IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner

v.

SITNET, LLC,
Patent Owner

Case IPR2026-00101
U.S. Patent No. 12,245,325

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 12,245,325

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PETITIONER'S EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 12,245,325 to Cona *et al.* ("'325 patent")
1002	Prosecution History of U.S. Patent No. 12,245,325 ("'325 File History")
1003	Declaration of Jeremy Cooperstock, Ph.D.
1004	*Curriculum Vitae* of Dr. Jeremy Cooperstock
1005	U.S. Patent No. 8,346,864 B1 to Amidon et al. ("Amidon")
1006	U.S. Patent Application Publication No. 2008/0103784 A1 to Wong et al. ("Wong")
1007	U.S. Patent No. 8,103,300 B2 to Gogic ("Gogic")
1008	U.S. Patent No. 7,801,971 B1 to Amidon et al. ("Amidon-971")
1009	Palen *et al*., *Online Forums Supporting Grassroots Participation in Emergency Preparedness and Response*, Communications of the ACM, Vol. 50, No. 3 (March 2007)
1010	U.S. Patent No. 7,016,307 B2 to Vasudev et al. ("Vasudev")
1011	U.S. Patent Application Publication No. 2006/0230053 A1 to Eldering ("Eldering")
1012	Harghirian *et al.*, *Increasing Advertising Value of Mobile Marketing – An Empirical Study of Antecedents*, Proceedings of the 38th Hawaii Int'l Conf. on System Sciences, IEEE (2005).
1013	Boyd & Ellison, *Social Network Sites: Definition, History, and Scholarship*, Journal of Computer-Mediated Communication, 13 (2008) pp. 210-230.
1014	U.S. Patent No. 8,024,330 to Franco *et al*. ("Franco")
1015	November 26, 2006 Wikipedia page "Social network" (from web.archive.org) (accessed January 24, 2024)
1016	Barry Wellman, *Network Analysis: Some Basic Principles,* Sociological Theory, Vol. 1 (1983) pp. 155-200 ("Wellman")
1017	U.S. Patent No. 8,332,454 to Cona *et al.* ("'454 patent")
1018	U.S. Patent No. 7,730,216 to Issa *et al*. ("Issa")

Exhibit No.	Description
1019	U.S. Patent No. 7,747,648 to Kraft *et al*. ("Kraft")
1020	*Meta Platforms, Inc. v. SitNet, LLC*, IPR2024-00529, Final Written Decision, Paper 33 (PTAB September 8, 2025)
1021	*Meta Platforms, Inc. v. SitNet, LLC*, IPR2024-00529, Petition, Paper 1 (PTAB February 27, 2024)
1022	*Meta Platforms, Inc. v. SitNet, LLC*, IPR2024-00529, Declaration of Dr. Jeremy Cooperstock in Support of Petition, EX1003 (PTAB February 27, 2024)
1023	*Meta Platforms, Inc. v. SitNet, LLC*, IPR2024-00530, Final Written Decision, Paper 30 (PTAB September 8, 2025)
1024	Claim Construction Order in *SitNet LLC v. Meta Platforms, Inc.*, Case No. 1:23-cv-06389-AS (SDNY) (Dkt. 79) filed July 26, 2024

Petitioner Meta Platforms, Inc. ("Petitioner") petitions for *inter partes* review, seeking cancellation of claims 1-18 ("the challenged claims") of U.S. Patent No. 12,245,325 ("the '325 patent"; EX1001), assigned to SitNet, LLC.

I. INTRODUCTION

The claims of the '325 patent are substantially similar to, and are unpatentable for similar reasons as, the claims of U.S. Patent No. 8,332,454, which were held unpatentable in IPR2024-00529.

Both claim sets are directed to creating ad-hoc communication groups within a conventional social-network platform. The claimed "situational network" simply allows participants to exchange information, via a computer network, about a "situation," such as a social event, emergency, or weather phenomenon. This "subset" of nodes (i.e., users) of a social network are identified based on "geographic proximity." Nothing in the '325 patent purports to create any new computer or social-network architecture. Rather, the claims use existing technologies to implement the well-known concept of ad-hoc-group communication. The Board agreed with this conclusion when analyzing prior-art grounds based on Amidon and Wong-Gogic in IPR2024-00529.

This Petition applies those same references to the '325 patent along with the additional Issa and Kraft references. As shown herein, the Amidon-Issa and Wong-

Gogic-Kraft combinations teach all elements of, and render obvious, independent claims 1 and 10 and dependent claims 2-9 and 11-18.

The declaration of Dr. Jeremy Cooperstock (EX1003), an expert in computer networking and telecommunications, supports this petition and confirms all challenged claims are unpatentable. Accordingly, the Board should cancel all claims of the ’325 patent.

II. SUBSTANTIAL SIMILARITY TO ’454 PATENT AND IPR2024-00529

The independent claims of the ’325 patent are substantially similar to the claims of the ’454 patent, which were held unpatentable in IPR2024-00529. *Compare* EX1001, Claim 1 *with* EX1017, Claim 1; EX1003, ¶¶37-40. Specifically, the concepts recited in claim elements [1.P]-[1.5] of the ’325 patent are nearly identical to the concepts recited in [1.P]-[1.5] of the ’454 patent. EX1020, 3-6; EX1021, 14-29, 50-59. The Board already determined that Amidon and Wong-Gogic render obvious all elements of claim 1 from the ’454 patent. EX1020, 41-42. The Board should reach the same conclusions here for the reasons provided below. Sections VI.D, VII.E.

The differences between the ’325 and ’454 patent claims are trivial. For example, independent claim 1 of the ’325 patent describes a “*discoverable*” event node and “*identifying”*/“*transmitting information [] to a target member node*.”

These trivial features were well known in the art as further explained below. Sections VI.D, VII.E.

III. IDENTIFICATION OF THE CHALLENGE (37 C.F.R. §42.104(B))

A. Identification of Prior Art

The '325 patent's earliest possible priority date is February 2, 2007. Without conceding this is the correct date, all references relied upon herein are prior art as of February 2, 2007.

Amidon (EX1005) was filed on December 13, 2006 and issued on January 1, 2013. Amidon is prior art under at least 35 U.S.C. §102(e).

Issa (EX1018) was filed on December 14, 2006 and issued on June 1, 2010. Issa is prior art under at least 35 U.S.C. §102(e).

Wong (EX1006) was filed on October 25, 2006 and was published on May 1, 2008. Wong is prior art under at least 35 U.S.C. §102(e).

Gogic (EX1007) was filed April 4, 2006 and issued on January 24, 2012. Gogic is prior art under at least 35 U.S.C. §102(e).

Kraft (EX1019) was filed on February 14, 2005 and issued on June 29, 2010. Kraft is prior art under at least 35 U.S.C. §102(e).

B. Grounds Summary

Petitioner requests *inter partes* review based on the following grounds:

Ground	35 U.S.C.	Claims	References

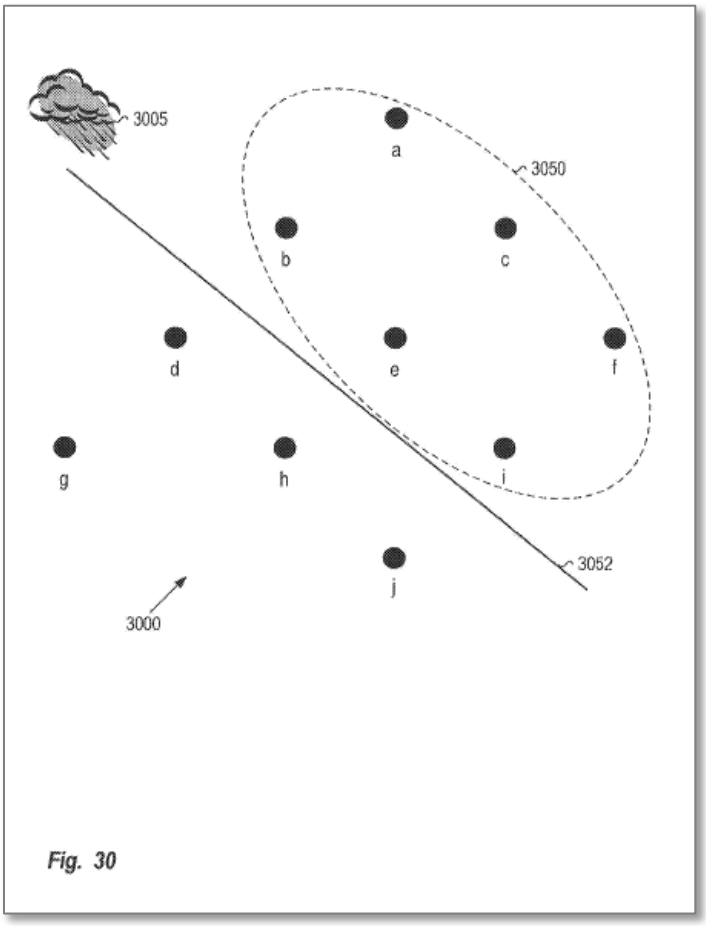
1	§ 103(a)	1-18	Amidon-Issa
2	§ 103(a)	1-18	Wong-Gogic-Kraft

IV. THE ’325 PATENT

A. Overview of the ’325 Patent

The ’325 patent is directed to a “method of creating a situational network based on a projection” or “subset” of nodes from a “multi-dimensional personal information network.” EX1001, Cl. 1; EX1003, ¶¶32-36. A “situational network allows the participants … to interact and exchange information over connections to or through a computer network … regarding the event or situation.” EX1001, 4:24-27. The ’325 patent describes a “situation” as broadly including social events, emergencies, weather phenomena, etc. *E.g.*, *id.*, 5:10-20, 31:64-65. A “projection” or “a ‘projected’ view” is “a subset of the nodes” of a social network, selected based on criteria like the geographic location of the user’s device. *Id.*, 17:4-5, 22:52-23:39.

