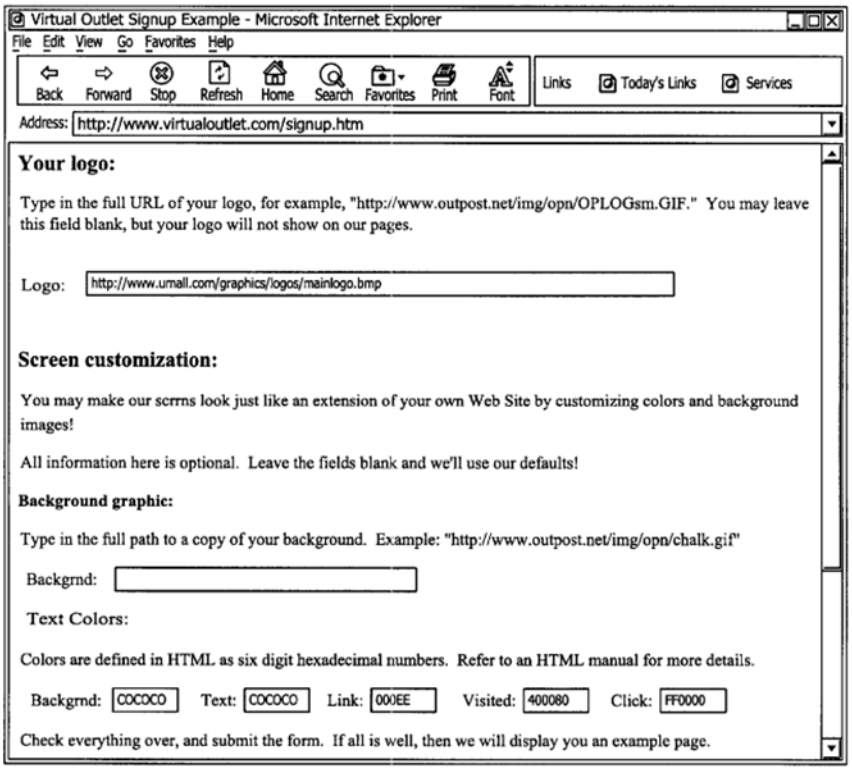


Fig. 6

EX1008, Fig. 6.

384. Arnold displays, in Fig. 7 (shown below), an "example confirmation Web page [which] repeats certain of the supplied sign-up information and displays the appearance requested by the representative for the merchant order Web page, including colors and fonts. If the representative finds the confirmation Web page acceptable and indicates a desire to confirm the sign-up request, then Sign-up detects the indication in step 409, sends a confirmation message to the merchant via the Internet and requests and displays a thank you message from the merchant in step

410, and returns. Otherwise, Signup returns from step 407 to step 401 to allow the representative to re-input data to the sign-up Web pages." EX1008, 9:45-57, Fig. 7.

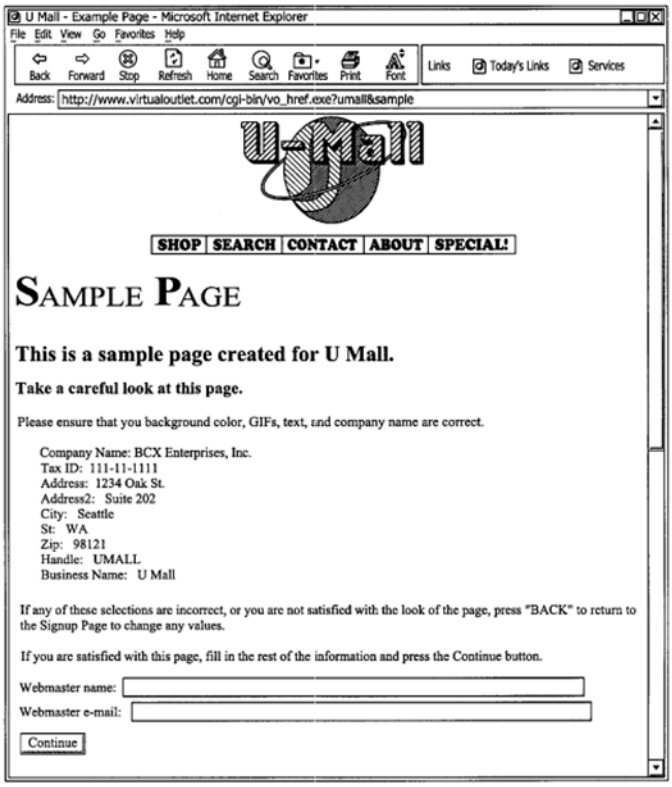


Fig. 7

EX1008, Fig. 7.

385. Arnold shows, in Fig. 10 (shown below), "an example catalog Web page. Items for sale are described and listed along with URLs corresponding to the order Web page that the merchant will supply to a customer linking through a VO Web page to the merchant site in order to purchase the item. The VO may incorporate items into the VO Web pages by including the URLs obtained from the merchant's catalog as hot links in the VO Web pages." EX1008, 10:41-52, Fig. 10.

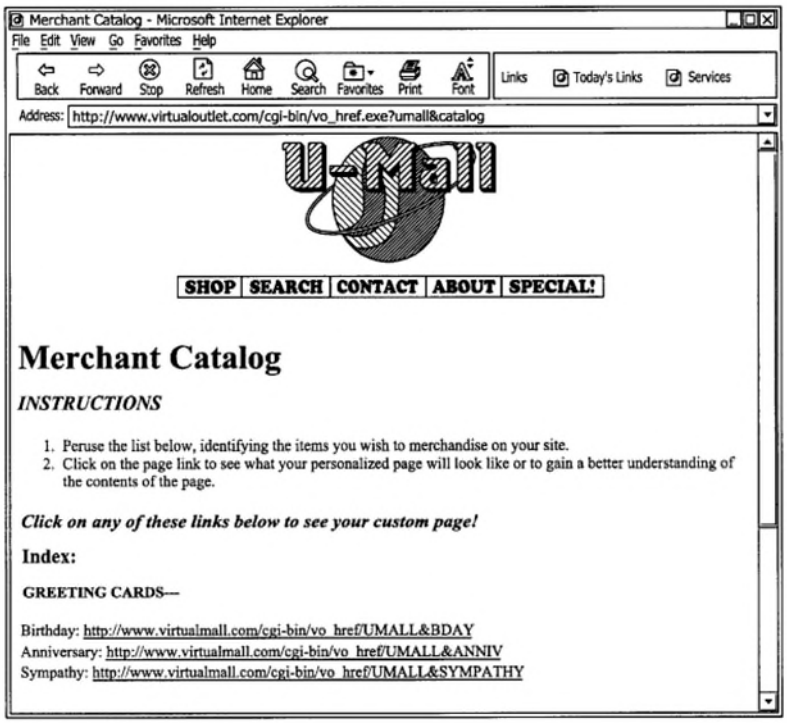


Fig. 10

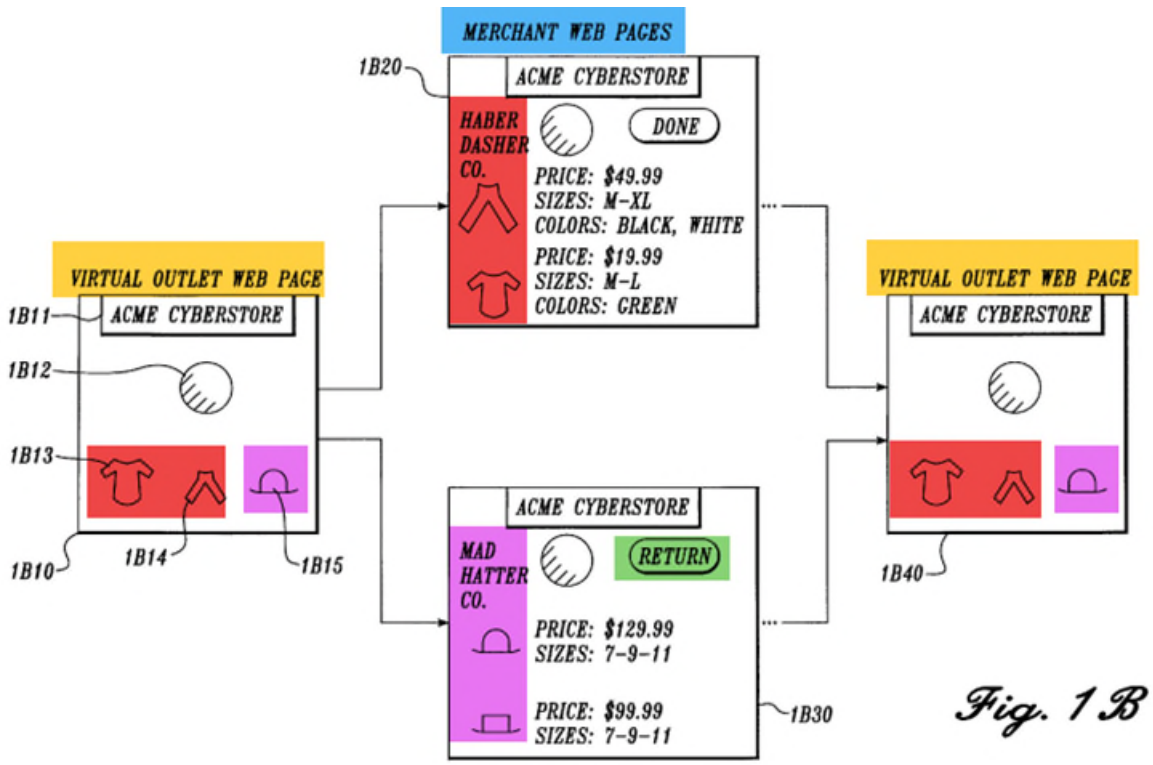
EX1008, Fig. 10.

386. Arnold explains that "[t]o purchase a product, a customer would first view a Web page provided by a VO. The VO Web page may show a graphical image of various products, such as a picture of a pair of blue jeans or a picture of a shirt. Each image has a URL associated with it that is a hot link to a Web page provided by the Web site of the merchant of the product. If a customer wishes to find more information about a product (e.g., cost or size information) or to purchase the product, the customer simply selects the image of the product displayed. When the image is selected, the customer computer then requests access to the merchant Web

page identified by the associated URL. A merchant computer provides the merchant Web page to the customer computer. Once the customer computer receives the merchant Web page, it displays the Web page to the customer … After the order is placed, the merchant Web page directs the customer computer to redisplay a Web page of the VO. By redisplaying the VO Web page, the VO can help ensure that the customer will return to a Web page of the VO after the purchase of a product." EX1008, 5:41-62.

387. Arnold illustrates, in Fig. 1B (shown below), "the sequence of Web pages as seen by a customer of a VO. In this example, the name of **the VO is "AcmeCyberstore;"** its logo is a circle with lines; and it is offering to sell shirts, pants, and hats. **The shirt and pants are sold through a merchant named "HaberDasher Company,"** and **the hats are sold through a merchant named "MadHatter Company."** When a customer accesses the Web page for the **AcmeCyberstore**, the customer would see Web page 1B10. This Web page contains banner 1B11 and logo 1B12, which identify the VO. In addition, this Web page contains the images **1B13, 1B14**, and **1B15** of the products that are being offered for sale. When a customer selects a product to purchase (or to view product information), the browser accesses the Web page for the merchant that sells the product. The Web page is identified by a URL (i.e., hotlink) associated with that product…. The merchant computer then sends that Web page to the customer

computer. The customer computer displays the **merchant Web page 1B20 [associated with Haber Dasher Co.], 1B30 [associated with Mad Hatter Co.]**…. When the customer has completed the purchase, the customer can select the **return icon** to return to the Web page lB40 for the AcmeCyberstore VO." EX1008, 7:30-8:6 (emphasis added), Fig. 1B.



EX1008, Fig. 1B (annotated).

2. Overview of Arora

388. Arora is titled "Draw-based editor for web pages" and was filed on July 29, 1996. Arora identifies Samir Arora, Gagan Arora, Rajagopal Lakshminarayan,

Gregory Brown and Martin Fried-Nielsen as inventors and was and published on December 1, 1998.

389. I understand that Arora is prior art to the ’316 Patent at least because it was published prior to the earliest possible filing date of the ’316 Patent.

390. Arora explains that “[t]he HTML to describe a Web page is often created by hand by a human being. If the design of the page changes, the corresponding HTML must be rewritten, which is an exacting process. Although several conventional HTML editors exist, these editors only allow the user to specify certain elements of a page and frequently still require the user to physically enter HTML code.” EX1009, 1:46-52.

391. To overcome problems and disadvantages of the prior art, Arora describes a what you see is what you get (“WYSIWYG”) web page editor that uses a “drag and drop interface to allow a user to easily design a Web page. The user moves display elements to define the appearance of a web page. When the user clicks/selects a "publish" button, HTML code is automatically generated.” EX1009, 2:20-25.

392. In Fig. 3 (shown below), Arora shows an example of a “page draw editor allows the user to design a page just as it will appear when viewed with a browser. The user uses the page draw editor to add text graphics, and other display elements to the page. The user can then rearrange display elements by dragging and

dropping them to a new location, placing the display elements exactly where they will eventually appear with pixel level accuracy." EX1009, 5:57-63, Fig. 3.

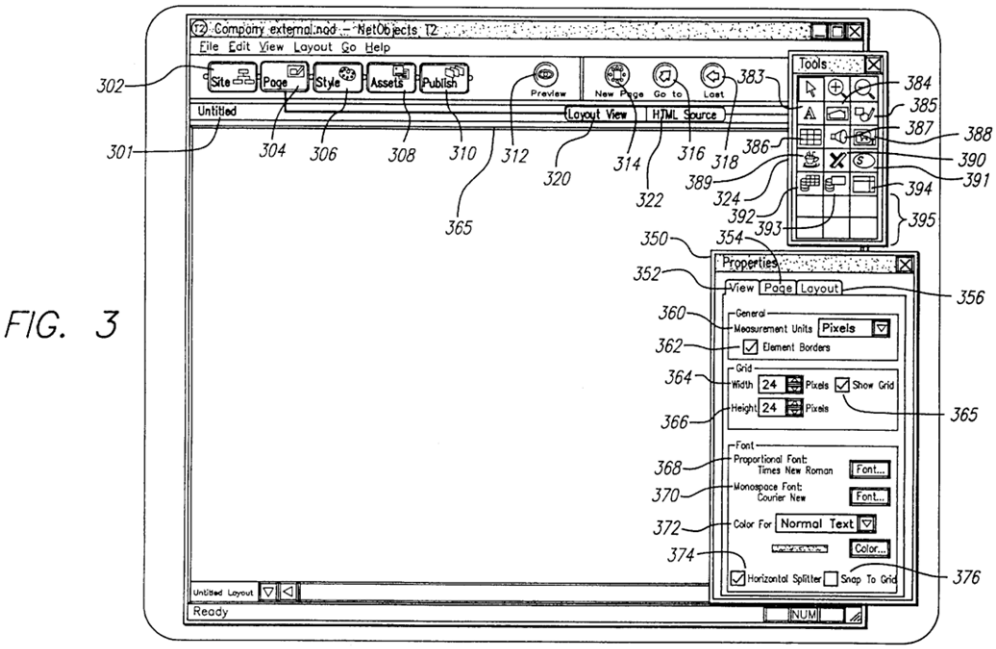


FIG. 3

EX1009, Fig. 3.

393. In Fig. 2 (shown below), Arora illustrates "a block diagram showing input and output to page draw editor software." EX1009, 5:37-38. The page draw editor includes "a portion 202 that creates and manages a page layout and a portion 204 that publishes the page." EX1009, 5:38-40. Fig. 2 describes that users can input web assets such as "existing text and images, and data" and edit those web assets using "editing commands" before publishing the page. EX1009, Fig. 2.

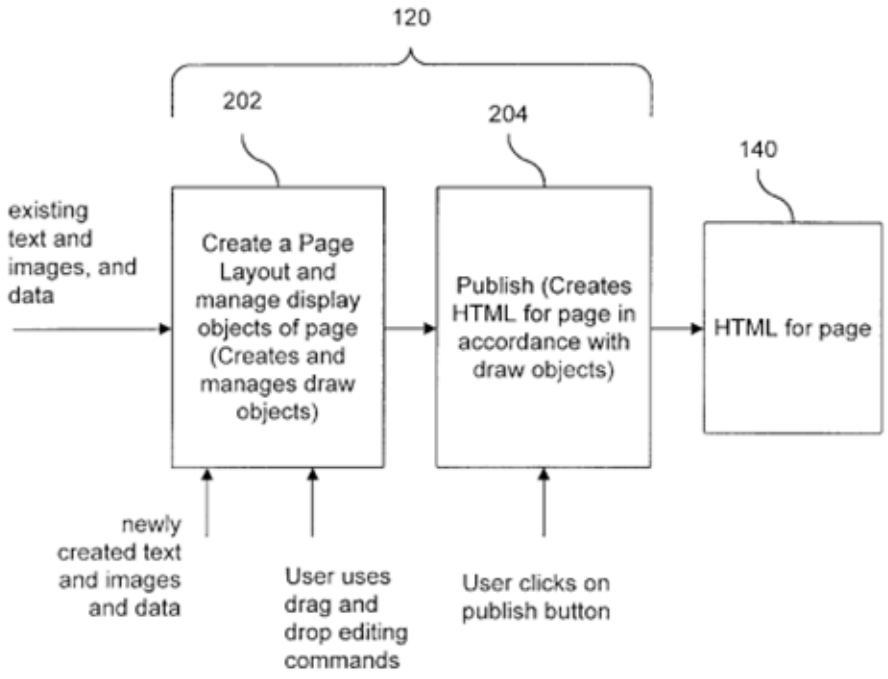


FIG. 2

EX1009, Fig. 2.

394. The page draw editor has various tools that allow users to input and edit elements of the web page. These tools include the "text tool," "image tool," "draw tool," "table tool," "sound tool," "video tool," "Java tool," "ActiveX tool," "Shockwave tool," "forms tools." *See* EX1009, 9:40-10:67.

395. Additionally, Arora describes "Assets display" (illustrated in Fig. 31 shown below) which "displays all current files, links and data objects" associated with the website. EX1009, 13:2-3, Fig. 31.

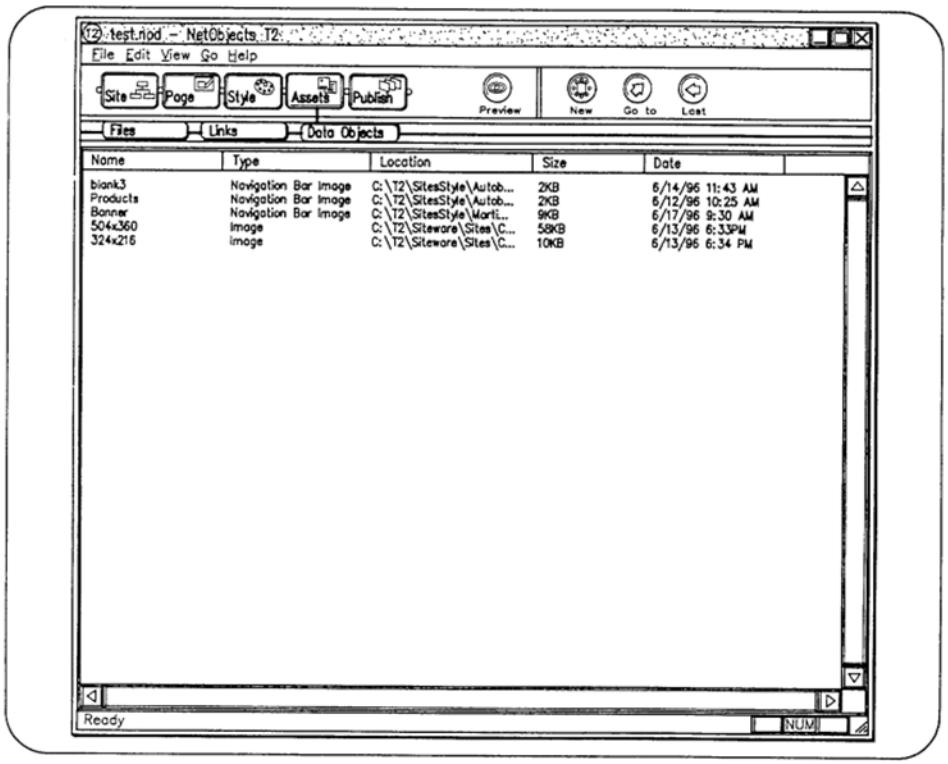
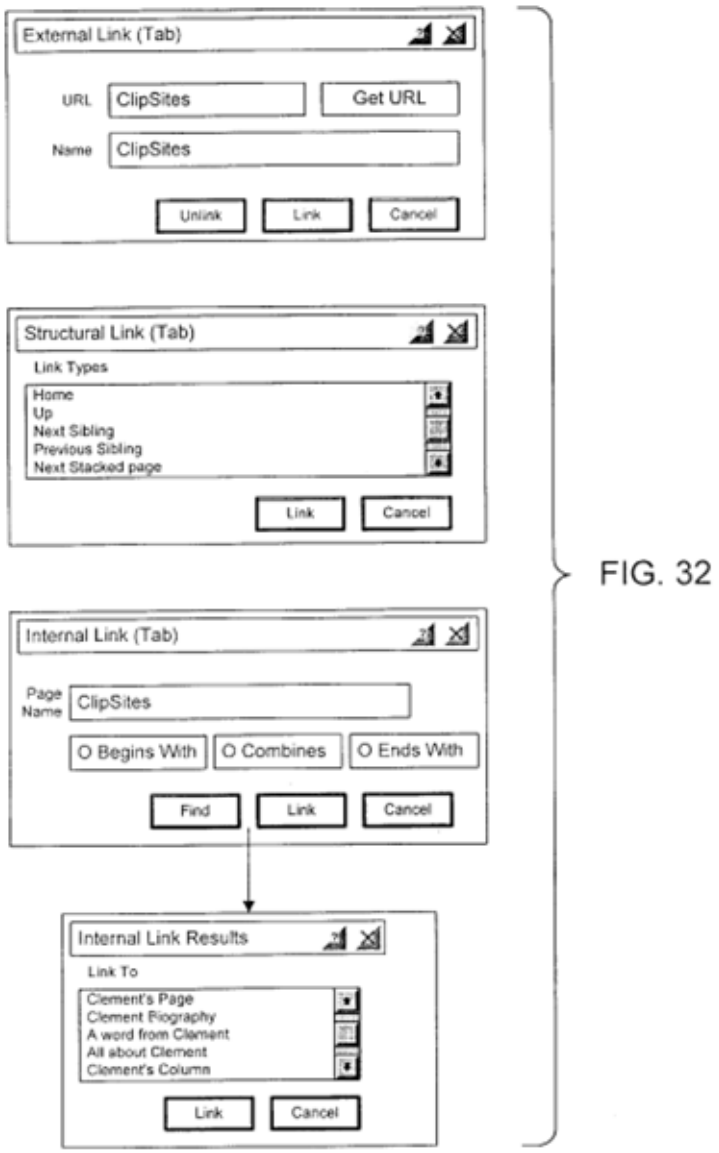


FIG. 31

EX1009, Fig. 31.

396. Arora shows, In Fig. 32 (shown below), "links dialog boxes" whereby users can manage links within a website.



EX1009, Fig. 32.

397. Arora explains that, after designing a page, "[w]hen the user "publishes" a page, the described embodiment generates HTML code for the page." EX1009, Fig. 31.

3. The combination of Arnold and Arora

398. As explained below, a Skilled Artisan would have been motivated to combine Arnold and Arora, *infra* §VII.B.4. In the combination of Arnold and Arora, the page layout design system Arnold would be combined with the "what you see is what you get" interface of Arora.

399. Arnold describes a "system of networked computers." EX1008, 6:65-66. In particular, in Arnold, a virtual outlet (**orange**) and merchant (**blue**) sell products to "customers" over the internet. EX1008, Abstract, Fig. 1A. As described below, *infra* §VII.B.5.a, shown in Figure 1B, this arrangement of VO computer 1A10 and merchant computer 1A11 together forms "*a server system*." The **VO computer 1A10** "provides the Web pages of the virtual outlet to customers via the WWW." EX1008, 6:65-7:9. And the **merchant computer 1A11** "provides the merchant Web page to the customer computer." EX1008, 5:52-53.

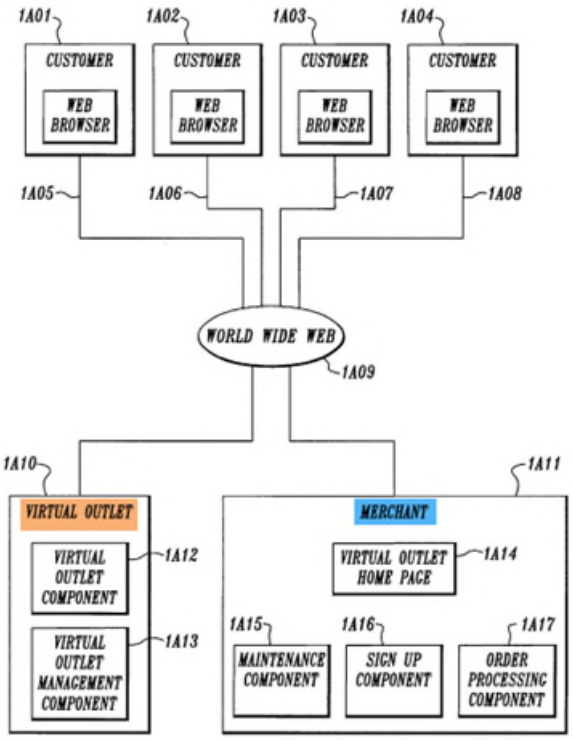


Fig. 1A

EX1008, Abstract, Fig. 1A (annotated).

400. Within the Virtual Outlet, is a "Virtual Outlet Management Component" (VOMC) "1A13" through which a "retailer accesses the merchant Web pages that provide management and sign-up facilities." EX1008, 8:39-44. Arnold explains that the "[t]he maintenance component" "1A15" (MOMC), of the merchant is the counterpart to the login and maintenance procedures made available to the VO by the maintenance component of the VO." EX1008, 11:50-52. Thus, the VOMC and MOMC both reside within the server system described by Arnold.

401. The VOMC and MOMC include web editing systems using layouts. The web editing systems of the VOMC and MOMC allow adding and modifying assets within a web page. For example, as illustrated in Fig. 6 (shown below), Arnold gives an example of the sign-up facility of the VOMC and explains that this page allows a "representative of the VO" to "input[] information concerning the appearance that the VO expects for a merchant order Web page that will be displayed when a customer hot links through the VO to the merchant site. This information includes a URL for a graphics file that contains the VO's logo, the desired background color, and other such information." EX1008, 8:45-9:20, Fig. 6.

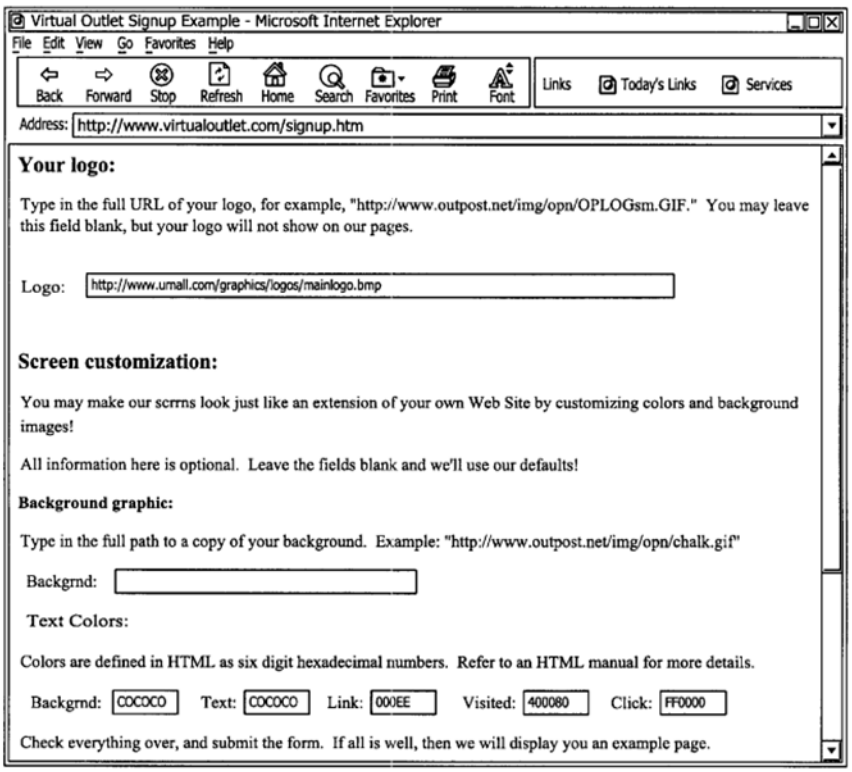


Fig. 6

EX1008, Fig. 6.

402. As another example, Arnold explains that the "maintenance component of the merchant" (which, as explained above is the counterpart to the VOMC), "supports… a range of maintenance functions" including "browsing the merchant's catalog." EX1008, 11:50-57. Arnold shows, in Fig. 10 (shown below), "an example catalog Web page. Items for sale are described and listed along with URLs corresponding to the order Web page that the merchant will supply to a customer linking through a VO Web page to the merchant site in order to purchase the item. The VO may incorporate items into the VO Web pages by including the URLs obtained from the merchant's catalog as hot links in the VO Web pages." EX1008, 10:41-52, Fig. 10.

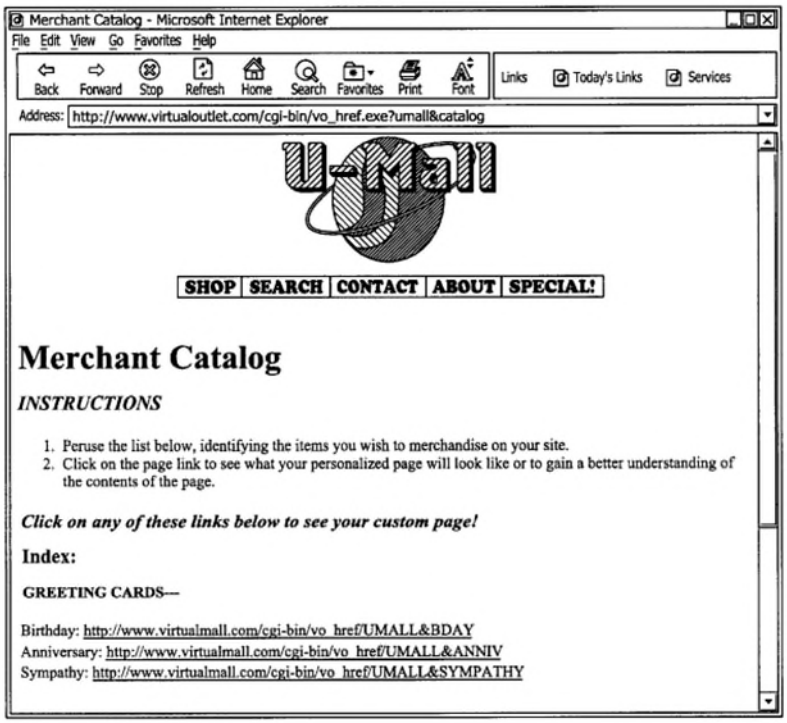


Fig. 10

EX1008, Fig. 10.

403. Arnold also describes previewing a web page before publishing it. For example, in Fig. 7 (shown below), an "example confirmation Web page [which] repeats certain of the supplied sign-up information and displays the appearance requested by the representative for the merchant order Web page, including colors and fonts. If the representative finds the confirmation Web page acceptable and indicates a desire to confirm the sign-up request, then Sign-up detects the indication in step 409, sends a confirmation message to the merchant via the Internet and

requests and displays a thank you message from the merchant in step 410, and returns." EX1008, 9:45-57, Fig. 7.

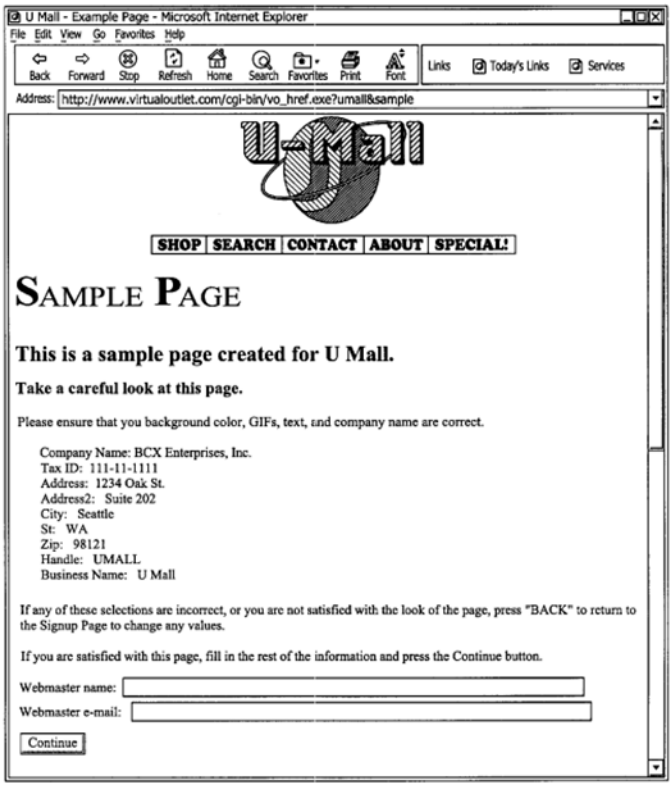


Fig. 7

EX1008, Fig. 7.

404. A Skilled Artisan would have modified Arnold's web editing systems of the VOMC and MOMC with Arora's "what you see is what you get" ("WYSIWYG") web page editor, which is a graphical user interface, that uses a "drag and drop interface to allow a user to easily design a Web page." EX1009, 2:20-22.

405. The graphical user interface described by Arora allows users to **add assets** into a web page and **edit them**. EX1009, Fig. 2.

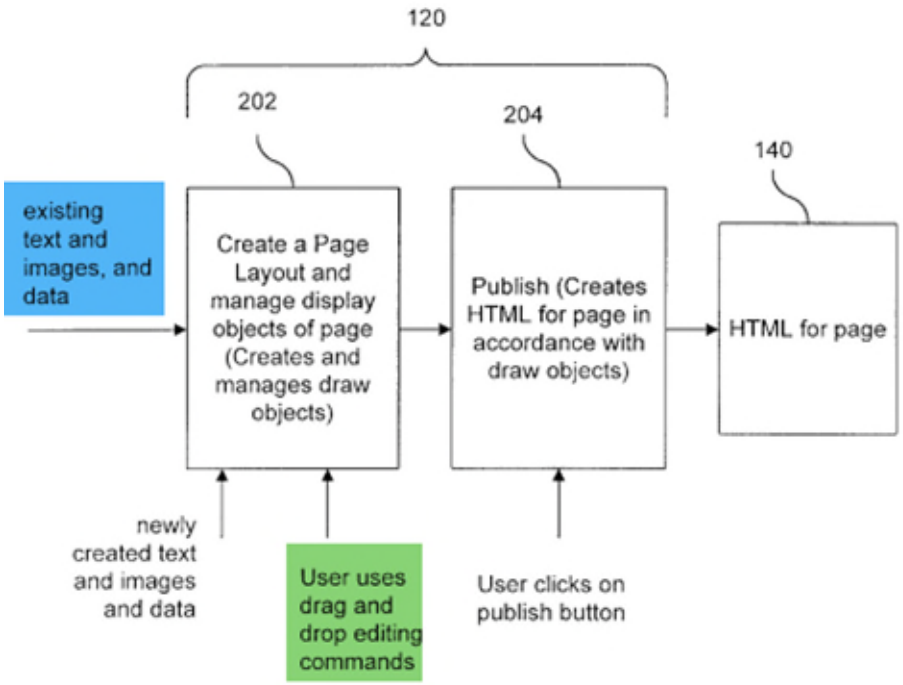
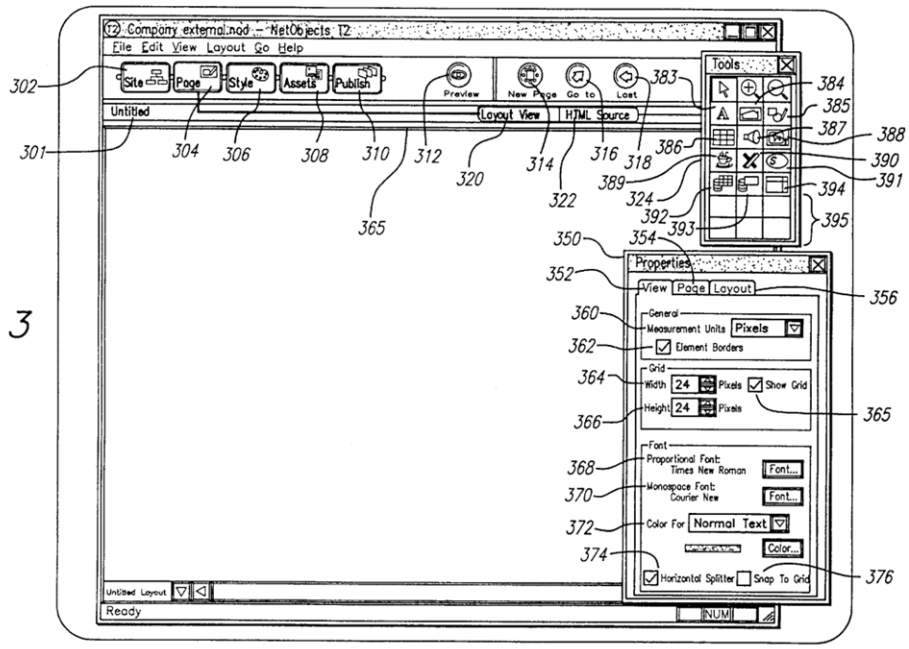


FIG. 2

EX1009, Fig. 2 (annotated).

406. The graphical user interface, called the "page draw editor" described by Arora includes an editing screen, illustrated in Fig. 3 (shown below) that has options for users to add assets into a web page.

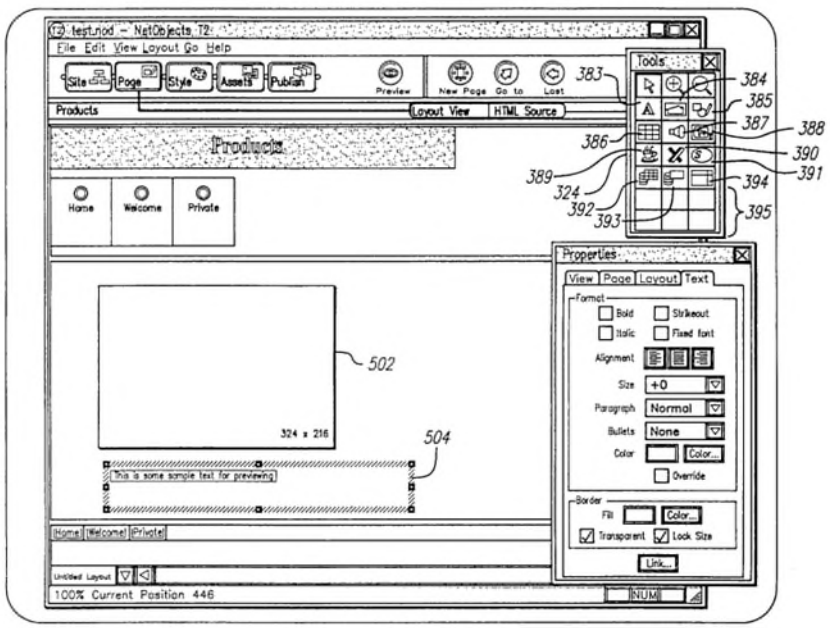
FIG. 3



EX1009, Fig. 3.