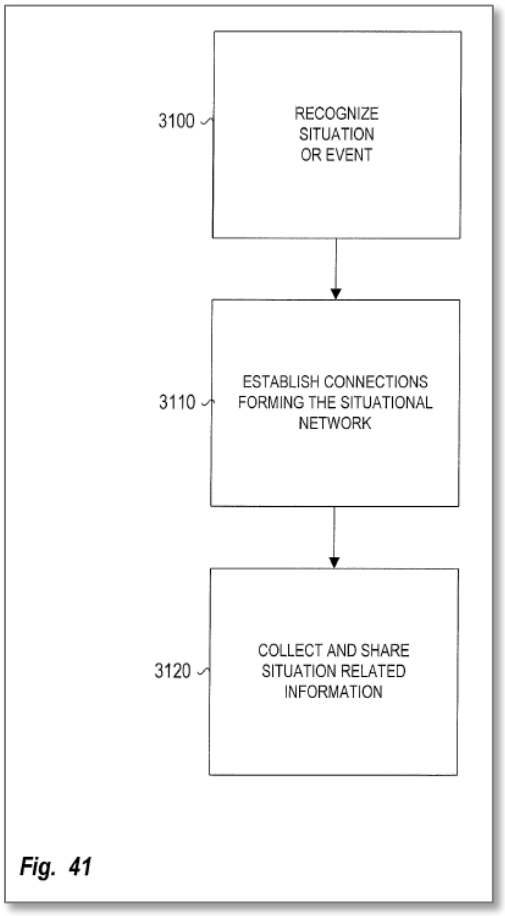
Figure 30 shows an example of a geographic projection 3050 of nodes of a situational network 3000. EX1001, 23:8-9.



EX1001, FIG. 30.

Network 3000 includes the ten nodes labeled (a) through (j). EX1001, 23:9-10. In this example, the situation 3005 is a storm posing a flood threat to persons located on one side of a river (boundary 3052). *Id.*, 23:13-16. Geographic projection 3050 includes a subset of the nodes, which are located in the flood zone. *Id.*, 23:9-18. EX1003, ¶34.

Notably, a situational network is not a specific network architecture. EX1001, 6:59-60. Regardless of the architecture, the same generic process is used to form the situational network (Figure 41). *Id.*, 7:48-53; EX1003, ¶35.



EX1001, FIG. 41.

The ’325 patent uses conventional technologies to implement the situational network. Users are connected to the situational network using devices, such as cell phones, PDAs, personal computers, network servers, or “other devices generally known to those skilled in the art.” EX1001, 4:53-58. Participants in the situational network are associated with “nodes,” which are simply the users’ point of

connection to the network, and which "may be implemented using a wide variety of available hardware and technologies generally known in the art." *Id.*, 15:34-51, 15:59-67; EX1003, ¶36.

B. Prosecution Summary

The '325 patent issued on March 4, 2025. In the first and only office action, the Examiner rejected all claims under obviousness-type double patenting over claims of other SitNet patents—including over the '454 patent. EX1002, 269-275. The Examiner did not issue any other rejections. *Id.* Applicant filed Terminal Disclaimers. *Id*., 276-278. The Examiner issued a Notice of Allowance, with no comments on their reasons. *Id*., 291-296. The prosecution history includes no substantive discussion of the claims in view of prior art. EX1003, ¶49.

C. Person of ordinary skill in the art

A person of ordinary skill in the art ("POSA") would have had a bachelor's degree in Computer or Electrical Engineering or equivalent discipline, and approximately two years' experience in telecommunications or computer networking. Additional education could substitute for professional experience, and work experience could substitute for formal education. EX1003, ¶¶50-51.

D. Claim Construction

Claims must be given their ordinary and customary meaning in light of the specification—the meaning the term would have had to a POSA at the time of the invention.

The Board and district court previously construed the terms "situational network" and "projection" and determined "event node" needs no construction. EX1020, 8-12, 18-24, 37-41; EX1023, 12-18; EX1024, 2-6. The Board's constructions were consistent with the district court's. While Petitioner submits no claim terms require construction for the purposes of this IPR, the art nevertheless teaches the claims under these prior constructions. EX1003, ¶¶52-55.

V. GROUND 1: CLAIMS 1-18 WOULD HAVE BEEN OBVIOUS OVER AMIDON IN VIEW OF ISSA.

A. Amidon

Amidon describes "providing systems and methods for users to conduct online conferences based on underlying social network structures." EX1005, 2:54-56; EX1003, ¶¶56-65. As the Board determined in IPR2024-00529, Amidon's conference teaches an *event node*. EX1020, 18-24.

Amidon allows users of a social network to communicate and exchange information in a "conference." A user may initiate a conference in the social network, and specify the parameters (e.g., degree of separation from the user, location, interests, or demographics) for selecting participants. EX1005, 2:57-60, 3:22-47, 4:5-9, 10:11-24, 12:37-65. Conference participants can send messages to particular users within the conference, selected based on the same and/or other parameters as those used to set up the conference. *Id.*, 2:60-63.

Figure 4 of Amidon "illustrates an exemplary user interface" for a social-network conference. EX1005, 16:65-67.

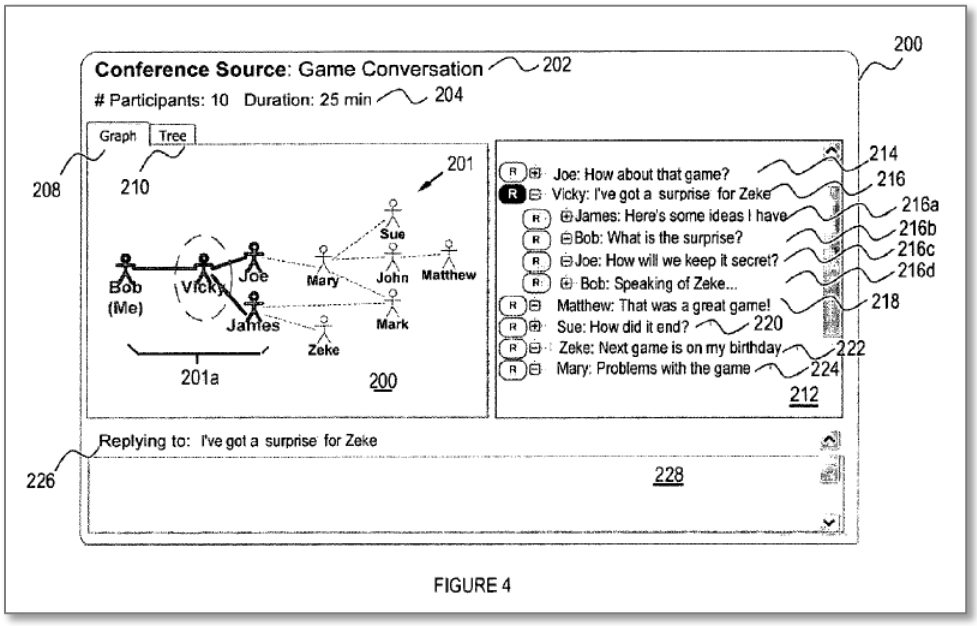
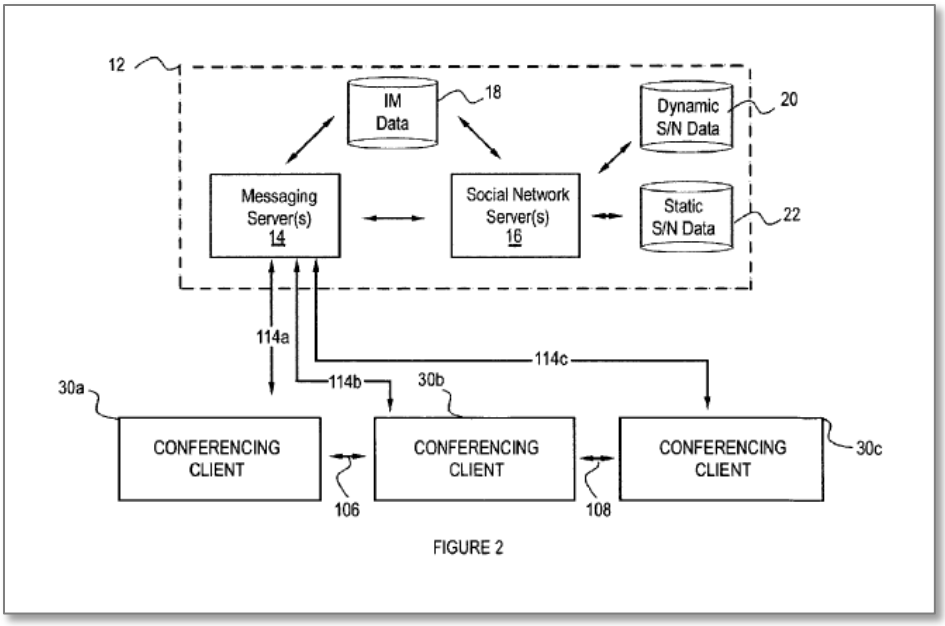


FIGURE 4

EX1005, FIG. 4.

Conference window 200 includes title bar 202, which describes the (i.e., "Game Conversation"). EX1005, 17:2-7. Thread display area 212 includes "data (messages, content, etc.) exchanged amongst the members of conference 201." *Id.*, 17:21-55.

Figure 2 illustrates exemplary system 12 that supports social-network-based conferencing, including messaging server 14 and social-network server 16. *Id.*, 8:1-4.



EX1005, FIG. 2.

Messaging server 14 facilitates messaging between users. EX1005, 8:44-9:8. Social network server 16 stores data defining social networks, including relationships and member data (e.g., profile information). *Id.*, 9:9-38. Each of conferencing clients 30a, 30b, 30c comprises one or more computing devices that interface with the messaging server 14 of system 12. *Id.*, 8:12-35, FIG. 2.