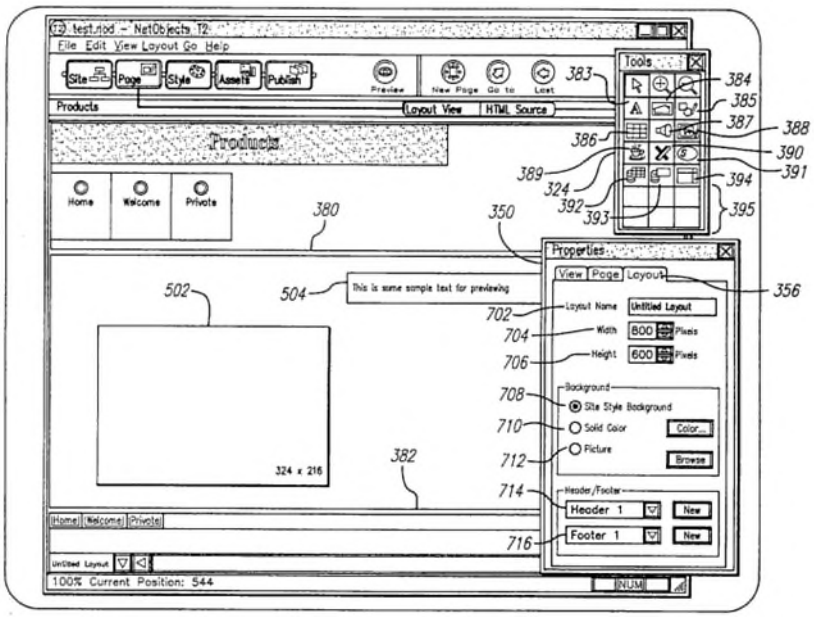
407. Users can add assets, such as an image (502) and text (504), illustrated in Fig. 5 (shown below), and the assets can be "dragged and dropped" "to a new location, thus changing the page layout." EX1009, 8:21-23, Fig. 5.

FIG. 5



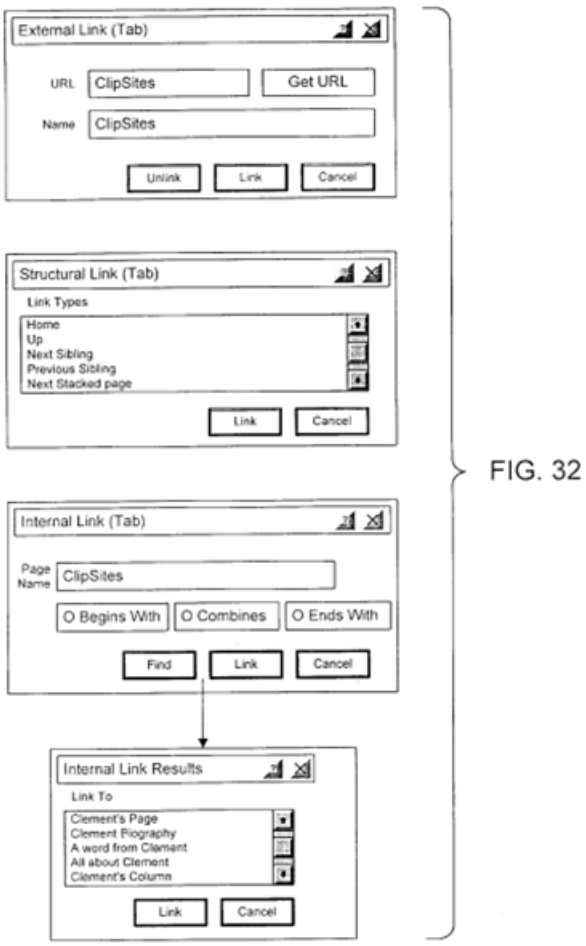
EX1009, Fig. 5.

FIG. 7



EX1009, Fig. 7.

408. The graphical user interface described by Arora allows users to "find" links to add to their website, as illustrated in Fig. 32 (shown below).



EX1009, Fig. 32.

409. The graphical user interface described by Arora has common user interface design elements, including selecting checkboxes next to a list of options, as illustrated in Fig. 18 (shown below).

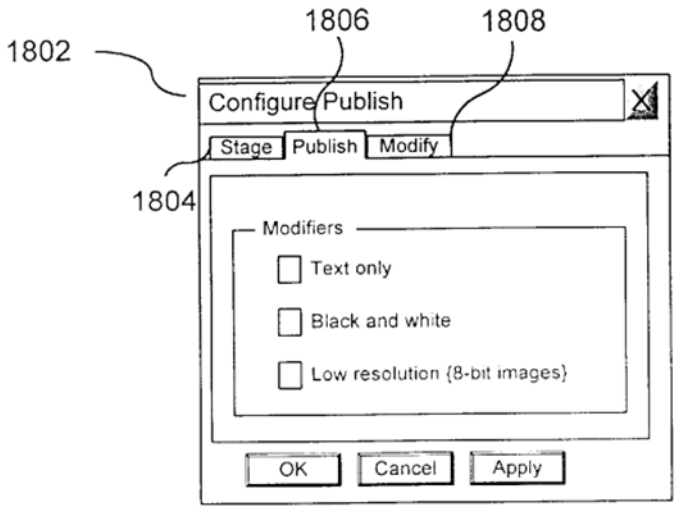


FIG. 18

EX1009, Fig. 18.

410. A Skilled Artisan would have modified Arnold's web editing systems of the VOMC and MOMC, which include page layout options, with Arora's WYSIWYG web page editor to facilitate simplified editing of web pages and to enable more extensive editing and design elements within the VO and Merchant web pages.

411. As shown below, such a combination would require a Skilled Artisan to simply implement Arora's WYSIWYG graphical user interface within the VOMC and the MOMC of Arnold.

412. For example, instead of using forms, illustrated by Arnold in Figs. 5 and 6 (shown below), whereby the VO representative "inputs information

concerning the appearance that the VO expects for a merchant order Web page that will be displayed," a Skilled Artisan would have implemented a WYSIWYG editor, such as Arora's page draw editor (illustrated by Arora in Fig. 5 (shown below)), that the VO could use to edit the web page. EX1008, 9:10-16, Figs. 5, 6; EX1009, Fig. 5.

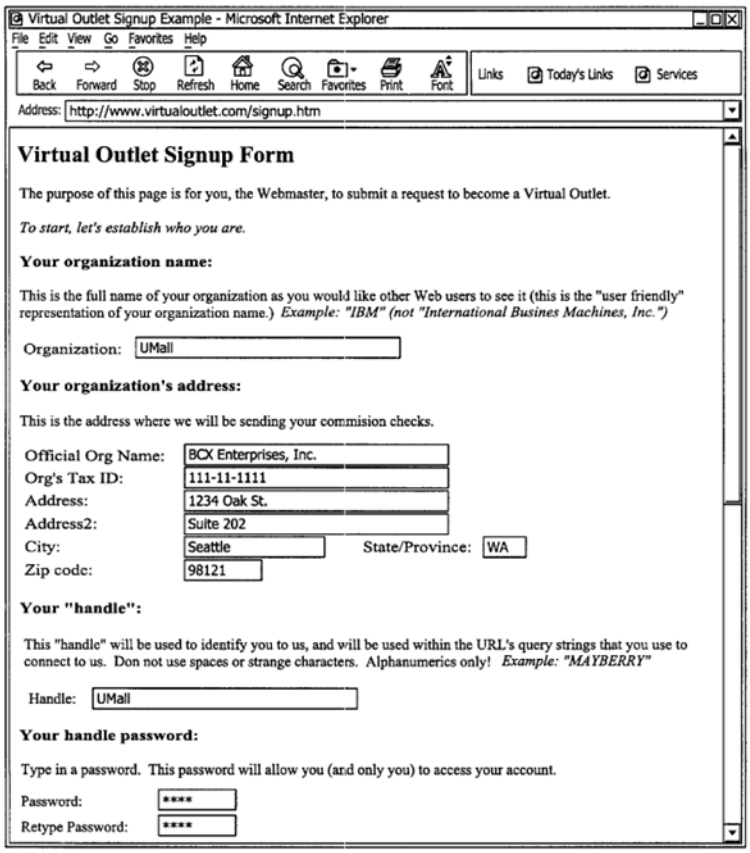


Fig. 5

EX1008, Fig. 5.

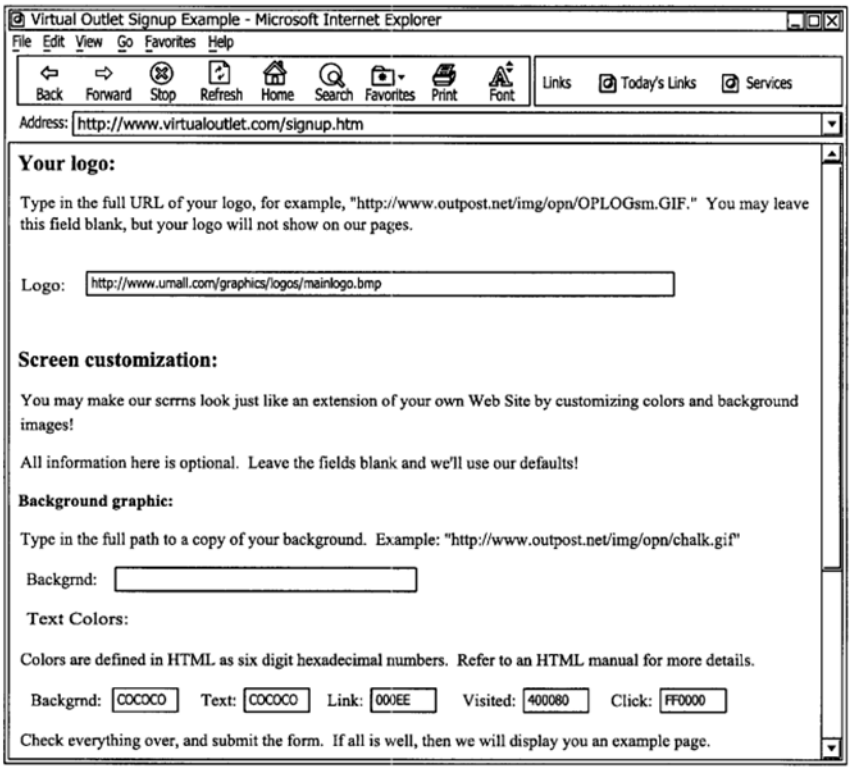
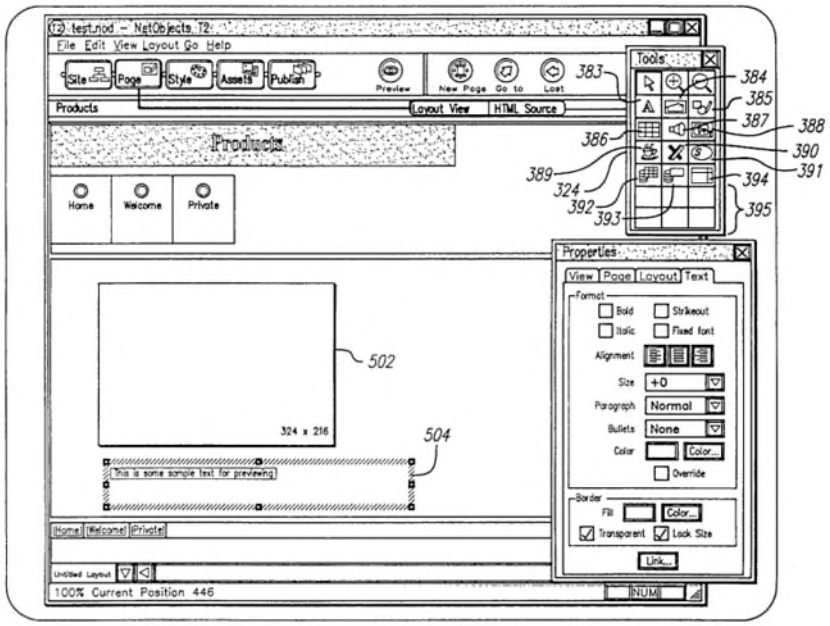


Fig. 6

EX1008, Fig. 6.

FIG. 5



EX1009, Fig. 5.

413. As another example, Arnold explains that the MOMC allows a VO representative to browse through a merchant's catalog and add items from the merchant's catalog as web assets in the VO pages. EX1008, 11:50-57; *See* EX1008, 10:43-48 (emphasis added) ("Items for sale are described and listed along with URLs corresponding to the order Web page that the merchant will supply to a customer linking through a VO Web page to the merchant site in order to purchase the item**. The VO may incorporate items into the VO Web pages by including the URLs obtained from the merchant's catalog as hot links in the VO Web pages.**"). A Skilled Artisan would have combined Arnold and Arora such that the items for the catalog from Arnold would have been inserted into Arora's page draw editor as assets for the web page to be subsequently edited:

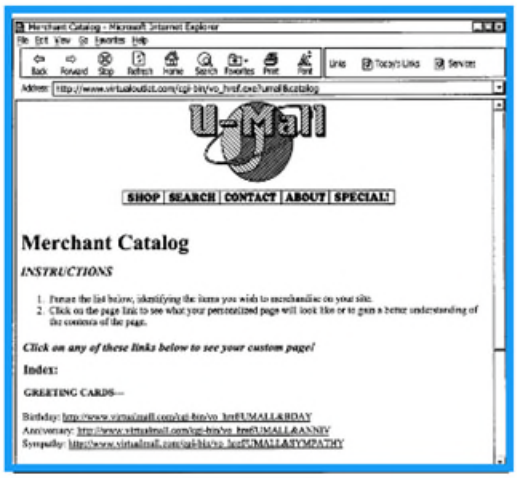


Fig. 10

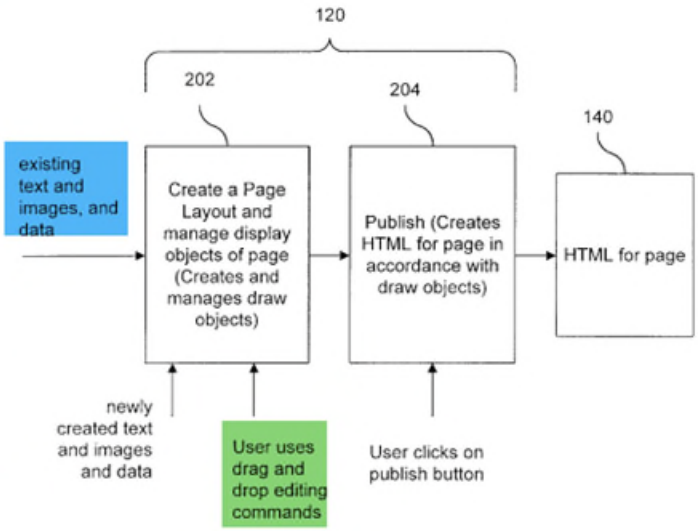
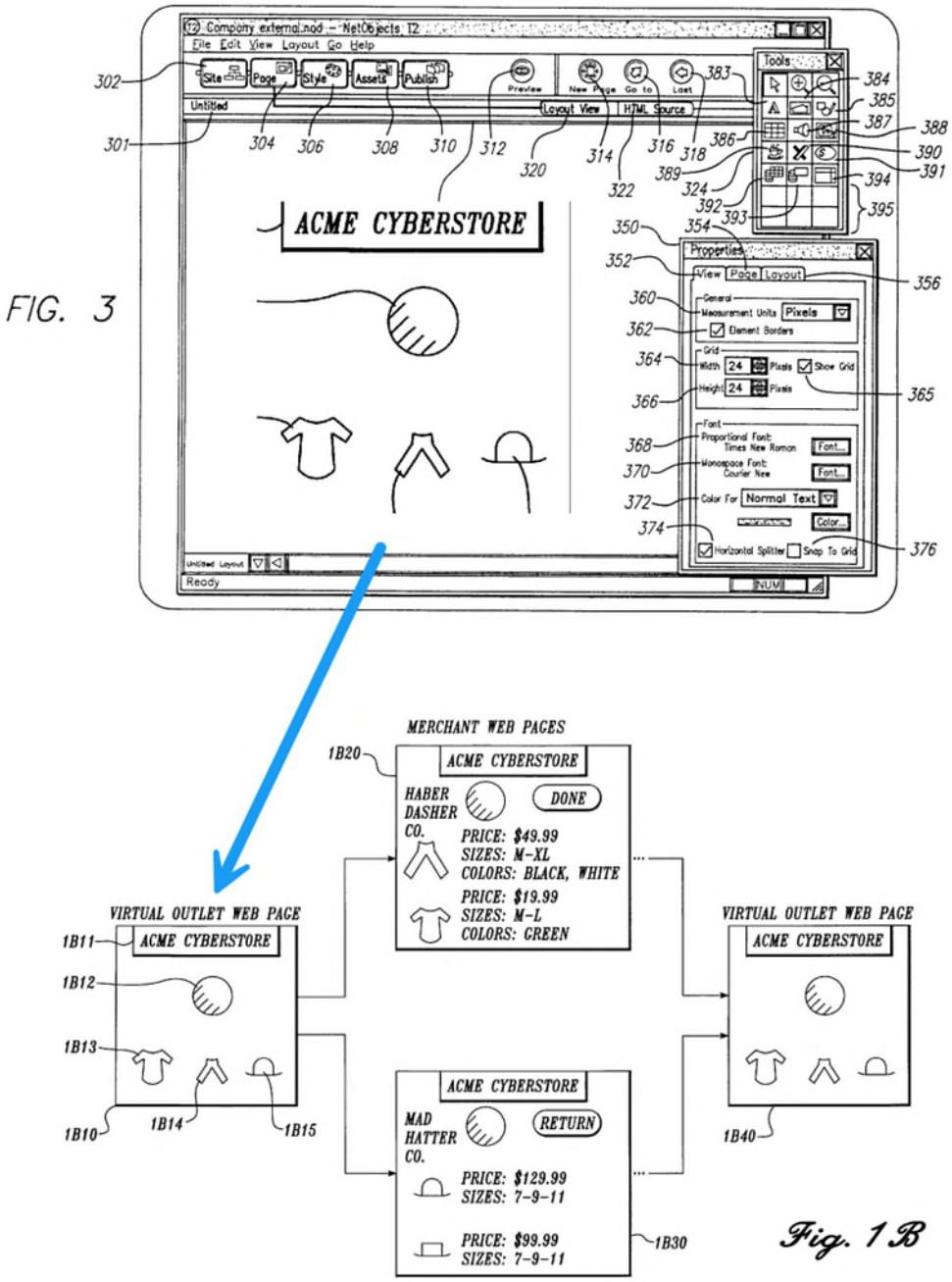


FIG. 2

EX1008, Fig. 10; EX1009, Fig. 2.

414. In this combination, the VO Acme Cyberstore, which is illustrated as 1B11 in Fig. 1B of Arnold (shown below), would have been edited by the Page Draw editor of Fig. 3 of Arora. Assets such as the hat (sold by Mad Hatter Co.) and shirt and pants (sold by HaberDasher Co) and could be inserted into the page draw editor via Arnold's merchant catalog and subsequently edited by Arora's page draw editor such as by dragging and dropping it in different areas of the page.



EX1008, Fig. 1B; EX1009, Fig. 3 (composite).

415. Indeed, Arnold explains that "the VO retailing system is, however, quite flexible, and **can accommodate a large number of different approaches to Web page design, sequence of Web page displays,** and VO retail relationships." EX1008, 14:52-55. Thus, A Skilled Artisan would have implemented Arora's graphical user interface within Arnold's VOMC and MOMC.

4. Motivation to Combine

416. A Skilled Artisan would have ample reasons and motivations to combine Arnold and Arora.

417. Indeed, as explained above (§VII.B.3) combining the systems of Arnold and Arora would have been simple substitution and a Skilled Artisan would have had a high likelihood of success in making the combination.

418. Additionally, Arnold and Arora are analogous art to the '316 patent. For example, Arnold, Arora and the '316 Patent are all in the same field of endeavor – *i.e.*, creating and marketing web sites. EX1009, 1:18-21 ("This application relates to the World Wide Web and, in particular, to a method and apparatus for easily generating web pages on a "What You See is What You Get" (WYSIWYG) basis."); EX1008, 3:1-4 ("There are several problems with [traditional] banner advertising. A first problem is that when the Web surfer clicks on the banner ad, the surfer leaves the content-rich site and goes to the selling site and possibly will not return." Therefore, "[a] need has been recognized, therefore, for a way to track purchases on

the Web that avoids the problems associated with the banner advertising method."); EX1001, 3:16-25 ("The present invention relates to a method of assisting a website designer in establishing an arrangement between a first website being designed by the website designer and a second website in order to market the first website at the second website upon the activation of the first website on the internet. The method includes, during design of the first website, receiving information at a user interface indicating a type of an element for marketing that is to be displayed at the second website, and information specifying the second website at which the element is to be displayed.")

419. A Skilled Artisan also would have recognized that the combination of Arnold and Arora is merely a combination of old elements. Website design using graphical user interfaces, including WYSIWYG was not new in 2000. *Supra* §IV.A. Additionally, reciprocal linking was not new in 2000. *Supra* §IV.B. These elements had been in existence for approximately half a decade before the earliest possible filing date of the '316 patent. Because these components had been in existence for so long, a Skilled Artisan would have recognized that combining these prior art references constituted nothing more than a simple substitution of one known element for another to obtain a predictable result.

420. Indeed, as explained above (§VII.B.3), this combination is merely a combination of the known elements of Arnold and Arora, with each performing their

known functions and yielding a predictable result. Therefore, the combination is obvious to try and implement old elements.

421. A Skilled Artisan would have been motivated to combine Arnold and Arora to provide users an extensive "interface" that allows them "to easily design" the VO and merchant "Web page[s]." EX1009, 2:21-22. Arnold describes editing the merchant site using a form-like interface illustrated in Figs. 5, 6 (shown below) and the VO site using a form-like interface illustrated in Fig. 10 (shown below). A Skilled Artisan would modify Arnold to include a WYSIWYG to allow for a more robust method of web design. In fact, Arnold explains that it "can accommodate a large number of different approaches to Web page design." EX1008,14:53-54.

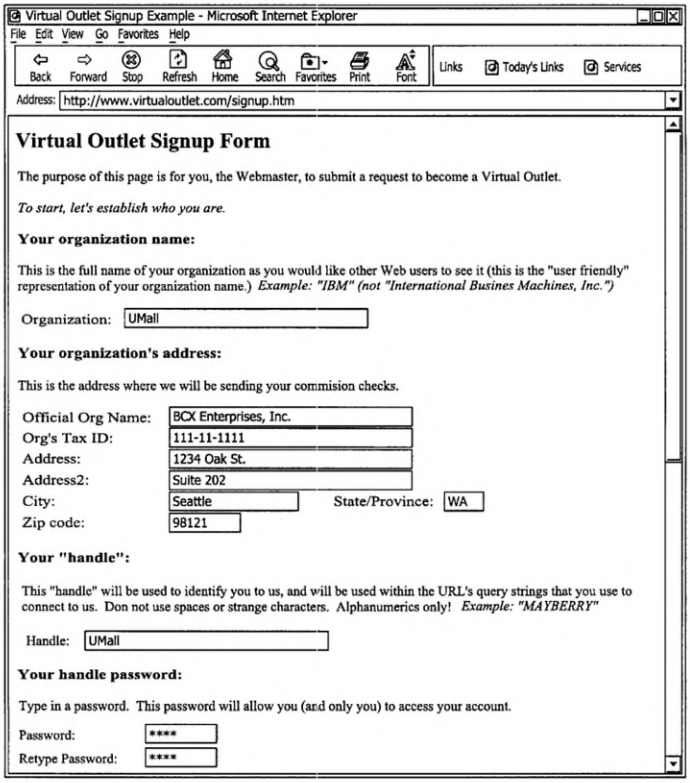


Fig. 5

EX1008, Fig. 6.

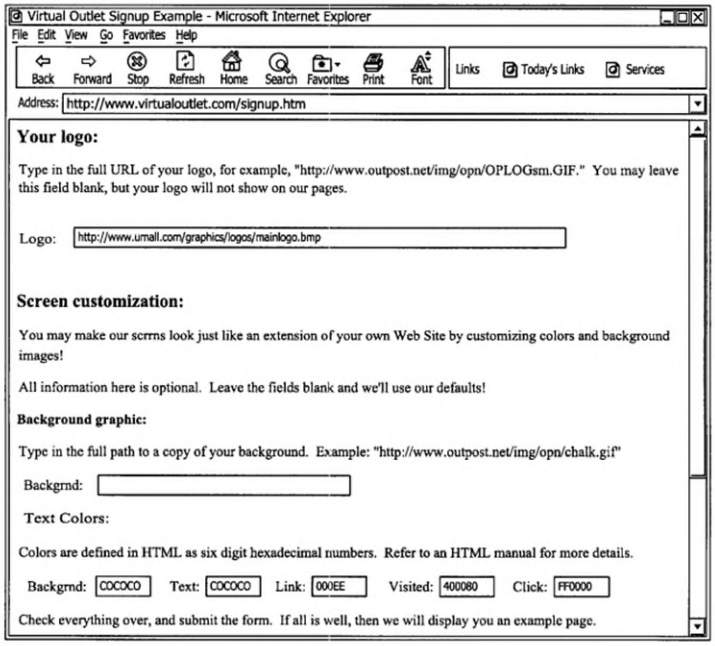


Fig. 6

EX1008, Fig. 6.

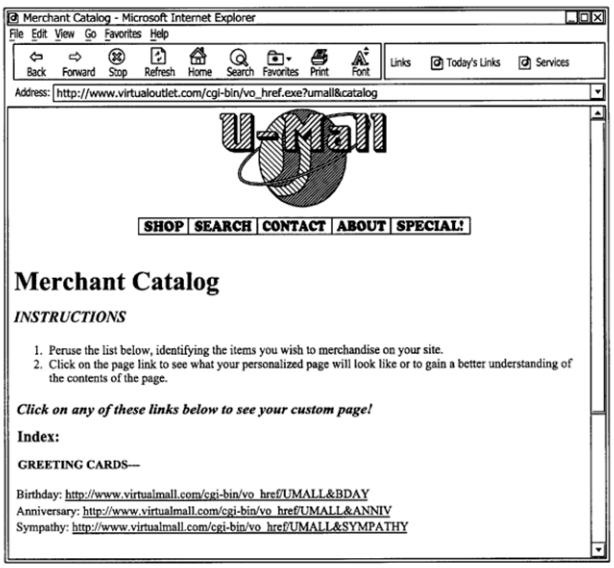


Fig. 10

EX1008, Fig. 10.

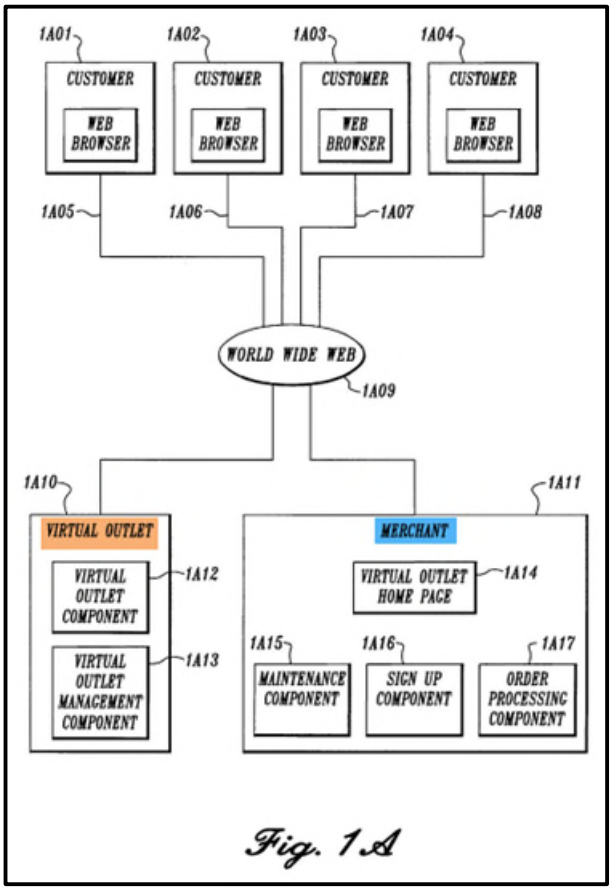
422. Thus, a Skilled Artisan would have been highly motivated to combine the reciprocal linking elements of Arnold with a robust web page design graphical user interface of Arora.

5. Claim 1 And Dependent Claims 2-7, 9-13

a. *1[pre]: A method performed within and by a server system configured to modify and serve web pages, comprising:*

423. In my opinion, Arnold in combination with Arora discloses or renders obvious a "*method performed within and by a server system configured to modify and serve web pages.*"

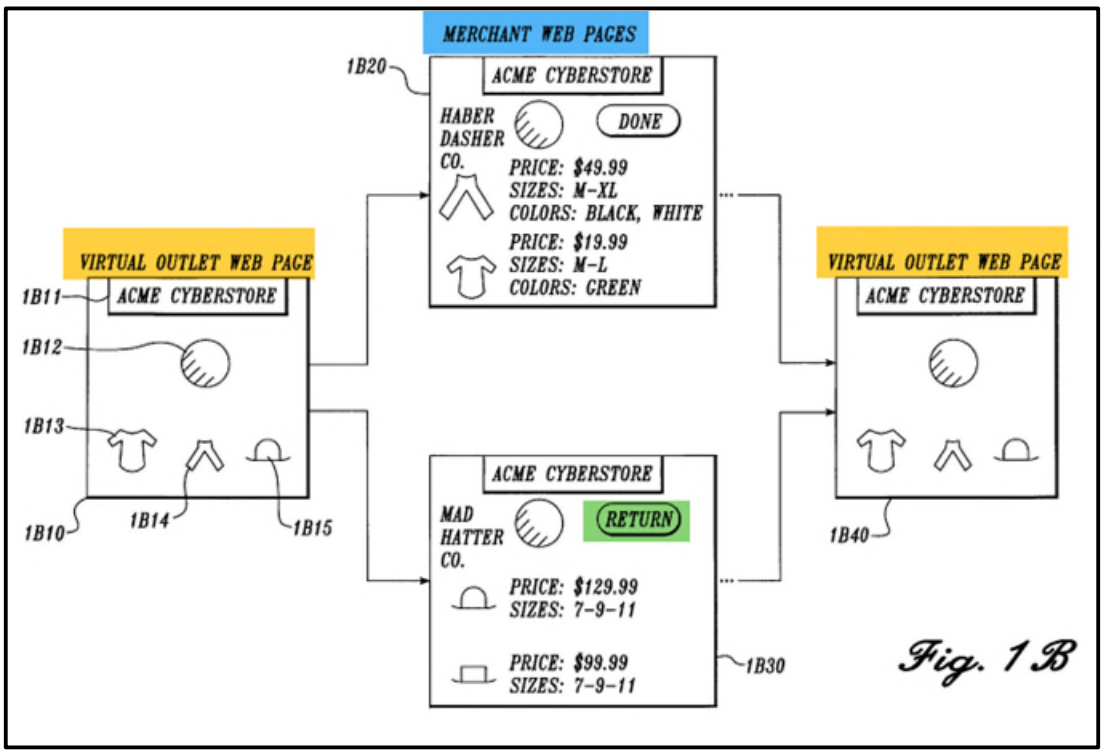
424. Arnold describes a "system of networked computers." EX1008, 6:65-66. In particular, in Arnold a virtual outlet (**orange**) and merchant (**blue**) sell products to "customers" over the internet. EX1008, Abstract, Fig. 1A.



EX1008, Abstract, Fig. 1A (annotated).

425. The "system of networked computers" includes a VO computer 1A10 that "provides the Web pages of the virtual outlet to customers via the WWW." EX1008, 6:65-7:9. The web pages of the virtual outlet include "link[s] that identif[y] a merchant Web page available from the merchant computer." EX1008, 4:11-12. And the merchant computer 1A11 "provides the merchant Web page to the customer computer." EX1008, 5:52-53. As shown in Figure 1B, this arrangement of VO computer 1A10 and merchant computer 1A11 together form "*a server system*." Moreover, the VO computer 1A10 and merchant computer 1A11 both "provide"

web pages to the customers through the WWW and, therefore, are "*configured to … serve web pages*." *See e.g.*, EX1008, 4:5-6 ("the merchant, virtual outlet owner, and customer each have a computer connected through a network and where the purchase is conducted as a transaction over the network.")



EX1008, Fig. 1B (annotated).

426. In particular, in the "*server system*" of Arnold, a "virtual outlet web page" (**orange**) offers products such as shirt 1B13, pants 1B14, and hat 1B15 for sale to customers. EX1008, 7:39-41; Fig. 1B. Each of these products are "supplied by a merchant" and each shirt 1B13, pants 1B14, and hat 1B15 include a link to a product page. EX1008, 4:3-5. When the customer selects the product to purchase from the displayed "virtual outlet web page" the customer computer "sends to the

merchant computer a request for the merchant Web page identified by the link associated with the product." EX1008, 4:14-20.

427. When the merchant computer receives the request for the web page, the "merchant computer modifies the merchant Web page" (**blue**). EX1008, 4:20-21. The merchant computer can modify the page to include for example, specialized logos, information, banners, and will also add a "return link" (**green**). EX1008, 4:20-21. The modified merchant Web page is displayed at the customer computer to allow the customer to purchase the product from the merchant. EX1008, 4:25-27. When the purchase is complete, the customer computer displays the return Web page (i.e., "virtual outlet web page" (**orange**) 1B40) "identified by the return link in the modified merchant Web page." EX1008, 4:30-32. Accordingly, the server system of Arnold also enables "*modify[ing] web pages*."

428. Accordingly, Arnold in combination with Arora discloses or renders obvious "*a method performed within and by a server system configured to modify and serve web pages*."

b. *1[a]: receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first web site;*

429. In my opinion, Arnold in combination with Arora discloses or renders obvious "*receiving, from a first client device associated with a first user and via a*

graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first web site."

430. The '316 Patent explains that a "[w]eb assets can include JAVA applets, scripts (including moving scripts and scripts written in a variety of internet languages such as PERL, CGI, SQL, JAVA, XML and HTML), stock art, clip art, digital art, background images, textures, GIF, JPEG, TIF, BMP, chat rooms, message boards, web objects, buttons, templates, themes, fading color, mouse over effects, borders, buttons, shadows, icons, internet designs, sounds, music, etc." EX1001, 7:40-47. "In general, web assets are graphic images, including text and related color, sound and animation features, which can be displayed on a website." EX1001, 7:47-50.

431. As discussed above, the server system of Arnold includes VO computer 1A10 and merchant computer 1A11. The VO computer (highlighted in **orange** below) "includes a virtual outlet component 1A12 that provides web pages of the virtual outlet to customers via the [world wide web]" and a "virtual outlet management component [, or 'VOMC,'] 1A13 that provides to a manager of the VO computer access to and display of the maintenance and sign-up Web pages of merchants." EX1008, 7:4-9.

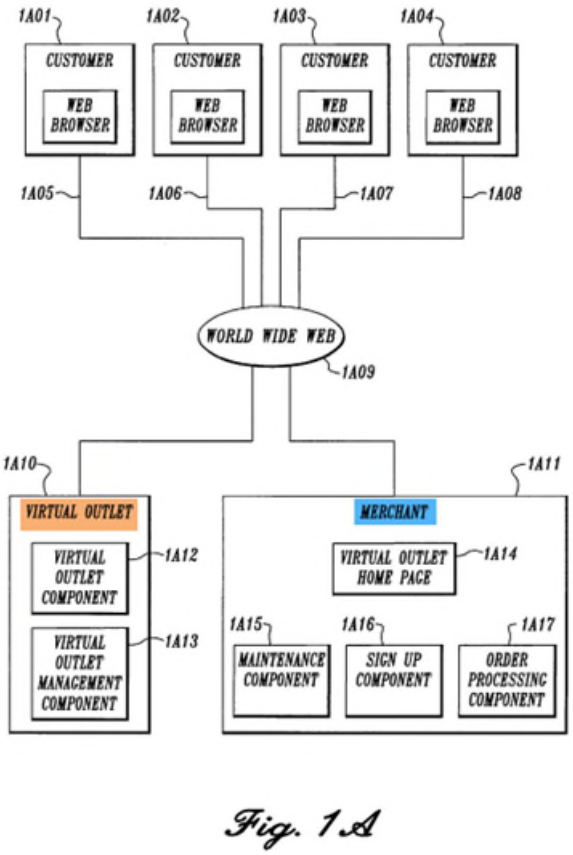
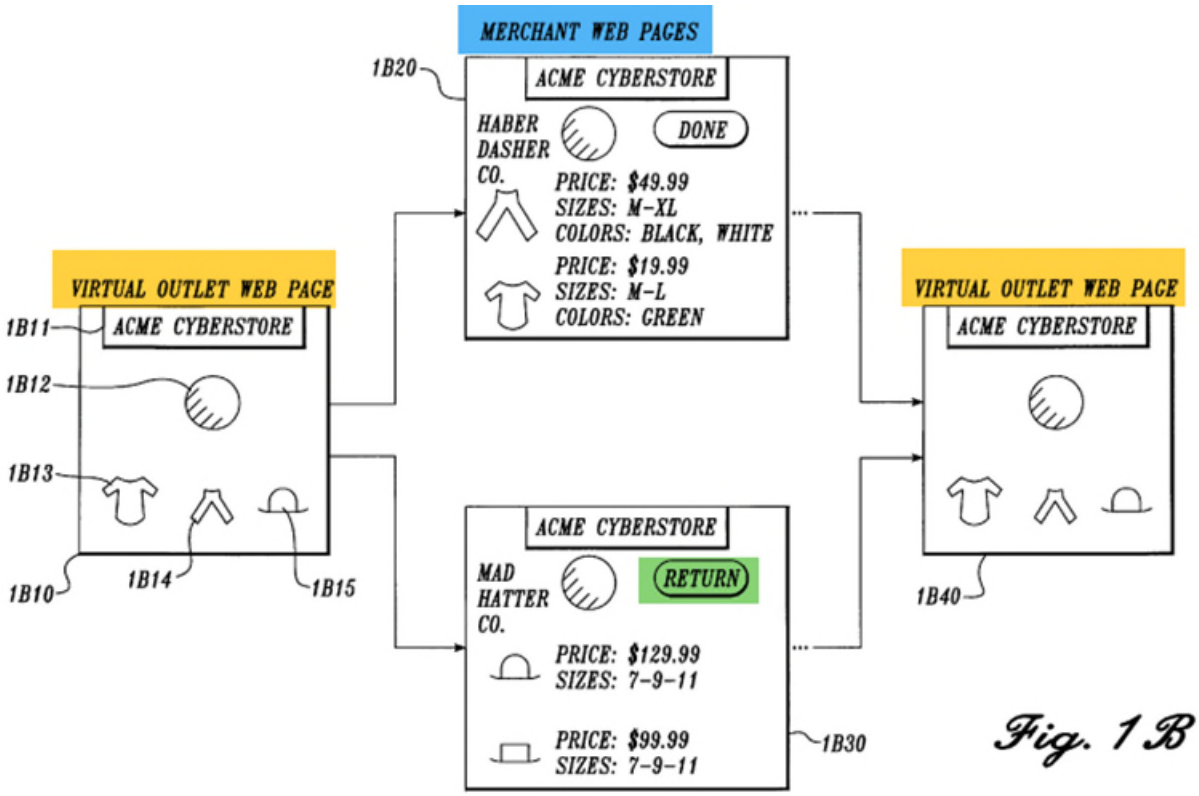


Fig. 1A

EX1008, Fig 1A (annotated).

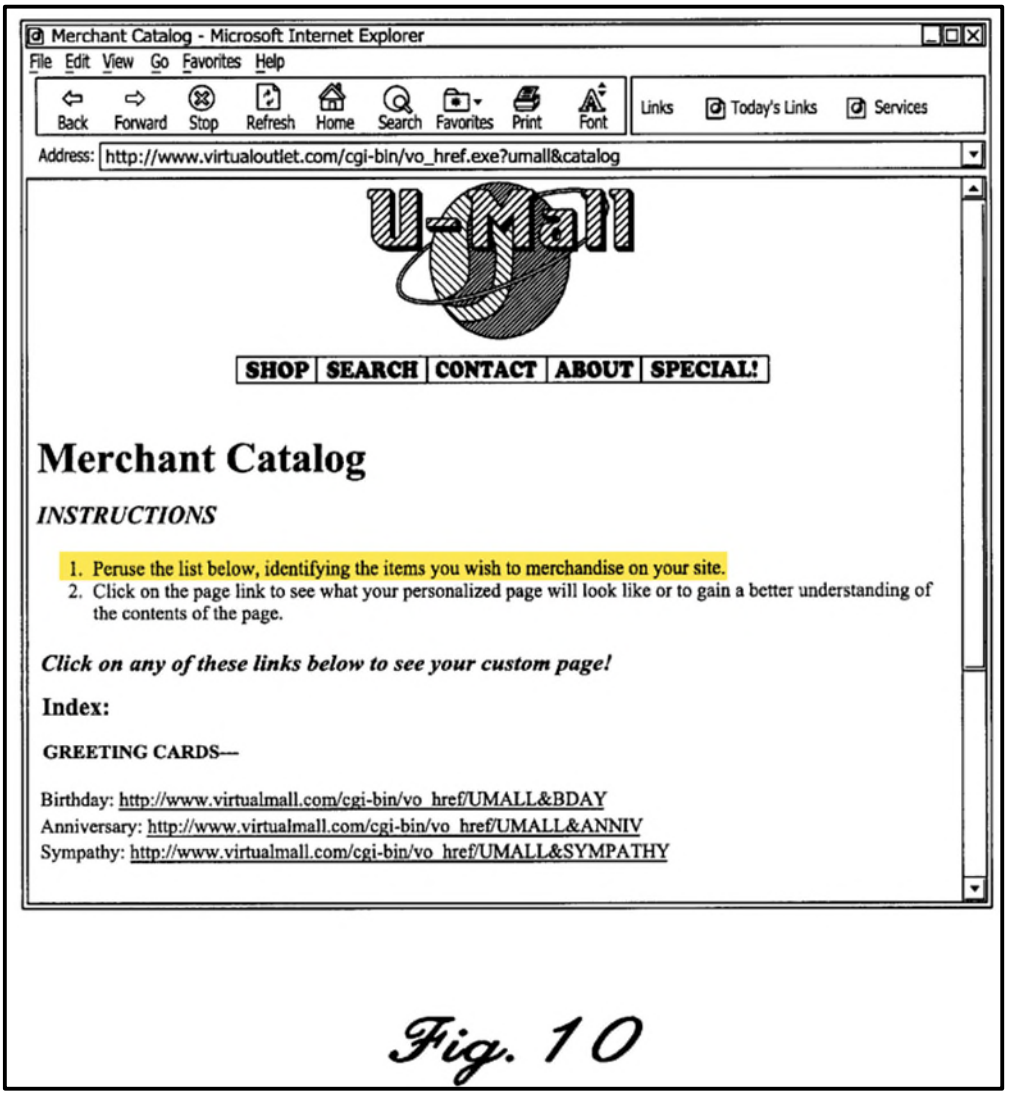
432. Fig. 1B illustrates an example of a "web page[] of the virtual outlet," (highlighted in **orange** below) which, as explained above, is provided by the virtual outlet component 1A12 of the Virtual Outlet. A Skilled Artisan would have understood that the Virtual Outlet web page is a page within the "*first web site*."



EX1008, Fig. 1B (annotated).

433. Arnold explains that the "VOMC displays the initial merchant Web page to the representative of the VO." EX1008, 8:52-53. "The initial merchant Web page includes input means for the [VO] representative to … login to an established account in order to conduct various maintenance transactions." EX1008, 8:58-9:2. A Skilled Artisan would have understood that the VO representative is a "*first user*." Additionally, a Skilled Artisan would have understood the device that the VO representative uses to access the VOMC is a "*first client device associated with a first user*."

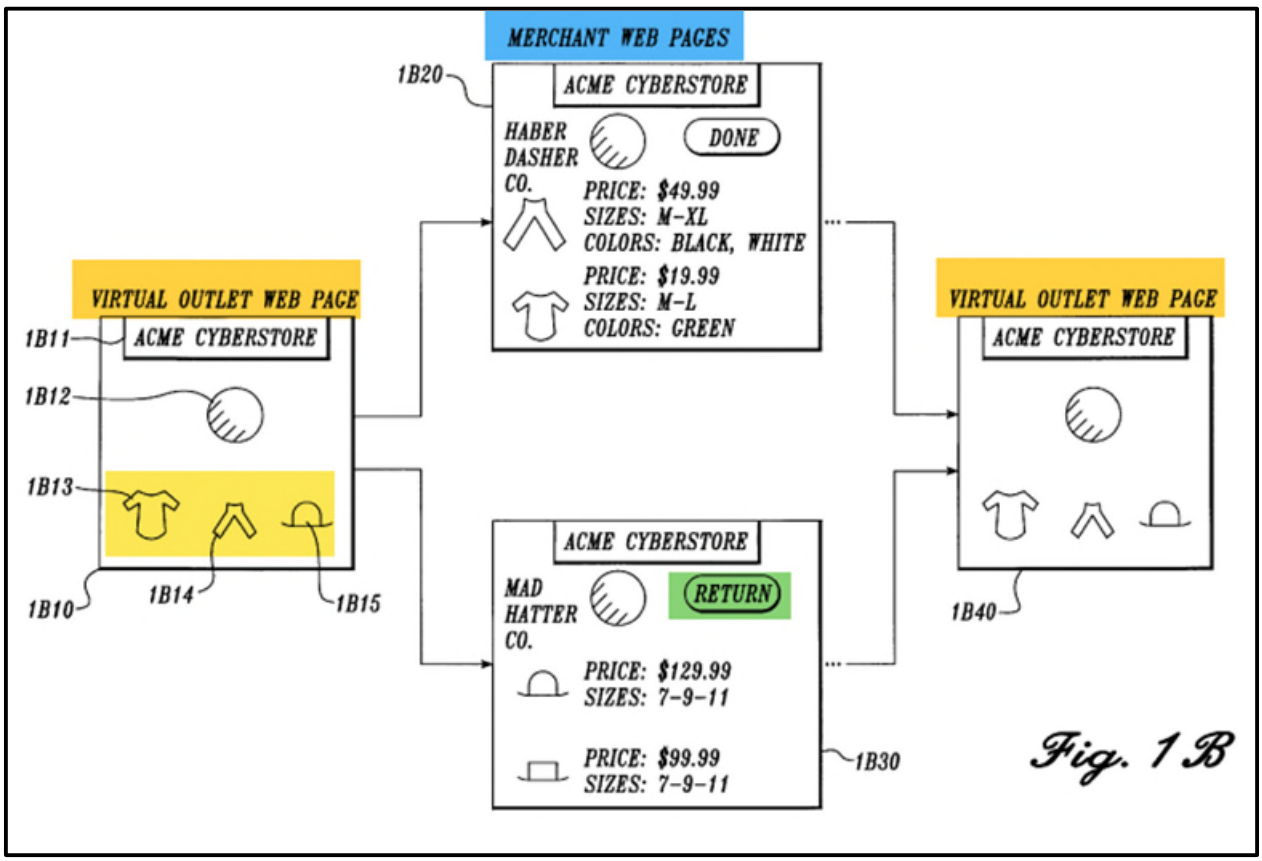
434. Arnold discloses or renders obvious "*receiving … information indicating a selection of a web asset to be used in a first web site.* In Fig. 10 (shown below), Arnold depicts "an example catalog Web page." This catalog web page allows a VO representative to "incorporate items into the VO Web pages by including the URLs obtained from the merchant's catalog as hot links in the VO Web pages." EX1008, 10:43-48. A Skilled Artisan would have understood that the "merchant's catalog [] hot links" are "*web assets*" at least because they are "web objects." EX1001, 7:40-47. Additionally, the items of the merchant catalog are depicted (in Figure 1B) in Arnold as "text descriptions or images." EX1008, 8:12-13.



EX1008, Fig. 10 (annotated).

435. The catalog of Fig. 10 states, as instruction 1 for the VO representative (highlighted), "peruse the list below, identifying the items you wish to merchandise on your site." A Skilled Artisan would have understood that when the VO representative makes an identification of an item to include in the virtual outlet web page, the server system receives "*information indicating a selection of a web asset to be used in a first web site*."

436. In Fig. 1B Arnold "illustrates the sequence of Web pages as seen by a customer of a VO" which includes assets, highlighted yellow, in the VO web page such as "images 1B13, 1B14, and 1B15 of the products that are being offered for sale." EX1008, 7:30-44. These assets are examples of "*web asset[s] to be used in the first web site*" that are selected from the merchant catalog.



EX1008, Fig. 10 (annotated).

437. As discussed above, a Skilled Artisan would have combined Arnold's reciprocal linking functionality with a simple, easy to use web editor having a graphical user interface such as a WYSIWYG application to implement reciprocal

linking in a web site. Arora describes a what you see is what you get ("WYSIWYG") web page editor that uses "a "drag and drop" interface to add, delete, and move display elements to define the layout of a Web page." EX1009, Abstract. Such a combination would allow a web designer to design a website using a robust editor and utilize reciprocal linking functionality to market the website and drive traffic to it. Indeed, Arnold states that "the VO retailing system is, however, quite flexible, and can accommodate a large number of different approaches to Web page design." EX1008, 14:52-55. Thus, a Skilled Artisan would have modified Arnold's reciprocal linking system to include a more robust web page design system such as Arora to design the virtual outlet web page and the merchant webpage.

438. Arora illustrates a "*graphical user interface.*" For example, Arora describes a "page draw editor [that] allows the user to design a [web] page just as it will appear when viewed with a browser." Arora's page draw editors allow users to add and edit web assets such as "text graphics, and other display elements. The user can then rearrange display elements by dragging and dropping them to a new location, placing the display elements exactly where they will eventually appear with pixel level accuracy." EX1009, 5:57-63. In Fig. 3 (shown below), Arora illustrates "an example of a page view displayed on display device 160 before the user has created any display elements on the page." EX1009, 5:51-53.

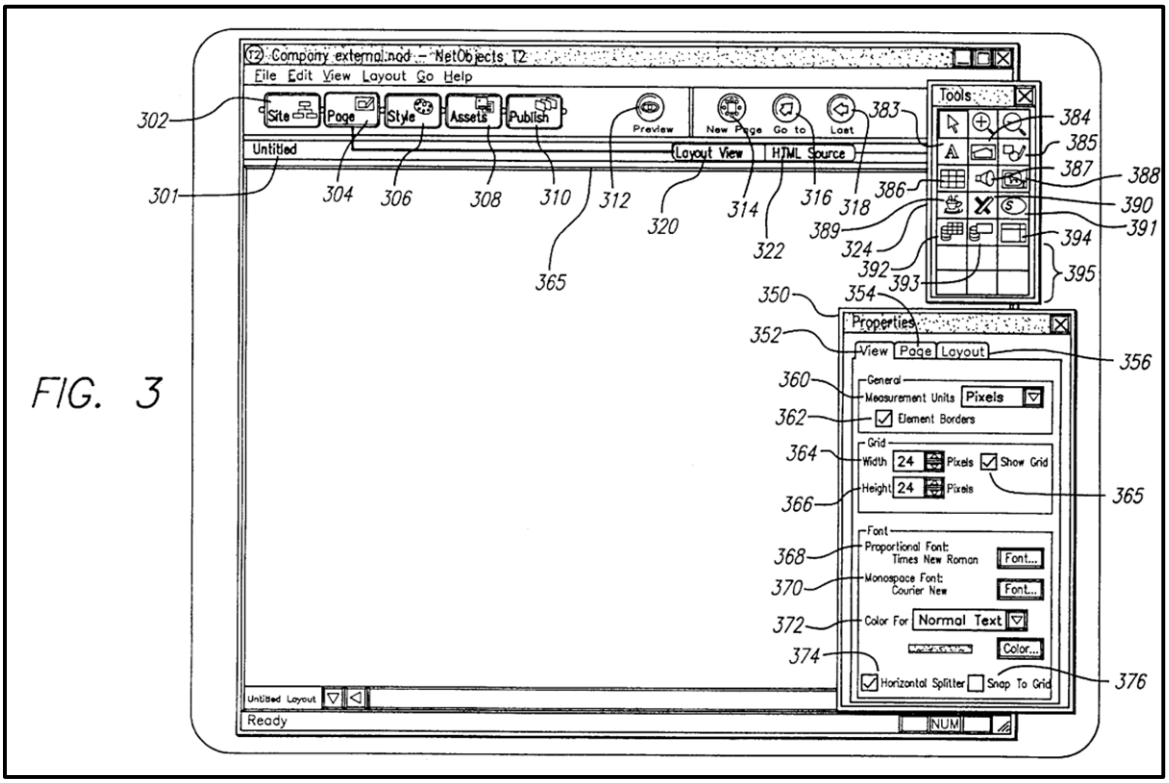
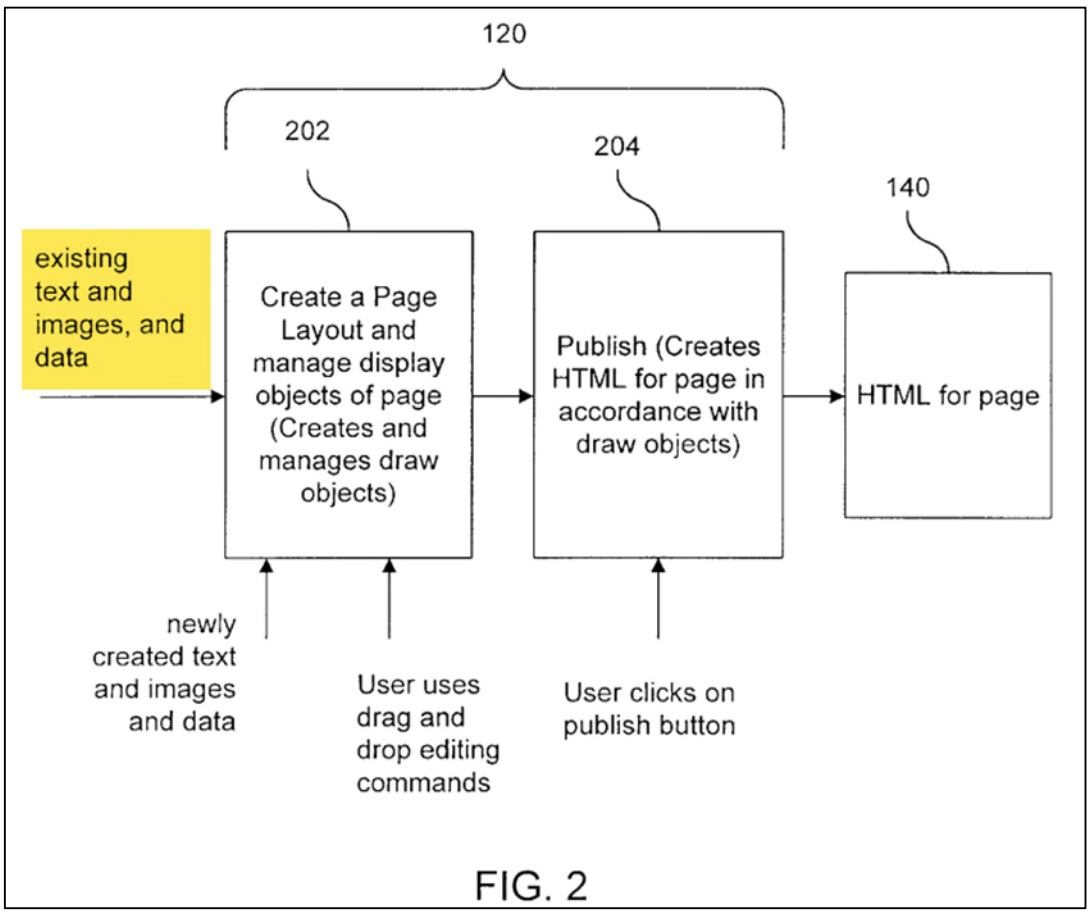


FIG. 3

EX1009, Fig. 3.

439. In Fig. 2, Arora illustrates "a block diagram showing input and output to page draw editor software" including inputting "existing text and images, and data" as "display objects of [the web] page."



EX1009, Fig. 2 (annotated).

440. In the combination of Arnold and Arora, a Skilled Artisan would have implemented the merchant catalog, which, as explained above, allows a VO representative, using his or her device, to make "*a selection of a web asset to be used in a first web site*" with the "*graphical user interface*" of Arora to design the VO web page. In this combination, a VO representative would select the web objects from the merchant catalog into the user interface of Arora. Because Arora is implemented within the server system of Arnold, the server system "*receives*" the "*selection*." *Supra* §VII.B.3. Moreover, in the combination the "*graphical user*

interface" of Arora is "*a graphical user interface associated with the server system*." *Supra* §VII.B.5.b.

441. Additionally, as explained above, the VO representative's device is "*a first client device associated with a first user*." *Supra* §VII.B.5.b. Accordingly, Arnold in combination with Arora discloses or renders obvious "*receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first web site*."

c. *1[b]: receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset;*

442. In my opinion, Arnold in combination with Arora discloses or renders obvious "*receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset.*"

443. As explained above (§VII.B.5.b.),a Skilled Artisan would have understood that the VO representative's device is a "*first client device associated with a first user*." Additionally, a "[w]eb assets can include JAVA applets, scripts (including moving scripts and scripts written in a variety of internet languages such as PERL, CGI, SQL, JAVA, XML and HTML), stock art, clip art, digital art, background images, textures, GIF, JPEG, TIF, BMP, chat rooms, message boards,

web objects, buttons, templates, themes, fading color, mouse over effects, borders, buttons, shadows, icons, internet designs, sounds, music, etc." EX1001, 7:40-47; *Supra* §VII.B.5.b. "In general, web assets are graphic images, including text and related color, sound and animation features, which can be displayed on a website." EX1001, 7:47-50. As explained above, Arnold discloses multiple types of "*web assets*" including "hot links," "text descriptions or images." *Supra* §VII.B.5.b.

444. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking and VO/Merchant system with Arora's robust "*graphical user interface"* and web design system to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b.

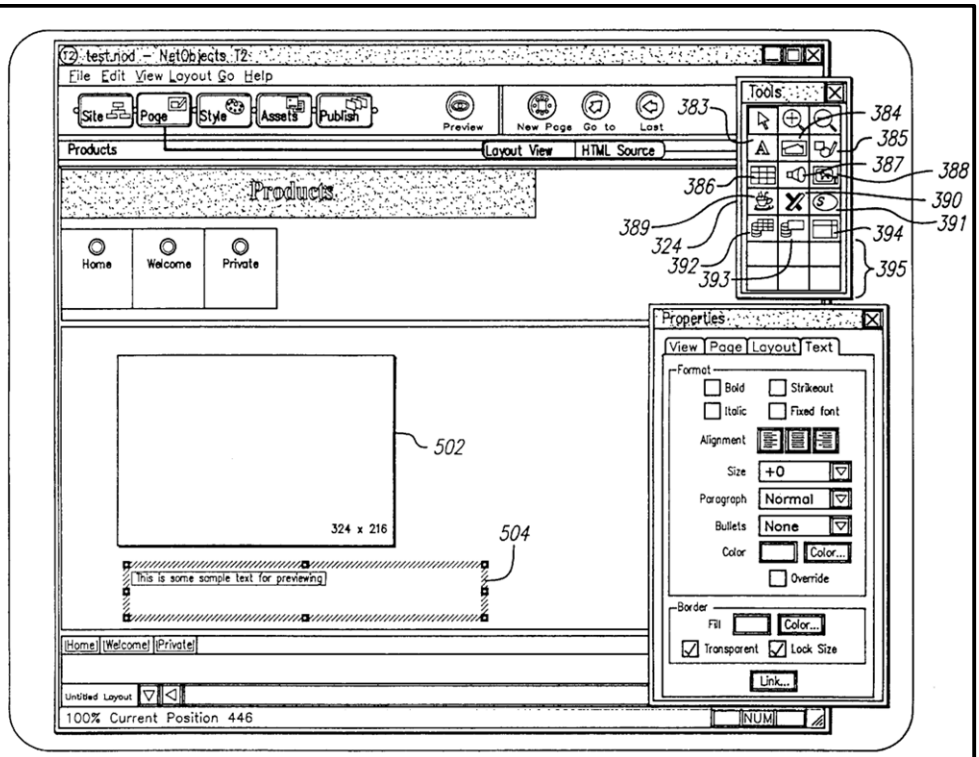
445. The "*graphical user interface*" of Arora has an "*editing screen*." For example, in Fig. 5, Arora illustrates the page draw editor "after the user has dragged and dropped an image 502 and some text 504 into the layout." The "Properties" window in Arora then allows the user to edit the text, layout, or images on page. EX1009, 10:13-30, 8:52-59, 6:42-60. For example, if the user selects an "image," the:

> Properties window allows the user to enter a name of an existing image and various properties of the image, such as whether the image is transparent, whether a fill background should be added to the image, and whether the image contains a link (e.g., a URL).The image tool has five secondary tools, shown in Fig. 9(b). Tool 3050 allows the user to

draw a boundary in which to place the image file. Tool 3052 allows the user to click on a color of the image that he wants to be transparent. When the image is displayed, pixels of that color in the image will be suppressed so that the background will show through. (This means that a new image with a transparent color must be generated when the HTML is generated). A flag in the Image draw object is set to indicate transparency.

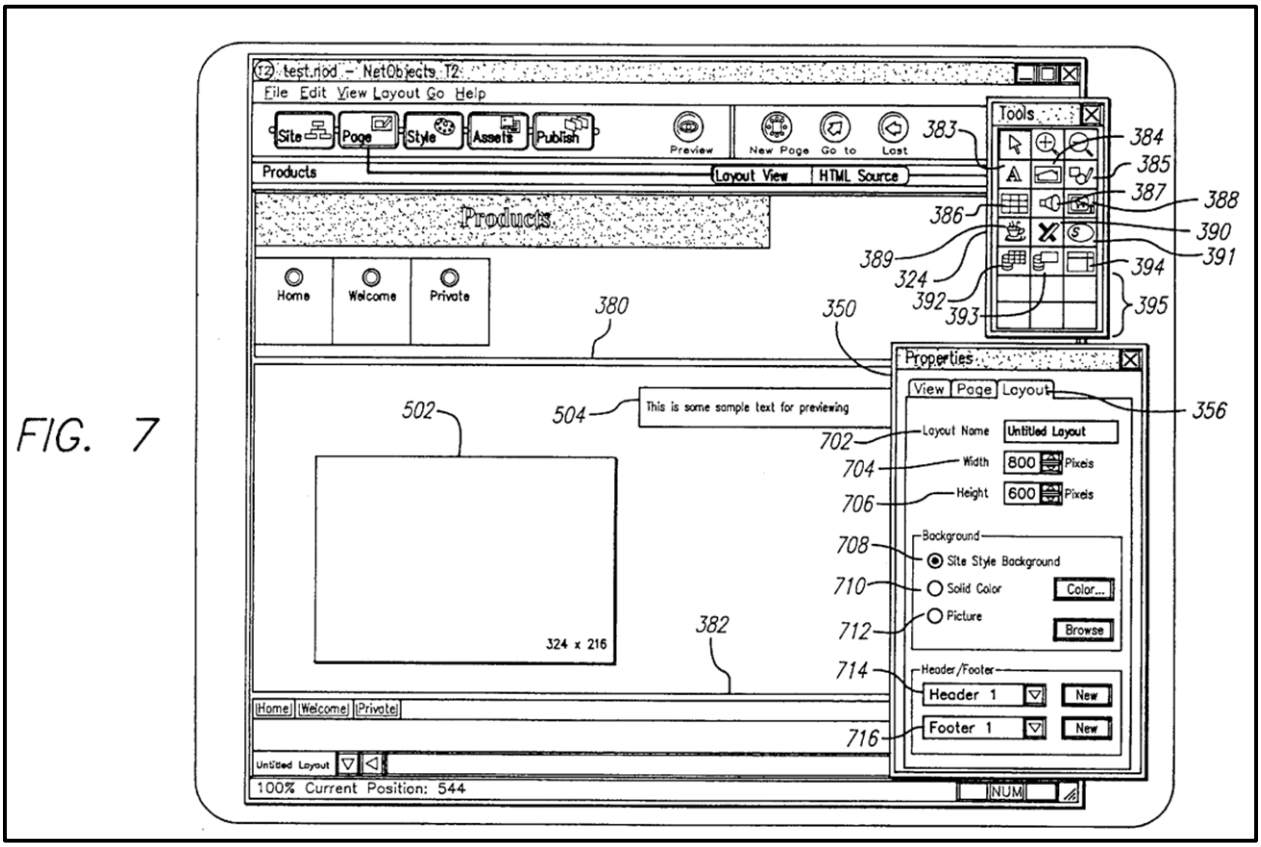
EX1009, 10:13-30.

FIG. 5



EX1009, Fig. 5.

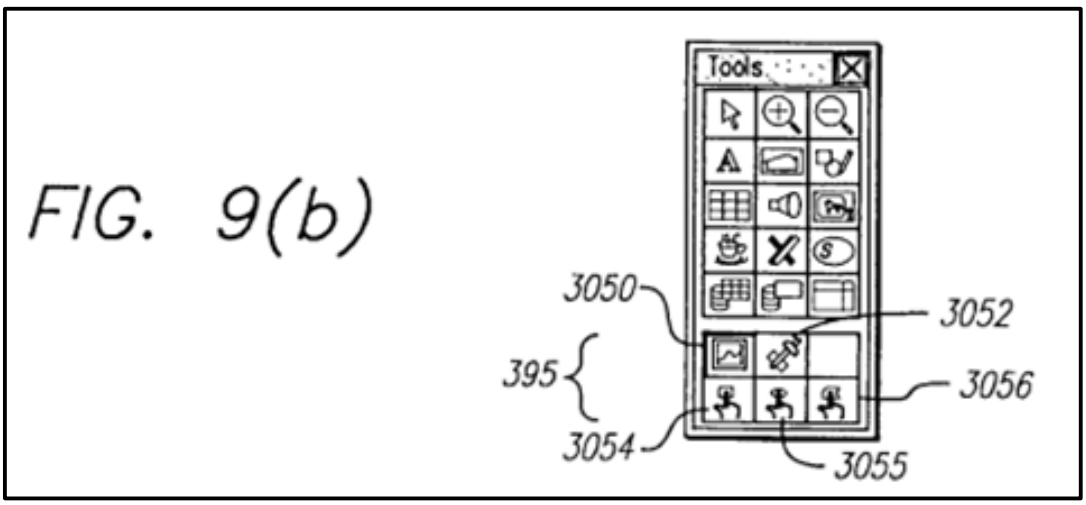
FIG. 7



EX1009, Fig. 7.

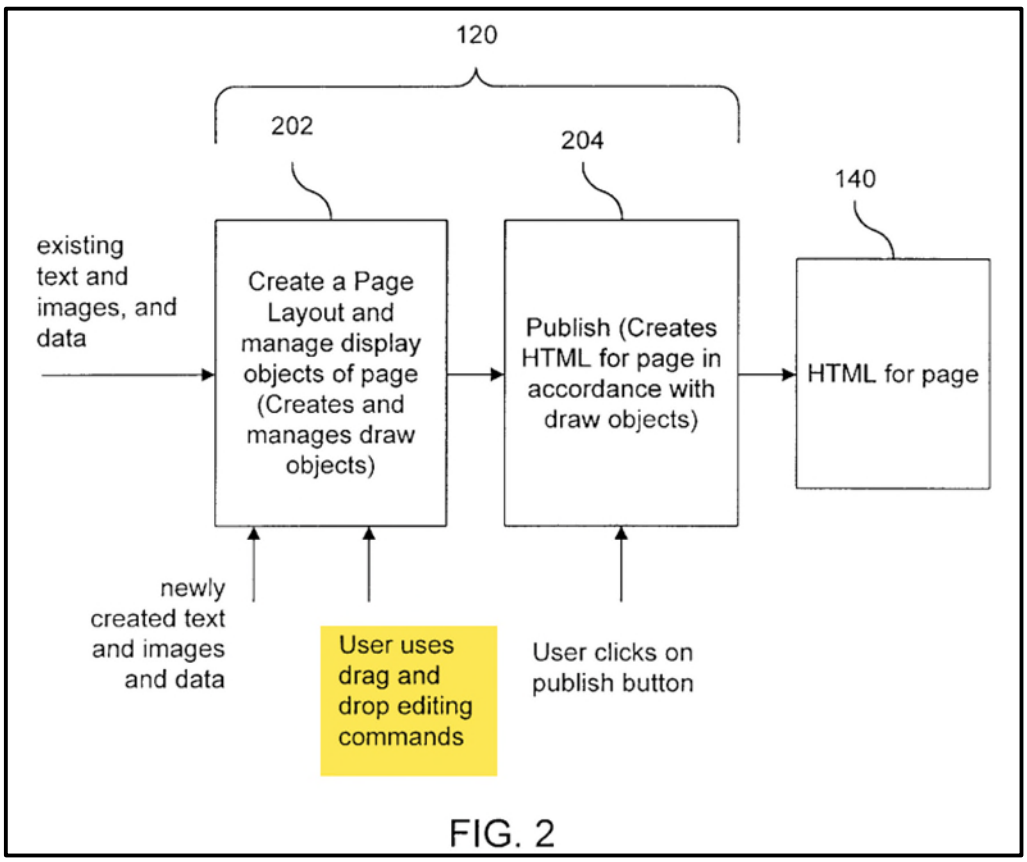
.

FIG. 9(b)



EX1009, Fig. 9B.

446. Indeed, Fig. 2 of Arora, which "is a block diagram showing input and output to page draw editor software," specifies that display objects can be managed using "drag and drop editing commands."



EX1009, Fig. 2 (annotated).

447. Accordingly, a Skilled Artisan would have understood that the screen of the page draw editor having image 502 and text 504 is an "*an editing screen of the graphical user interface.*" Additionally, a Skilled Artisan would have understood that when the user uses Arora's drag and drop editing commands a user sends an "*an instruction to modify the web asset to generate an edited web asset*." As explained

above, because Arora is implemented within the server system of Arnold, the server system "*receives*" the "*instruction*." *Supra* §VII.B.5.b.

448. As discussed above, a Skilled Artisan would have implemented Arora's graphical user interface whereby the VO representative, using his or her device, would select the web objects from the merchant catalog into the user interface of Arora. *Supra* §VII.B.5.b. These web objects would display objects of the VO web page which are thereafter edited. Accordingly, Arnold in combination with Arora discloses or renders obvious "*receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset*."

d. *1[c]: generating, based upon the instruction, the edited web asset;*

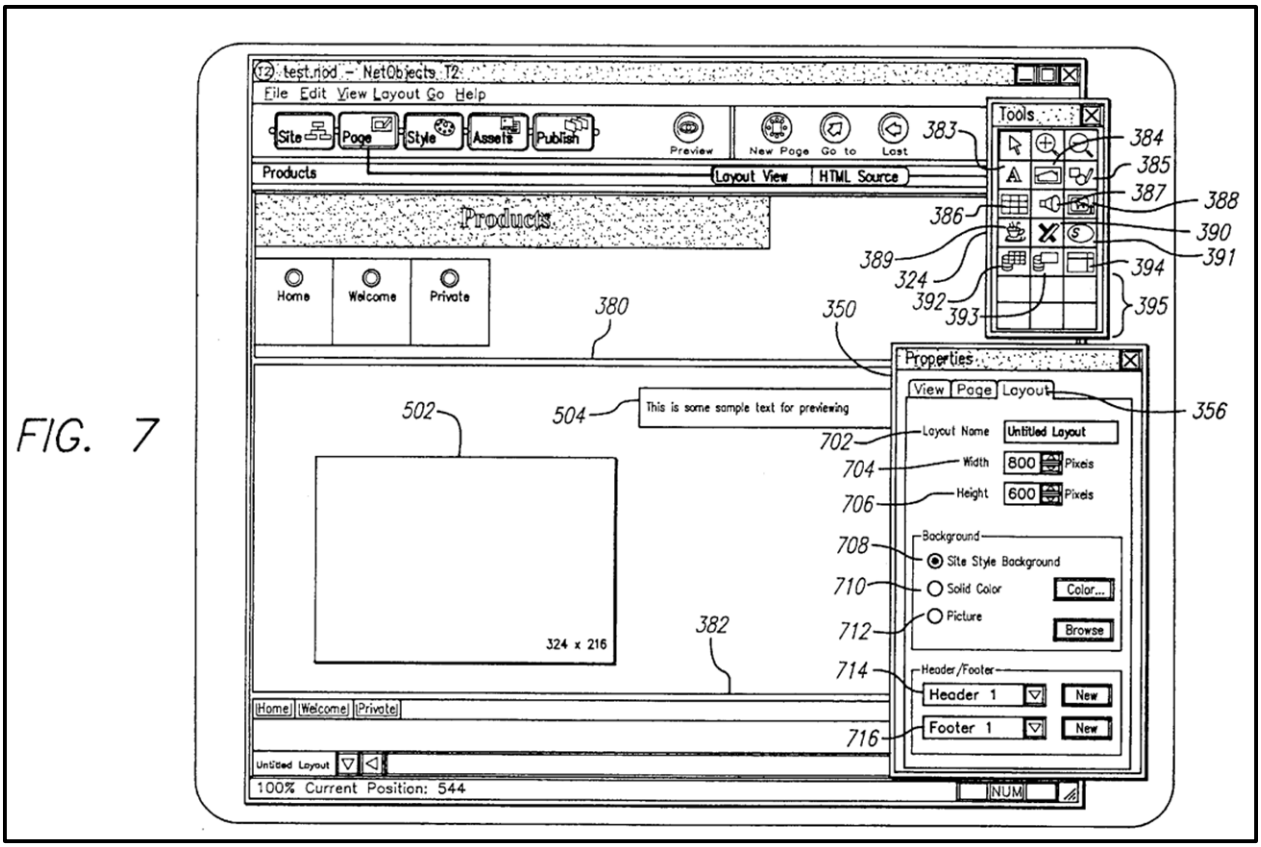
449. In my opinion, Arnold in combination with Arora discloses or renders obvious "*generating, based upon the instruction, the edited web asset.*"

450. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking system with Arora's robust graphical user interface to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b.

451. Additionally, as discussed above, a Skilled Artisan would have understood that when a user uses Arora's drag and drop editing commands, the user sends "*an instruction to modify the web asset to generate an edited web asset*." *Supra* §VII.B.5.c.

452. As discussed above, the VO representative, using his or her device, would select the web objects from the merchant catalog into the user interface of Arora. *Supra* §VII.B.5.b. These web objects would display objects of the VO web page which would thereafter be "*edited*," such as being placed in a different position on the screen (i.e. being dragged and dropped).

453. Fig. 7 of Arora shows the graphical user interface of Arora "after the user has dragged and dropped the text to a different location on the page." EX1009, 8:42-44.



EX1009, Fig. 7.

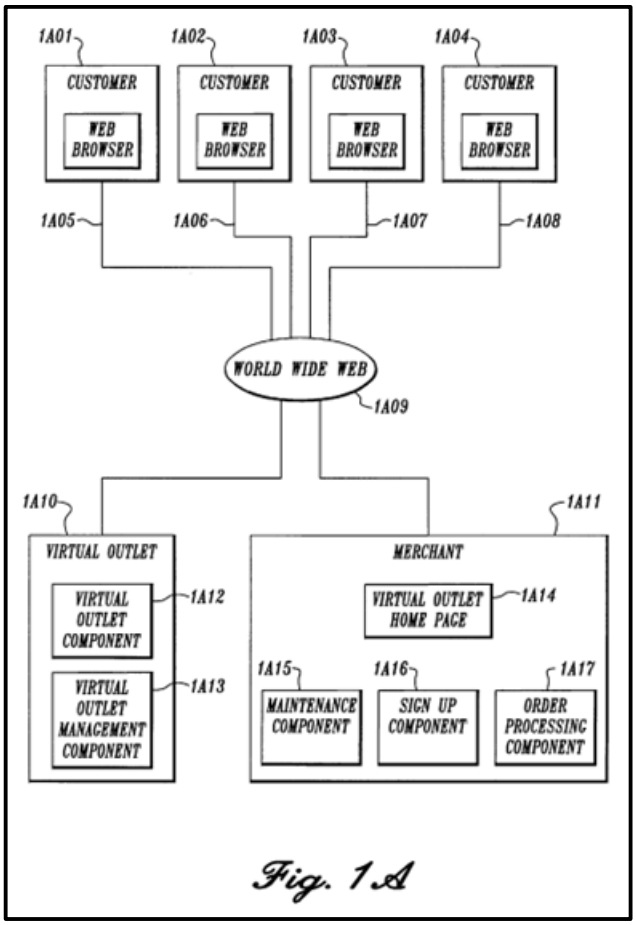
454. A Skilled Artisan would have understood that after the "drag and drop" commands are received through the "Properties" window, the web asset is edited. For example, in the case of if the user selects an "image," the user can use Tool 3052 within the "Properties" window to specify "a color of the image" that the user wants to be transparent. Arora explained that "[w]hen the image is displayed, pixels of that color in the image will be suppressed so that the background will show through. (This means that a new image with a transparent color must be generated when the HTML is generated)." EX1009, 10:13-30. Therefore, using Tool 3052 "generates" a "new image with a transparent color" (i.e., an edited web asset) based on the instruction received through the "Properties" window.

455. Accordingly, Arnold in combination with Arora discloses or renders obvious "*generating, based upon the instruction, the edited web asset.*"

e. *1[d]: forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system;*

456. In my opinion, Arnold in combination with Arora discloses or renders obvious "*forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system.*"

457. As explained above (§VII.B.5.b.), a Skilled Artisan would have understood that the VO representative's device is a "*first client device associated with a first user*." Additionally, as explained above (VII.B.6.a) referring to Fig. 1A, the arrangement of VO computer 1A10 and merchant computer 1A11 together form the "*server system*."