B. Issa

Issa describes an "aggregation node" that operates in the context of a social network. EX1018, Abstract. Issa's "aggregation node" teaches an "event node" operating in a "multi-dimensional personal information network" as recited in the claims. EX1003, ¶¶66-69. Issa also teaches that such nodes are discoverable. EX1018, 15:17-23.

Issa connects "multiple social network nodes using an aggregation node," EX1018, Title, to provide "live communication links among networked users" and aggregate and share content, including "instant messaging, web-based communications, file and content sharing, [and] audio communications." EX1018, 2:57-3:4; *see also* 13:60-14:15.

An example of Issa's aggregation node and its connection to social network nodes is depicted in Figure 5. *See* EX1018, 12:33-13:58, FIG. 5.

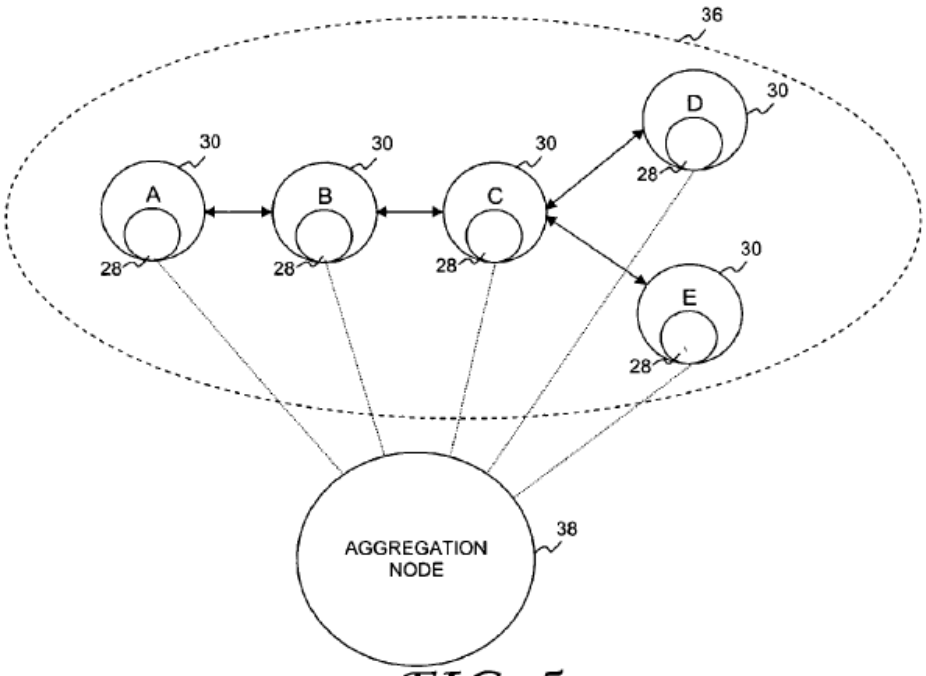


FIG. 5

EX1018, FIG. 5.

As depicted in Figure 5, "aggregation node 38 may comprise a centralized server and/or a proxy server" that obtains "digital content and/or metadata" from the nodes "participating in the social network." EX1018, 13:7-20, 13:40-59. One

way of receiving content and distributing content is to establish a "virtual peer" in the social network and using it to receive content from the social media participants and to serve content requests to "[m]ember and non-member peers." EX1018, 2:66-3:39, 12:50-13:6, 13:40-59, 14:27-15:-23, 15:55-16:23; *see also* 3:20-25 (the virtual peer allows "multiple social network nodes communicatively connected to the aggregation node to be addressed with a single request.").

C. A POSA would have found it obvious to combine Amidon and Issa.

A POSA would have been motivated to modify Amidon's social network communication system to incorporate Issa's teachings of an aggregation node framework and discoverable nodes. EX1003, ¶¶83-91.

Both Amidon and Issa have identical inventorship. EX1005, (75); EX1018, (75). A POSA would have recognized and known of the teachings in both references and would have been motivated to incorporate Issa's aggregation node framework to provide a process for aggregating, caching, and distributing shared content in Amidon's social network conferences. EX1018, 13:40-59; EX1003, ¶84.

Issa provides a framework of using an "aggregation node" and "virtual peer" to gather messages from nodes of a network and to share content. EX1018, 13:40-59. Such a framework would have furthered Amidon's goal of facilitating content sharing in social networks. EX1005, 2:45-48, 3:4-15. Issa's framework would have furthered Amidon's goal of providing data exchanges, data distribution, and

caching data for conference participants from a social network. EX1005, 4:23-44, 15:6-16:64.

Issa's framework and functionality beneficially provides content sharing and distribution. EX1018, 13:40-59. This digital content includes "video, audio, text, image, graphic, html, [and] metadata." EX1018, 16:17-23, *see also* 13:60-63. A POSA would have therefore recognized and would have been motivated to implement the benefits of content sharing provided by Issa's aggregation node framework to also aggregate, cache, and distribute shared content as described in Amidon. EX1003, ¶¶85-88.

A POSA would have also been motivated to implement Issa's teaching of listing an aggregation node and virtual peer in a "directory for discovery by other nodes or web users" or a "meta-directory about virtual peers that is searchable by member and/or non-member peers." EX1018, 15:17-23. Amidon explains that social networking sites provide "instant messaging and online chat rooms" and commonly offer the ability to provide access "to the public at large." EX1005, 1:41-49, 15:36-39, 17:36-42. When the user wishes a conference to be accessible publicly—e.g., so that users in geographic proximity can locate and join the conference—a POSA would have recognized that Issa's description of a searchable "directory for discovery by other nodes or web users" would have been a simple way to further Amidon's functionality. EX1005, 12:56-65; EX1018, 15:17-23;

EX1003, ¶89. Thus, a POSA would have known of, and would have been motivated to implement, Issa's teaching of discoverable nodes. EX1003, ¶89.

A POSA would have also known how to combine Amidon and Issa because Issa is a predictable variation of Amidon. EX1003, ¶90. In addition to sharing identical inventorship, both references describe using a common server/client infrastructure to aggregate and distribute messages and content among connected nodes. EX1005, 4:60-5:2, 8:44-9:38; EX1018, 1:44-53, 3:60-4:8, 5:12-21, 13:7-20; *see also* EX1018, 2:57-66, 13:60-14:15, 16:5-23; EX1005, 3:4-15, 13:43-56. In view of these shared implementation details, a POSA would have readily implemented Issa's aggregation node framework with Amidon. Implementing Issa with Amidon amounts to combining prior-art elements in a predictable way using known methods. The results would have been predictable as well: the combination would have used an aggregation node to obtain, aggregate, and distribute content from participants of a social network conference. EX1003, ¶91.

D. Independent Claim 1

1. [1.P]

To the extent limiting, Amidon teaches the preamble. EX1003, ¶¶92-99. Amidon teaches "systems and methods for users to conduct online conferences based on underlying social network structures." EX1005, 2:54-56. As described in the '325 patent, a "situational network 3000 is created when an occurrence or

expected occurrence of an event or situation 3005 causes connection, also referred to as links, to be established between, within or among a set of participants." EX1001, 4:20-24, FIG. 1. The '325 patent provides several examples of "situations," including "a social event, such as a concert or festival." *Id.*, 31:64-65, *see also* 5:10-25. Claim 1 broadly recites "a situation" with no further limitation.

In Amidon, a social network conference may be created automatically upon detecting *situations*—e.g., users listening to the same music, a certain number of users in the social network involved in a conversation, or users sharing content on a particular topic. EX1005, 13:57-14:29. Amidon's teaching of a set of users communicating via a conference created in response to a situation corresponds to *a situational network*. Section V.D.2 ([1.1]) (regarding Amidon's teachings of a *situation*).

Amidon's identification of users for inclusion in a social network conference (e.g., based on distribution parameters) teaches *creating a situational network based on a projection from a multi-dimensional personal information network*. A "user can specify the nature and extent of a conference amongst members of a social network based on various parameters, including social network parameters." *Id.*, 2:57-60. "Once a conference has been initiated, users participating in the conference can direct messages to desired users in the conference based on the same and/or other parameters." *Id.*, 2:60-63. Conference metadata is used to

manage a social network conference, including "data identifying one or more members of a social network and at least one distribution parameter." *Id.*, 3:22-25. "Based on the social network data and the distribution parameter(s), multiple other users may be identified for inclusion in a social network conference" (*i.e.*, *form[s] a projection of nodes of the situational network*). *Id.*, 3:33-36, 10:37-39 ("Social network server 16 then uses the distribution parameters and other information to assemble a participant list for potential inclusion in the social network conference."), 21:21-22. This list of users for possible inclusion in the conference is the claimed *projection*. This is consistent with the '325 patent's description of "a 'projected' view" as "a subset of the nodes" of the social network. EX1001, 17:4-5, 22:52-55.

Amidon's social network conference includes *transmitting information related to a situation*. "Once a conference has been initiated, users participating in the conference can direct messages to desired users in the conference." EX1005, 2:60-63. These messages can include "shared audio files" or "video files" and other "file and content sharing." *Id.*, 3:4-15, 6:48-57, 13:43-56, 21:18-45. The conference corresponds to *a situation*—e.g., users listening to the same music or discussing or sharing content about a particular topic. EX1005, 13:57-14:29, *see also* 4:6-9, 12:37-65.

2. [1.1]

This element includes four features: (i) *creating, by an event node server, an event node*; (ii) the *event node* is in a *multi-dimensional personal information network* that *comprises member nodes*; (iii) the *event node* corresponds *to the situation*; and (iv) *the event node is discoverable by browsing the multi-dimensional personal information network*. The Amidon-Issa combination teaches all four features. EX1003, ¶¶100-120.

(i) Amidon teaches *creating, by an event node server, an event node*. Amidon's social network server 16 (*an event node server*) "uses [] distribution parameters and other information to assemble a participant list for potential inclusion in the social network conference." EX1005, 10:37-39, FIG. 2, *see also* 9:9-38. "Data defining the social network conference, including the participant list, is then stored in computer-readable form," for example, "one or more additional databases accessible by social network conferencing system 12." *Id.*, 10:40-44, *see also* 3:36-39. Amidon also teaches that each message in a conference may be tracked by a database record and/or that messages may be cached. *Id.*, 15:18-46.