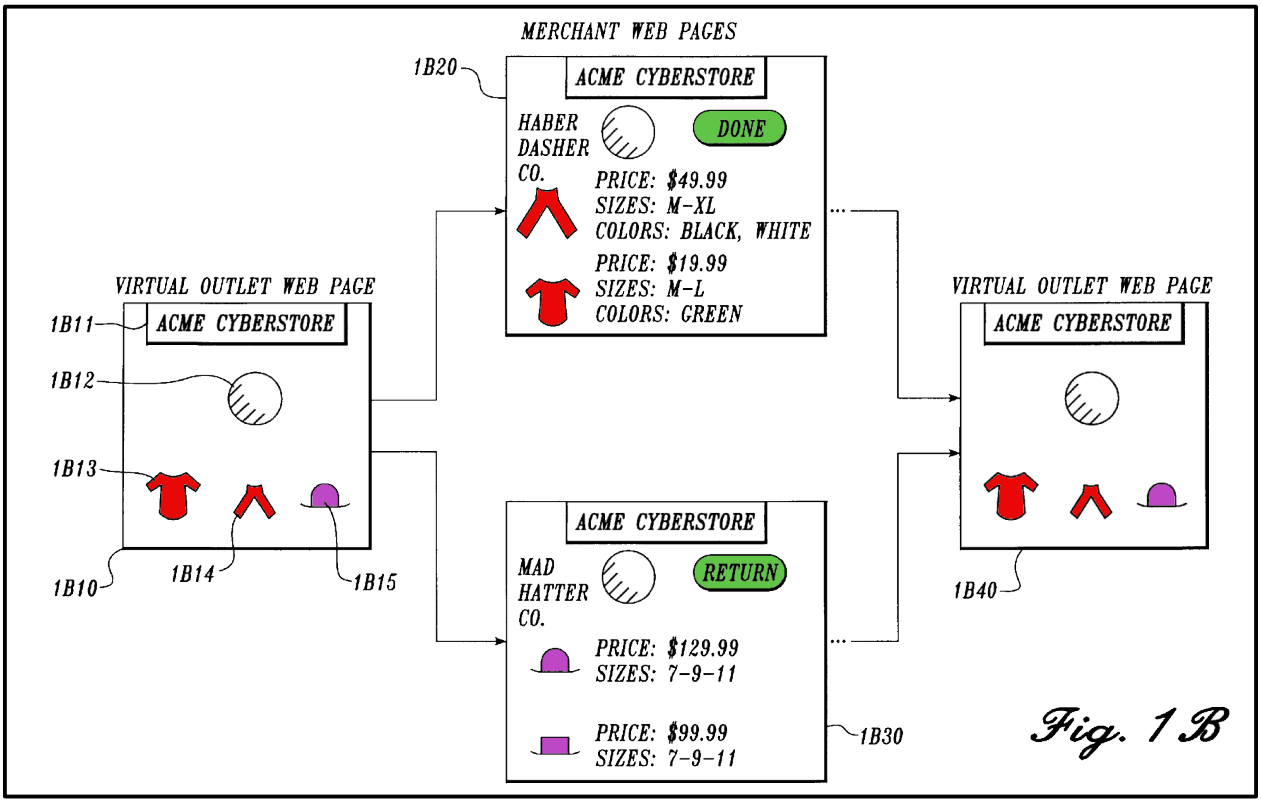
EX1008, Fig. 1A.

458. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking and VO/Merchant system with Arora's robust graphical user

interface and web design functionality to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b.

459. Arnold discloses or renders obvious "*one or more previously-created websites.*" Referring to the merchant catalog web page in Fig. 10, Arnold explains that "[i]tems for sale are described and listed along with URLs corresponding to the order Web page that the merchant will supply to a customer linking through a VO Web page to the merchant site in order to purchase the item." A Skilled Artisan would have understood that the merchant site is "*previously-created*" because it exists prior to the VO representative selecting an item from the merchant catalog.

460. Referring to the example in Fig. 1B (shown below), Arnold explains that "[w]hen a customer selects a product to purchase (or to view product information), the browser accesses the Web page for the merchant that sells the product." A Skilled Artisan would have understood that the Web page for the merchant is created by a Merchant, who is "*one or more other users of the server system*." The VO representative may access the merchant catalog and select **shirts and pants** from HaberDasher and **hats** from MadHatter to sell on the VO website.

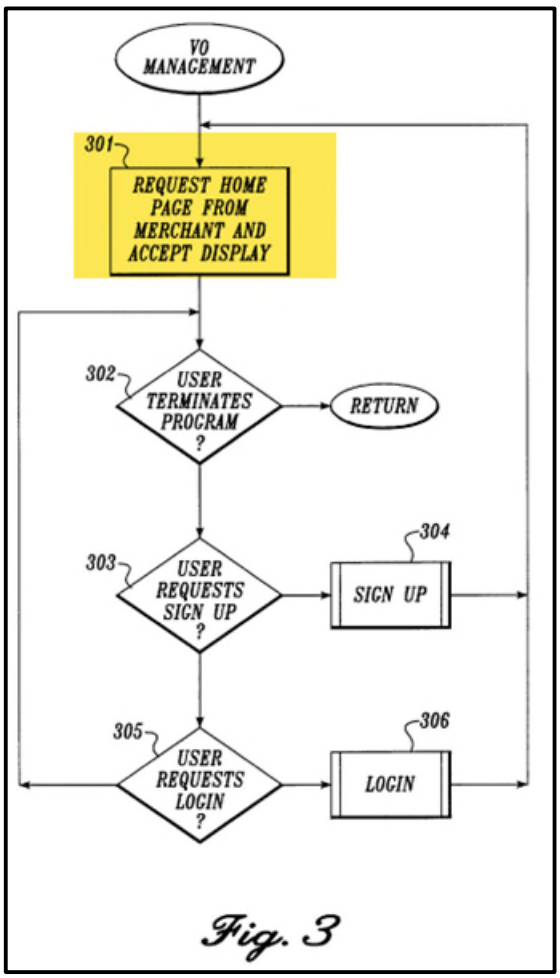


EX1008, FIG. 1B.

461. Arnold discloses or renders obvious "*forwarding … one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system*."

462. In Fig. 3, Arnold illustrates "a high-level flow control diagram for the virtual outlet management component of the VO." EX1008, 8:45-46. Arnold explains that "as part of step 301, the representative indicates with which merchant the VO wishes to interact. This information may be requested from the representative. Alternatively, the VOMC may provide the representative with a list of options from **which to select a merchant**." EX1008, 8:45-66 (emphasis added).

As explained above, the Web page for the merchant is created by a Merchant, therefore, a Skilled Artisan would have understood that the "list of options" of merchants to choose from includes "*one or more identifiers respectively associated with one or more previously-created websites.*"



EX1008, Fig. 3.

463. Arnold further explains that "If the VOMC detects in step 303 that the [VO] representative wishes to establish a relationship with the merchant, the VOMC calls the Sign-up routine." EX1008, 8:64-66. Arnold explains that "once the

relationship has been established, a representative of the VO can login to the merchant computer's account management component … to browse the merchant's catalog." EX1008, 6:26-31. Thus, selection of a merchant is a necessary precursor to selecting products from a merchant's catalog.

464. As discussed above, a Skilled Artisan would have implemented Arora's graphical user interface whereby the VO representative, using his or her device, would select the web objects from the merchant catalog into the user interface of Arora. *Supra* §VII.B.5.b. Likewise, a Skilled Artisan would have understood that a VO representative would have selected a merchant, which is a necessary precursor to selecting objects from a merchant catalog, through the same graphical user interface. Thus, the "list of options from which to select a merchant" would have been displayed in said graphical user interface.

465. Accordingly, Arnold in combination with Arora discloses or renders obvious "*forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system*."

f. *1[e]: receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more*

previously-created websites to create a first hyperlink from the first web site to the second web site;

466. In my opinion, Arnold in combination with Arora, discloses or renders obvious "*receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first web site to the second web site.*"

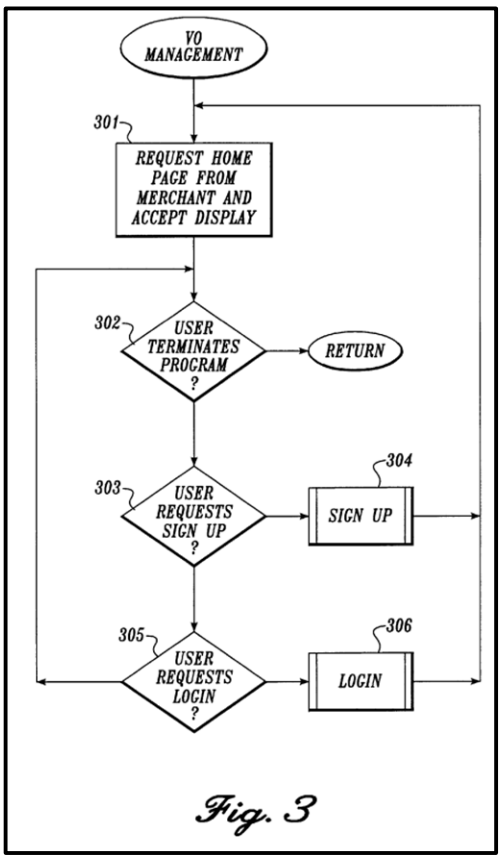
467. As explained above (§VII.B.5.b.), a Skilled Artisan would have understood that the VO representative's device is a "*first client device associated with a first user.*" As explained above (VII.B.5.e), a Skilled Artisan would have understood that the merchant site is an example of a "*previously-created website[].*"As explained above, (VII.B.5.b), a Skilled Artisan would have understood that the virtual outlet web page is a page within the "*first web site*."

468. A Skilled Artisan would have understood that the merchant site is also the "*second website*." In particular, Arnold explains that "a merchant Web page," which is a page within the merchant site, is provided by a "merchant computer." EX1008, 4:10-15.

469. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking system with Arora's robust graphical user interface to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b. A Skilled

Artisan would have understood that in this combination a VO representative would have selected a merchant through the graphical user interface.

470. Referring to Fig. 3 (shown below), Arnold explains "[a]s part of step 301, the [VO] representative indicates with which merchant the VO wishes to interact. This information may be requested from the representative. Alternatively, the VOMC may provide the representative with a list of options **from which to select a merchant**." EX1008, 8:55-58.



EX1008, Fig. 3.

471. A Skilled Artisan would have understood that the Web page for the merchant is created by a Merchant, who is "*one or more other users of the server*

system." *Supra* §VII.B.5.e. Accordingly, a Skilled Artisan would have understood that when "the [VO] representative indicates with which merchant the VO wishes to interact" they are making a selection of a merchant from the graphical user interface. Arnold explains that "[i]f the VOMC detects in step 303 that the [VO] representative wishes to establish a relationship with the merchant, the VOMC calls the Sign-up routine." EX1008, 8:64-66. As part of the Sign-up routine "Sign-up displays the sign-up Web page." EX1008, 9:5-10; *see also id*. ("Figs. 5 and 6 display example sign-up Web pages.").

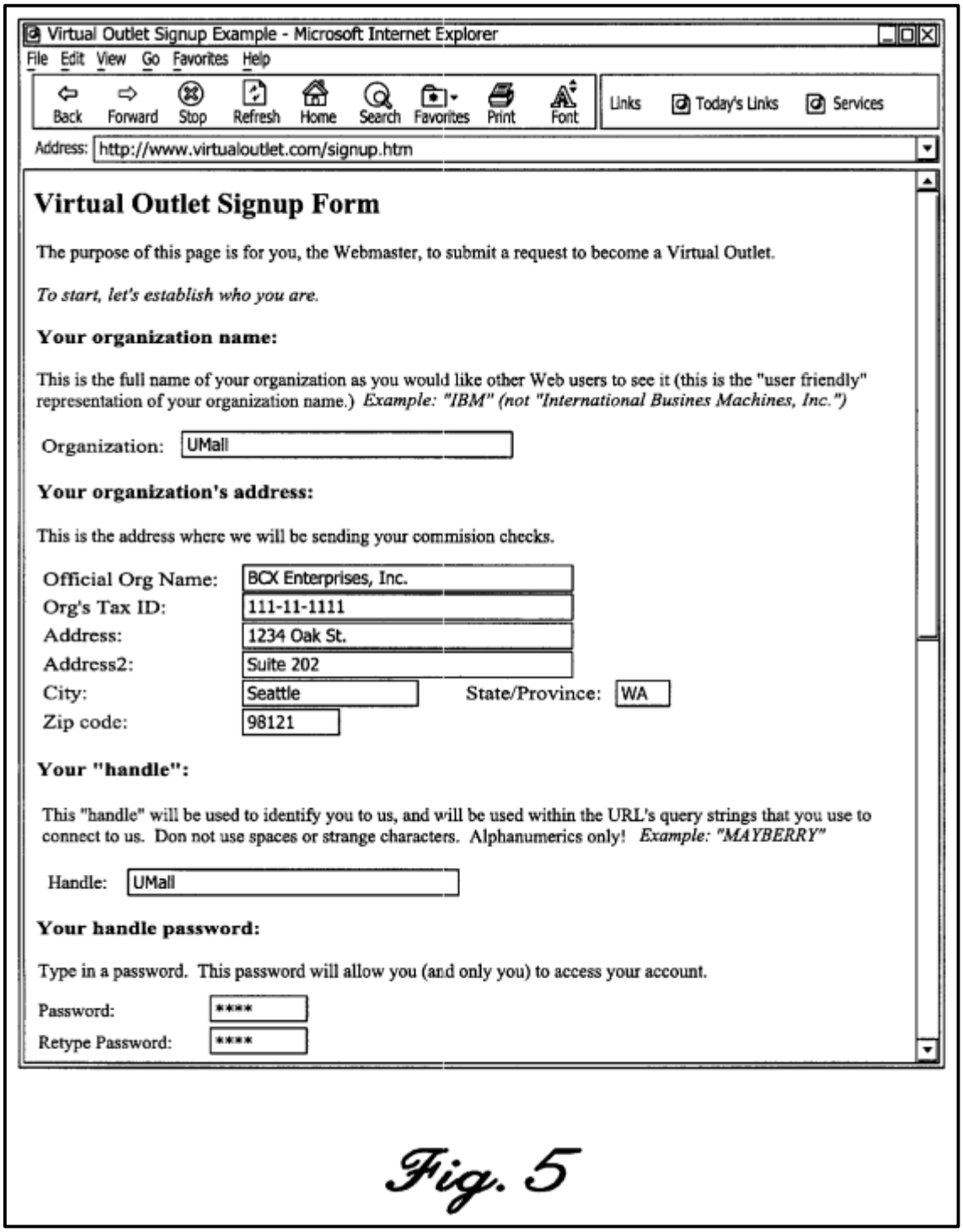


Fig. 5

EX1008, Fig. 5.

472. "[W]hen the representative has completed inputting information to the sign-up Web page, and indicates that it should be returned to the merchant, Sign-up

returns **the collected information to the merchant computer via the Internet** in step 403." EX1008, 9:21-45 (emphasis added). Therefore, the "*server system*" "*receives*" a "*first identification indicating a selection of a second website from the one or more previously-created websites"* in the form of the sign up information provided by the VO representative.

473. The "*first indication*" is also "*…to create a first hyperlink from the first web site to the second web site.*"

474. As explained above, selecting a merchant is a necessary precursor step to selecting a product from a merchant's catalog. *Supra* §VII.B.5.e.

475. Referring to the merchant catalog in Fig. 10, Arnold explains that VO representative may "incorporate items into the VO Web pages by including the URLs obtained from the merchant's catalog as hot links in the VO Web pages." EX1008, 10:43-48.

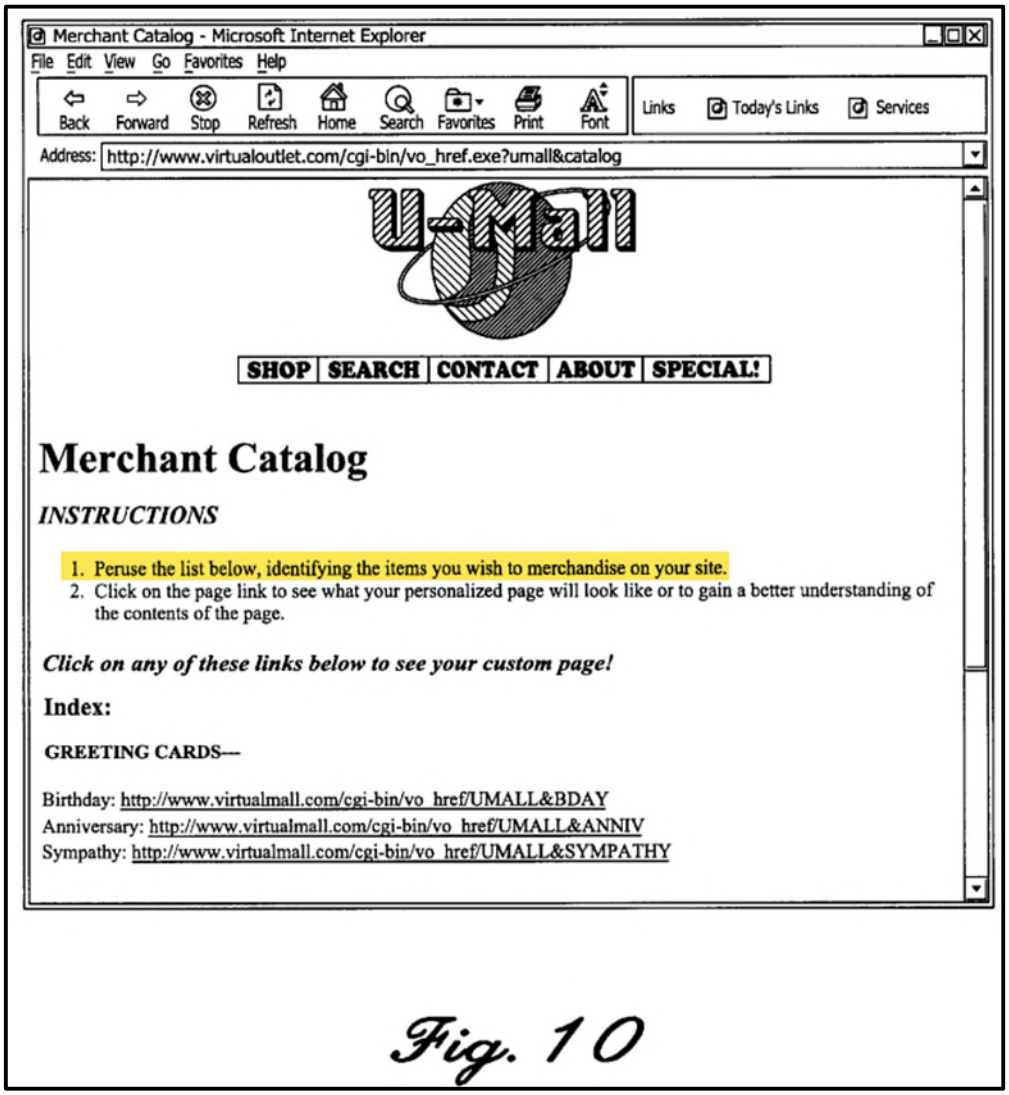


Fig. 10

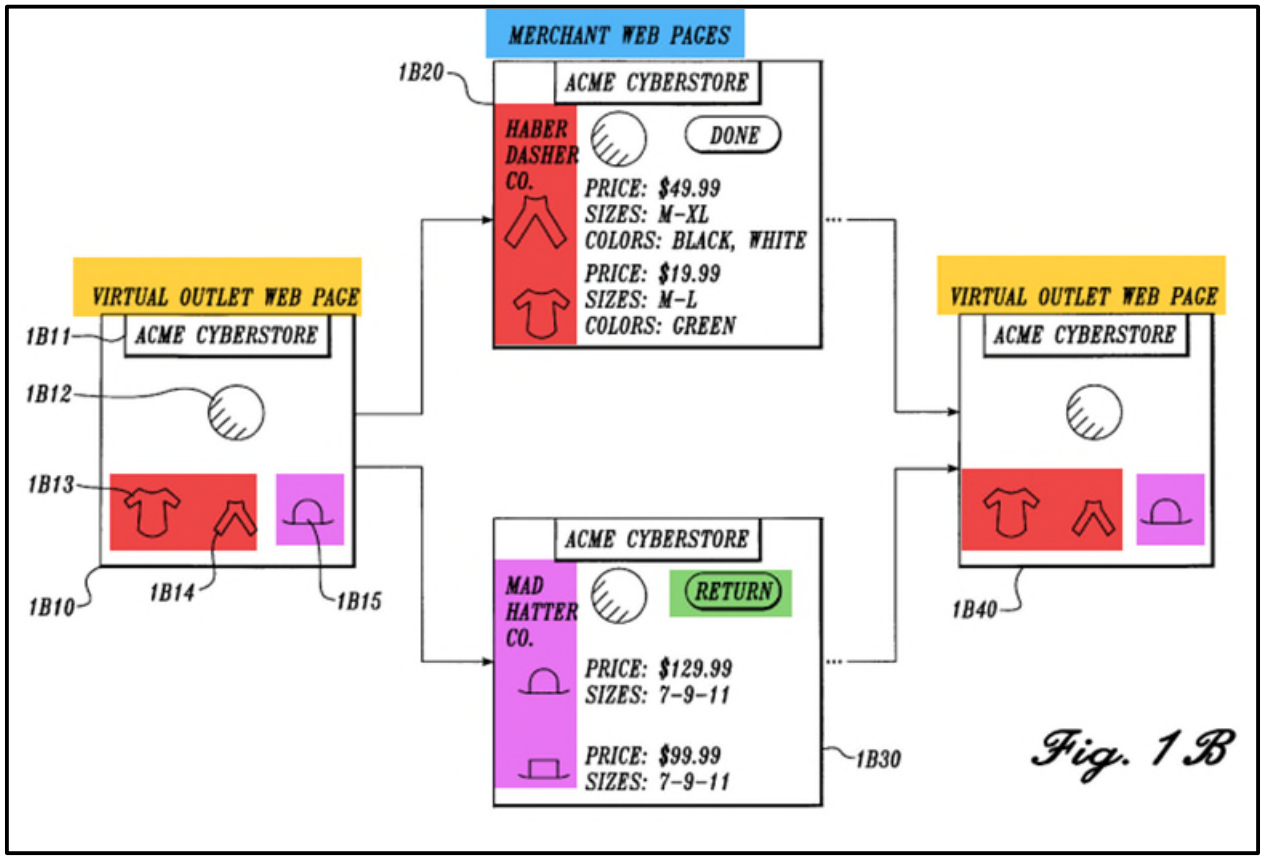
EX1008, Fig. 10.

476. The catalog of Fig. 10 states, as instruction 1 for the VO representative (highlighted), "peruse the list below, identifying the items you wish to merchandise on your site."

477. Arnold explains "[t]he VO Web page may show a graphical image of various products, such as a picture of a pair of blue jeans or a picture of a shirt. **Each**

image has a URL associated with it that is a hot link to a Web page provided by the Web site of the merchant of the product." EX1008, 5:40-46 (emphasis added).

478. In Fig. 1B (shown below), Arnold illustrates the **VO Web Page** linking to various **Merchant Web Pages**, **Haber Dasher Co**. and **MadHatter Co**. *See* Arnold at 7:30-8:6 (" In this example, the name of the VO is "AcmeCyberstore;" its logo is a circle with lines; and it is offering to sell shirts, pants, and hats. The shirt and pants are sold through a merchant named "HaberDasher Company," and the hats are sold through a merchant named "MadHatter Company." When a customer accesses the Web page for the AcmeCyberstore, the customer would see Web page 1B10. This Web page contains banner 1B11 and logo 1B12, which identify the VO. In addition, this Web page contains the images 1B13, 1B14, and 1B15 of the products that are being offered for sale. When a customer selects a product to purchase (or to view product information), the browser accesses the Web page for the merchant that sells the product. The Web page is identified by a URL (i.e., hotlink) associated with that product."). EX1008, 7:30-45 (annotated). Therefore, the sign-up process described above, is used to create the VO/Merchant relationship and includes "a hot link to a Web page provided by the Web site of the merchant of the product" (i.e., "*a first hyperlink from the first web site to the second web site*.")



EX1008, Fig. 1B (annotated).

479. Accordingly, Arnold in combination with Arora discloses or renders obvious "*receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first web site to the second web site*"

g. *1[f]: storing, within a computer database system of the server system, first information indicating that the first identification was received by the server system;*

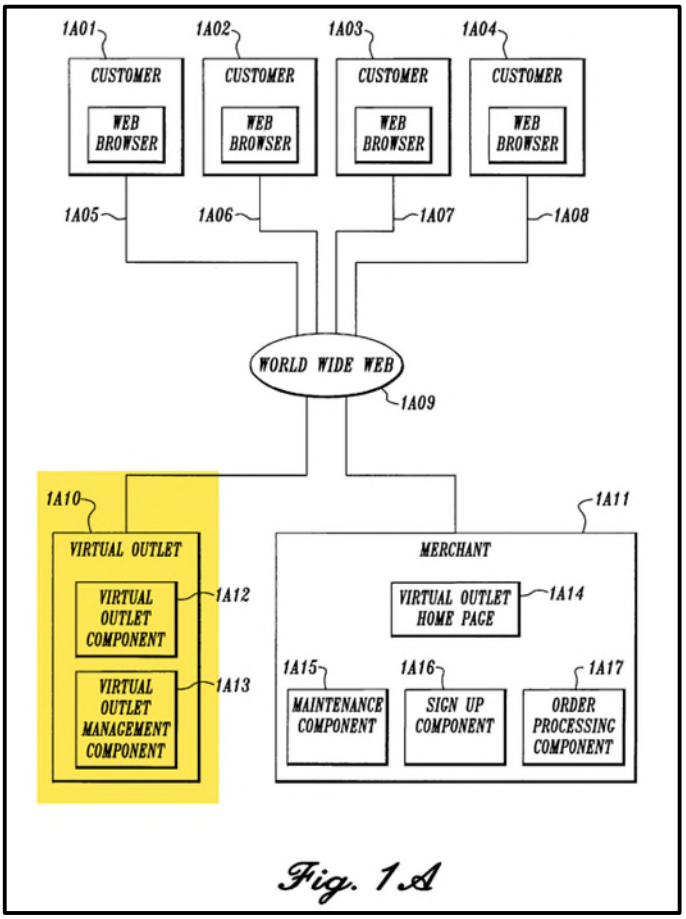
480. In my opinion, Arnold in combination with Arora discloses or renders obvious "*storing, within a computer database system of the server system, first*

information indicating that the first identification was received by the server system."

481. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking system with Arora's robust graphical user interface to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b.

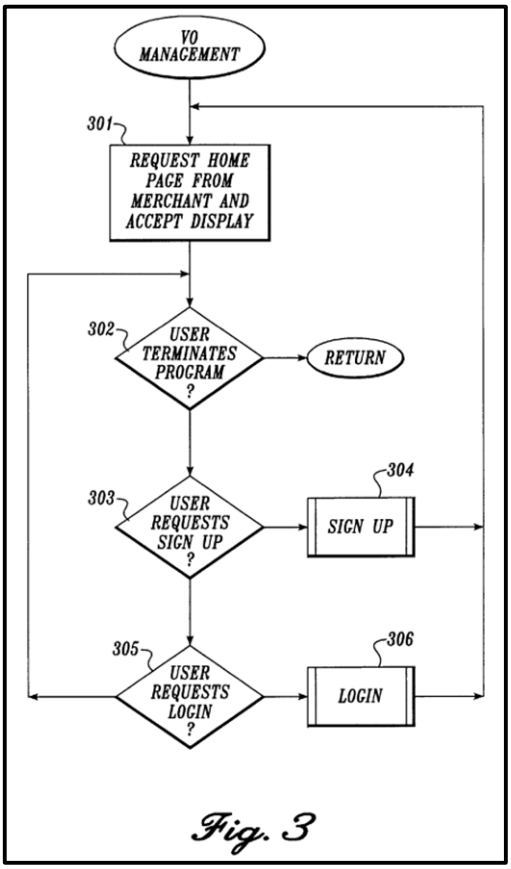
482. As explained above, §VII.B.5.f, the selection of a merchant from the graphical user interface, results in "*a first identification indicating a selection of a second website from the one or more previously-created websites.*"

483. As discussed above, §VII.B.5.a , the server system of Arnold includes VO computer 1A10 and merchant computer 1A11. The VO computer (highlighted in **orange** below) "includes a virtual outlet component 1A12 that provides web pages of the virtual outlet to customers via the [world wide web]" and a "virtual outlet management component [, or 'VOMC,'] 1A13 that provides to a manager of the VO computer access to and display of the maintenance and sign-up Web pages of merchants." EX1008, 7:4-9, Fig. 1A..



EX1008, Fig 1A (annotated).

484. In Fig. 3 (shown below), Arnold illustrates "a high-level flow control diagram for the virtual outlet management component of the VO." Arnold explains "As part of step 301, the representative indicates with which merchant the VO wishes to interact. The initial merchant Web page includes input means for the representative to … to establish a relationship." EX1008, 8:53-62, Fig. 3. Arnold explains "[a]fter viewing the home page, a VO representative may decide to attempt to enter a VO relationship with the merchant by invoking the Sign-up procedure." EX1008, 11:40-42.



EX1008, Fig 3.

485. In Fig. 15, Arnold illustrates "a flow diagram for the Sign-up Request routine." Arnold explains that "[i]f the information was correctly specified" during sign-up, the system "temporarily stores the sign-up information in a file on the merchant computer in step 1504 and returns." EX1008, 12:39-44, Fig. 15.

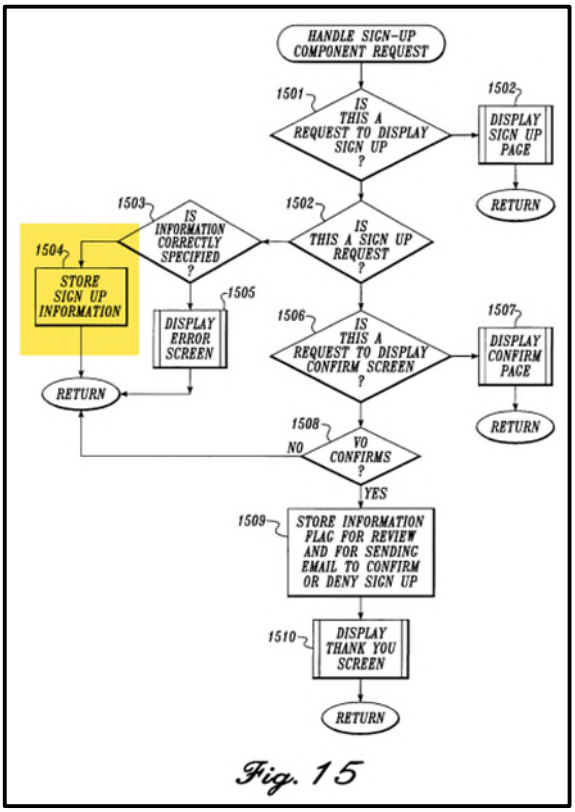


Fig. 15

EX1008, Fig. 15.

INFORMATION STORED AT SIGN-UP

VIRTUAL OUTLET NAME	VIRTUAL OUTLET URL
VIRTUAL OUTLET MAILING ADDRESS	TAXPAYER ID
VIRTUAL OUTLET EMAIL ADDRESS	SOCIAL SECURITY NUMBER
PROPOSED PASSWARD	BANK ACCOUNT NUMBER
URL OF LOGOS TO DISPLAY ON ORDER PAGE(S)	
URL FOR GRAPHICS FOR BACKGROUND	
COLORS FOR VARIOUS PARTS OF SCREEN	
FONTS FOR TEXT	
OTHER CHARACTERISTICS FOR HTML DISPLAY	
NAVIGATION BAR	
BANNER ADVERTISING	

Fig. 16

EX1008, Fig. 16.

486. A Skilled Artisan would have understood that "Store Sign Up Information" indicates that sign-up information, including the "VO relationship with the merchant" would be stored in a computer database. EX1008, 13:1-10 ("In step 1509, sign-up-- Request permanently stores the sign-up information on the merchant computer and flags the stored information for review by a representative of the merchant computer.") Accordingly, a Skilled Artisan would have understood that Arnold discloses or renders obvious "*storing … first information indicating that the first identification was received by the server system.*"

487. Additionally, Arnold gives an example of a relationship between merchant HaberDasher Company and VO AcmeCyberstore, in which the relationship is stored in a database. *See* EX1008, 7:54-60 (emphasis added) ("When the merchant computer for the HaberDasher Company receives this URL, **it accesses a database established when the AcmeCyberstore established a virtual outlet relationship with the HaberDasher Company.** That database specifies a Web page layout that is preferably a layout similar to that of the Web page for the AcmeCyberstore.")

488. Accordingly, Arnold in combination with Arora discloses or renders obvious "*storing, within a computer database system of the server system, first information indicating that the first identification was received by the server system.*"

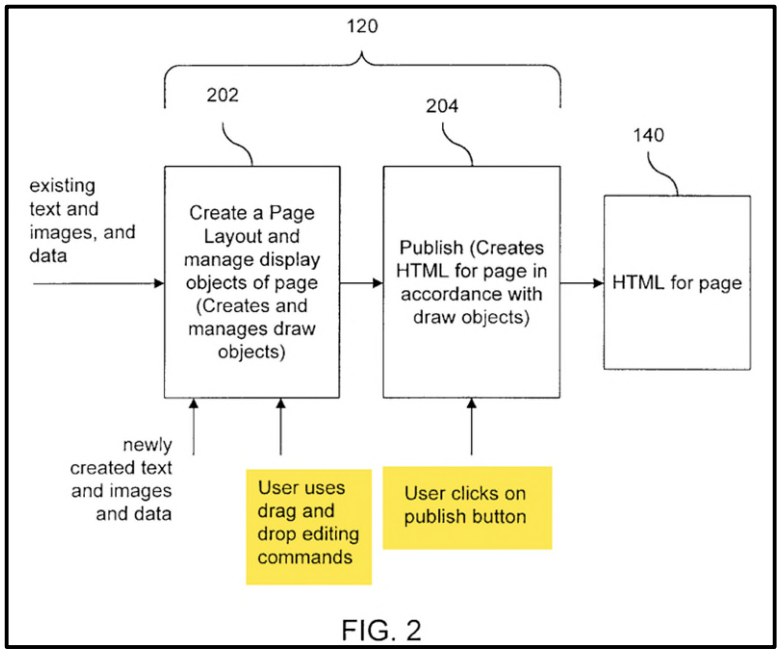
h. *1[g]: modifying, based upon the instruction, the first website to include the edited web asset;*

489. In my opinion, Arnold in combination with Arora discloses or renders obvious "*modifying, based upon the instruction, the first website to include the edited web asset.*"

490. As explained above, §VII.B.5.b, a Skilled Artisan would have understood that the virtual outlet web page is a page within the "*first web site*."

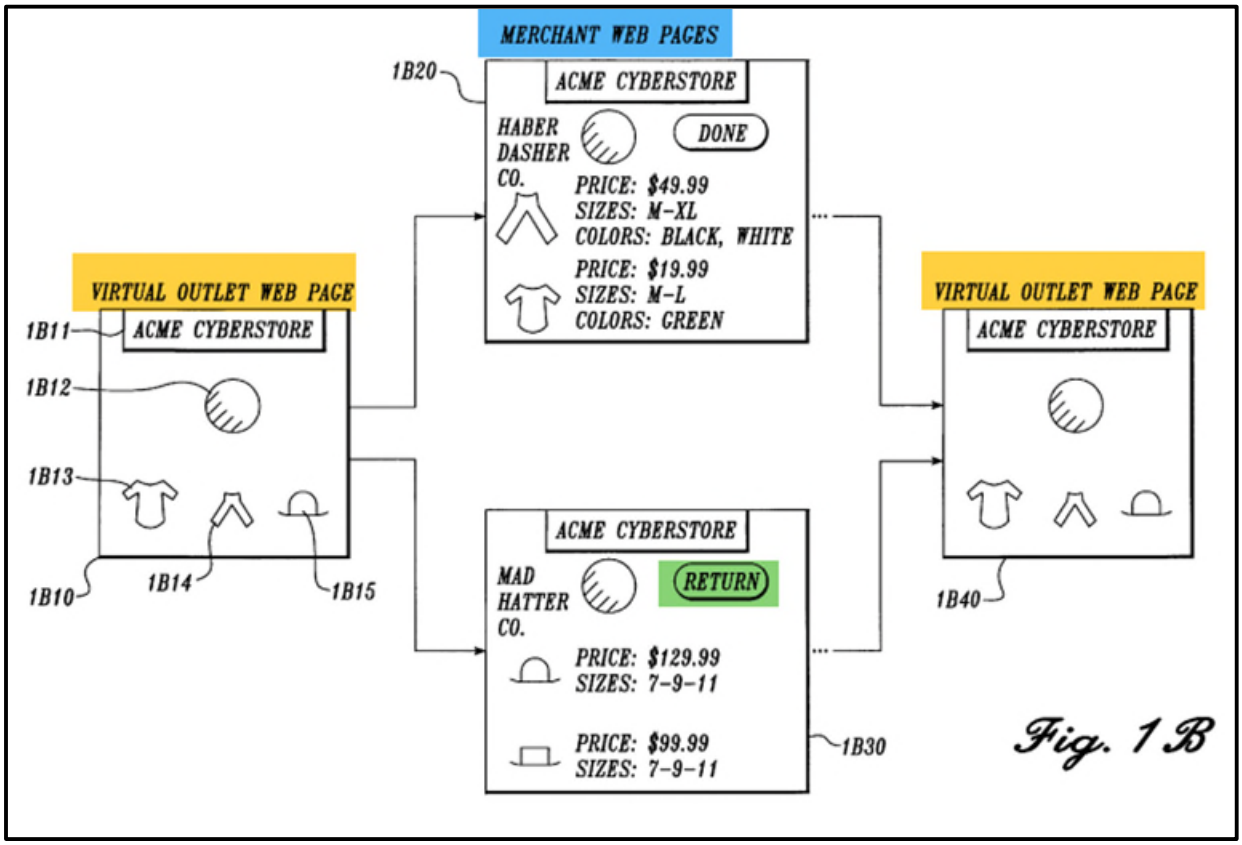
491. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking and VO/Merchant system with Arora's robust graphical user interface and web design functionality to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b. As explained above (§VII.B.5.c), a Skilled Artisan would have understood that when the user uses Arora's drag and drop editing commands a user sends an "*an instruction to modify the web asset to generate an edited web asset*."

492. Fig. 2 of Arora, which "is a block diagram showing input and output to page draw editor software," specifies that after a page layout is edited, such as by using "drag and drop editing commands," the user "clicks on the publish button" which publishes the page "in accordance with draw objects" and an HTML for the page is created



EX1009, Fig. 2 (annotated).

493. A Skilled Artisan would have understood that after editing the VO web page using Arora's graphical user interface, the page would have been published as a VO web page, such ACME Cyberstore, illustrated in Fig. 1B.



EX1008, Fig. 1B (annotated).

494. Accordingly, Arnold in combination with Arora discloses or renders obvious "*modifying, based upon the instruction, the first website to include the edited web asset*."