Amidon's social network conference (as defined by the stored data and accessible via window 200) is the claimed *event node*. EX1003, ¶¶101-103. "[C]onferencing system 12 may store data defining social network conferences in any suitable fashion and location(s)." EX1005, 15:6-10, FIG. 3. This is consistent

with the '325 patent's description of a node as "provid[ing] an associated entity with the ability to store and manage [its] profile and relationships with other users of the [social network]." EX1001, 15:37-39. This also is consistent with the ordinary and customary meaning of node, wherein nodes may represent people, organizations, communities, locations, websites, or any other unit that is part of the network. EX1003, ¶¶103-104.

Amidon describes multiple ways of forming (*creating*) a social network conference (*event node*). EX1005, 13:34-35. For example, system 12 supports conference formation based on user preferences and past activity. *Id.*, 13:57-60. As another example, "a user may provide for the system to automatically form a conference," based on current activity, like listening to similar music. *Id.*, 13:65-14:3. "Other conferences may be formed based on network activity, such as sharing content of a particular data type (photos, movies, etc.) and/or content having similar metadata (sharing of particular music, songs, movies, etc.)." *Id.*, 14:3-7.

Further, "[s]ocial network server 16 [(i.e., the *event node server*)] may be configured to analyze data describing current messaging sessions or other activity, such as social network circuit activity, and periodically compare such data to conference formation parameters provided by one or more users." *Id.*, 14:13-18; EX1003, ¶105. "For example, a user may indicate that the user wishes to

automatically create a new conference any time the user is involved in a subset of a social network circuit related to a game when the subset includes three or more people. Social network server 16 can access circuit data and automatically form a conference including such users." EX1005, 14:22-27. In this example, a conference is automatically formed when a group of three or more users are in live communication (i.e., a conversation) about a game. EX1003, ¶¶105-106.

In another example, a first user identifies that they wish to create a conference including "only those users who are also sharing content on a particular topic ('Vacation')." EX1005, 21:18-26. When social network server 316 determines other users are sharing relevant content, the server provides a "filtered view" of the network, which includes users that meet the first user's criteria. *Id.*, 21:21-35. The first user may then invite users to join a conference and, pending acceptance, social network server 316 creates and tracks a conference including these users. *Id.*, 21:28-45.

Thus, Amidon teaches the social network conference (as defined by the stored data and accessible via window 200) (i.e., *the event node*) is *created by* the social network server (i.e., *event node server*). EX1003, ¶107

Issa also teaches the claimed *event node*. EX1003, ¶¶108-110. For example, Issa's aggregation node 32 (illustrated below) teaches the claimed *event node*. EX1018, Abstract, 3:20-25, 12:63-67, 13:40-59, 14:27-36.

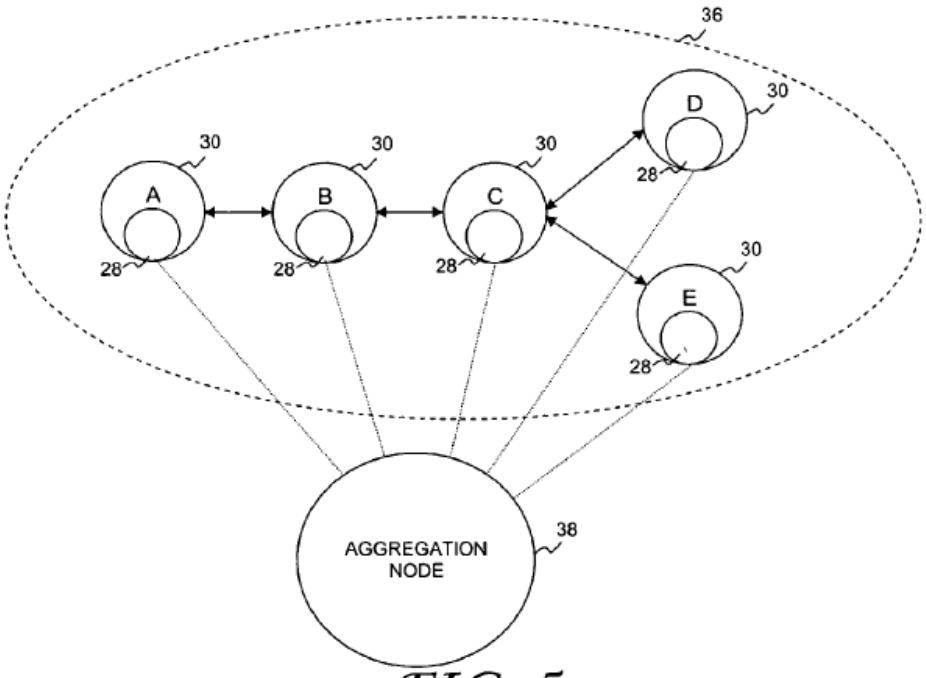


FIG. 5

EX1018, FIG. 5.

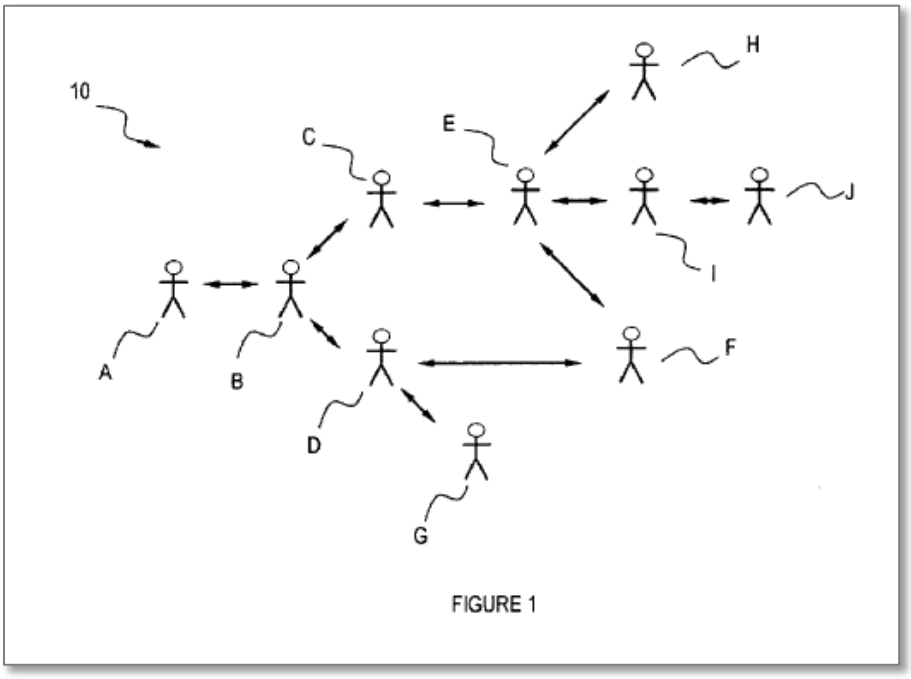
"[A]ggregation node 38 may comprise a centralized server and/or a proxy server." EX1018, 13:7-20. Aggregation node 38 obtains "digital content and/or metadata" from the connected nodes. EX1018, 13:40-59. Issa connects "multiple social network nodes using an aggregation node." EX1018, Title, *see also* 1:28-53, 2:55-66, 8:60-9:20. "Members of a pre-existing social network may selectively activate embedded latent peers and link to an aggregation node." EX1018, Abstract, 12:33-49. To receive and distribute content, the aggregation node establishes a "virtual peer" in the social network that allows "multiple social network nodes communicatively connected to the aggregation node to be

addressed with a single request." *Id*., 3:20-24, *see also* 2:66-3:4, 12:50-13:6, 13:40-59, 14:27-15:23, 15:55-16:23.

Thus, like Amidon, Issa also teaches the claimed creation of an *event node in a multi-dimensional personal information network* by an *event node server*. EX1003, ¶111. The Amidon-Issa combination therefore teaches an *event node* as recited in claim 1. *Id.*

(ii) Amidon teaches a *multi-dimensional personal information network* that *comprises member nodes*. EX1003, ¶¶112-114. The '325 patent uses the terms "multi-dimensional personal information network" and "N-dimensional social network (NDSN)" interchangeably. *See* EX1001, 6:25-29, 8:4-8, 15:1-4. An NDSN, the '325 patent says, "captures and manages multi-dimensional relationships between persons and other entities that are users of the network." *Id.*, 15:1-4. "The NDSN uses multiple dimensions of association to characterize the relationships between users or members." *Id.*, 15:9-10. For example, the NDSN uses multiple dimensions to characterize the relationship between two or more users, such as "friendship," "family, professional connection, consumer (e.g., consumer-to-merchant) relationship and healthcare-relation (e.g., providers, insurers, etc.)." *Id.*, 15:9-17. In the '325 patent, "[n]odes may connect via different dimensions." *Id.*, 15:39-40.

Amidon's social network 10 (illustrated below) is a *multi-dimensional personal information network* that *comprises member nodes*.



EX1005, FIG. 1.

Members of Amidon's social network may be "linked to one another through *one or more types* of *social connections*," including, for example, "common friendship, place or field of employment, place of education, place of residence, membership in a club or other group, or common hobbies or topical interests." EX1005, 1:27-38. In Figure 1, links between users A through J are shown by double-ended arrows. *Id.*, 6:60-63. Amidon further teaches that "one of skill in the art will recognize that social networks may be much more extensive than social network 10," and, for example, "links between friends (or other contacts) … may be densely intertwined and overlap extensively." *Id.*, 7:38-47. Like in the '325 patent,

the relationships between members of Amidon's social network are characterized in multiple dimensions, i.e., friendship, place of employment, common hobbies, etc. Thus, Amidon's social network 10 is a *multi-dimensional personal information network*.