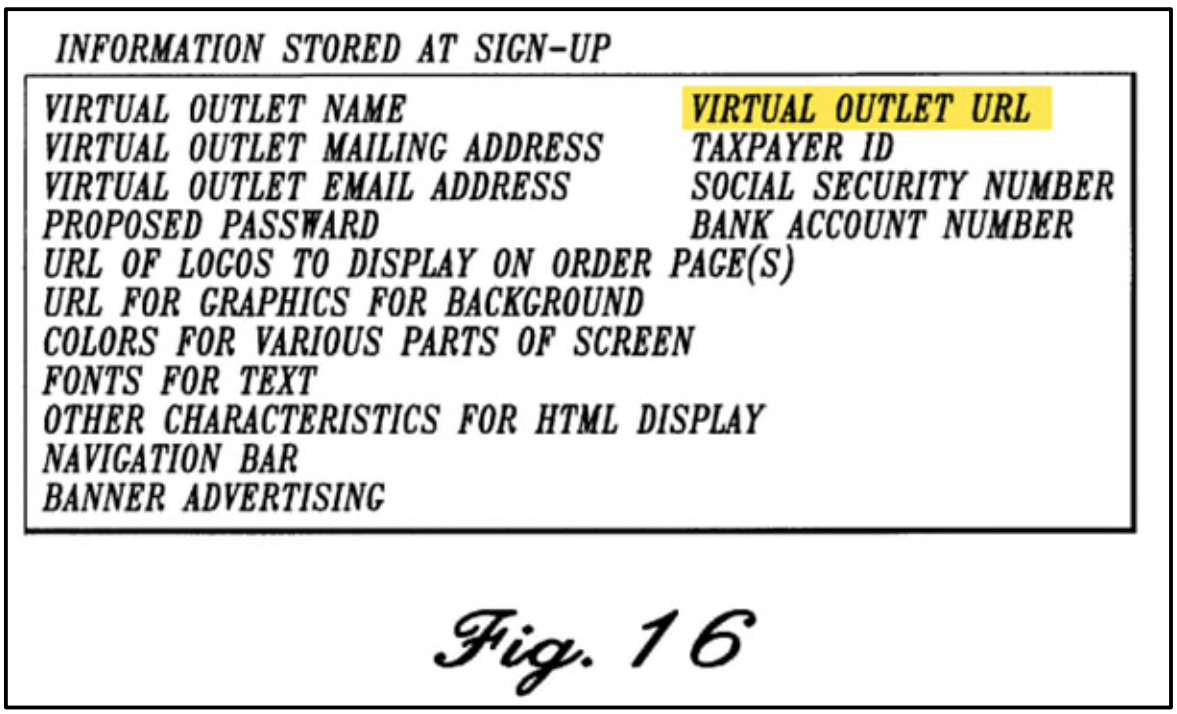
i. *1[h]: modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink;*

495. In my opinion, Arnold in combination with Arora discloses or renders obvious "*modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink.*"

496. As explained above, §VII.B.5.b, a Skilled Artisan would have understood that the virtual outlet web page is a page within the "*first web site*."

497. As explained above, §VII.B.5.g, the selection of a merchant from the graphical user interface, results in "*first information indicating that the first identification was received*" being stored within the merchant MOMC.

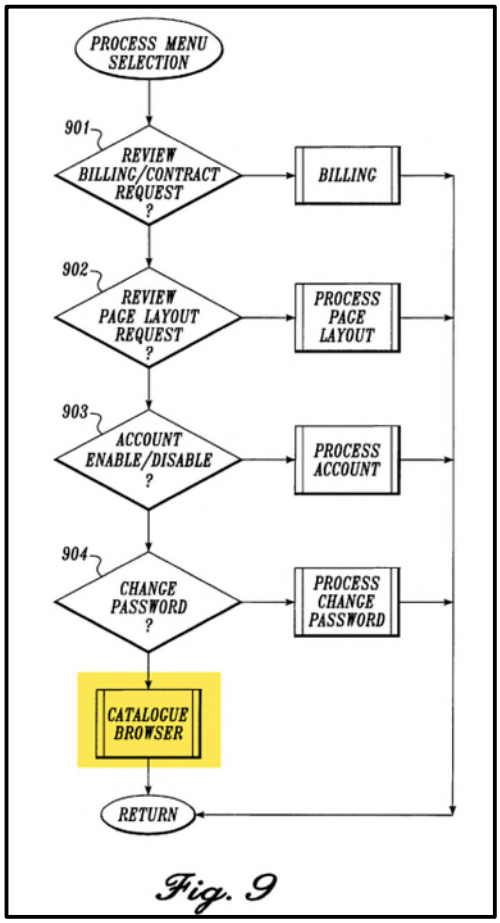
498. Arnold explains that "[i]f the information was correctly specified" during sign-up, the system "temporarily stores the sign-up information in a file on the merchant computer in step 1504 and returns." EX1008, 12:39-44. In Fig. 16, Arnold "lists example information returned by the VO to the merchant during the sign-up process." EX1008, 12:54-56, Fig. 16. As shown below, said "*information indicating…*" includes the "virtual outlet URL."



EX1008, Fig. 16 (annotated).

499. Once the sign-up information (i.e., "*first information indicating…*") is stored on the merchant computer, the merchant will "send an email to the VO to notify the VO of the establishment of the relationship and will activate the account so that the VO can subsequently login to the merchant maintenance facilities." EX1008, 13:1-15.

500. Arnold, in Fig. 9, illustrates "[a] flow diagram for the routine Process_Menu_Selection" which "calls" the "Catalog—Browser routine[], depending on the [VO] representative's selection." EX1008, 10:23-24, Fig. 9. The VO receives access to the Catalog—Browser function "*based upon*" the "*first information indicating…*" (i.e., sign up information) being stored on the merchant computer.

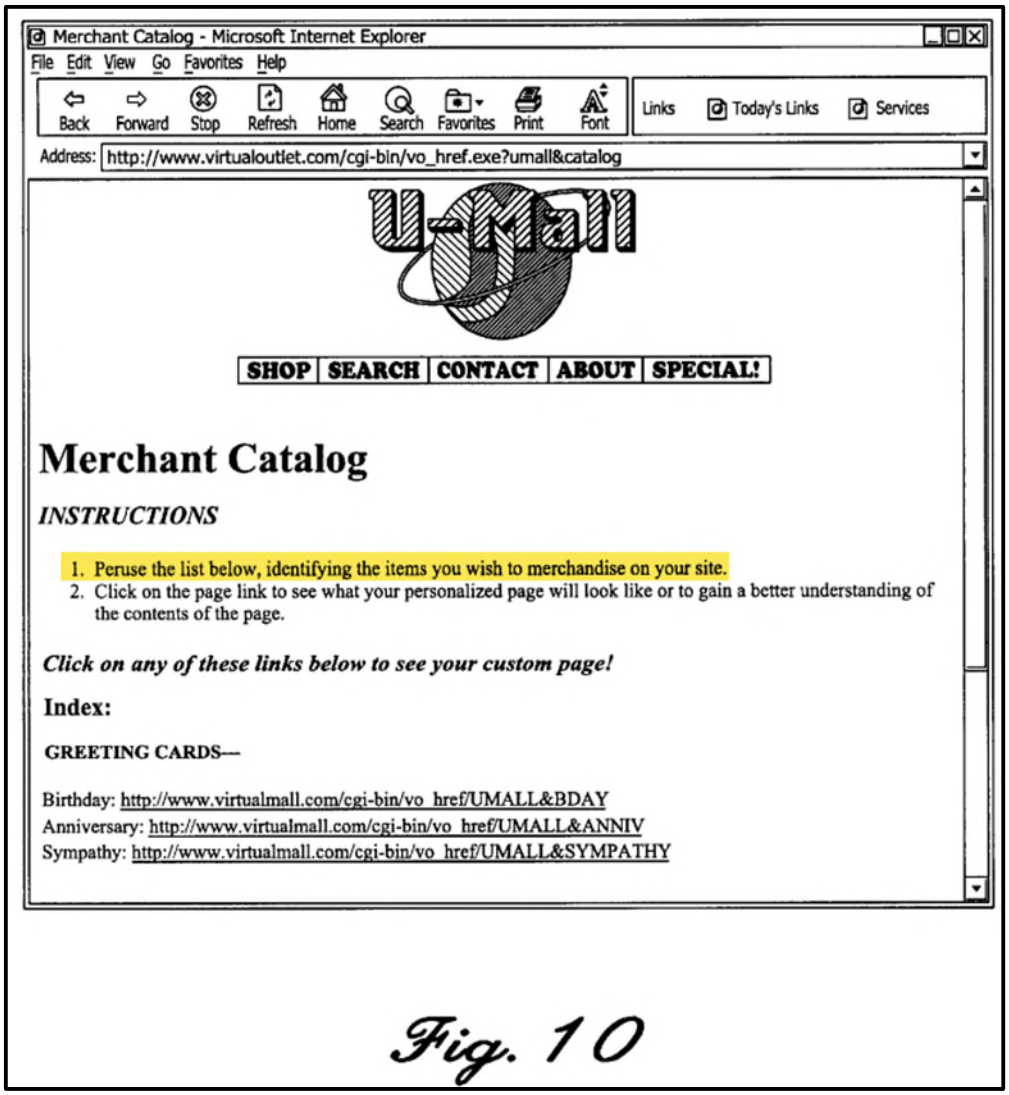


EX1008, Fig. 9 (annotated).

501. Arnold explains that "The Catalog-- Browser routine allows a VO representative to browse through catalog **Web pages supplied by the merchant**. The VO may incorporate items into the VO Web pages by including the URLs obtained from the merchant's catalog as hot links in the VO Web pages." EX1008, 10:47-48.

502. In Fig. 10 (shown below), Arnold depicts "an example catalog Web page." This catalog web page allows a VO representative to "incorporate items into

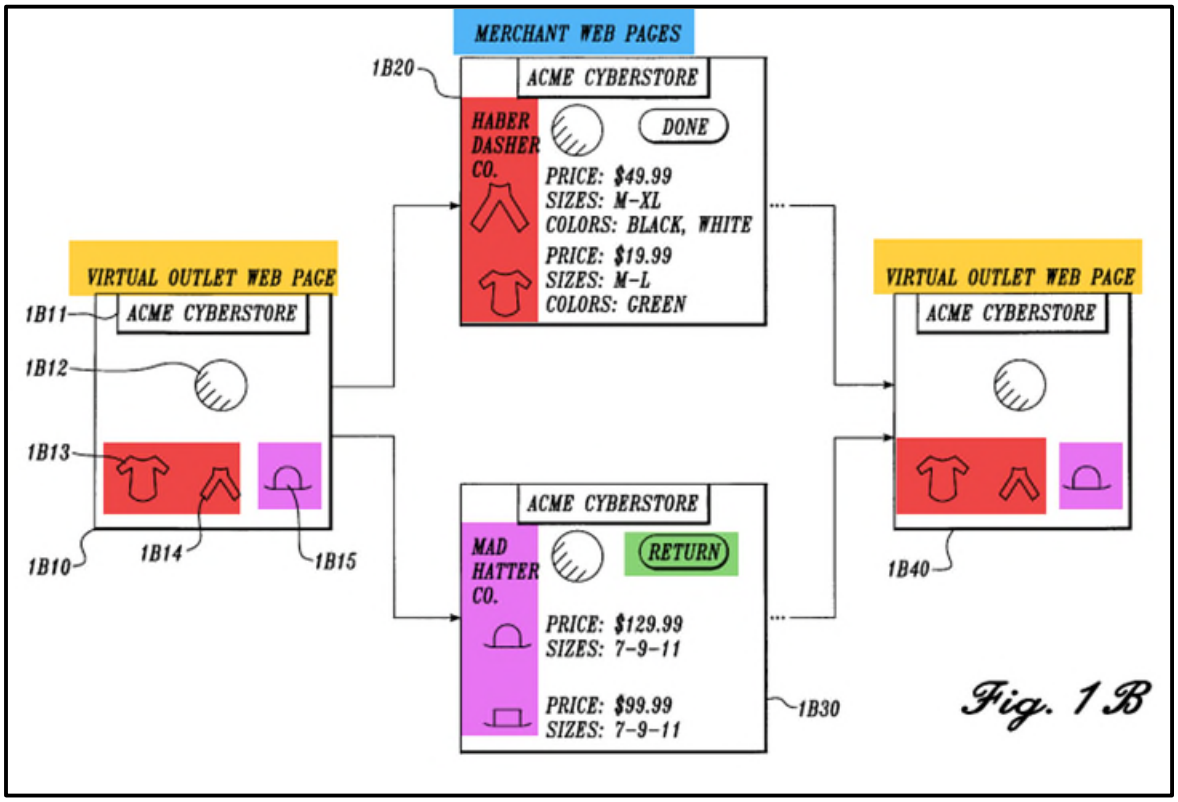
the VO Web pages by including the URLs obtained from the merchant's catalog as hot links in the VO Web pages." EX1008, 10:43-48, Fig. 10.



EX1008, Fig. 10 (annotated).

503. The catalog of Fig. 10 states, as instruction 1 for the VO representative (highlighted), "peruse the list below, identifying the items you wish to merchandise on your site."

504. Arnold, in Fig. 1B (shown below), depicts the "sequence of Web pages as seen by a customer of a VO." *See* EX1008, 7:30-31. Here, Arnold illustrates the **VO Web Page** linking to various **Merchant Web Pages**, **Haber Dasher Co**. and **MadHatter Co**. *See* EX1008, 7:30-8:6 (" In this example, the name of the VO is "AcmeCyberstore;" its logo is a circle with lines; and it is offering to sell shirts, pants, and hats. The shirt and pants are sold through a merchant named "HaberDasher Company," and the hats are sold through a merchant named "MadHatter Company." When a customer accesses the Web page for the AcmeCyberstore, the customer would see Web page 1B10. This Web page contains banner 1B11 and logo 1B12, which identify the VO. In addition, this Web page contains the images 1B13, 1B14, and 1B15 of the products that are being offered for sale. **When a customer selects a product to purchase (or to view product information), the browser accesses the Web page for the merchant that sells the product. The Web page is identified by a URL (i.e., hotlink) associated with that product**."). A Skilled Artisan would have understood that the URL (i.e., hotlink) from the virtual outlet web page to the merchant page is a "*first hyperlink*" and that it is inserted in the "*first website*" (as shown below in **red**).



EX1008, Fig. 1B (annotated).

505. Referring to Fig. 1B, Arnold explains that "[t]he Web page is identified by a URL (i.e., hotlink) associated with that product. For example, the shirt image 1B13 may have the URL "http://WWW.HaberDasher.com/?AcmeCyberstore&AcmeCyberstore.com/home page&hat" associated with it." EX1008, 7:44-48 (annotated). Arnold explains that "[t]he portion "HaberDasher.com" identifies the merchant that sells the shirt, the portion "AcmeCyberstore" identifies the VO, and the portion "AcmeCyberstore.com/homepage" identifies the Web page to return to after the sale is complete." Thus, the "hotlink" includes the VO Web page, AcmeCyberstore and

the merchant HaberDasher. A Skilled Artisan would have understood that when the VO representative selects an item from the merchant catalog, a new URL would be created. *See* EX1008, 6:26-31 ("Once the relationship has been established, a representative of the VO can login to the merchant computer's account management component, which provides to the representative the ability to change the VO's password, to review and change account information, to browse the merchant's catalog to select items to sell…") For example, the shirt image resulted in "**&hat**" being appended to create the hotlink: "http://WWW.HaberDasher.com/?AcmeCyberstore&AcmeCyberstore.com/home page**&hat**".

506. As explained above, the sign-up information ("*information indicating…*") includes the "virtual outlet URL." A Skilled Artisan would have understood that the hotlink, which contains the "virtual outlet URL," is thus created "*based upon the first information indicting that the first identification was received*." Furthermore, Arnold explains that "[i]f a return Web page is not identified, the merchant can use a default return Web page for that virtual outlet." EX1008, 7:52-54. A Skilled Artisan would have understood that this "default return Web page," is the URL specified by the VO representative during sign-up.

507. Accordingly, Arnold in combination with Arora discloses or renders obvious "*modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink.*"

j. *1[i]: modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site; and*

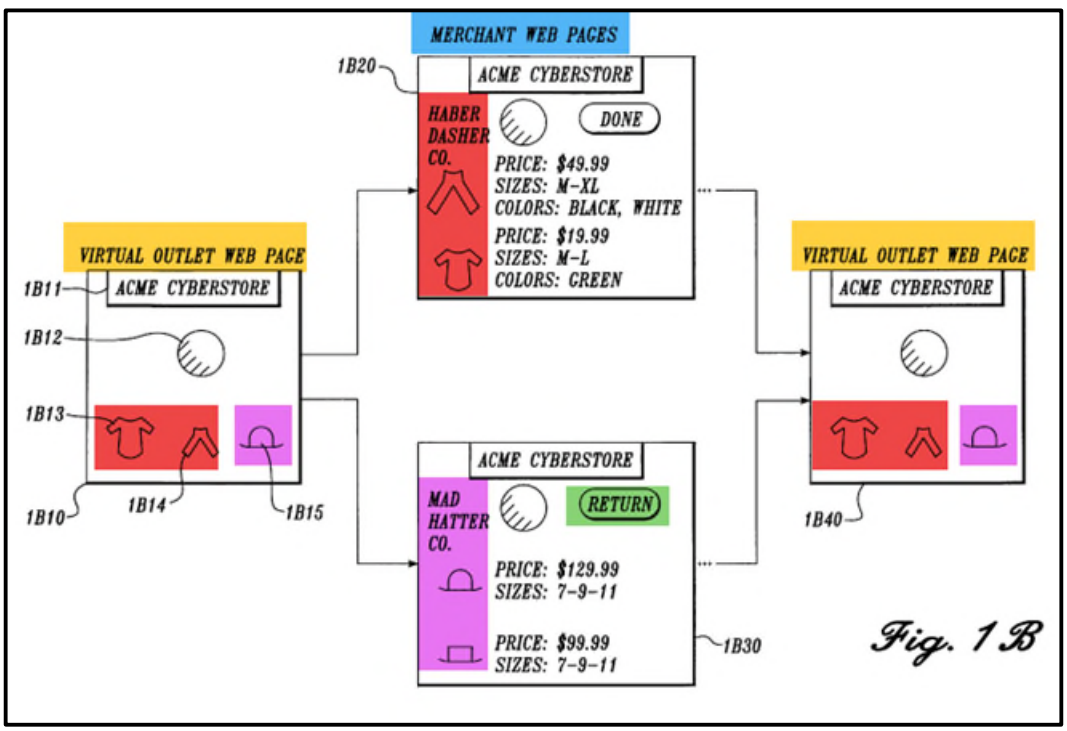
508. In my opinion, Arnold in combination with Arora discloses or renders obvious "*modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site.*"

509. As explained above, §VII.B.5.f, a Skilled Artisan would have understood that the merchant web page is a page within the "*second web site.*"

510. As explained above, §VII.B.5.g, the selection of a merchant from the graphical user interface, results in "*first information indicating that the first identification was received*."

511. As described above, Arnold explains "[t]he VO may incorporate items into the VO Web pages by including the URLs obtained from the merchant's catalog as hot links in the VO Web pages." EX1008, 10:47-48. Thus, a hot link is not created until the VO representative sends "*first information indicating that the first identification was received*."

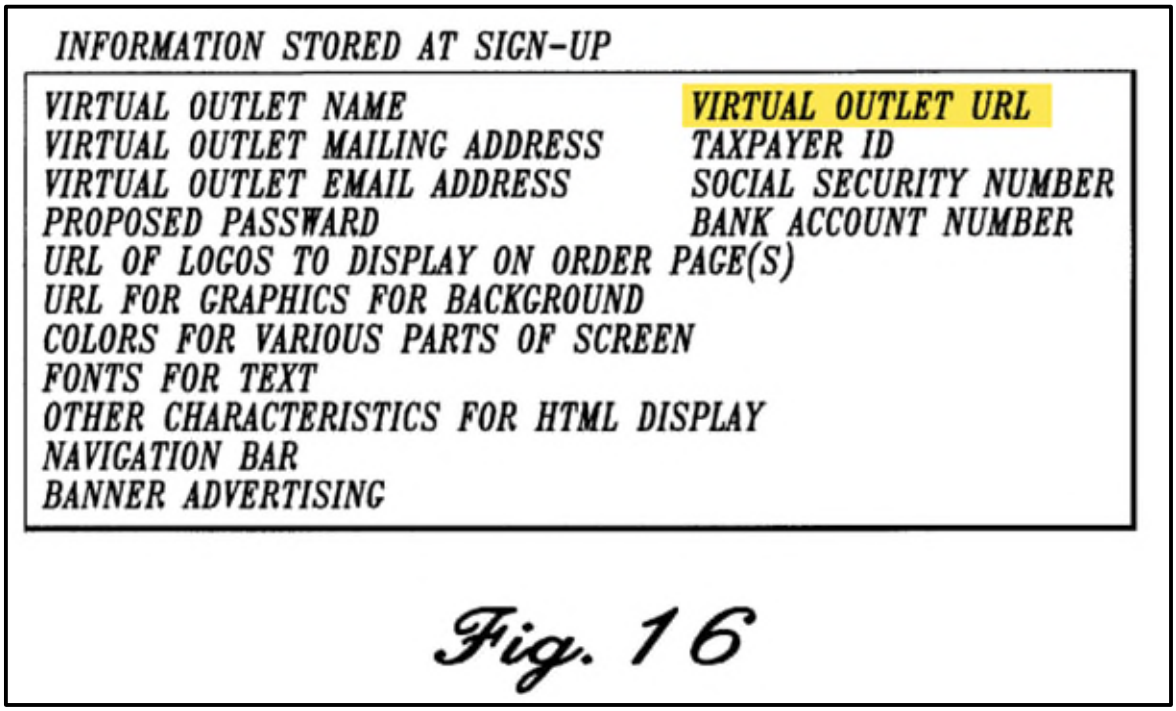
512. Arnold explains that "[w]hen the merchant computer for the HaberDasher Company receives this [hot link] URL" it "dynamically creates a Web page (e.g., an HTML file) in accordance with the layout and **associates the return URL with an icon on the Web page**. The merchant computer then sends that Web page to the customer computer. The customer computer displays the merchant Web page 1B20, 1B30. The merchant Web page may allow the representative to browse through various other Web pages to collect information (e.g., delivery address or credit card number) relating to the purchase. **When the customer has completed the purchase, the customer can select the return icon to return to the Web page lB40 for the AcmeCyberstore VO**." EX1008, 7:62-8:6 (emphasis added), Fig. 1B.



EX1008, Fig 1B.

513. In particular, as explained above (§VII.B.5.a), when the merchant computer receives the request for the web page, the "merchant computer modifies the merchant Web page." EX1008, 4:20-21. The merchant computer can modify the page to include for example, specialized logos, information, banners, and will also add a "**return link**." EX1008, 4:20-21. The modified merchant Web page is displayed at the customer computer to allow the customer to purchase the product from the merchant. EX1008, 4:25-27. Accordingly, a Skilled Artisan would have understood that because the return icon in the merchant web page links back to the virtual outlet web page, the return icon is a "*reciprocal second hyperlink to the first web site*." A Skilled Artisan would have also understood that Arnold discloses "*modifying…the second website*" to include the return link.

514. As explained above, the "*information indicating…*" includes the "virtual outlet URL."



EX1008, Fig. 16 (annotated).

515. Again, referring to Fig. 1B, Arnold explains that "[t]he Web page is identified by a URL (i.e., hotlink) associated with that product. For example, the shirt image 1B13 may have the URL "http://WWW.HaberDasher.com/?AcmeCyberstore&AcmeCyberstore.com/home page&hat" associated with it." EX1008, 7:44-48. Arnold explains that "[i]f a return Web page is not identified, the merchant can use a default return Web page for that virtual outlet." EX1008, 7:52-54. A Skilled Artisan would have understood that this "default return Web page," is the URL specified by the VO representative during sign-up. Therefore, a Skilled Artisan would have understood that the return hotlink that is inserted in the "*second website*" is "*based upon*" the sign up information.

Accordingly, Arnold in combination with Arora discloses or renders obvious "*modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site.*"

k. *1[j]: serving computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site, wherein*

516. In my opinion, Arnold in combination with Arora discloses or renders obvious "*serving computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site.*"

517. As explained above, §VII.B.5.b, a Skilled Artisan would have understood that the virtual outlet web page is a page within the "*first web site*."

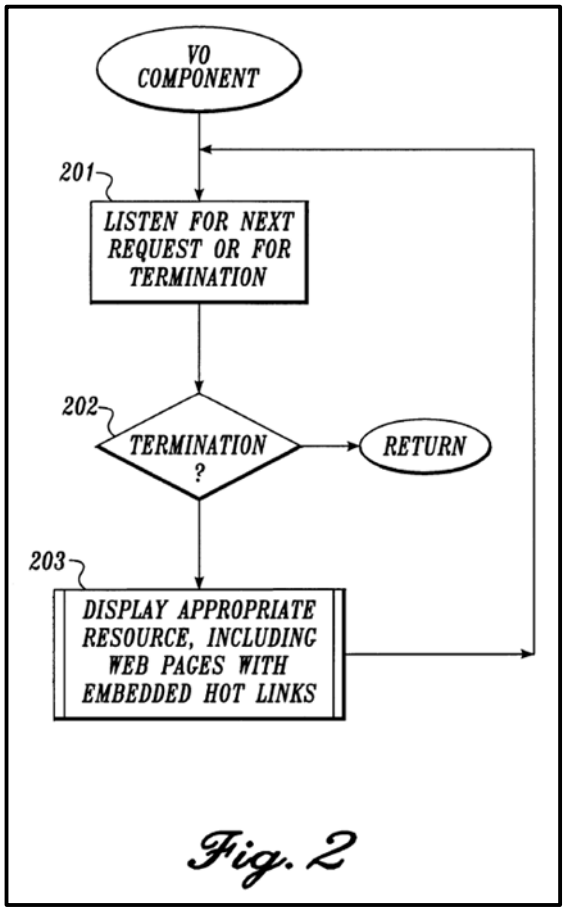
518. As explained above, §VII.B.5.f, a Skilled Artisan would have understood that the merchant web page is a page within the "*second web site.*"

519. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking and VO/Merchant system with Arora's robust graphical user interface and web design functionality to design the virtual outlet web page and the merchant web page. *Supra* §VII.B.5.b. As explained above (§VII.B.5.h), a Skilled Artisan would have understood that in this combination, when the user uses Arora's

drag and drop editing commands and subsequently publishes the page, a user modifies the virtual outlet webpage "*to include the edited web asset*."

520. As discussed above, §VII.B.5.f, a Skilled Artisan would have understood that the URL (i.e., hotlink) from the virtual outlet web page to the merchant page is a "*first hyperlink*."

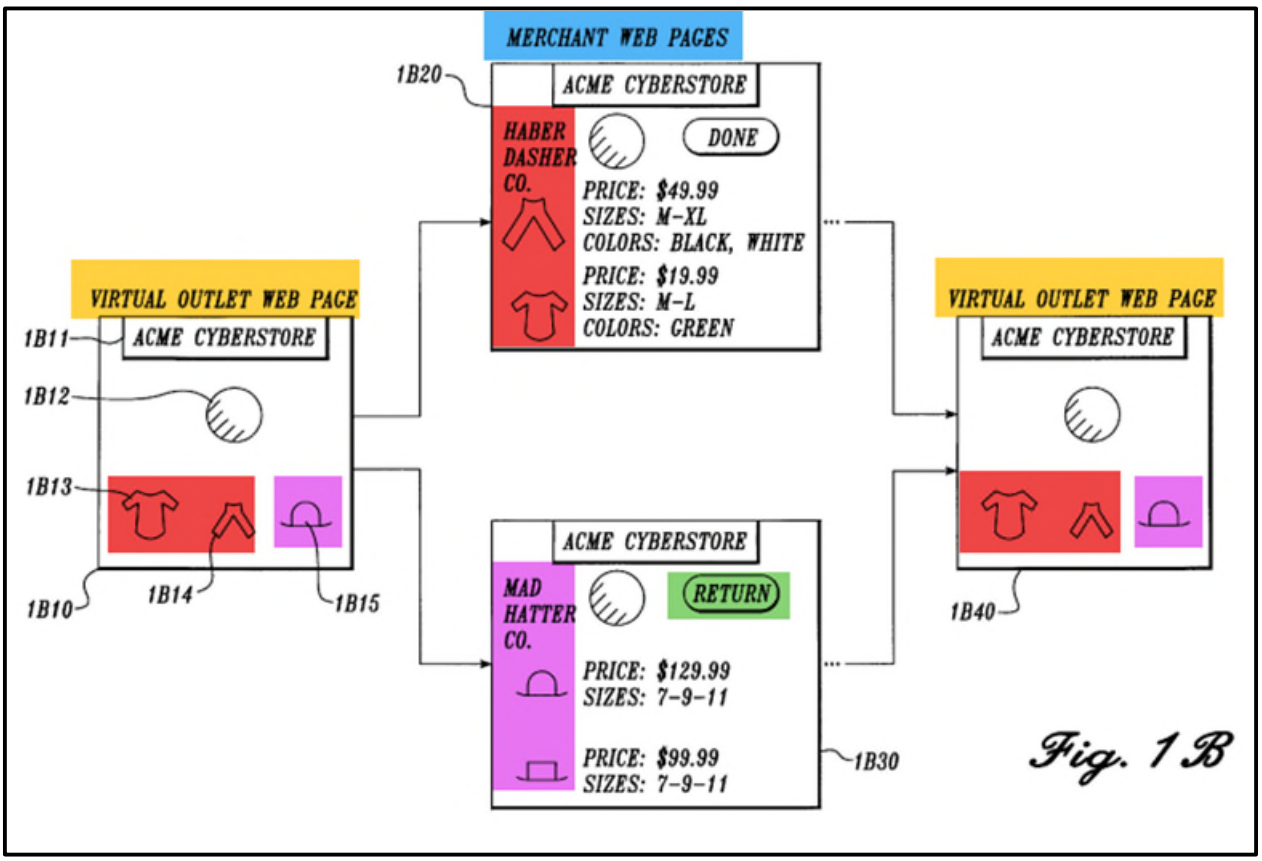
521. Arnold, in Fig. 2 (shown below), illustrates a "flow diagram for the virtual outlet component of the VO." EX1008, 8:25. Arnold explains that "[t]he virtual outlet component is a WWW server. In step 201, the virtual outlet component listens for a request from a customer identified by a URL." In step 203, "the virtual outlet component sends to the customer's computer **the requested VO Web page or requested resource, such as a graphics file… The HTML file defining a VO Web page may contain hot links to merchant order Web pages.** Each hot link identifies a merchant order Web page and the VO, and optionally a return VO Web page." EX1008, 8:25-36 (emphasis added). Therefore, the "*server system*" serves "*computer data associated with the first website that includes … the first hyperlink from the first web site to the second web site*" to a customer computer.



EX1008, Fig. 2.

522. In Fig. 1B, "illustrates the sequence of Web pages as seen by a customer of a VO." EX1008, 7:30-31. Arnold explains that "In this example, the name of **the VO is "AcmeCyberstore;"** its logo is a circle with lines; and it is offering to sell shirts, pants, and hats. The shirt and pants are sold through a merchant named "**HaberDasher Company**," and the hats are sold through a merchant named "**MadHatter Company**." When a customer accesses the Web page for the **AcmeCyberstore**, the customer would see Web page 1B10…. [T]his Web page contains the images **1B13, 1B14**, and **1B15** of the products that are being offered for

sale**. When a customer selects a product to purchase (or to view product information), the browser accesses the Web page for the merchant that sells the product. The Web page is identified by a URL (i.e., hotlink) associated with that product.**" EX1008, 7:30-8:6 (emphasis added), Fig. 1B.



EX1008, Fig. 1B (annotated).

523. A Skilled Artisan would have understood that since Arora can edit any image the "*edited web asset*" could be any image shown in the "*first website*" including the logo or any of the items for sale. As explained above (§VII.B.5.h), the first website would be published after the "*edited web asset*" is added.

524. Accordingly, Arnold in combination with Arora discloses or renders obvious "*serving computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site.*"

l. *1[k]: the server system is configured to host the first web site and the second website,*

525. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the server system is configured to host the first web site and the second website.*"

526. As discussed above, the server system of Arnold includes VO computer 1A10 and merchant computer 1A11. EX1008, Fig 1A.

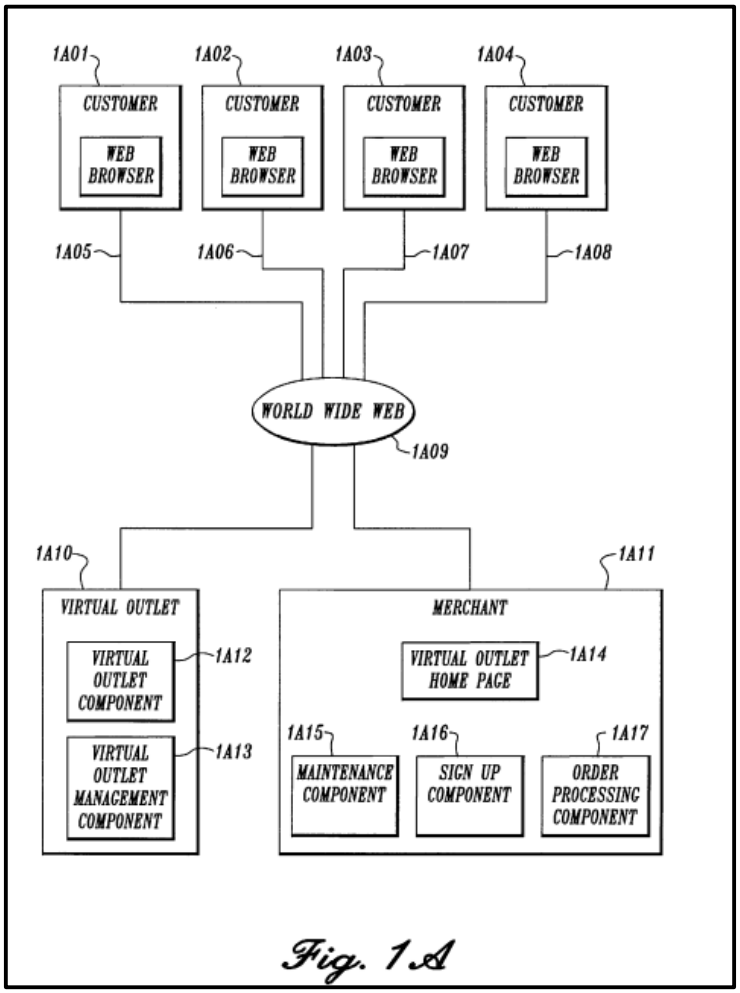


Fig. 1A

EX1008, Fig 1A.

527. As explained above, §VII.B.5.b, a Skilled Artisan would have understood that the virtual outlet web page is a page within the "*first web site*."

528. As explained above, §VII.B.5.f, a Skilled Artisan would have understood that the merchant web page is a page within the "*second web site.*"

529. Arnold explains that "[t]he VO computer includes a virtual outlet component 1A12 that provides the Web pages of the virtual outlet to customers via the WWW." EX1008, 7:4-6. Because the web page of the virtual outlet is the first

website, a Skilled Artisan would have understood that Arnold discloses "*the server system is configured to host the first web site*."

530. Arnold also explains that "[t]he merchant computer" shown in Fig. 1A, "also includes an order processing component 1A17 that provides order Web pages directly to customer computers via the network." EX1008, 7:17-19.

531. As discussed above, Arnold explains that the merchant computer "dynamically creates a Web page (e.g., an HTML file) in accordance with the layout and associates the return URL with an icon on the Web page. The merchant computer then sends that Web page to the customer computer. The customer computer displays the merchant Web page 1B20, 1B30." EX1008, 7:62-67. Because the merchant web page is the second website, a Skilled Artisan would have understood that Arnold discloses "*the server system is configured to host… the second web site*."

532. Accordingly, Arnold in combination with Arora discloses or renders obvious "*the server system is configured to host the first web site and the second website*."

m. *1[l]: the editing screen is configured to display the web asset, and*

533. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the editing screen is configured to display the web asset.*"

534. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking and VO/Merchant system with Arora's robust graphical user

interface and web design functionality to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b.

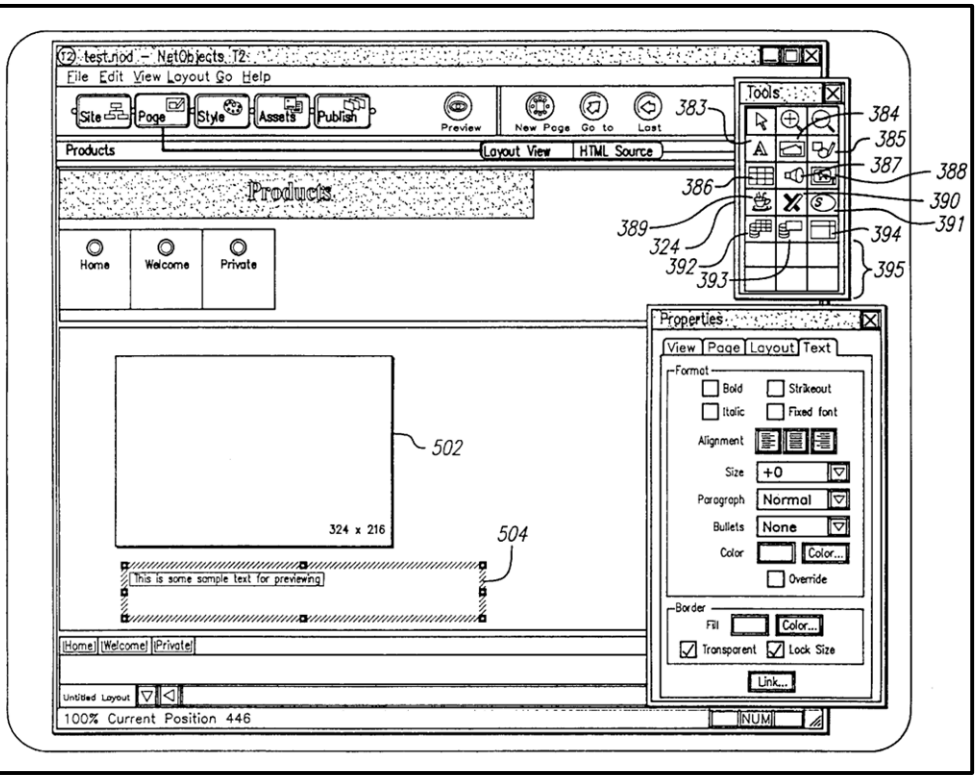
535. As explained above, §VII.B.5.c, a Skilled Artisan would have understood that the screen of the page draw editor having image 502 and text 504 is an "*an editing screen of the graphical user interface.*" In particular, a Skilled Artisan would have understood that after the "drag and drop" commands are received through the "Properties" window, the web asset is edited. For example, in the case of if the user selects an "image," the user can use Tool 3052 within the "Properties" window to specify "a color of the image" that the user wants to be transparent. Arora explained that "[w]hen the image is displayed, pixels of that color in the image will be suppressed so that the background will show through. (This means that a new image with a transparent color must be generated when the HTML is generated)." EX1009, 10:13-30. Therefore, using Tool 3052 "generates" a "new image with a transparent color" (i.e., an edited web asset) based on the instruction received through the "Properties" window. Moreover, Arora explains that an "*edited web asset*" is displayed.

536. A Skilled Artisan would have understood that the point of the "What You See Is What You Get" (WYSIWYG) editor of Arora is to display edited web objects as they are edited. EX1009, 2:20-35. In particular, Arora describes "a true WYSIWYG Web page" where "most browsers to display a page that has

substantially the same layout, proportionality, coloring, and spacing as the layout of the page displayed by the page draw editor software." *Id*. Accordingly, Arora describes an "*editing screen [that] is configured to display the web asset*."

537. As explained above, §VII.B.5.c, the "*graphical user interface*" of Arora has an "*editing screen*." For example, in Fig. 5, Arora illustrates the page draw editor "after the user has dragged and dropped an image 502 and some text 504 into the layout." Box 504, and the accompanying "Properties" allows the user to edit sample text.

FIG. 5



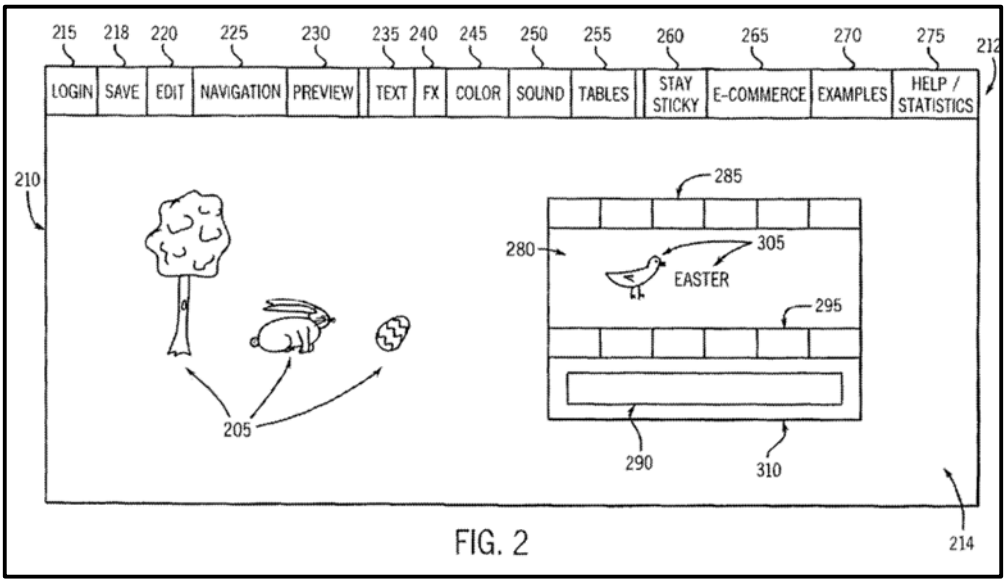
EX1009, Fig. 5.

538. Accordingly, Arnold in combination with Arora discloses or renders obvious "*the editing screen is configured to display the web asset*."

n. ***1[m]: the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.***

539. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.*"

540. The challenged '316 Patent, referring to Fig. 2 (shown below), explains "The GUI is provided on a display at the registered user computer 180 and includes a **primary display screen**, which is termed a STICKY WEB™ website design plate 210 (or web design plate) (STICKY WEB™ is a trademark of the Perfect Web Corporation, of Delray Beach, Fla.). Website design plate 210 has a plurality of selection buttons 212, which in the preferred embodiment include a log in button 215, a save button 218, an edit button 220, a navigation button 225, a preview button 230, a text button 235, an fx button 240, a color button 245, a sound button 250, a tables button 255, a STAY STICKY™ button 260, an e-commerce button 265, an examples button 270 and a help/statistics button 275." EX1001 at 7:16-36 (emphasis added); Fig. 2.

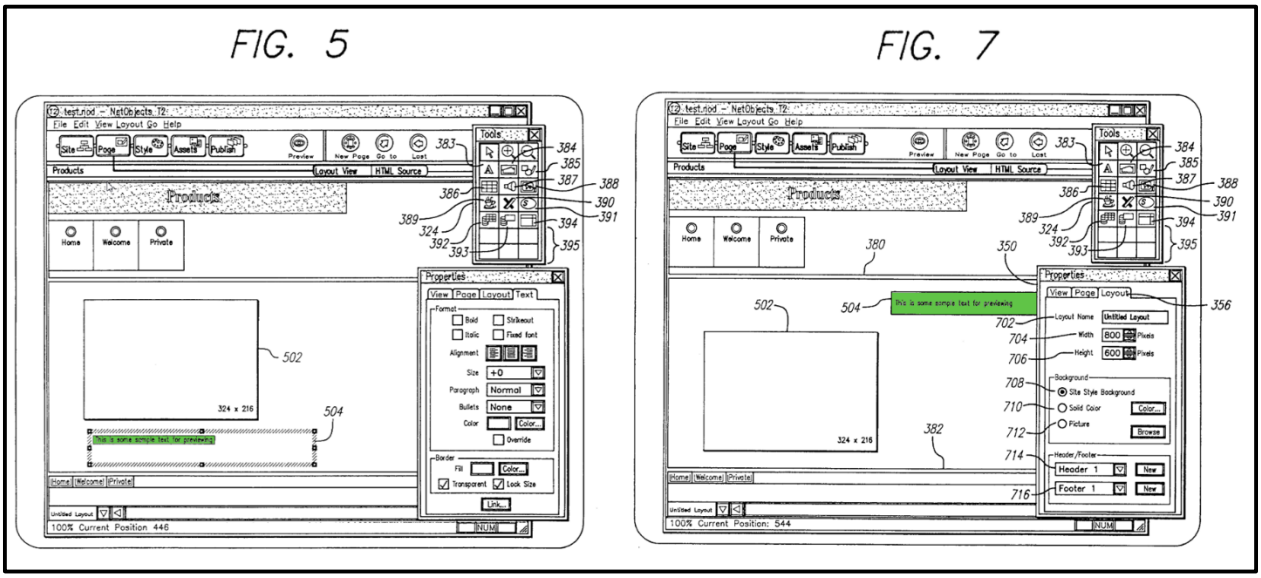


EX1001 at Fig. 2.

541. Thus, a Skilled Artisan would have understood that Website design plate 210 is exemplary of the primary display screen and includes a screen having design options and controls.

542. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking and VO/Merchant system with Arora's robust graphical user interface and web design functionalities to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b. As discussed above, , §VII.B.5.c, a Skilled Artisan would have understood that when the user uses Arora's drag and drop editing commands a user sends an "*an instruction to modify the web asset to generate an edited web asset*."

543. Fig. 7 of Arora shows the graphical user interface of Arora "after the user has dragged and dropped the text to a different location on the page."



EX1009 FIGs.5, 7.

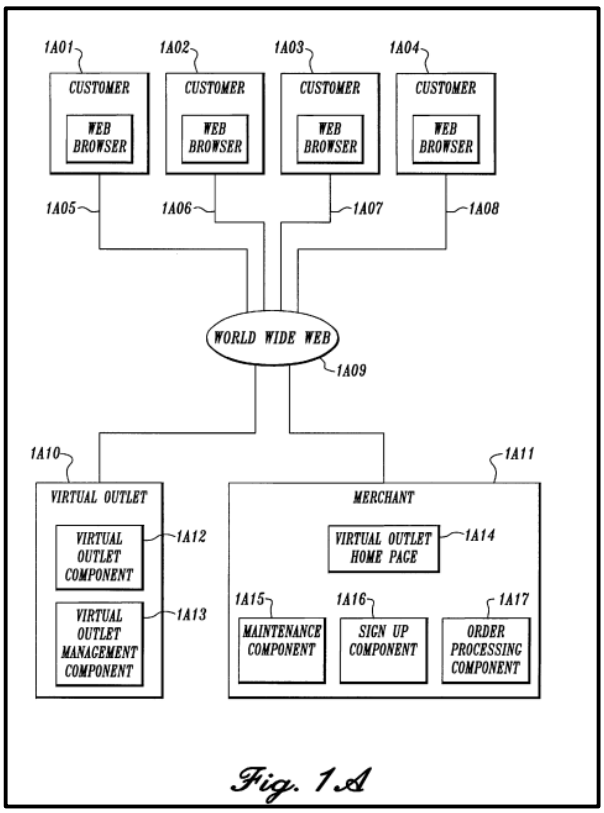
544. The screen in Fig. 7 has design options and controls and is visually similar to the Website design plate 210 ("*primary display screen*") described in the '316 patent. EX1001, 7:15-17, Fig. 2. Moreover, as explained above the combination discloses displaying the edited web asset in the WYSIWYG editor of Arora. Accordingly, Arnold in combination with Arora discloses or renders obvious "the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction."

o. ***2[a]: The method of claim 1, wherein the server system is configured to: store, within the computer database system, second information indicating that a second identification to create the second hyperlink from the second website to the first website was received by the***

server system and from a second user associated with the second web site, and

545. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the server system is configured to: store, within the computer database system, second information indicating that a second identification to create the second hyperlink from the second website to the first website was received by the server system and from a second user associated with the second web site.*"

546. As discussed above, the "*server system*" of Arnold includes VO computer 1A10 and merchant computer 1A11. EX1008, Fig 1A.



EX1008, Fig 1A.

547. As explained above, §VII.B.5.a, a Skilled Artisan would have understood that the virtual outlet web page is a page within the "*first web site*."

548. As explained above, §VII.B.5.f, a Skilled Artisan would have understood that the merchant web page is a page within the "*second web site."*

549. As discussed above, §VII.B.5.j, a Skilled Artisan would have understood that the return icon in the merchant web page is a "*reciprocal second hyperlink to the first web site*."

550. Arnold explains "[t]he prospective VO first establishes the relationship through a sign-up procedure. The VO provides the merchant with various information such as the VO's name, street address, email address, and design information (e.g., color scheme) of the VO Web site. The merchant computer accepts the information**, the merchant considers whether a VO relationship should be established, and, if the merchant decides to establish the relationship, the merchant computer sends a confirmation back to the prospective VO**." EX1008, 6:18-26 (emphasis added). Thus, "the merchant" "evaluat[es] whether to enter into a VO retail relationship with the VO." EX1008, 11:45-48. A Skilled Artisan would have understood that the merchant is a "*second user associated with a second web site*." Additionally, because the merchant must establish a relationship before a reciprocal arrangement can be established, a Skilled Artisan would have understood

that the confirmation is "*second information indicating that a second identification to create the second hyperlink from the second website to the first website.*"

551. Arnold explains that the "sign-up component of the merchant system is the counterpart to the Sign-up procedure of the maintenance component of the VO. The sign-up component allows a VO to supply information to the merchant that the merchant uses to evaluate whether to enter into a VO retail relationship with the VO. The maintenance component of the merchant is the counterpart to the login and maintenance procedures made available to the VO by the maintenance component of the VO. This component supports login requests from VOs, and, following successful logins, a range of maintenance functions for updating account information, changing the password assigned to the VO, and browsing the merchant's catalog." EX1008, 11:44-57.

552. As explained above in §VII.B.5.g, Arnold discloses "*storing, within a computer database system of the server system, first information indicating that the first identification was received by the server system*" based on the VO indicating an association with the merchant. A Skilled Artisan would understand that since the merchant has counterpart procedures, the "*second information indicating that a second identification to create the second hyperlink from the second website to the first website*" is also "*store[d], within the computer database system*."

553. Accordingly, Arnold in combination with Arora discloses or renders obvious "*wherein the server system is configured to: store, within the computer database system, second information indicating that a second identification to create the second hyperlink from the second website to the first website was received by the server system and from a second user associated with the second web site*."

p. *2[b]: modify the second website to include the second hyperlink based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received.*

554. In my opinion, Arnold in combination with Arora discloses or renders obvious "*modify the second website to include the second hyperlink based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received.*"

555. As explained above, §VII.B.5.f, a Skilled Artisan would have understood that the merchant web page is a page within the "*second web site."*

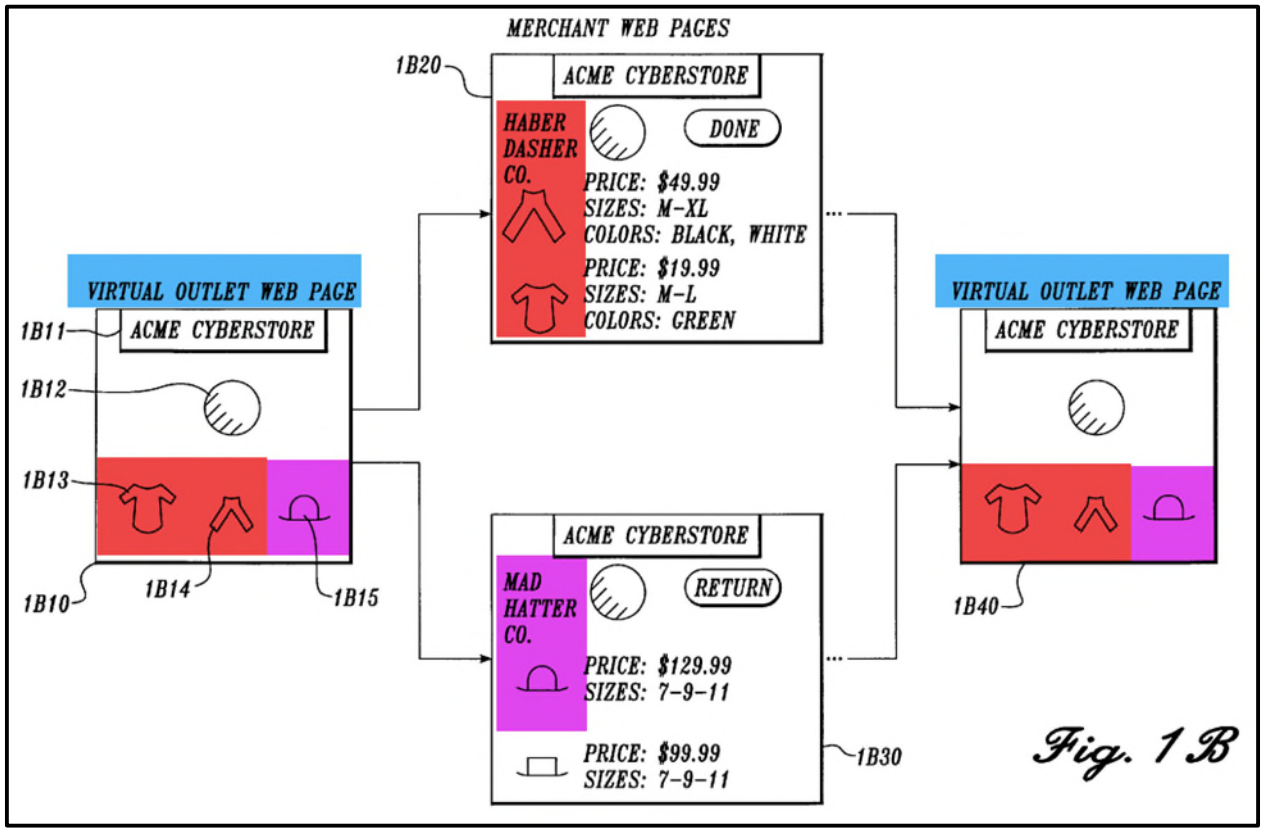
556. As discussed above, §VII.B.5.j, a Skilled Artisan would have understood that the return icon in the merchant web page is a "*reciprocal second hyperlink to the first web site*."

557. As explained above, §VII.B.5.g, the virtual outlet representative's selection of a merchant from the graphical user interface, results in "*first information indicating that the first identification was received*."

558. As explained above, §VII.B.5.o, a Skilled Artisan would have understood that the confirmation from the merchant to establish a relationship with a virtual outlet is "*second information indicating that a second identification to create the second hyperlink from the second website to the first website.*"

559. Arnold explains that, to establish a reciprocal relationship, a "**prospective VO first establishes the relationship through a sign-up procedure.** The VO provides the merchant with various information such as the VO's name, street address, email address, and design information (e.g., color scheme) of the VO Web site**.** The merchant computer accepts the information**, the merchant considers whether a VO relationship should be established, and, if the merchant decides to establish the relationship, the merchant computer sends a confirmation back to the prospective VO**." EX1008, 6:17-26 (emphasis added).

560. Arnold, in Fig. 1B (shown below), illustrates "the sequence of Web pages as seen by a customer of a VO" that has a reciprocal relationship with a merchant. EX1008, 7:30-31.



EX1008, Fig. 1B (annotated).

561. A Skilled Artisan would have understood that because the relationship between the virtual outlet web page and the merchant web page could not occur without both the virtual outlet representative's selection of a merchant from the graphical user interface as well as the merchant's confirmation to back to the prospective VO, Arnold in combination with Arora discloses or renders obvious "*modify the second website to include the second hyperlink based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received.*"

q. *3: The method of claim 1, wherein the graphical user interface is configured to receive an entry associated*

with the first identification within an entry field of the graphical user interface.

562. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the graphical user interface is configured to receive an entry associated with the first identification within an entry field of the graphical user interface.*"

563. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking system with Arora's robust graphical user interface to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b.

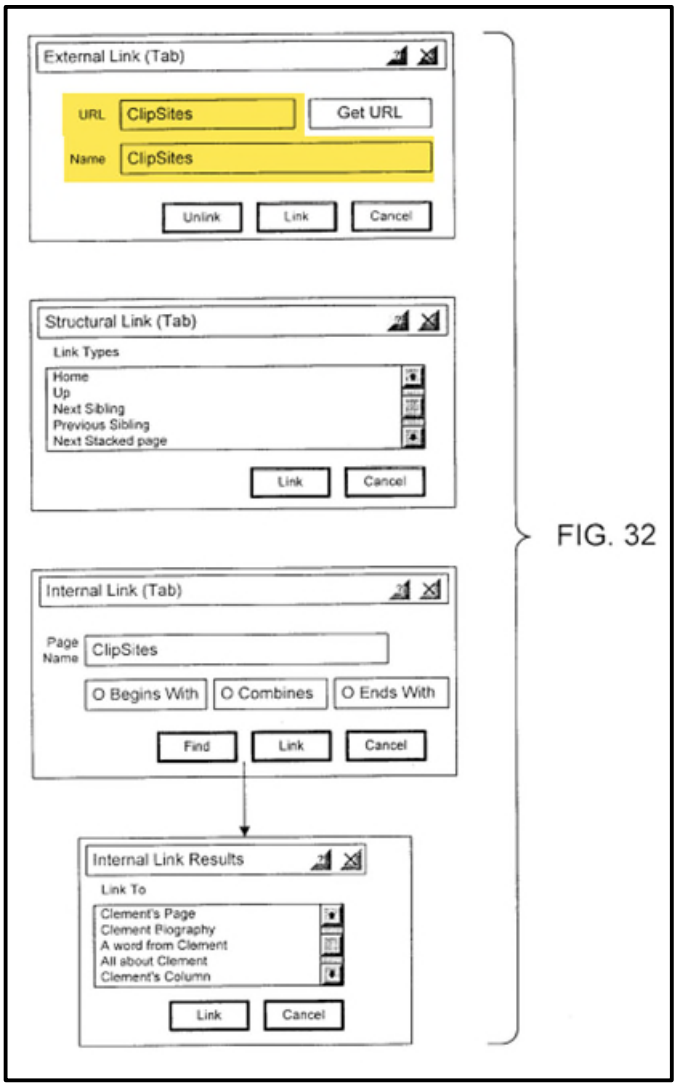
564. As explained above, §VII.B.5.g, the virtual outlet representative's selection of a merchant from the graphical user interface, results in "*first information indicating that the first identification was received*."

565. Arnold explains "the [VO] representative indicates with which merchant the VO wishes to interact. This information may be requested from the representative. Alternatively, the VOMC may provide the representative with a list of options from which to select a merchant." EX1008, 8:55-58.

566. A Skilled Artisan would have understood that requesting the information from a merchant requires "*an entry field of the graphical user interface*."

567. Indeed, Arora illustrates creating links to other websites using an entry field. For example, Arora, in Fig. 32 (shown below), illustrates creating links to other

websites. Here, users can link to an external link by inputting the "URL" or "Name" in an entry field.



EX1009, Fig. 32

568. Thus, Arnold in combination with Arora discloses or renders obvious "*configured to receive an entry associated with the first identification within an entry field of the graphical user interface.*"

r. *4[a]: The method of claim 1, wherein the graphical user interface is configured to present a graphical widget*

adjacent each of the one or more identifiers respectively associated with the one or more previously-created websites,

569. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the graphical user interface is configured to present a graphical widget adjacent each of the one or more identifiers respectively associated with the one or more previously-created websites.*"

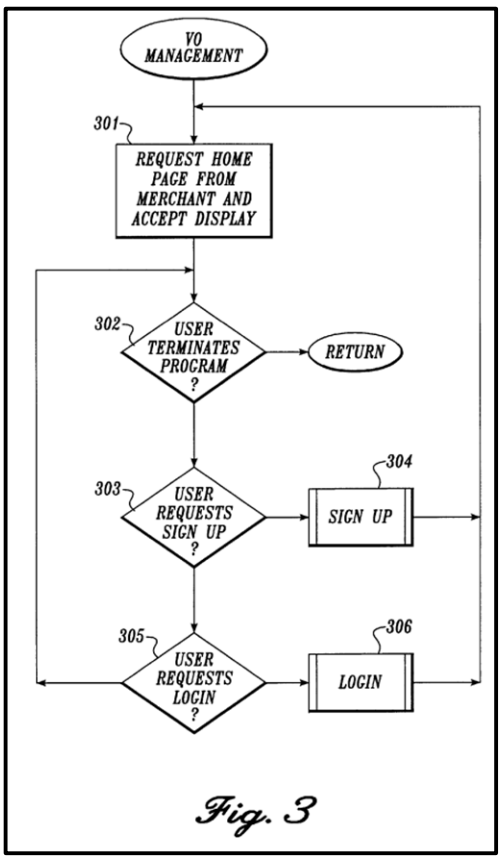
570. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking system with Arora's robust graphical user interface to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b.

571. As explained above §VII.B.5.e, a Skilled Artisan would have understood that the merchant site is an example of a "*previously-created website[].*"

572. As explained above, §VII.B.5.e, a Skilled Artisan would have understood that the list of options from merchants to choose from includes "*one or more identifiers respectively associated with one or more previously-created websites.*"

573. Arnold illustrates, in Fig. 3 (shown below), a "high-level flow control diagram for the virtual outlet management component," which includes the "sign-up" process. EX1008 8:45-46. Arnold describes "As part of step 301, the [VO] representative indicates with which merchant the VO wishes to interact. This information may be requested from the representative. Alternatively, **the VOMC**

may provide the representative with a list of options from which to select a merchant" EX1008, 8:55-58 (emphasis added).

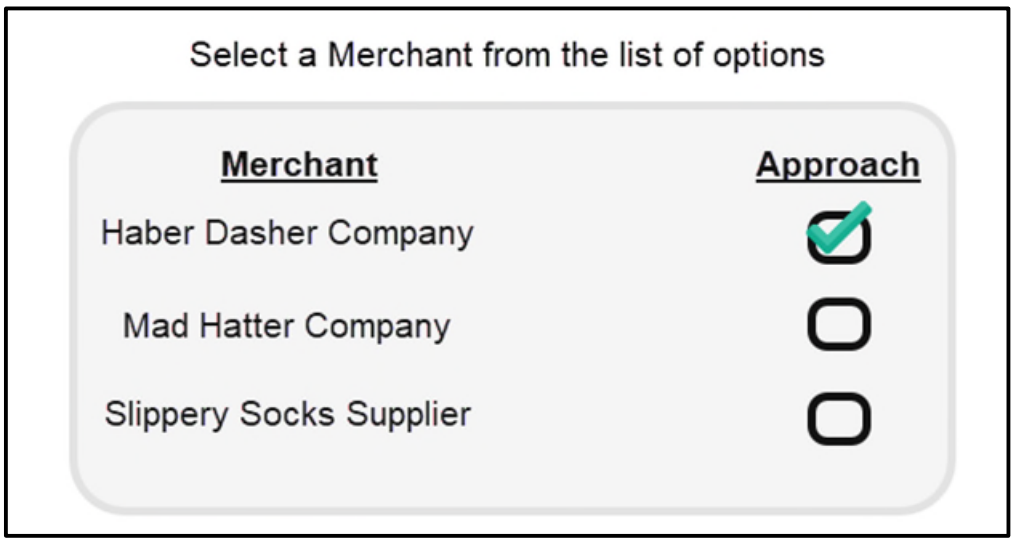


EX1008, Fig. 3.

574. A Skilled Artisan would have designed a user interface having "*a method of selection that includes a graphical widget adjacent to the selection*." For example, when the VO is presented a "list of options from which to select a merchant," a Skilled Artisan would have understood that a checkbox or "approach" button could appear indicating whether the VO had already signed up with, or approached, a given merchant. Thus, for merchants that the VO had already signed

up with, or approached, the checkbox would appear already checked (or the button could show the word "invited"), and for merchants that the VO had not already signed up with, or approached, the check box would appear unchecked (or the button could show the word "invited").

575. An example of this combination where a VO has already approached or signed up with merchant "Haber Dasher Company" but has not approached merchants "Mad Hatter Company" or "Slippery Socks Supplier" would look like:



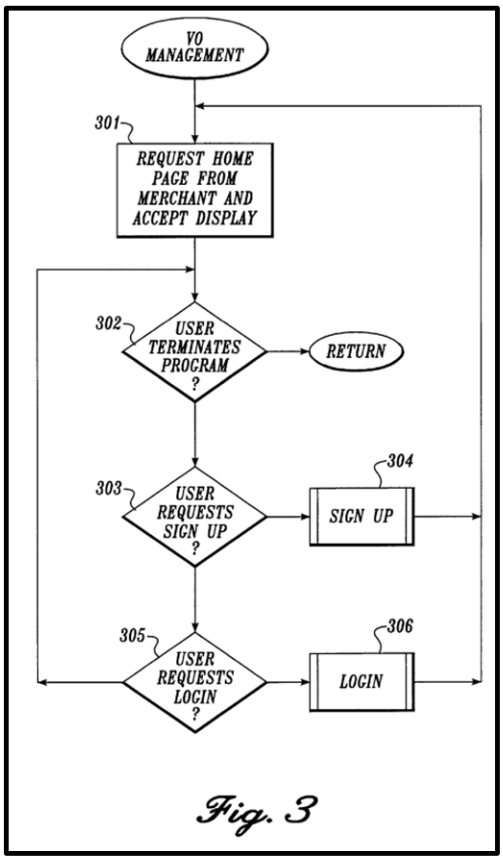
576. Accordingly, Arnold in combination with Arora renders obvious "*wherein the graphical user interface is configured to present a graphical widget adjacent each of the one or more identifiers respectively associated with the one or more previously-created websites*."

s. *4[b]: the graphical widget is configured to receive a user-initiated selection, and*

577. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the graphical widget is configured to receive a user-initiated selection.*"

578. As explained above, A Skilled Artisan would have understood that a checkbox or "approach" button could appear indicating whether the VO had already signed up with, or approached, a given merchant. Thus, for merchants that the VO had already signed up with, or approached, the checkbox would appear already checked (or the button could show the word "invited"), and for merchants that the VO had not already signed up with, or approached, the check box would appear unchecked (or the button could show the word "approach"). *Supra* §VII.B.5.r.

579. Arnold illustrates, in Fig. 3 (shown below), a "high-level flow control diagram for the virtual outlet management component." EX1008, 11:45-46. Arnold describes "As part of step 301, the [VO] representative indicates with which merchant the VO wishes to interact. This information may be requested from the representative. Alternatively, the VOMC may provide the representative with a list of options from which to select a merchant." EX1008, at 8:55-58.



EX1008, Fig. 3.

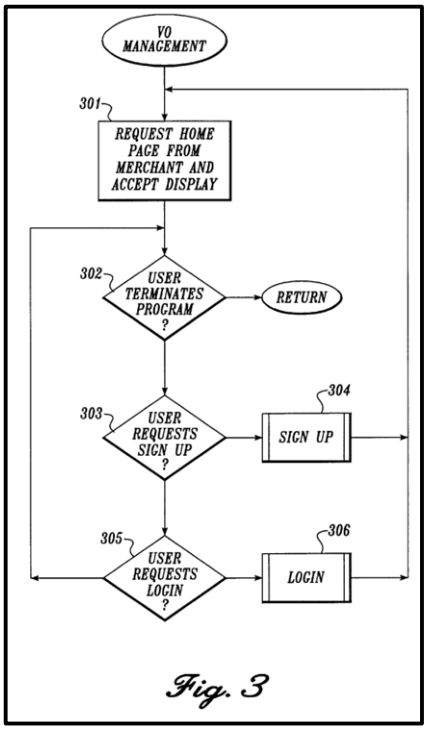
580. A VO could select the unchecked check box to select a merchant to sign up with, or approach. Thus, a Skilled Artisan would understand that the Arnold in combination with Arora discloses "*the graphical widget is configured to receive a user-initiated selection*."

t. *4[c]: the selection of the second website is based upon the user-initiated selection.*

581. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the selection of the second website is based upon the user-initiated selection.*"

582. As explained above, §VII.B.5.f, a Skilled Artisan would have understood that the merchant web page is a page within the "*second web site."*

583. Arnold illustrates, in Fig. 3 (shown below), a "high-level flow control diagram for the virtual outlet management component." EX1008, 8:45-46. Arnold describes "As part of step 301, the [VO] representative indicates with which merchant the VO wishes to interact. This information may be requested from the representative. Alternatively, the VOMC may provide the representative with a list of options from which to select a merchant" EX1008, 8:55-58.



EX1008, Fig. 3.

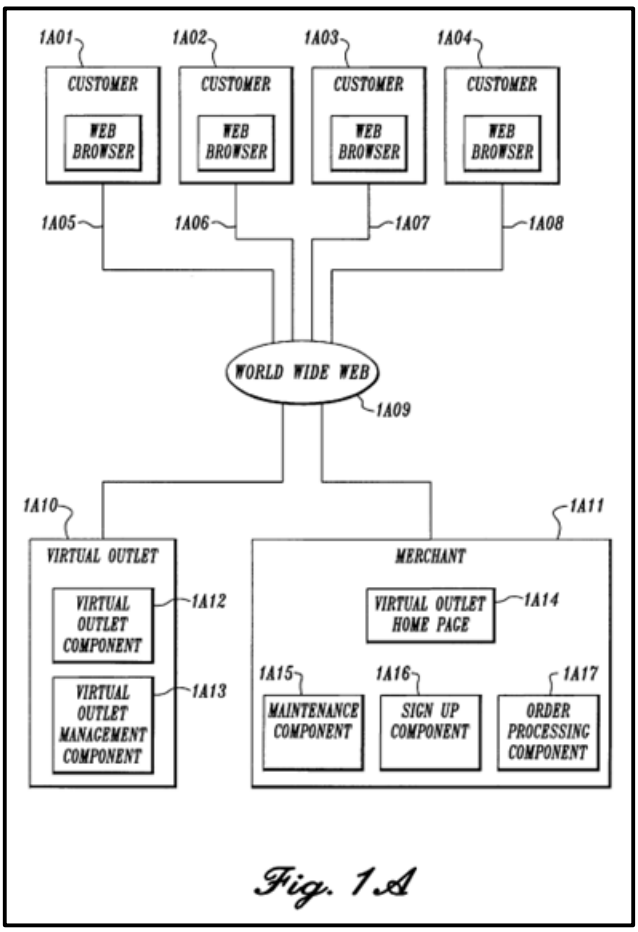
584. Accordingly, Arnold in combination with Arora discloses or renders obvious "*the selection of the second website is based upon the user-initiated selection*."

u. ***5: The method of claim 1, wherein the server system is configured to identify the one or more previously-created websites based upon a receipt, by the server system, of a request generated by the graphical user interface for one or more suggested linking locations for the first website.***

585. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the server system is configured to identify the one or more previously-created websites based upon a receipt, by the server system, of a request generated*

by the graphical user interface for one or more suggested linking locations for the first website."

586. As discussed above, the server system of Arnold includes VO computer 1A10 and merchant computer 1A11.



EX1008, Fig 1A.

587. As explained above, §VII.B.5.e, a Skilled Artisan would have understood that the merchant site is an example of a "*previously-created website[].*"

588. As discussed above, §VII.B.5.b, a Skilled Artisan would have combined the graphical user interface of Arora with the reciprocal linking features of Arnold.

589. Arnold illustrates, in Fig. 3 (shown below), a "high-level flow control diagram for the virtual outlet management component." Arnold describes "As part of step 301, the [VO] representative indicates with which merchant the VO wishes to interact. This information may be requested from the representative. Alternatively, the VOMC may provide the representative with a list of options from which to select a merchant." EX1008 at 8:55-58.

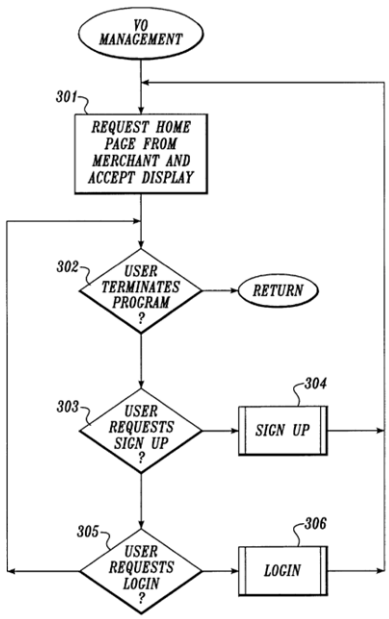


Fig. 3

EX1008, Fig. 3.

590. A Skilled Artisan would have understood that the list of options provided by the VOMC to the VO representative is "*one or more suggested linking locations for the first website*."

591. As explained above, a Skilled Artisan would have combined the graphical user interface of Arora with the reciprocal linking features of Arnold. *Supra* §VII.B.5.b. Additionally, as explained above, a Skilled Artisan would have understood that in this combination, a VO representative would have selected a merchant through the same graphical user interface. Thus, a Skilled Artisan would have understood that the graphical user interface would "*request*" the "*one or more suggested linking locations for the first website."*

592. Accordingly, Arnold in combination with Arora discloses or renders obvious "*the server system is configured to identify the one or more previously-created websites based upon a receipt, by the server system, of a request generated by the graphical user interface for one or more suggested linking locations for the first website.*"

v. *6[a]: The method of claim 1, wherein the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface, and*

593. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the graphical user interface is configured to receive user information*

supplied by the first user within at least one information collection field of the graphical user interface."

594. As discussed above, §VII.B.5.b, a Skilled Artisan would have understood that the VO representative is a "first user."

595. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking system with Arora's robust graphical user interface to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b.

596. Arnold displays, in Figs. 5 and 6 (shown below), "example sign-up Web pages. The Web page of Fig. 5 inputs such information as the mailing address and email address of the VO, as well as a proposed password for use if the merchant decides to establish a relationship with the VO." EX1008, at 9:10-14, Figs. 5, 6. "The Web page of Fig. 6 inputs information concerning the appearance that the VO expects for a merchant order Web page that will be displayed when a customer hot links through the VO to the merchant site. This information includes a URL for a graphics file that contains the VO's logo, the desired background color, and other such information." EX1008, at 9:14-20.

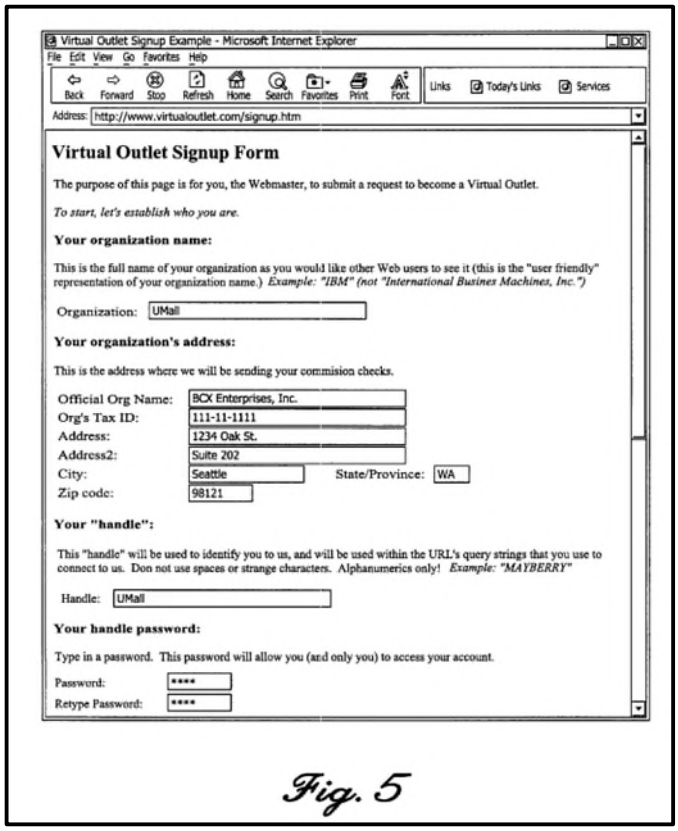


Fig. 5

EX1008, Fig. 5.