(iii) Amidon teaches the *event node correspond[s] to a situation.* EX1003, ¶¶115-117. The '325 patent provides several examples of "situations," including "a social event, such as a concert or festival," activities like skiing or surfing, weather phenomena, or emergencies. EX1001, 5:10-20, 31:64-65.

In Amidon, a social network conference (i.e., *the event node*) is created by social network server 16 (i.e., *the event node server*) upon detecting various *situations*— e.g., users listening to the same music or discussing or sharing content about a particular topic. EX1005, 13:57-14:29. Thus, the social network conference (as defined by the stored data and accessible via window 200) (i.e., *the event node*) *corresponds to the situation*. Further, a POSA would have understood that, regardless of the *situation* to which the event node corresponds, the same social network architecture would be used to implement the system and methods of the challenged claims. EX1003, ¶116.

This teaching of a "*situation*" applies in the Amidon-Issa combination as well. Issa's aggregation node as implemented with Amidon would have enabled

the aggregation and distribution of content corresponding to *a situation*, such as those described in Amidon. EX1018, 4:1-8, 13:40-59; EX1005, 13:57-14:29.

(iv) Issa teaches that an *event node* (e.g., Issa's aggregation node with virtual peer functionality) *is discoverable by browsing the multi-dimensional personal information network*. EX1003, ¶¶118-120. Issa explains that each aggregation node and virtual peer includes an identifier. EX1018, 14:55-64. "The identifier for each virtual peer may be listed in a ***directory for discovery by other nodes or web users***." EX1018, 15:17-23. "There may also be a ***meta-directory about virtual peers that is searchable*** by member and/or non-member peers. Member and non-member peers use the virtual peer identifier to join to the established sharing network." *Id.* In this manner, Issa as combined with Amidon teaches an *event node* that is *discoverable by browsing* a *multi-dimensional personal information network*. EX1003, ¶¶118-120.

A POSA would have been motivated to implement Issa's aggregation node and virtual peer framework along with Issa's discoverability functionality as previously explained. Section V.C.

3. [1.2]

Amidon teaches this element. EX1003, ¶¶121-125.

First, Amidon teaches *identifying a subset of the member nodes of the multi-dimensional personal information network.* EX1003, ¶¶121-123. According to

Amidon, conference metadata is used to manage a social network conference and includes "data identifying one or more members of a social network and at least one distribution parameter." EX1005, 3:22-25. "Based on the social network data and the distribution parameter(s)," Amidon's system identifies "multiple other users … for inclusion in a social network conference." *Id.*, 3:33-36, 10:37-39 ("Social network server 16 then uses the distribution parameters and other information to assemble a participant list for potential inclusion in the social network conference."), 21:21-22. This list of users for possible inclusion in the conference is the claimed *subset*. This is consistent with the '325 patent's description of "a subset of the nodes" of the social network. EX1001, 17:4-5, 22:52-55.

Second, Amidon teaches that the *subset of the member nodes* may be based on *geographic proximity* because Amidon discloses that "participation [in a social network conference] may be defined *geographically*, such as limiting a conference to users within a particular locale or within a certain distance from one another." EX1005, 4:6-9, 12:37-65; EX1003, ¶¶124-125. Amidon recognizes, "*user devices* and/or the conferencing system *may support location-based services* such that the location of particular users can be determined." *Id.*, 12:59-61. Amidon thus teaches that users can be limited to users within a geographic proximity to a situation. EX1005, 4:6-9, 12:59-61.

4. [1.3]

Amidon and Issa teach this element. EX1003, ¶¶126-131.

First, Amidon teaches *transmitting an invitation … to devices corresponding to each node in the subset formed in step (b)*. EX1003, ¶¶127-128. Amidon's invitations are transmitted to users to join a social network conference. The social network server provides a conference participant list (i.e., *the subset*) to the messaging server, which in turn sends an invitation to the users on the list via their respective computing devices 330. *See* EX1005, 21:3-8, *see also* 19:54-67, FIG. 6B.[1] In another example, a user sends a message to other users inviting them to join a conference.[2] *See id.*, 21:18-38.

Amidon also teaches storing, as part of the data defining a social network conference, a record for each user indicating the user's conference status. *Id.*, 15:6-17. The "status indicators may include 'active,' '*invited* but inactive,' and '*invited* but declined,'" *id.*, 15:15-17.

[1] Amidon's Figures 2 and 6B disclose similar features, and the teachings of one could be applied to the other with a reasonable expectation of success. EX1003, ¶127; *see also, e.g.*, EX1005, 20:1-7.

[2] Claim 1 does not require the invitation to be transmitted from a computer system, and does not foreclose the invitation transmission being initiated by a user.

Second, Amidon teaches the *invitation* is *to establish a respective link with the event node*. For a user to participate in a conference, a link 116 (*a link*) is established between users' devices, e.g., device 330, and the social network server 316 (*the event node server*). EX1005, 20:1-7, 20:39-62, FIG. 6B. Thus, when sending an invitation to participate in a conference, Amidon teaches sending an *invitation to establish a link with the event node*. EX1003, ¶129; Section V.D.6 ([1.5]) (regarding Amidon's teachings of *establishing a link*). Thus, Amidon renders obvious element [1.3].

Issa also teaches [1.3]. EX1003, ¶130. Issa teaches transmitting "invitations" that "include the name of the virtual peer … so that the invited nodes can pass the identifier back to the aggregation node for verification purposes if such nodes decide to join the content sharing network." EX1018, 15:24-33, 15:42-54. When the invited users accept the invitation, a link is established with Issa's aggregation node. *Id*., 2:55-66, 3:57-59, 9:36-40, 15:36-41, 15:66-16:4.

5. [1.4]

Amidon teaches this element. EX1003, ¶¶132-133.

Amidon discloses monitoring for responses to invitations:

> [T]he conferencing system provides feedback as to the conference initiation process. For instance, after inviting various members, [the user] may be presented with a pop-up window and/or other notification(s) of progress. The *window may indicate*, for example,

which members have received invitations, which members are in the process of responding, and *the response(s) received*.

EX1005, 21:54-61.

6. [1.5]

Amidon teaches this element. EX1003, ¶¶134-138.

Amidon teaches *establishing the respective link with each device accepting the invitation to form the situational network* because Amidon discloses that user devices can participate in a social network conference. For example, Figure 4 illustrates an exemplary user interface showing social network conference participants.

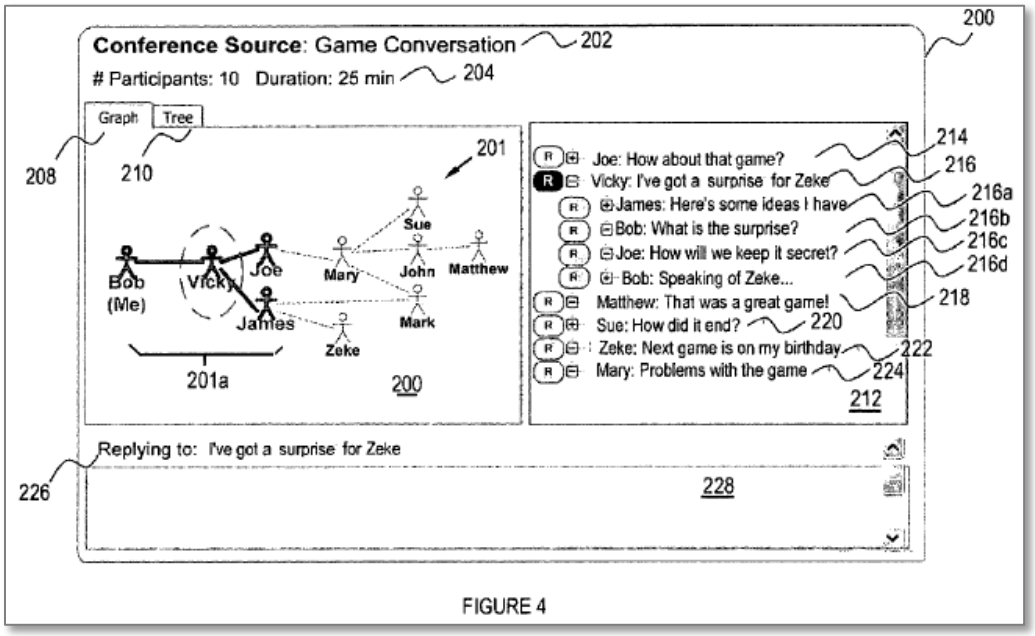


FIGURE 4

EX1005, FIG. 4.