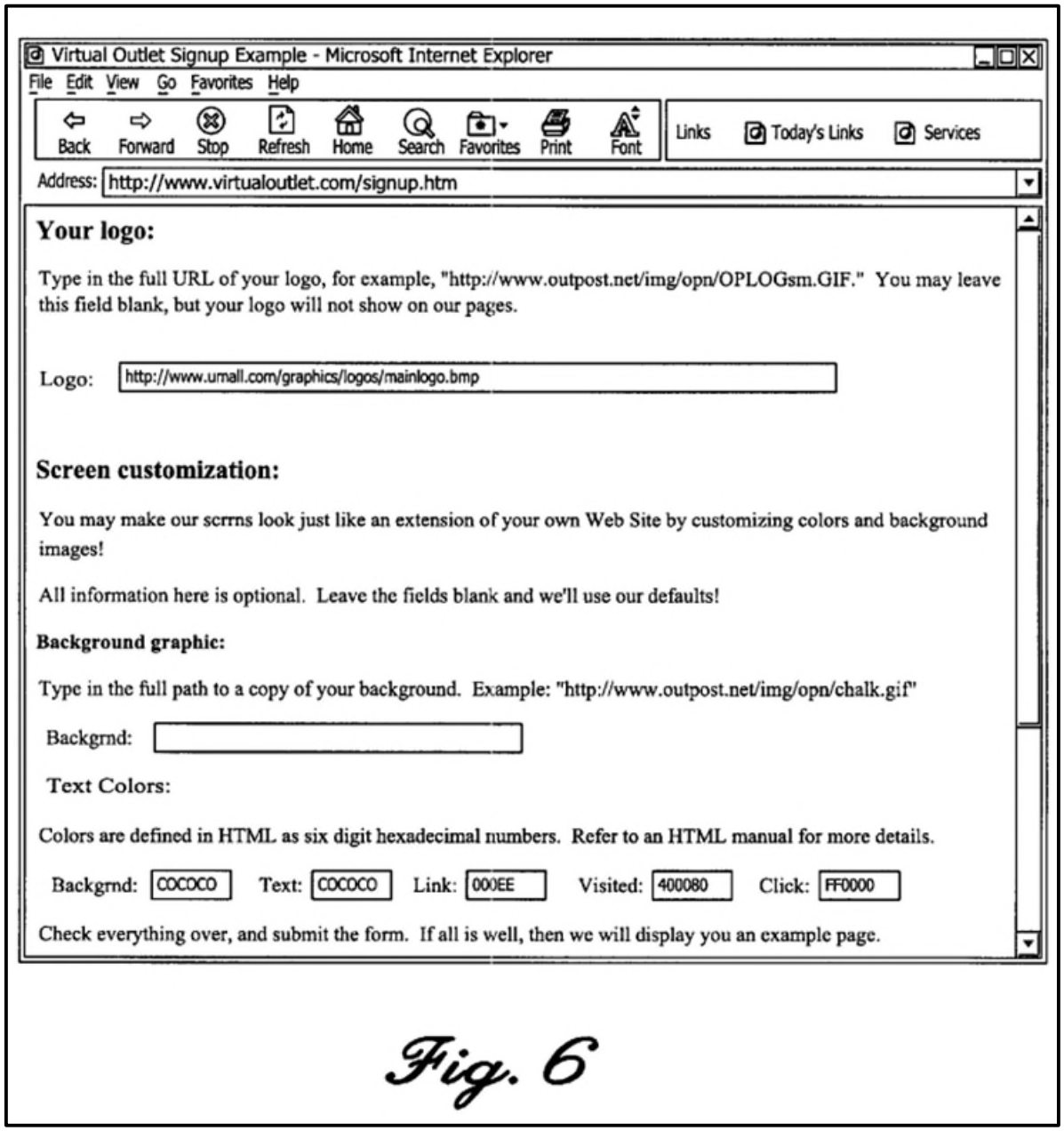
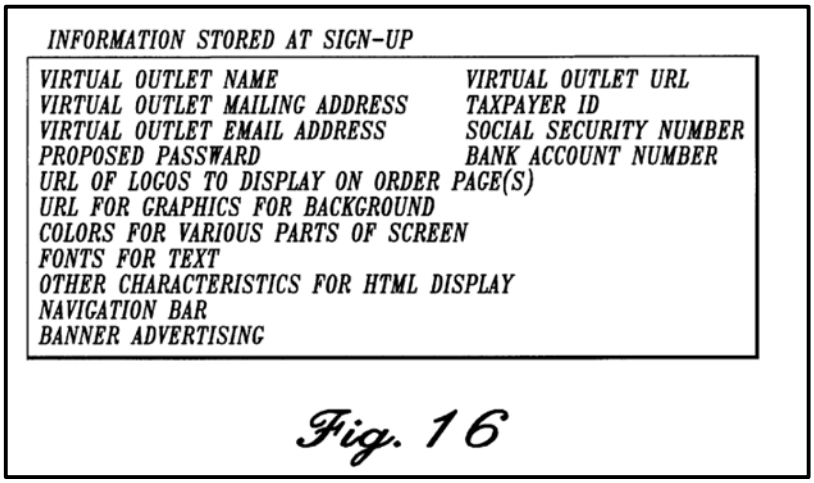


Fig. 6

EX1008, Fig. 6.

597. Arnold lists, in Fig. 16 (shown below), "some of the information returned by the virtual outlet to the merchant during the sign-up process." EX1008, 4:64-65.



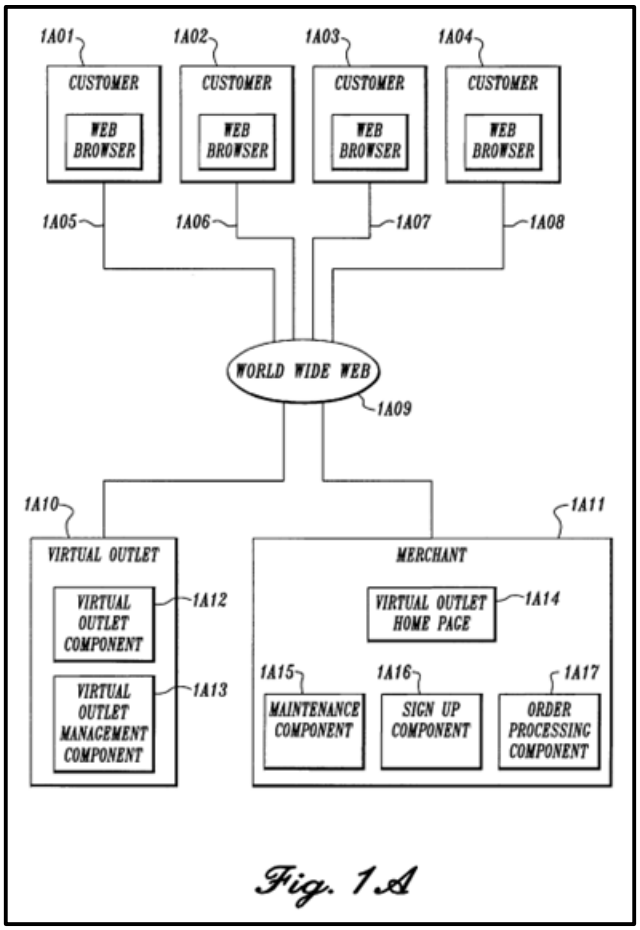
EX1008, Fig. 16.

598. Accordingly, Arnold in combination with Arora discloses or renders obvious "*the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface.*"

w. *6[b]: the server system is configured to select the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface.*

599. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the server system is configured to select the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface.*"

600. As discussed above, the server system of Arnold includes VO computer 1A10 and merchant computer 1A11.



EX1008, Fig 1A.

601. As explained above, §VII.B.5.e, a Skilled Artisan would have understood that the merchant site is an example of a "*previously-created website[].*"

602. As discussed above, §VII.B.5.b, a Skilled Artisan would have understood that the VO representative is a "*first user*."

603. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking system with Arora's robust graphical user interface to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b. 597

604. Arnold explains that the "[VO] representative indicates with which merchant the VO wishes to interact. This information may be requested from the representative. Alternatively, the VOMC may provide the representative with a list of options from which to select a merchant" EX1008, 8:55-58.

605. Arnold explains that "The sign-up component of the merchant system is the counterpart to the Sign-up procedure of the maintenance component of the VO." EX1008, 11:44-45.

606. Figs. 5 and 6 "display example sign-up Web pages" which collects information such as "organization," "official Org. name," and logo "URL EX1008, 9:10-20, Figs. 5, 6.

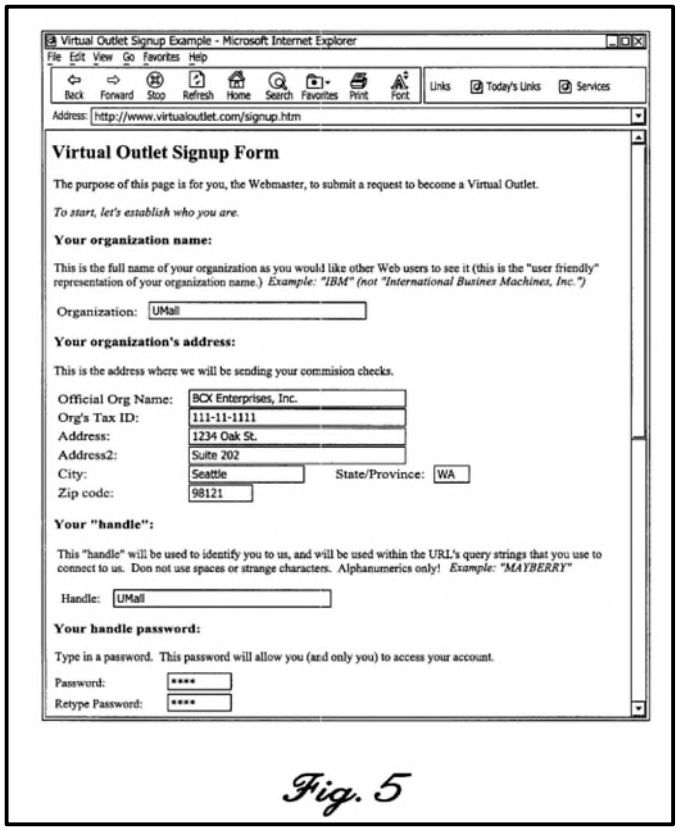


Fig. 5

EX1008, Fig. 5.

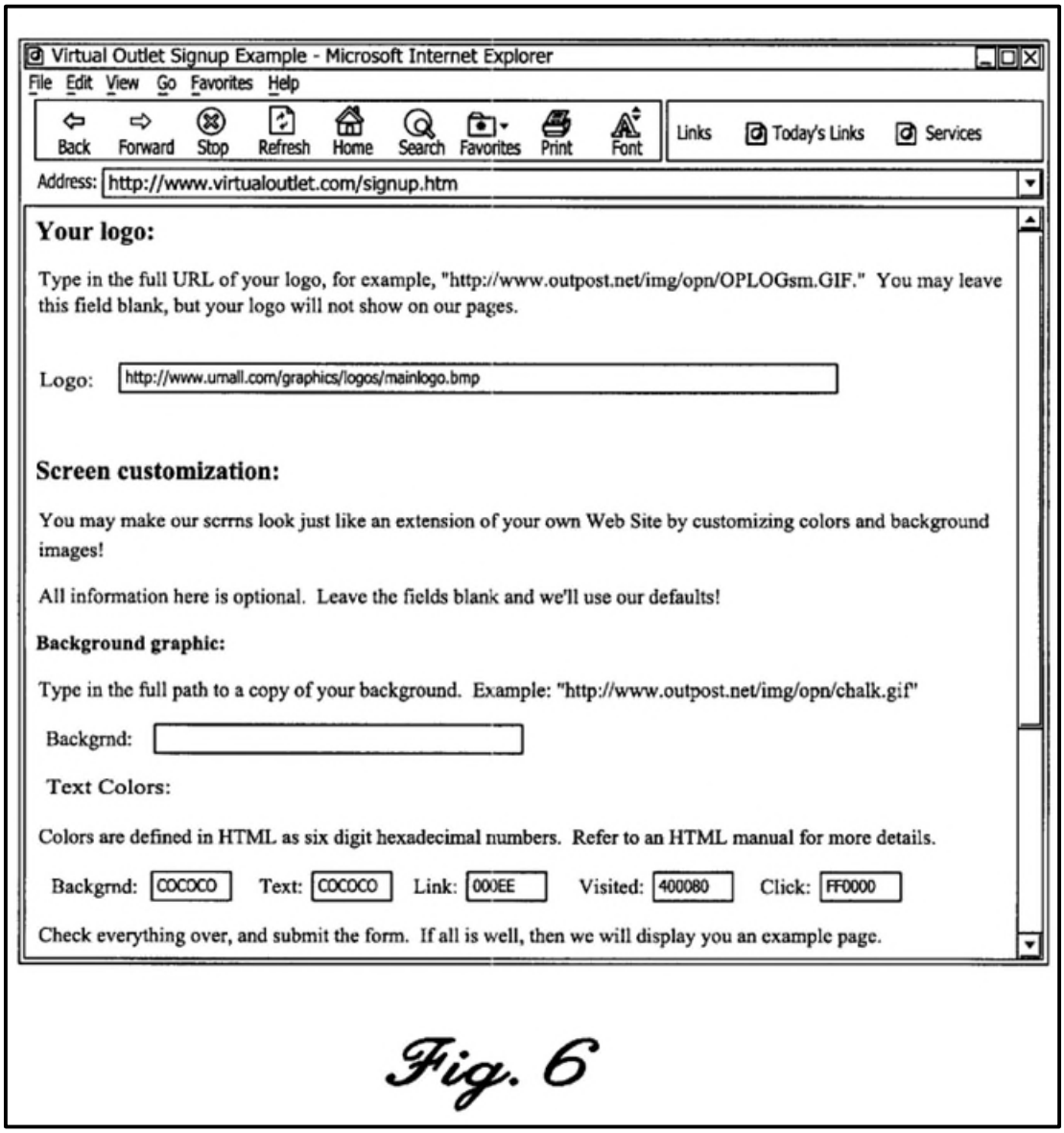
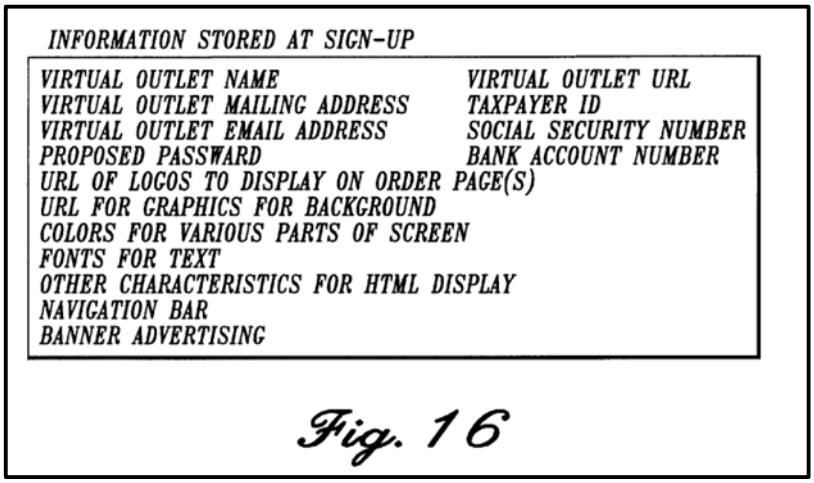


Fig. 6

EX1008, Fig. 6.

607. Arnold illustrates, in Fig. 16 (shown below), "information returned by the VO to the merchant during the Sign-up process." EX1008, 12:55-56. A Skilled Artisan would understand that the sign-up component of the merchant system would collect similar information since it's a counterpart to the VO sign up procedure.



EX1008, Fig 16.

608. A Skilled Artisan would have understood that an identification of the merchant is required when providing a "a list of options."

609. Accordingly, Arnold in combination with Arora discloses or renders obvious "*the server system is configured to select the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface.*"

x. ***7: The method of claim 6, wherein the user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of a group consisting of: a name of the first user, an email address of the first***

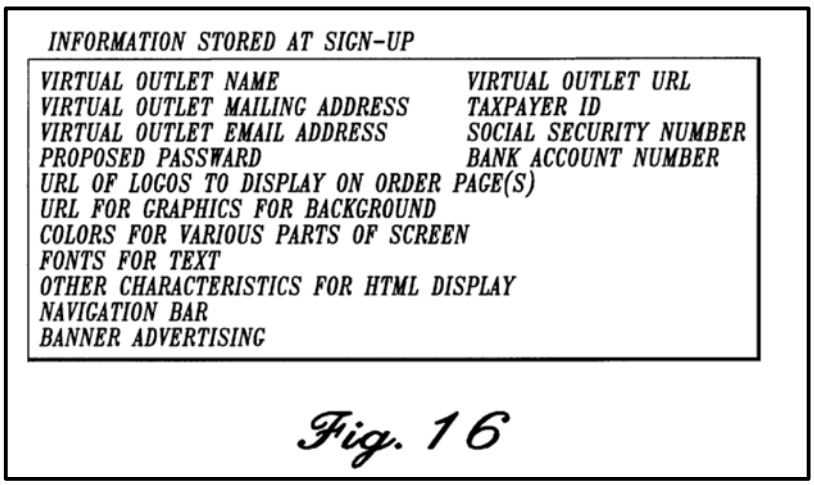
user, a hobby of the first user, a business of the first user, and an interest of the first user.

610. In my opinion, Arnold in combination with Arora discloses or renders obvious "*wherein the user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of a group consisting of: a name of the first user, an email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user.*"

611. As explained above in §VI.B, this claim recites a Markush group whereby only one among the following list is required to disclose this limitation: "*a name of the first user, an email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user.*"

612. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking system with Arora's robust graphical user interface to design the virtual outlet web page and the merchant webpage. *Supra* VII.B.5.b.

613. Arnold lists, in Fig. 16 (shown below), "some of the information returned by the virtual outlet to the merchant during the sign-up process."



EX1008, Fig. 16.

614. The list of information collected from a VO includes Name and Email Address.

615. Arnold explains that "The sign-up component of the merchant system is the counterpart to the Sign-up procedure of the maintenance component of the VO." EX1008, at 11:44-45. Therefore, a Skilled Artisan would understand that the sign-up component of the merchant system would collect similar information including Name and Email Address.

616. Accordingly, Arnold in combination with Arora discloses or renders obvious "*wherein the user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of a group consisting of: a name of the first user, an*

email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user."

y. *9: The method of claim 6, wherein the first user and the second user are registered users of the server system.*

617. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the first user and the second user are registered users of the server system.*"

618. As discussed above, §VII.B.5.b, a Skilled Artisan would have understood that the VO representative is a "*first user*."

619. As discussed above, §VII.B.5.o, a Skilled Artisan would have understood that the merchant is a "*second user*."

620. Arnold displays, in Fig. 1A (shown below), "a preferred system of networked computers that includes the present invention" which includes "a VO computer" having a "virtual outlet management component 1A13." EX1008, 6:65-7:7, Fig. 1A.

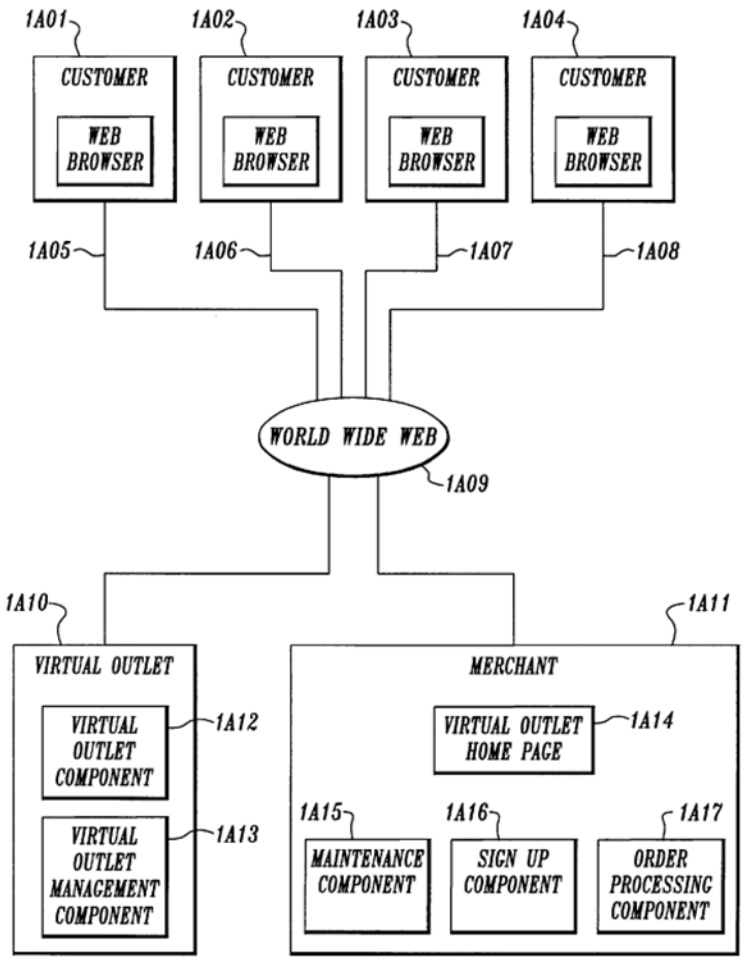
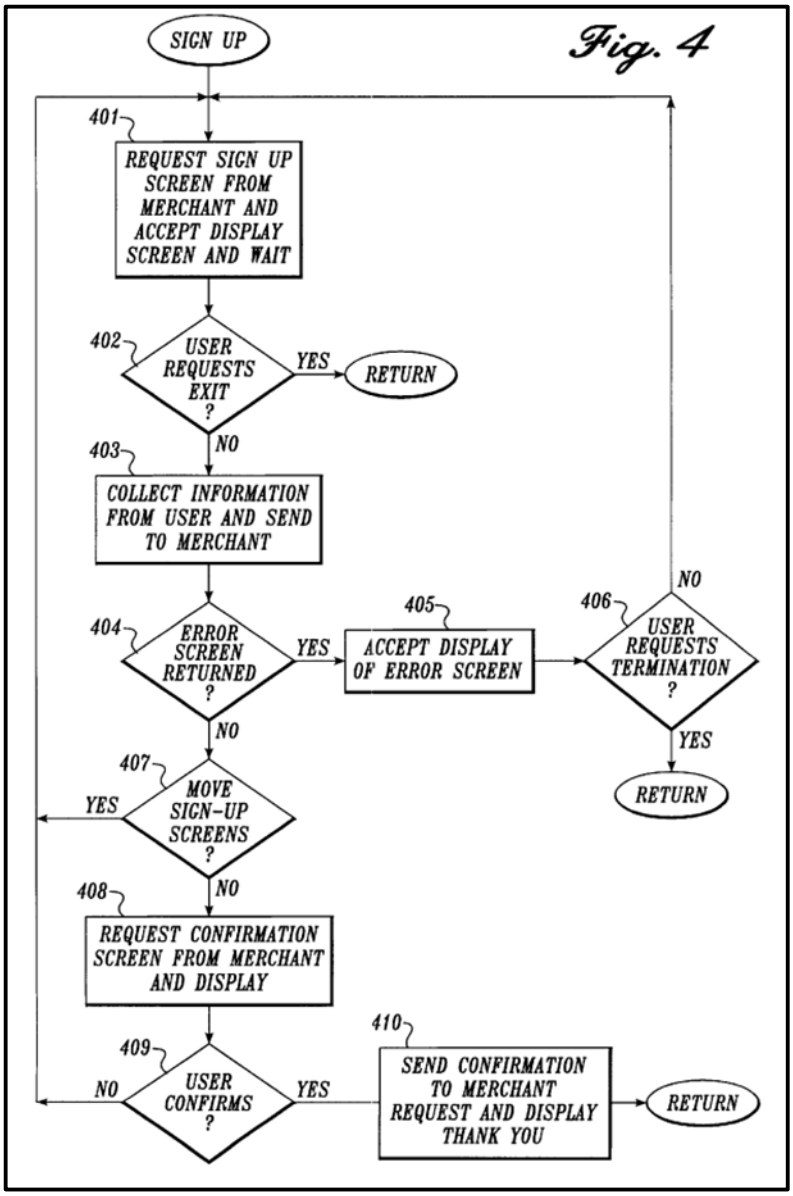


Fig. 1A

EX1008, Fig. 1A.

621. Arnold displays, in Fig. 4 (shown below), "a flow diagram for the Sign-up routine" for the VO. Arnold explains "[t]he sign-up component of the merchant system is the counterpart to the Sign-up procedure of the maintenance component of the VO." EX1008, 11:44-48.



EX1008, Fig. 4.

622. Accordingly, Arnold in combination with Arora discloses or renders obvious "*wherein the first user and the second user are registered users of the server system.*"

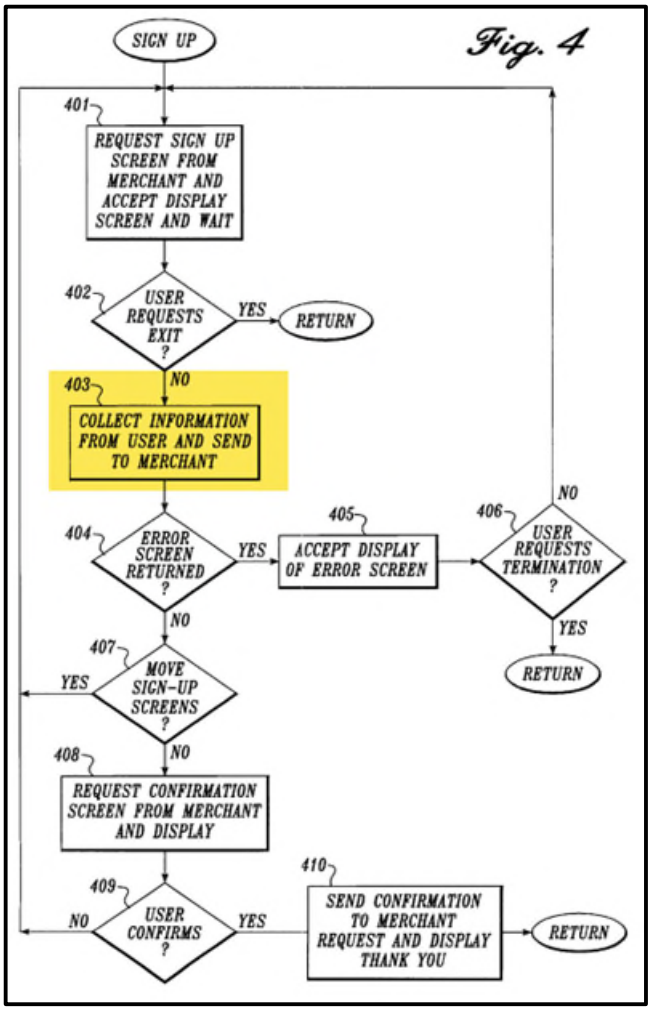
z. ***10: The method of claim 9, wherein the user information is supplied by the first user within the at least one information collection field of the graphical user interface during registration of the first user with the server system.***

623. In my opinion, Arnold in combination with Arora discloses or renders obvious "*wherein the user information is supplied by the first user within the at least one information collection field of the graphical user interface during registration of the first user with the server system.*"

624. As discussed above, §VII.B.5.b, a Skilled Artisan would have understood that the VO representative is a "*first user*."

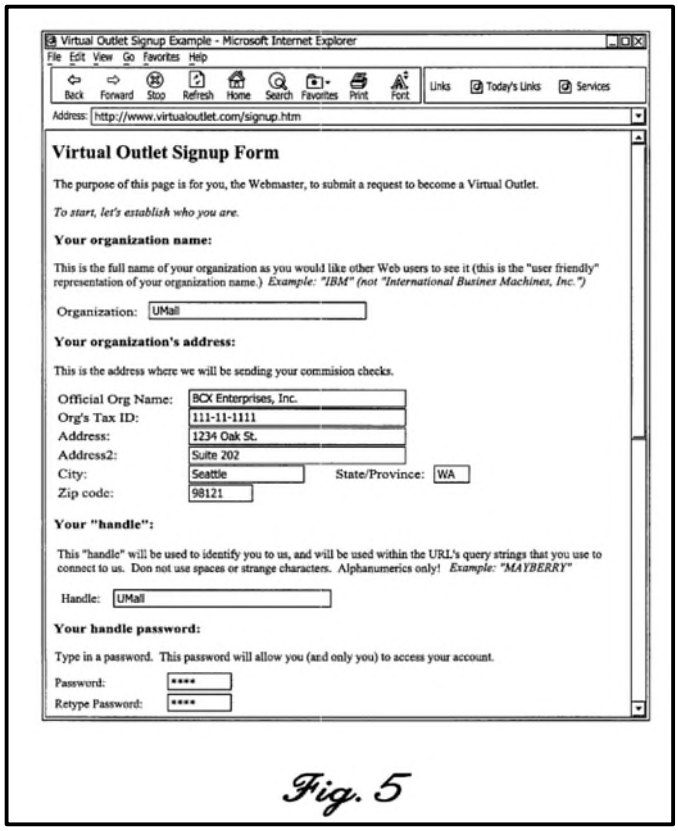
625. As explained above, a Skilled Artisan would have combined Arnold's reciprocal linking system with Arora's robust graphical user interface to design the virtual outlet web page and the merchant webpage. *Supra* §VII.B.5.b.

626. Arnold displays, in Fig. 4 (shown below), "a flow diagram for the Sign-up routine" for the VO. EX1008, 4:42, Fig. 4. At step 403, Arnold describes collecting User information of the VO.



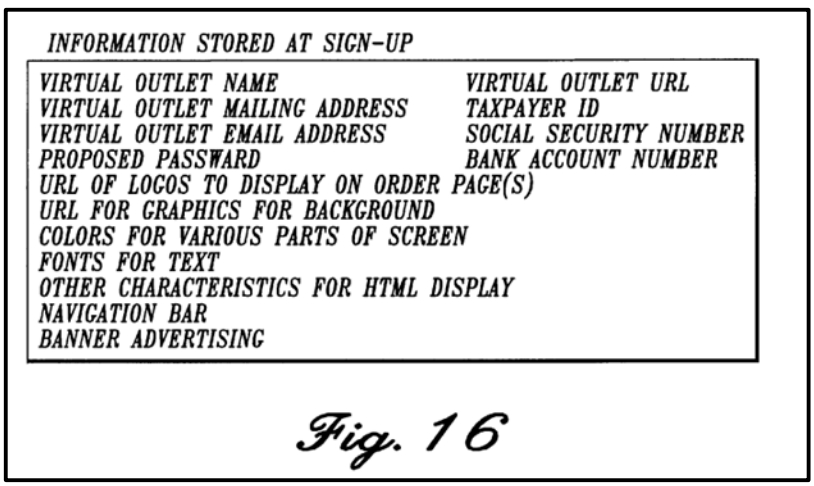
EX1008, Fig. 4 (annotated).

627. Arnold displays, in Fig. 5 (shown below) an "example sign-up Web page[]" which collects information from the VO such as "organization" and "official Org. name" in a graphical user interface. EX1008, 4:44.



EX1008, Fig. 5.

628. Fig. 16 lists information collected during VO sign up procedure.



EX1008, Fig. 16.

629. Accordingly, Arnold in combination with Arora discloses or renders obvious "*wherein the user information is supplied by the first user within the at least one information collection field of the graphical user interface during registration of the first user with the server system.*"

aa. *11: The method of claim 1, wherein the first web site of the first user includes a plurality of web pages including a first web page.*

630. In my opinion, Arnold in combination with Arora discloses or renders obvious "*wherein the first web site of the first user includes a plurality of web pages including a first web page.*"

631. As explained above, §VII.B.5.b, a Skilled Artisan would have understood that the virtual outlet web page is a page within the "*first web site*."

632. As discussed above, §VII.B.5.b, a Skilled Artisan would have understood that the VO representative is a "*first user*."

633. Arnold explains "[t]he VO may incorporate items into the **VO Web pages** by including the URLs obtained from the merchant's catalog as hot links in the **VO Web pages**." EX1008, 10:47-50 (emphasis added).

634. Accordingly, Arnold in combination with Arora discloses or renders obvious "*wherein the first web site of the first user includes a plurality of web pages including a first web page.*"

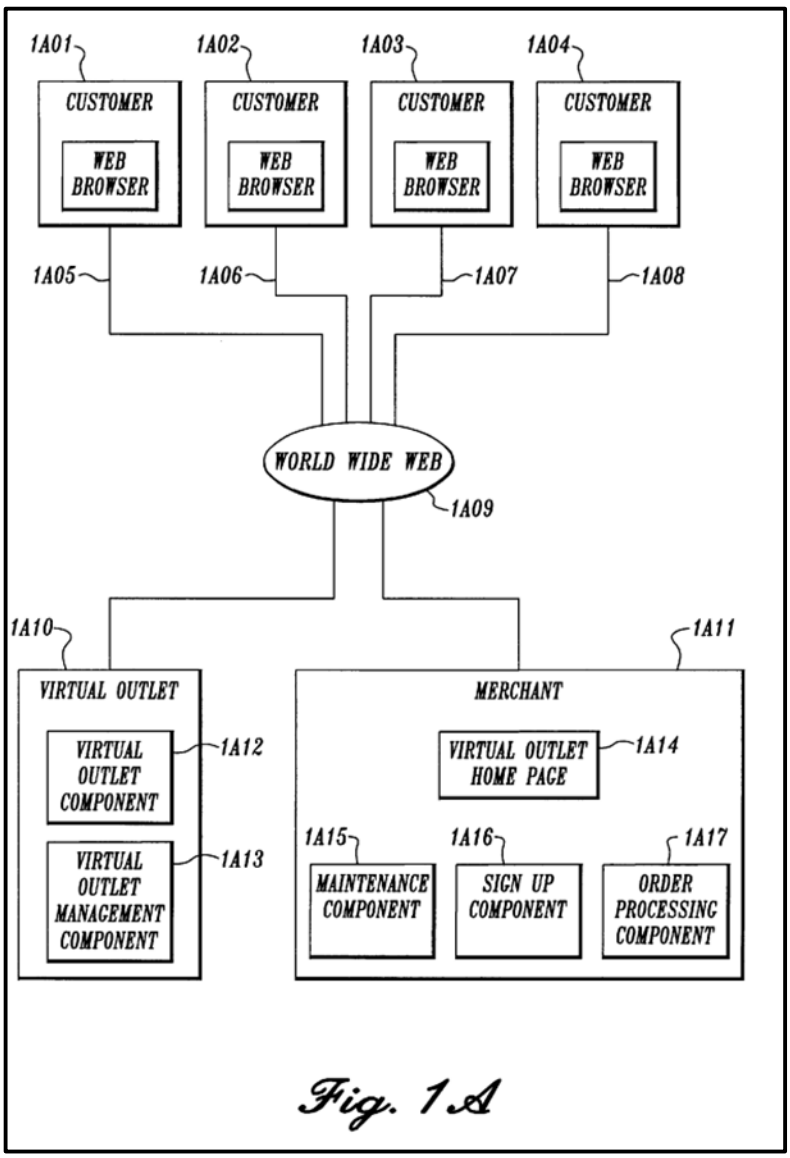
bb. *12: The method of claim 11, wherein the server is configured to serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.*

635. In my opinion, Arnold in combination with Arora discloses or renders obvious "*wherein the server is configured to serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.*"

636. As explained above, §VII.B.5.b, a Skilled Artisan would have understood that the virtual outlet web page is a page within the "*first web site*."

637. Arnold explains "[t]he order processing component of the merchant system handles order requests that come directly from customers browsing the VO. By clicking on an item displayed on a VO Web page, the customer directs his or her Web browser to request a Web page directly from the merchant computer, and display it on the customer's display device. The customer continues requesting Web pages from the merchant and displaying them until the customer has completed the ordering sequence, and then returns to viewing the VO Web page on which the ordered item was originally displayed." EX1008, 58-61.

638. Arnold displays, in Fig. 1A (shown below), "a preferred system of networked computers that includes the present invention" which includes "customer computers 1A01-1A04." EX1008, 6:65-7:7, Fig. 1A.



EX1008, Fig. 1A.

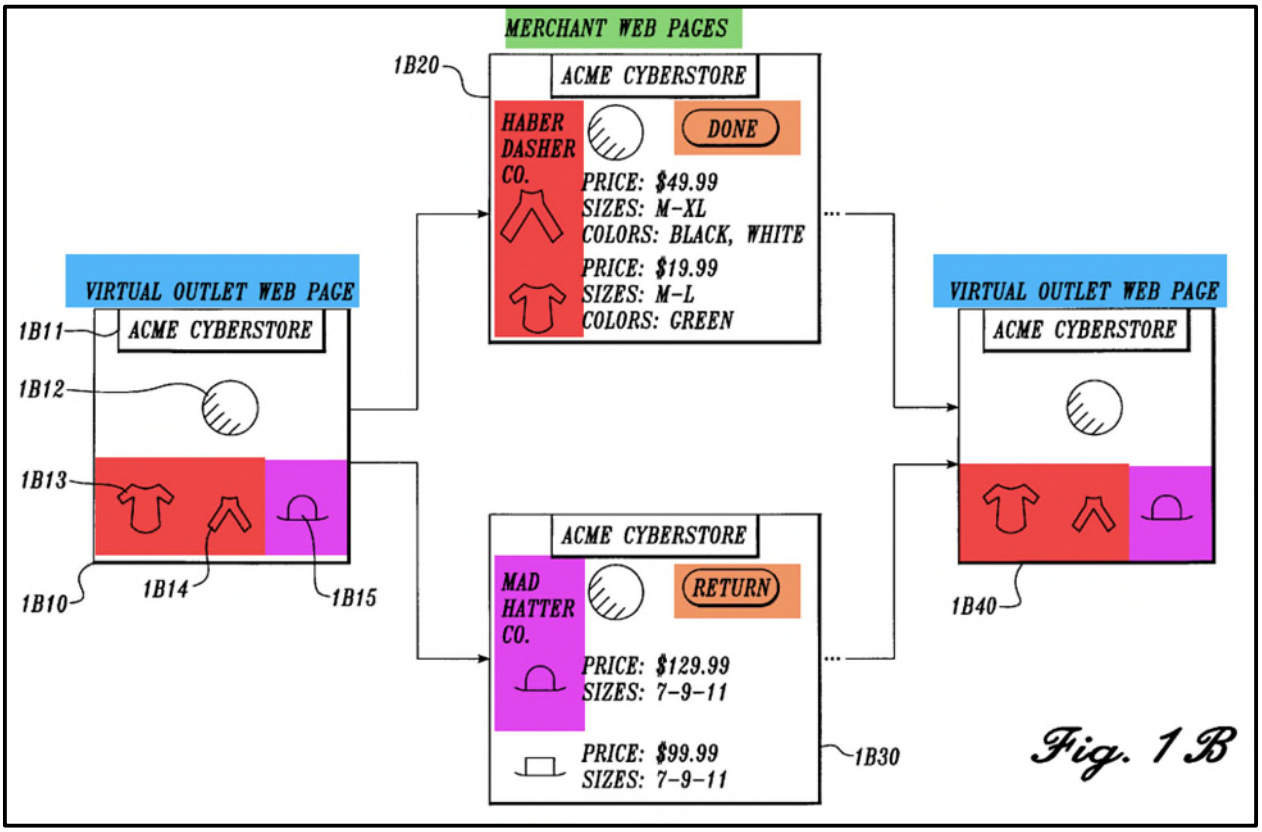
639. A Skilled Artisan would have understood that a customer's device is a "*third client device*."

640. Accordingly, Arnold in combination with Arora discloses or renders obvious "*wherein the server is configured to serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.*"

cc. *13[a]: The method of claim 11, wherein the server system is configured to: create, in the first web page, a reciprocal link site for the first hyperlink, and*

641. In my opinion, Arnold in combination with Arora discloses or renders obvious "*wherein the server system is configured to: create, in the first web page, a reciprocal link site for the first hyperlink.*"

642. As explained above in VII.B.5.i, and illustrated by Arnold in Fig.1B (shown below), Arnold describes creating in VO web page, reciprocal link sites (to the merchant sites, **Haber Dasher Co.** and **Mad Hatter Co.**). *See also* EX1008, 7:30-8:6, Fig. 1B.



EX1008, Fig. 1B (annotated).

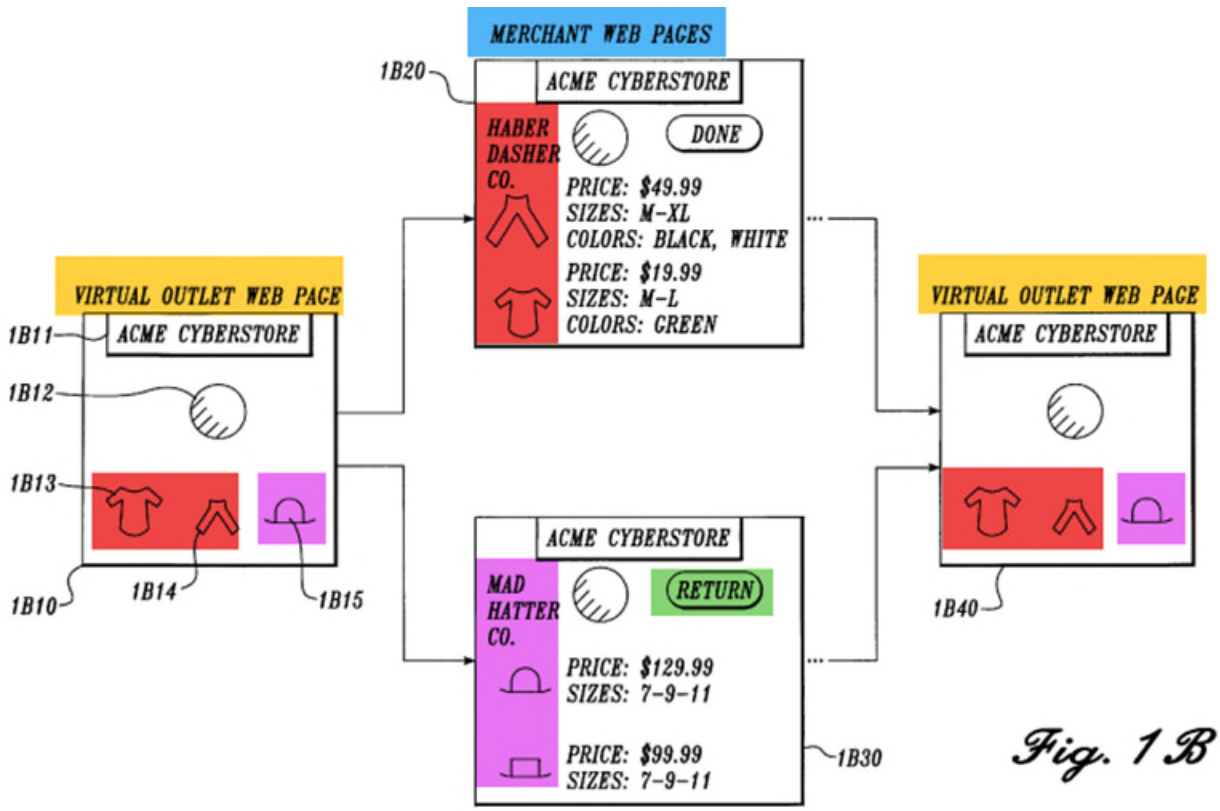
643. A Skilled Artisan would have understood that the VO site having a link to the merchant web pages is a "*first web page*." A Skilled Artisan would have understood that to include a URL in the VO site, a reciprocal link site must be created in the VO. Therefore, Arnold disclose a space within a web page (within a website) for displaying reciprocal links to other websites.

644. Accordingly, Arnold in combination with Arora discloses or renders obvious "*wherein the server system is configured to: create, in the first web page, a reciprocal link site for the first hyperlink.*"

dd. *13[b]: create, in a second web page of the second website, a reciprocal link site for the second hyperlink.*

645. In my opinion, Arnold in combination with Arora discloses or renders obvious "*create, in a second web page of the second website, a reciprocal link site for the second hyperlink.*"

646. As explained above in §VII.B.5.j, and illustrated by Arnold in Fig.1B (shown below), Arnold describes creating in **merchant site**, **reciprocal link sites** (to the **VO, Acme Cyber Store.**) *See also* EX1008, 7:30-8:6.



EX1008, Fig. 1B.

647. As explained above, §VII.B.5.f, a Skilled Artisan would have understood that the merchant web page is a page within the "*second web site.*"

648. A Skilled Artisan would have understood that the page in the merchant site having a return link is a "*second web page*." A Skilled Artisan would have understood that to include a return link in the merchant site, a reciprocal link site must be created in the merchant site.

649. Therefore, Arnold discloses a space within a web page (within a website) for displaying reciprocal links to other websites. Accordingly, Arnold in combination with Arora discloses or renders obvious "*create, in a second web page of the second website, a reciprocal link site for the second hyperlink.*"

6. Claim 14 And Dependent Claims 15-20, 22-26

a. *14[pre]: A server system configured to modify and serve web pages, comprising:*

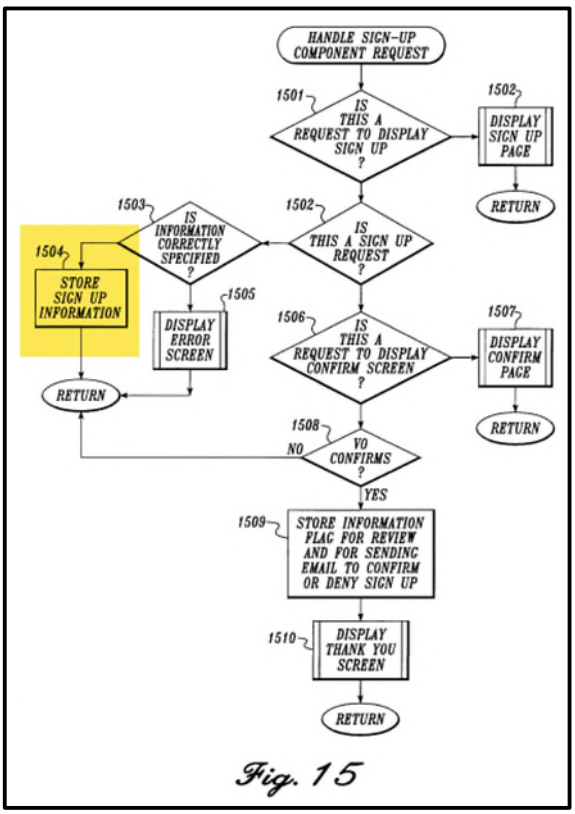
650. In my opinion, Arnold in combination with Arora discloses or renders obvious a "*server system configured to modify and serve web pages.*"

651. For all the reasons stated above in §VII.B.5.a, Arnold in combination with Arora would meet this limitation.

b. *14[a]: a computer database system, and*

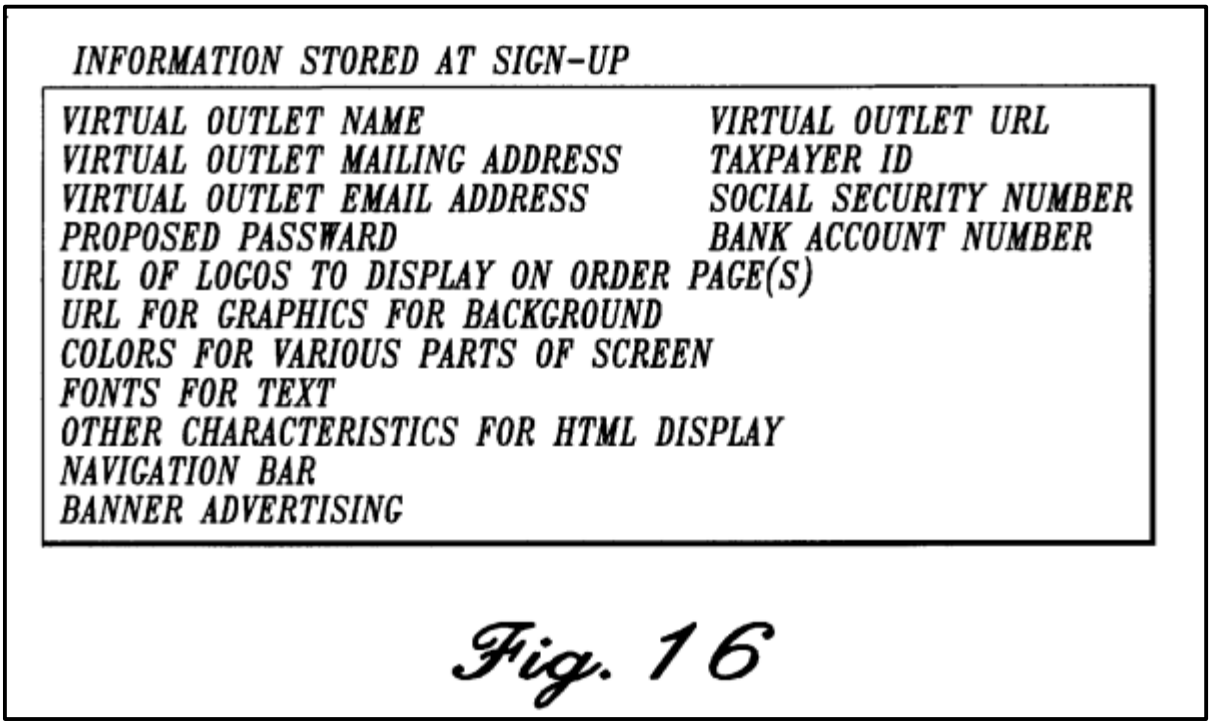
652. In my opinion, Arnold in combination with Arora discloses or renders obvious "*a computer database system.*"

653. In Fig. 15 (shown below), Arnold illustrates "a flow diagram for the Sign-up_ Request routine." Arnold explains that "[i]f the information was correctly specified" during sign-up, the system "temporarily stores the sign-up information in a file on the merchant computer in step 1504 and returns." EX1008, 12:39-44.



EX1008, Fig. 15 (annotated).

654. An entry of the database is shown in Figure 16:



EX1008, Fig. 16.

655. A Skilled Artisan would understand that "Store Sign Up Information" indicates that sign-up information would be stored in a computer database.

656. Additionally, Arnold gives an example of a relationship between merchant HaberDasher Company and VO AcmeCyberstore, in which the relationship is stored in a database. *See* EX1008, 7:54-60 (emphasis added) ("When the merchant computer for the HaberDasher Company receives this URL, **it accesses a database established when the AcmeCyberstore established a virtual outlet relationship with the HaberDasher Company.** That database specifies a Web page layout that is preferably a layout similar to that of the Web page for the AcmeCyberstore.")

657. Accordingly, Arnold in combination with Arora discloses or renders obvious "*a computer database system*."

c. *14[b]: a hardware system configured to perform:*

658. In my opinion, Arnold in combination with Arora discloses or renders obvious "*a hardware system.*"

659. In Fig. 1A (shown below), Arnold illustrates a block diagram of the "preferred system of networked computers that includes the present invention." EX1008, 6:65-66.

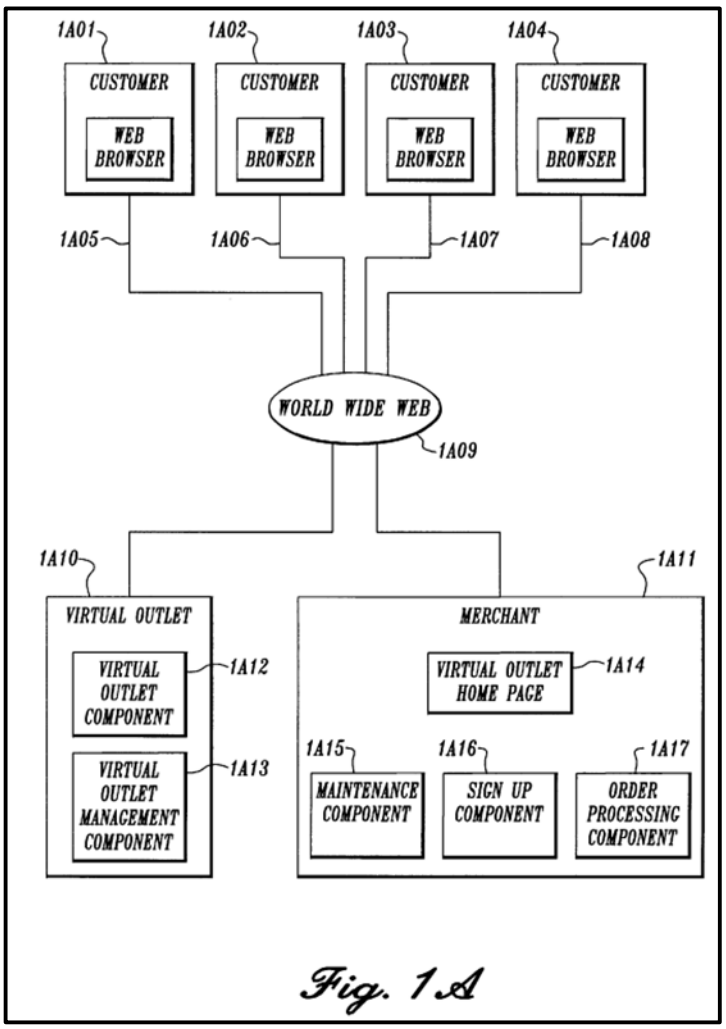


Fig. 1A

EX1008, Fig. 1A.

660. A Skilled Artisan would have known that the VO and Merchant computer form a computer "*hardware system*."

661. Accordingly, Arnold in combination with Arora discloses or renders obvious "*a hardware system*."

d. *14[c]: receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first website;*

662. In my opinion, Arnold in combination with Arora discloses or renders obvious "*receiving, from a first client device associated with a first user and via a graphical user interface associated with the server system, information indicating a selection of a web asset to be used in a first website.*"

663. For all the reasons stated above in §VII.B.5.b, Arnold in combination with Arora would meet this limitation.

e. *14[d]: receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset;*

664. In my opinion, Arnold in combination with Arora discloses or renders obvious "*receiving, from the first client device and via an editing screen of the graphical user interface, an instruction to modify the web asset to generate an edited web asset.*"

665. For all the reasons stated above in §VII.B.5.c, Arnold in combination with Arora would meet this limitation.

f. *14[e]: generating, based upon the instruction, the edited web asset;*

666. In my opinion, Arnold in combination with Arora discloses or renders obvious "*generating, based upon the instruction, the edited web asset.*"

667. For all the reasons stated above in §VII.B.5.d, Arnold in combination with Arora would meet this limitation.

g. *14[f]: forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system;*

668. In my opinion, Arnold in combination with Arora discloses or renders obvious "*forwarding, to the first client device and to be displayed by the graphical user interface, one or more identifiers respectively associated with one or more previously-created websites that were previously-created by one or more other users of the server system.*"

669. For all the reasons stated above in §VII.B.5.e, Arnold in combination with Arora would meet this limitation.

h. *14[g]: receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more*

previously-created websites to create a first hyperlink from the first web site to the second website;

670. In my opinion, Arnold in combination with Arora discloses or renders obvious "*receiving, from the first client device and via the graphical user interface, a first identification indicating a selection of a second website from the one or more previously-created websites to create a first hyperlink from the first web site to the second web site.*"

671. For all the reasons stated above in §VII.B.5.f, Arnold in combination with Arora would meet this limitation.

i. *14[h]: storing, within a computer database system of the server system, first information indicating that the first identification was received by the server system;*

672. In my opinion, Arnold in combination with Arora discloses or renders obvious "*storing, within a computer database system of the server system, first information indicating that the first identification was received by the server system.*"

673. For all the reasons stated above in §VII.B.5.g, Arnold in combination with Arora would meet this limitation.

j. *14[i]: modifying, based upon the instruction, the first website to include the edited web asset;*

674. In my opinion, Arnold in combination with Arora discloses or renders obvious "*modifying, based upon the instruction, the first website to include the edited web asset.*"

675. For all the reasons stated above in §VII.B.5.h, Arnold in combination with Arora would meet this limitation.

k. *14[j]: modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink;*

676. In my opinion, Arnold in combination with Arora discloses or renders obvious "*modifying, based upon the first information indicating that the first identification was received, the first web site to include the first hyperlink.*"

677. For all the reasons stated above in §VII.B.5.i, Arnold in combination with Arora would meet this limitation.

l. *14[k]: modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site; and*

678. In my opinion, Arnold in combination with Arora discloses or renders obvious "*modifying, based upon the first information indicating that the first identification was received, the second web site to include a reciprocal second hyperlink to the first web site.*"

679. For all the reasons stated above in §VII.B.5.j, Arnold in combination with Arora would meet this limitation.

m. *14[l]: serving computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site, wherein*

680. In my opinion, Arnold in combination with Arora discloses or renders obvious "*serving computer data associated with the first website that includes the edited web asset and the first hyperlink from the first web site to the second web site.*"

681. For all the reasons stated above in §VII.B.5.k, Arnold in combination with Arora would meet this limitation.

n. *14[m]: the server system is configured to host the first web site and the second website,*

682. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the server system is configured to host the first web site and the second website.*"

683. For all the reasons stated above in §VII.B.5.l, Arnold in combination with Arora would meet this limitation.

o. *14[n]: the editing screen is configured to display the web asset, and*

684. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the editing screen is configured to display the web asset.*"

685. For all the reasons stated above in §VII.B.5.m, Arnold in combination with Arora would meet this limitation.

p. *14[o]: the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.*

686. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the graphical user interface includes a primary display screen configured to display the edited web asset based upon the instruction.*"

687. For all the reasons stated above in §VII.B.5.n, Arnold in combination with Arora would meet this limitation.

q. *15[a]: The server system of claim 14, wherein the server system is configured to: store, within the computer database system, second information indicating that a second identification to create the second hyperlink from the second website to the first website was received by the server system and from a second user associated with the second website, and*

688. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the server system is configured to: store, within the computer database system, second information indicating that a second identification to create the second hyperlink from the second website to the first website was received by the server system and from a second user associated with the second website.*"

689. For all the reasons stated above in §VII.B.5.o, Arnold in combination with Arora would meet this limitation.

r. ***15[b]: modify the second website to include the second hyperlink based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received.***

690. In my opinion, Arnold in combination with Arora discloses or renders obvious "*modify the second website to include the second hyperlink based upon both the first information indicating that the first identification was received and the second information indicating that the second identification was received.*"

691. For all the reasons stated above in §VII.B.5.p, Arnold in combination with Arora would meet this limitation.

s. ***16: The server system of claim 14, wherein the graphical user interface is configured to receive an entry associated with the first identification within an entry field of the graphical user interface.***

692. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the graphical user interface is configured to receive an entry associated with the first identification within an entry field of the graphical user interface.*"

693. For all the reasons stated above in §VII.B.5.q, Arnold in combination with Arora would meet this limitation.

t. ***17[a]: The server system of claim 14, wherein the graphical user interface is configured to present a graphical widget adjacent each of the one or more***

identifiers respectively associated with the one or more previously-created websites,

694. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the graphical user interface is configured to present a graphical widget adjacent each of the one or more identifiers respectively associated with the one or more previously-created websites.*"

695. For all the reasons stated above in §VII.B.5.r, Arnold in combination with Arora in combination with Arora would meet this limitation.

u. *17[b]: the graphical widget is configured to receive a user-initiated selection, and*

696. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the graphical widget is configured to receive a user-initiated selection.*"

697. For all the reasons stated above in §VII.B.5.s, Arnold in combination with Arora in combination with Arora would meet this limitation.

v. *17[c]: the selection of the second website is based upon the user-initiated selection.*

698. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the selection of the second website is based upon the user-initiated selection.*"

699. For all the reasons stated above in §VII.B.5.t, Arnold in combination with Arora would meet this limitation.

w. ***18: The server system of claim 14, wherein the server system is configured to identify the one or more previously-created websites based upon a receipt, by the server system, of a request generated by the graphical user interface for one or more suggested linking locations for the first website.***

700. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the server system is configured to identify the one or more previously-created websites based upon a receipt, by the server system, of a request generated by the graphical user interface for one or more suggested linking locations for the first website.*"

701. For all the reasons stated above in §VII.B.5.u, Arnold in combination with Arora would meet this limitation.

x. ***19[a]: The server system of claim 14, wherein the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface, and***

702. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the graphical user interface is configured to receive user information supplied by the first user within at least one information collection field of the graphical user interface.*"

703. For all the reasons stated above in §VII.B.5.v, Arnold in combination with Arora would meet this limitation.

y. ***19[b]: the server system is configured to select the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface.***

704. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the server system is configured to select the one or more the previously-created websites associated with the one or more identifiers to be displayed to the first user based upon the user information supplied by the first user within the at least one information collection field of the graphical user interface.*"

705. For all the reasons stated above in §VII.B.5.w, Arnold in combination with Arora would meet this limitation.

z. ***20: The server system of claim 19, wherein the user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of a group consisting of: a name of the first user, an email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user.***

706. In my opinion, Arnold in combination with Arora discloses or renders obvious "*wherein the user information supplied by the first user within the at least one information collection field of the graphical user interface and used to select one or more the previously-created websites associated with the one or more identifiers includes at least one of a group consisting of: a name of the first user, an*

email address of the first user, a hobby of the first user, a business of the first user, and an interest of the first user."

707. For all the reasons stated above in §VII.B.5.x, Arnold in combination with Arora would meet this limitation.

aa. *22: The server system of claim 19, wherein the first user and the second user are registered users of the server system.*

708. In my opinion, Arnold in combination with Arora discloses or renders obvious "*the first user and the second user are registered users of the server system.*"

709. For all the reasons stated above in §VII.B.5.y, Arnold in combination with Arora would meet this limitation.

bb. *23: The server system of claim 22, wherein the user information is supplied by the first user within the at least one information collection field of the graphical user interface during registration of the first user with the server system.*

710. In my opinion, Arnold in combination with Arora discloses or renders obvious "*wherein the user information is supplied by the first user within the at least one information collection field of the graphical user interface during registration of the first user with the server system.*"

711. For all the reasons stated above in §VII.B.5.z Arnold in combination with Arora would meet this limitation.

cc. ***24: The server system of claim 14, wherein the first web site of the first user includes a plurality of web pages including a first web page.***

712. In my opinion, Arnold in combination with Arora discloses or renders obvious "*wherein the first web site of the first user includes a plurality of web pages including a first web page.*"

713. For all the reasons stated above in §VII.B.5.aa Arnold in combination with Arora would meet this limitation.

dd. ***25: The server system of claim 24, wherein the server is configured to serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.***

714. In my opinion, Arnold in combination with Arora discloses or renders obvious "*wherein the server is configured to serve, in response to a web page request from a third client device, the first web page of the first web site to the third client device.*"

715. For all the reasons stated above in §VII.B.5.bb Arnold in combination with Arora would meet this limitation.

ee. ***26[a]: The server system of claim 24, wherein the server system is configured to: create, in the first web page, a reciprocal link site for the first hyperlink, and***

716. In my opinion, Arnold in combination with Arora discloses or renders obvious "*wherein the server system is configured to: create, in the first web page, a reciprocal link site for the first hyperlink.*"

717. For all the reasons stated above in §VII.B.5.cc Arnold would meet this limitation.

ff. *26[b]: create, in a second web page of the second website, a reciprocal link site for the second hyperlink.*

718. In my opinion, Arnold in combination with Arora discloses or renders obvious "*create, in a second web page of the second website, a reciprocal link site for the second hyperlink.*"

719. For all the reasons stated above in §VII.B.5.dd Arnold would meet this limitation.

C. Ground 3: Arnold in view of Arora and Ahlberg Renders Claims 8 and 21 Obvious

720. The paper titled "Dynamic Queries for Information Exploration: An Implementation and Evaluation" by Christopher Ahlberg, Christopher Williamson and Ben Shneiderman ("Ahlberg") (EX1043) was published by the Association for Computing Machinery ("ACM") within the Proceedings of the SIGCHI Conference on Human Factors in Computing Systems ("CHI 1992") on June 1, 1992. I understand that Ahlberg is prior art to the '316 Patent at least because it was published before the filing date of the '316 Patent.

721. The ACM is the world's largest education and scientific computing society, and it includes a set of Special Interest Groups (SIGs) that represent the major areas of computing. SIGCHI (www.sigchi.org) is the special interest group on

human computer interaction. With over 5,000 members, it is the leading international community of students and professionals interested in research, education, and practical applications of Human Computer Interaction (HCI). In addition to presentation of the paper, the ACM provided subscribing members of the ACM SIGCHI printed copies of the CHI 1992 proceedings, which included the Ahlberg Paper, and which interested members would regularly browse. That is, both attendees at the conference and subscribing members of the ACM SIGCHI were provided with copies of Ahlberg, illustrating that Ahlberg was available for dissemination. Both the attendees of the ACM CHI Conference and subscribing members of the ACM SIGCHI fit the definition of a Skilled Artisan.

722. Importantly, the ACM CHI conference is not only an academic conference. Rather, many of the interface developments published and presented at the conference stem from industry R&D laboratories. Indicative of this fact, two of the chairs of the 1992 CHI conference were employees of Apple Computer and IBM, and the authorship of papers at the conference included affiliations from many leading tech companies.

723. Ahlberg describes "dynamic queries" that provid[e] a graphical visualization of [a] database and search results." EX1043, 1. Ahlberg describes an interface, called FG interface, that uses a database search to filter the set of information presented to the user based on their typed input. *See* EX1043, 3.

724. Ahlberg is analogous to the ’316 Patent, Arnold, and Arora. *Supra* §VII.B.4. For example, both Ahlberg and the ’316 Patent are all in the same field of endeavor—*i.e.*, using graphical interfaces/widgets to view and manipulate data. EX1043, 1 (“We designed, implemented and evaluated a new concept for direct manipulation of databases, called dynamic queries, that allows users to formulate queries with graphical widgets, such as sliders. By providing a graphical visualization of the database and search results, users can find trends and exceptions easily.”); EX1001, 3:16-25 (“The present invention relates to a method of assisting a website designer in establishing an arrangement between a first website being designed by the website designer and a second website in order to market the first website at the second website upon the activation of the first website on the internet. The method includes, during design of the first website, receiving information at a user interface indicating a type of an element for marketing that is to be displayed at the second website, and information specifying the second website at which the element is to be displayed. The method further includes saving the information at a first defined database that is coupled to the user interface, obtaining the element for marketing of the type indicated, and causing the display of the element for marketing at the second website when the first website is activated with respect to the internet.”).

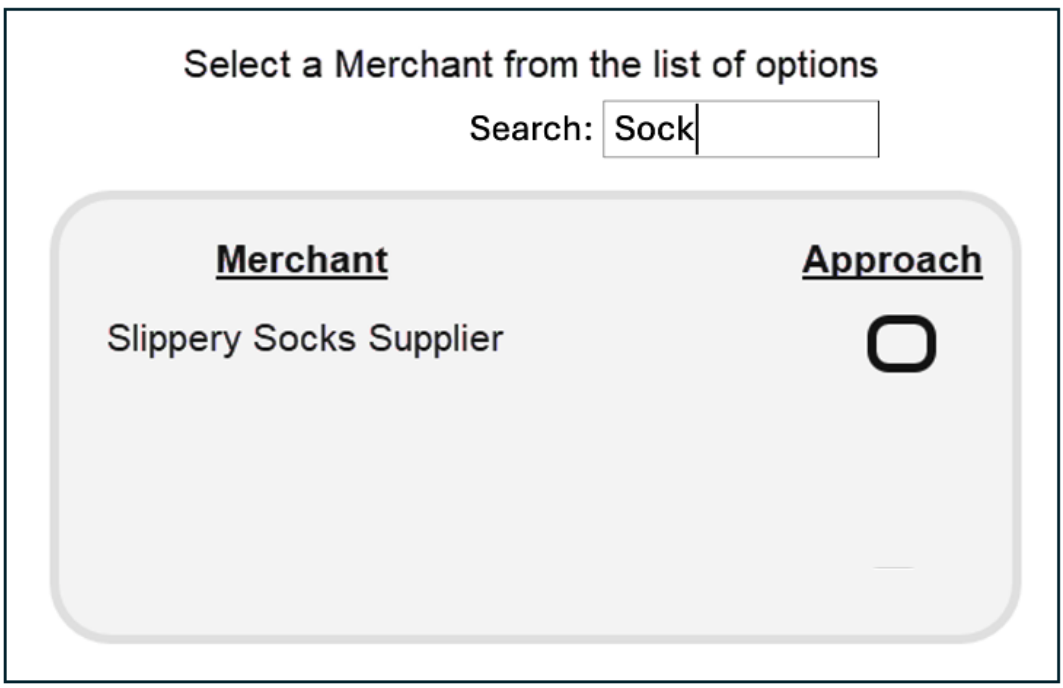
725. In addition, Ahlberg, Arnold, Arora and the ’316 Patent address graphical user interfaces that provide filters that the user can employ to select subsets of information for display. The ’316 Patent, for example, discloses search functionality in which “[u]pon receiving search criteria from the registered users, the system 100 performs a search for sounds meeting the search criteria and then lists all available sound elements that meet the search criteria.” EX1001, 8:51-54; *See also,* Figs. 4, 5. This is directly analogous to disclosures within Ahlberg, such as “[t]he elements that fulfill the [search] criteria are listed in order.” EX1043, 4, Fig. 4. Similarly, Arora discloses a user interface for managing assets in which the content of the display is filtered according to user selections: “The Assets view shows all files, hyperlinks, or data objects associated with the current system, depending on whether the user clicks secondary button 3102, 3104, or 3106.” EX1009, 13:7-10, Fig. 31.

726. A Skilled Artisan would have been motivated to combine Ahlberg with Arnold and Arora for the same reasons as above. *Surpa* §VII.B.4.

727. A Skilled Artisan would have been motivated to combine Ahlberg with Arnold and Arora because Arnold describes storing information in a database (*See* EX1008, 4:64-65, Fig. 16), and later “provid[ing]” that information to a VO representative. *See Supra* VII.B.5.v, VII.B.5.w. Ahlberg describes an interface such as a graphical widget that could be used to retrieve information stored in databases.

EX1043, 1. In the combination of Arnold, Arora and Ahlberg the stored information would have been graphically represented by the widget described by Ahlberg.

728. Based on Ahlberg's "dynamic queries" approach, a Skilled Artisan would have understood that the list of merchants could be filtered (i.e., searched) by typing in criteria that the user was seeking (e.g., "clothing and fashion"). For example, if a VO representative wanted to search for a merchant selling socks, the interface (or widget) would query the database of merchants and list relevant merchants as the VO representative typed in the search bar:



729. A Skilled Artisan would have recognized the benefits of using Ahlberg's "dynamic queries" within the combined system of Arnold and Arora at least because such a configuration would make it easier for VO representatives to

sort through and select relevant merchants to connect to. Indeed, as Ahlberg explains by using "graphical visualization of the database and search results, users can find trends and exceptions easily." EX1043 , 1. Using Ahlberg's "dynamic queries" also allows VO representatives to select and form merchant relationship "statistically faster" than "form fill-in" interfaces. *Id*.

730. A Skilled Artisan also would have recognized that the combination of Arnold, Arora and Ahlberg is merely a combination of old elements. Searching for and visually representing data stored in a database was not new in 2000. Indeed, the '316 patent explains that "search engines are currently well known in the art." This combination is merely a combination of the known elements of Arnold, Arora and Ahlberg, with each performing their known functions and yielding a predictable result. Therefore, the combination is obvious to try and implement old elements.

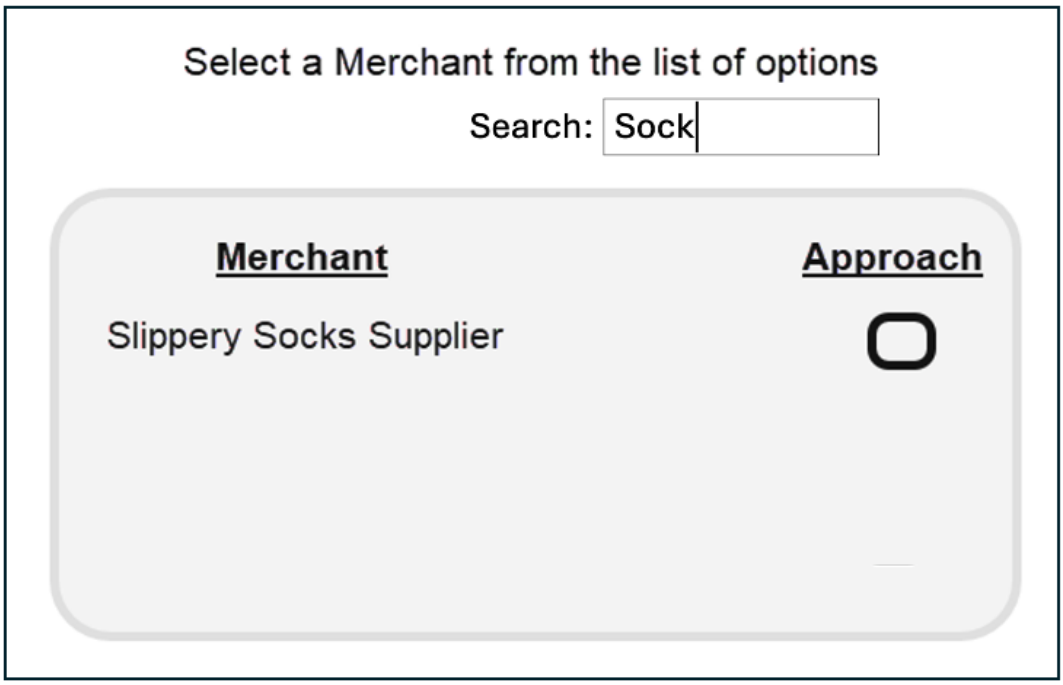
a. ***8[a]: The method of claim 6, wherein the server system is configured to select the plurality of the previously-created websites associated with the one or more identifiers by searching other user information previously-supplied by other users of the server system and stored within the server system, and***

731. In my opinion, Arnold in combination with Arora and Ahlberg discloses or renders obvious "*the server system is configured to select the plurality of the previously-created websites associated with the one or more identifiers by searching other user information previously-supplied by other users of the server system and stored within the server system*."

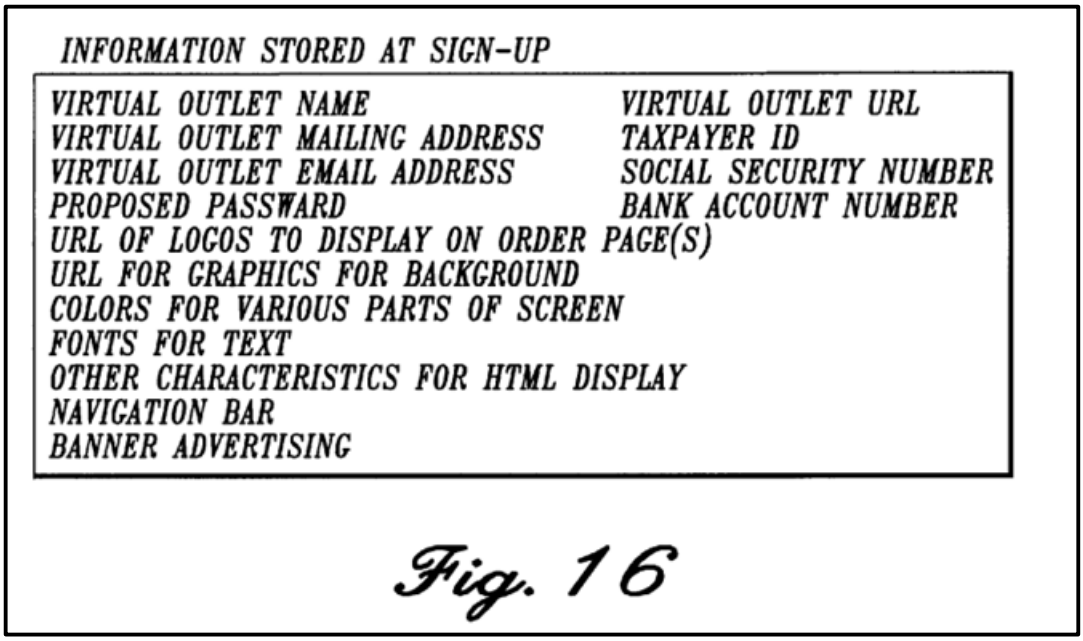
732. As explained above, the "*previously-created websites associated with the one or more identifiers"* includes registered merchant web pages. *Supra* VII.B.5.v, VII.B.5.w.

733. Arnold explains that the "[VO] representative indicates with which merchant the VO wishes to interact. This information may be requested from the representative. Alternatively, the VOMC may provide the representative with a list of options from which to select a merchant" EX1008, 8:55-58.

734. As explained above, §VII.C, a Skilled Artisan would have combined Arnold, Arora and Ahlberg. In the combination of Arnold, Arora and Ahlberg, if a VO representative wanted to search for a merchant selling socks, the interface (or widget) would query the database of merchants and list relevant merchants as the VO representative typed in the search bar:



735. In this combination, querying any of the merchant information stored by Arnold (illustrated in Fig. 16) would populate the search interface. As explained above, §VII.A.2.w, the stored information in Arnold is "*previously-supplied by other users*" during sign up.



EX1008, Fig. 16.

736. Accordingly, Arnold in combination with Arora and Ahlberg discloses or renders obvious "*the server system is configured to select the plurality of the previously-created websites associated with the one or more identifiers by searching other user information previously-supplied by other users of the server system and stored within the server system*."

b. *8[b]: the searching is performed by a search engine using the user information supplied by the first user within the at least one information collection field of the graphical user interface.*

737. As discussed above, §VII.B.5.b, a Skilled Artisan would have understood that the VO representative is a "*first user*."

738. Arnold explains that "as part of step 301, the [VO] representative indicates with which merchant the VO wishes to interact. This information may be

requested from the representative. Alternatively, the VOMC may provide the representative with a list of options from which to select a merchant." EX1008 at 8:55-58.

739. A Skilled Artisan would have understood that a VO representative would have had to "*search*" for a merchant to "indicate[] with which merchant the VO wishes to interact."

740. As explained above, Ahlberg describes a search interface or widget that queries a database.

741. To extent that Patent Owner argues that Ahlberg does not describe a "*search engine*," the '316 Patent explains that "search engines are currently well known in the art." EX1001, 15:37-41, 8:42-44 ("System 100 employs any of a number of conventional search engines to perform the searches.") Thus, "search engines" are applicant admitted prior art (AAPA).

742. Accordingly, Arnold in combination with Arora, Ahlberg and/or AAPA discloses or renders obvious "*the searching is performed by a search engine using the user information supplied by the first user within the at least one information collection field of the graphical user interface.*"

c. *21[a]: The server system of claim 19, wherein the server system is configured to select the plurality of the previously-created websites associated with the one or more identifiers by searching other user information*

previously-supplied by other users of the server system and stored within the server system, and

743. In my opinion, Arnold in combination with Arora and Ahlberg discloses or renders obvious "*the server system is configured to select the plurality of the previously-created websites associated with the one or more identifiers by searching other user information previously-supplied by other users of the server system and stored within the server system.*"

744. For all the reasons stated above in §VII.C.a, Arnold in combination with Arora and Ahlberg would meet this limitation.

d. *21[b]: the searching is performed by a search engine using the user information supplied by the first user within the at least one information collection field of the graphical user interface.*

745. In my opinion, Arnold in combination with Arora, Ahlberg and/or AAPA discloses or renders obvious "*the searching is performed by a search engine using the user information supplied by the first user within the at least one information collection field of the graphical user interface.*"

746. For all the reasons stated above in §VII.C.b, Arnold in combination with Arora, Ahlberg and/or AAPA would meet this limitation.

VIII. SECONDARY CONSIDERATIONS

747. I understand that certain objective factors, sometimes known as "secondary considerations," are taken into account in determining whether a claimed invention would have been obvious. In most instances, these secondary considerations of non-obviousness are raised by the patentee. I also understand that these objective indications are only relevant to obviousness if there is a connection, or nexus, between them and the invention covered by the patent claims.

748. I also understand that secondary considerations of non-obviousness are inadequate to overcome a strong showing on the primary considerations of obviousness. For example, where the inventions represented no more than the predictable use of prior art elements according to their established functions, the secondary considerations are inadequate to establish non-obviousness.

749. I have been informed that Petitioner is unaware of any publicly available secondary considerations evidence bearing any nexus to the purported claimed invention. No secondary considerations were asserted or relied on during prosecution. EX1002. I reserve the right to address any secondary considerations should Patent Owner raise them.

IX. CONCLUSION

750. In my opinion, the Challenged Claims 1-26 of the '316 Patent are unpatentable.