To participate in such a social network conference, Amidon teaches that a link 116 (*the respective link*) is established between the user's client devices, e.g., device 330l (*each device accepting the invitation*), and the social network server 316 (the *event node* server), as illustrated in Figure 6B (reproduced below):

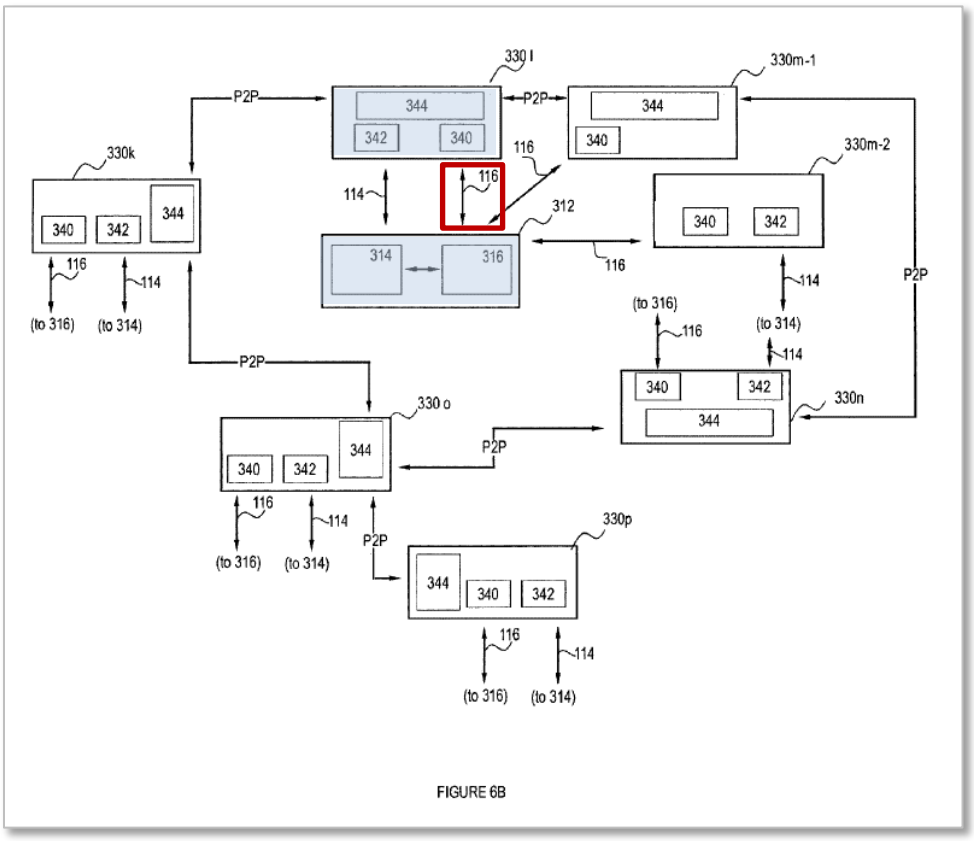


FIGURE 6B

EX1005, FIG. 6B (annotated).

EX1005, 20:1-7, 20:39-62, *see also* 8:60-9:22. Amidon further discloses that user devices may be linked to one or more social networking servers 316, which creates the conference and tracks participation. EX1005, 20:39-43, 21:36-38, 21:62-63. Establishing these links with the client devices forms a *situational network*. Section V.D.1 ([1.P]); EX1003, ¶¶134-138.

7. [1.6]

Amidon and Issa teach this element for the reasons provided herein and as further explained with reference to dependent claims 2-9 and 11-18. EX1003, ¶¶139-153; Sections V.F-M.

First, Amidon teaches *identifying a target member node* when using distribution parameters to determine the recipients of a particular message. EX1005, 2:57-3:3, 4:10-22, 4:39-44, 10:25-11:14, 12:37-13:33, 13:65-14:12. Amidon uses parameters for distributing messages to members participating in a social network conference. *Id.*, 4:39-44, 10:11-24, 12:37-13:33. When conferencing system 12 and social network server 16 receive a message, Amidon uses these parameters to identify target recipients. *Id.*

Amidon explains that each message exchanged in a conference includes a "unique identifier that is cross-referenced to a particular distribution list." EX1005, 11:42-55. Amidon generates this distribution list—which identifies recipient targets—based on parameters set by a sender. *Id.*, 4:39-44, 10:11-11:14, 12:37-13:33. Amidon provides several examples of setting parameters to distribute messages among the users identified in Figure 1:

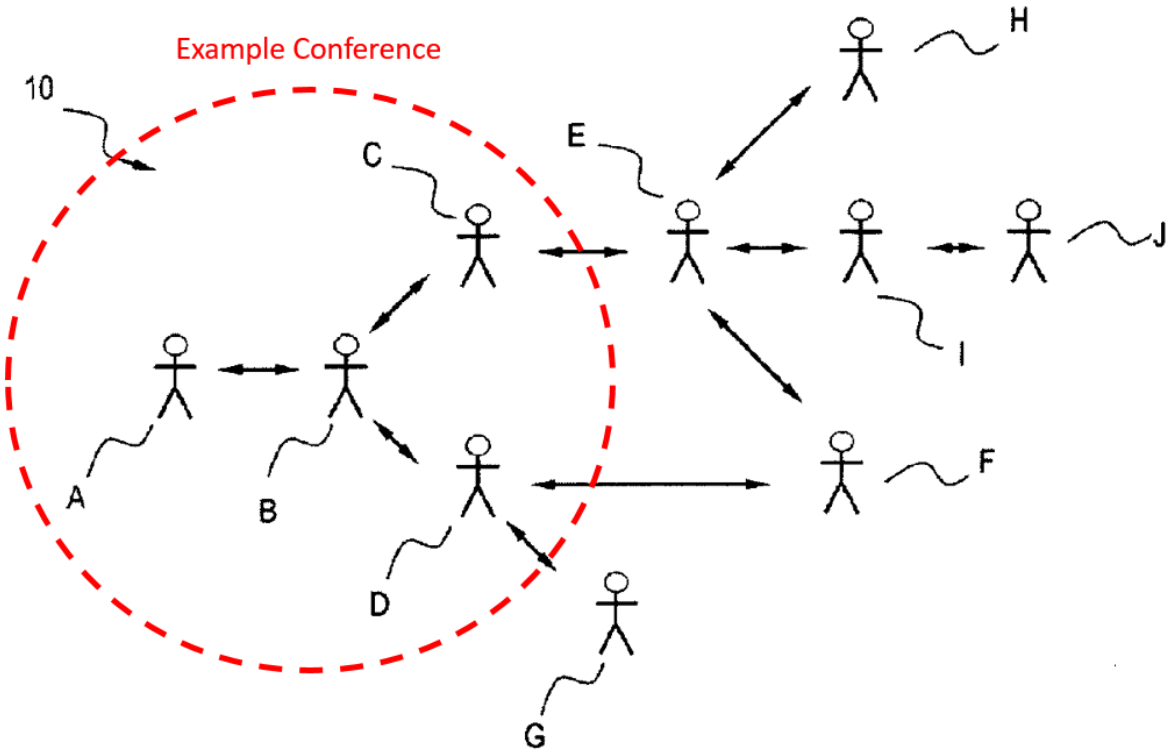


FIGURE 1

EX1005, FIG. 1 (annotated).

For example, Amidon describes a scenario where a conference is established with "users A, B, C, and D" and where "user A wishes to send a message." EX1005, 10:45-58. "User A may send the message to the entire conference, or may further limit the message by specifying additional parameters." *Id.*

In one "limited distribution" example, "user A may specify that the message is to be distributed only to members within ***one degree of separation***." EX1005, 11:1-7. In this case, "the recipient list provided to messaging server 14 includes

only user B. Messaging server 14 relays user A's message to user B, but not to users C or D." EX1005, 11:8-14, FIG. 1.

Thus, Amidon teaches *identifying a target member node* when using distribution parameters to determine the recipients of a particular message. EX1003, ¶¶140-144.

Second, Amidon teaches that the *target member node is connected to at least one node of the subset of the member nodes via at least one dimension of the multi-dimensional personal information network*. EX1003, ¶¶145-147. Amidon's description of two participants in a social network conference who are linked (e.g., as "***one degree of separation***" or "friends") teaches this claim element when Amidon's system delivers a message or content from one participant to the other participant (i.e., the *target member node*). EX1005, 6:66-7:18, 10:11-24, 12:53-58, 12:66-13:7.

The '325 patent explains that "friendship is a dimension" used in its N-dimensional social network. EX1001, 15:11-20. Other dimensions may include "family" or "preferences and behaviors." *Id.* Amidon teaches these same dimensions and connecting friends and family members with varying degrees of separation. EX1005, 6:66-7:47, 10:11-24, 12:1-22, 12:37-65, 13:8-33.

Amidon's disclosure of a message being transmitted to a friend, to a "friend-of-a-friend (FOAF)," or to a connection with one or more degrees of separation

also teaches [1.6]. EX1005, 6:66-7:18; EX1003, ¶148. Returning to the example in Figure 1, "users A through J may have designated one another as 'friends' in a social networking site" where "A has designated B as a friend, B has designated C and D as friends, and so forth." EX1005, 6:66-7:18, 7:38-47. When user A designates user B as an acceptable recipient of a transmitted message, Amidon's conferencing system 12 identifies user B as a target user, and user B is a friend of user A (i.e., the users are connected *via at least one dimension*). EX1005, 11:1-14, *see also* 3:48-4:4; EX1003, ¶148.

Similarly, when user A indicates that recipients within two degrees of separation should receive a message, conference system 12 also identifies users C and D as target member nodes as well. EX1005, 10:11-24, 12:8-9 (describing social network server 16 determining "which participants in the present conference meet [a user's] criteria"). "Server 14 then relays A's message to conferencing clients associated with each of B, C, and D." EX1005, 10:66-67, *see also* 10:45-66. Amidon therefore teaches additionally identifying *target member nodes* via multiple dimensions of friendship. EX1003, ¶149.

The recipients of these messages correspond to nodes of the subset for the reasons presented for [1.2]. EX1003, ¶150; Section V.D.3. For example, when a subset of users are in a conference based on "geographical parameters," communication among or between those users (e.g., friends) results in

communication between a target member node and a node that is part of the subset identified in [1.2]. EX1005, 12:59-65, *see also* 10:45-58, 11:1-14, 12:59-65; EX1003, ¶150. Amidon therefore teaches the elements of [1.6].

If SitNet argues that Amidon's target user is not a *node*, the combination of Amidon and Issa also renders obvious a *target member node* for the reasons provided for [1.1] (*member nodes*). EX1003, ¶¶151-153. Issa's framework refers to users as "nodes" in a social network and explains that such nodes are recipients of digital content subject to "distribution parameters." *See* EX1018, 5:64-6:47. Issa's Figure 1 "illustrates an exemplary social network of users sharing digital content in accordance with certain controls on distribution. ***Users are designated generally in FIG. 1 as nodes***." EX1018, 5:64-6:4 (emphasis added).

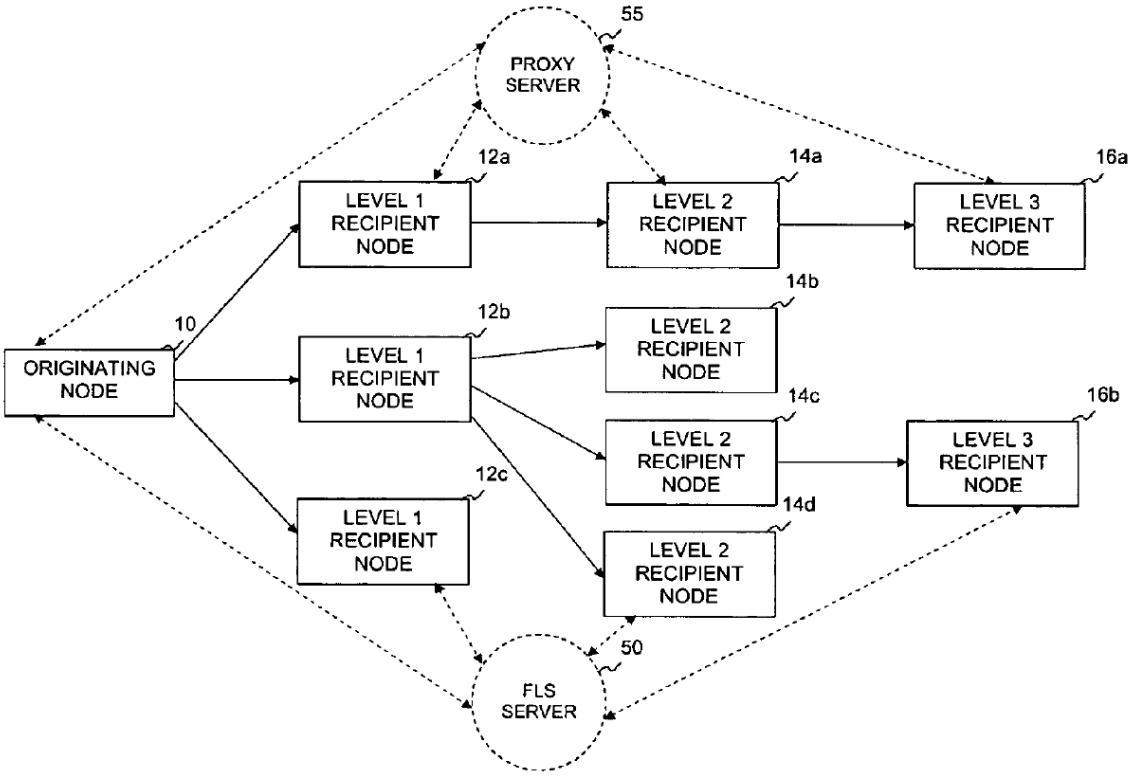


FIG. 1

EX1018, FIG. 1.

Issa additionally explains that these originating and recipient nodes may be characterized based on a "degree of separation" for controlling the distribution of content. EX1018, 1:59-64, 6:15-25, 8:52-59.

Issa therefore confirms that the terms "user" and "node" are interchangeable—especially in the context of identifying recipient users based on distribution parameters. EX1003, ¶153. Thus, Amidon's description of users and client devices also teaches nodes, and Amidon's recipient-user teaches a *target*

member node. *Id.* A POSA would have implemented Issa's node framework as previously explained. Section V.C.

8. [1.7]

Amidon teaches this element. EX1003, ¶¶154-158.

As explained for [1.P], [1.1], and [1.6], Amidon teaches transmitting messages and content to social network members participating in a "social network conference" related to a situation. Sections V.D.1-2, V.D.7; EX1005, 6:58-60. Amidon's social network conference may be created automatically upon detecting various *situations*—e.g., users listening to the same music or discussing or sharing content about a particular topic. EX1005, 13:57-14:29, *see also* 4:6-9, 12:37-65 (describing additional location-based conferencing). As described for [1.P], [1.1], and [1.6], conference system 12 identifies a user (*target member node*) to receive a message related to a situation according to parameters set by sender and then transmits the message to those identified users. EX1005, 4:60-5:2, 10:59-11:14.

In Amidon's Figure 4, users send messages about the game (i.e., *information related to the situation*). EX1005, 17:21-35. Amidon explains, "each thread compris[es] data (messages, content, etc.)." *Id.*, 17:22-26. Amidon's "messages" and "content" contained in thread 214 are *information* about the conference's topic (i.e., the *situation*). EX1003, ¶157. Moreover, non-functional information recited in the claim cannot be given patentable weight. *Praxair Distribution, Inc. v.*

Mallinckrodt Hosp. Prods. IP Ltd., 890 F.3d 1024, 1031–32 (Fed. Cir. 2018) ("Claim limitations directed to printed matter are *not entitled to patentable weight* unless the printed matter is functionally related to the substrate on which the printed matter is applied."); *C R Bard Inc. v. AngioDynamics, Inc.*, 979 F.3d 1372, 1381 (Fed. Cir. 2020) (similar); *In re Distefano*, 808 F.3d 845, 848 (Fed. Cir. 2015) (similar). Here, the claimed method can be performed irrespective of the particular content of information that is provided.

E. Independent Claim 10

Amidon-Issa renders obvious Claim 10. Claim elements [10.1]-[10.7] are substantially the same as [1.1]-[1.7] respectively. Amidon-Issa therefore renders obvious [10.1]-[10.7] for the same reasons. Sections V.D.2-8; EX1003, ¶¶159-160. Claim 10 further recites generic sever components in [10.P] and [10.A]-[10.D], including "*central processing units*" and "*network controllers*." Amidon-Issa render these components obvious.

Regarding [10.P], Amidon's system 12 supports social-network-based conferencing and teaches the claimed *system* for the reasons provided for [1.P]. EX1005, 8:1-3, FIG. 2; Section V.D.1; EX1003, ¶161.

Regarding [10.A] and [10.C], Amidon's social network server 16 together with messaging server 14 teaches the claimed *event node server* and *central processing units* for reasons similar to those presented for [1.1]. Section V.D.2;

EX1005, 5:56-6:10 ("server processes discussed herein may be implemented using a single server or multiple servers working in combination."), 9:39-10:10, 10:59-67. Amidon's social network server 16 and/or messaging server 14 include central processing units and would have employed a central processing unit to perform the functionality described in Amidon. EX1005, 5:59-63, 6:19-39; EX1003, ¶162.

Regarding [10.B] and [10.D], Amidon also teaches *one or more network controllers*. EX1003, ¶163. For example, Amidon's system can "relay [] communicated data over a network such as the Internet" and other "alternative networks." EX1005, 6:11-18. Amidon facilitates these network communications using "hard-wired logic or other circuitry, including, but not limited to application-specific circuits" and "social network circuit functionality." EX1005, 6:27-30, 9:39-41. Thus, Amidon teaches using *one or more network controllers* with an event node server to perform the functionality described in claims 1 and 10. EX1003, ¶¶163-164.

F. Claims 2 and 11

Amidon and Issa teach these claims as explained for [1.6]. Section V.D.7; EX1003, ¶¶165-168. The '325 patent explains that "friendship," "family," "preferences and behaviors" are all dimensions. EX1001, 15:11-20. Amidon similarly teaches two users who are directly connected by a *single dimension*. EX1003, ¶166. Figure 1 depicts a single connection between users A and B where

"A has designated B as a friend," and users A and B are "within one degree of separation." EX1005, 7:6-10, 11:8-14.

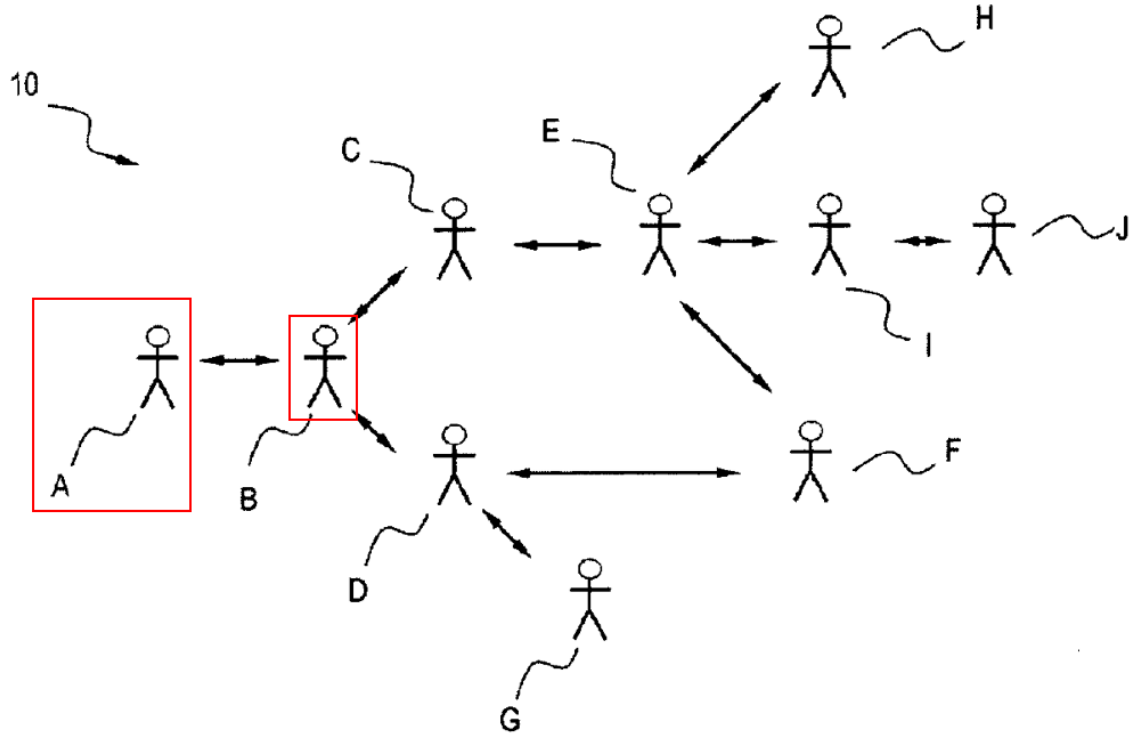


FIGURE 1

EX1005, FIG. 1 (annotated).

As explained for [1.6], "user A may specify that [a] message is to be distributed only to members within one degree of separation." EX1005, 11:4-14. Thus, Amidon teaches identifying a *target member node* that is connected by a *single dimension* as explained for [1.2] and [1.6]. EX1003, ¶¶167-168; Sections V.D.3, V.D.7.

G. Claims 3 and 12

Amidon and Issa teach these claims as explained for [1.6]. EX1003, ¶¶169-173; Section V.D.7. The '325 patent explains that "[t]wo nodes that are separated by two or more degrees of separation are indirectly connected." EX1001, 16:66-67. Amidon similarly teaches two users who are indirectly connected by a *plurality of dimensions* (e.g., two). EX1005, 6:66-7:10, 12:37-65, 12:66-13:7, 13:23-33. Figure 1 depicts two connections between users A and C (i.e., A is friend of B, and B is a friend of C). EX1005, 15:48-51.

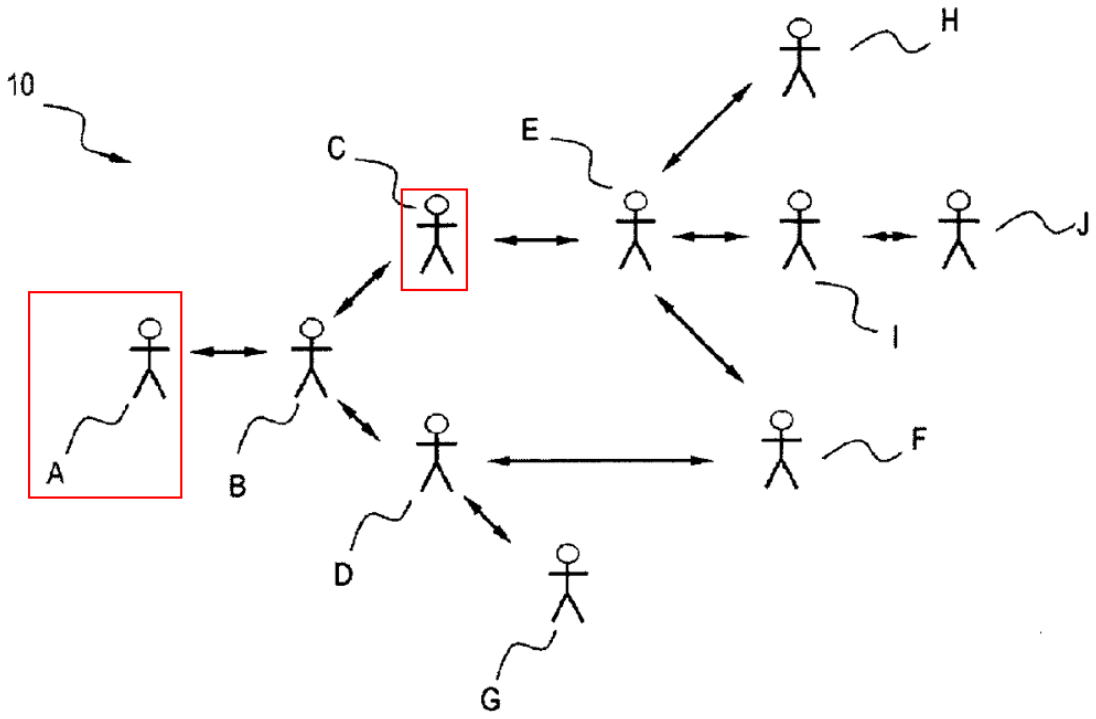


FIGURE 1

EX1005, FIG. 1 (annotated).

This "friend-of-a-friend (FOAF)" configuration teaches the claimed indirect connection. EX1005, 6:66-7:10, 12:37-65, 12:66-13:7, 13:23-33. Amidon's linking of users through different relationship types (e.g., friends, family, or co-workers) teaches the claimed *plurality of dimensions*. EX1005, 7:6-13 (describing friendship links as well as users D and F being "designated as brothers" and users I and J as "co-workers" in Figure 1). As explained for [1.6], when user A specifies distribution parameters that include user C (e.g., when specifying two degrees of separation or no limits to distribution), Amidon's conferencing system 12 identifies user C as a *target member node*. EX1005, 10:49-67. Amidon teaches different user relationship types (*plurality of dimensions*) may define the links between such users like between users A and C (e.g., friends, family, or co-workers). EX1005, 7:6-13; EX1003, ¶172. Similarly, Amidon also describes a scenario where "user A could specify users within a single degree of separation from user E" and form a conference with and deliver messages to "users E, C, H, I, and F." EX1005, 10:21-24. When different user relationship types occur along this chain, this teaches another example of identifying a *target member node* connected via a *plurality of dimensions*. EX1003, ¶172.

Thus, Amidon teaches identifying a *target member node* that is connected to a node of the subset of member nodes by a *plurality of dimensions* as explained for [1.2] and [1.6]. Sections V.D.3, V.D.7; EX1003, ¶¶169-173.

H. Claims 4 and 13

Amidon and Issa teach these claims as explained for [1.6]. Section V.D.7; EX1003, ¶¶174-177. The '325 patent states that an "NDSN might utilize dimensions that link participants by preferences and behaviors, e.g., a preference for a type of product or service." EX1001, 15:17-20.

Amidon describes users connected by preferences (*preference dimension*), such as "users currently listening to the same song, music by the same artist, music of the same genre, etc." EX1005, 13:65-14:12, 14:22-25. "[A] user may provide for a conference to be formed when ***at least three users within two degrees of separation*** are listening to music performed by a specified artist." *Id*., 14:9-12. In this example, users that have "two degrees of separation" are *indirectly connected*. EX1003, ¶176. And this indirect connection is based on them listening to the same song, artist, or genre (*preference dimension*). *Id.* Amidon describes other preferences or "interests" as well, such as for users "engaged in file sharing at certain times" or "sharing content on a particular topic ('Vacation')." EX1005, 12:37-46, 21:18-45, 20:63-66.

I. Claims 5 and 14

Amidon and Issa teach these claims as explained for [1.6]. Section V.D.7; EX1003, ¶¶178-180. Amidon explains that some users have varying interaction permissions based on degrees of separation. EX1005, 12:37-46. "A participation

policy … may be provided to any desired degree of granularity." *Id*., 13:29-30. For example, "users within 2 degrees of separation from a moderator may be allowed to fully participate, [while] users ***within four degrees of separation may be allowed to view the conference but not participate***." EX1005, 13:23-29, *see also* 4:10-22.

Based on this description, when a user transmits a message in a conference, Amidon's system identifies a recipient within four degrees of separation who may be friends and view the message but may not otherwise interact with the conference. EX1005, 13:19-20; EX1003, ¶180. Amidon identifies this message recipient according to set distribution parameters and therefore teaches identifying a *target member node based on a dimension other than interaction with the event node*. Section V.D.7

J. Claims 6 and 15

Amidon teaches these claims for reasons similar to claims 5 and 14. Section V.I; EX1003, ¶¶181-184. Amidon describes a conference where "users within 2 degrees of separation from a moderator may be allowed to fully participate, [while] users ***within four degrees of separation may be allowed to view the conference but not participate***." EX1005, 13:23-29 (emphasis added). In this scenario, the nodes within two degrees of separation correspond to *another node that interacted with the event node* while the nodes having three and four degrees of separation are

identified based on connections to the nodes within two degrees of separation and therefore teach the claimed *target member node*. EX1003, ¶182. These connections can be seen from Amidon's Figure 1 below:

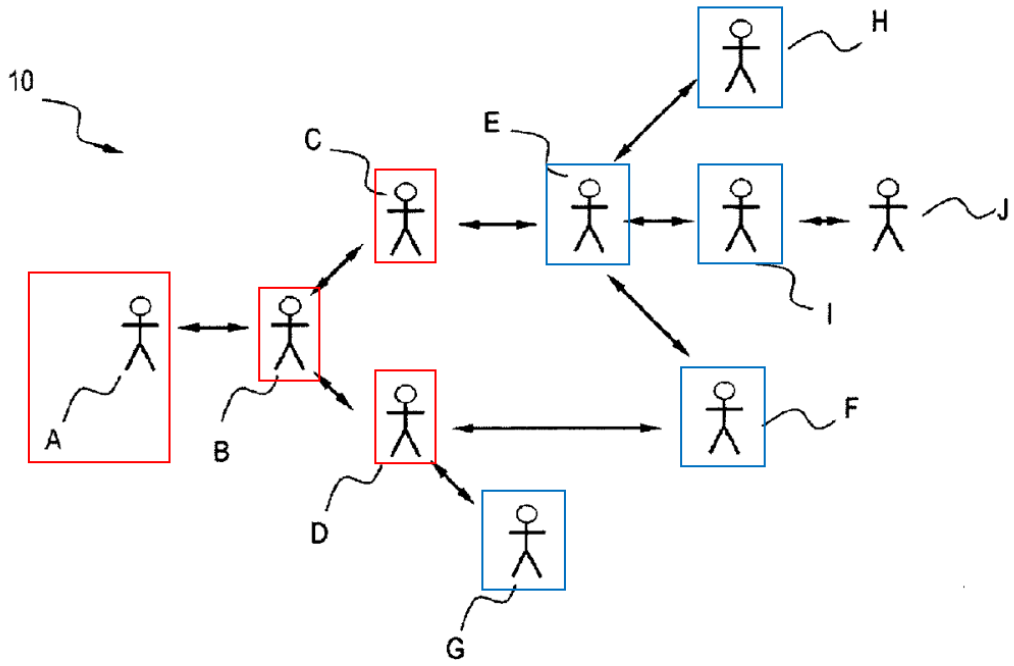


FIGURE 1

EX1005, FIG. 1 (annotated).

For example, relative to user A, users B, C, and D are within two degrees of separation while users E, H, I, F, and G are within four degrees of separation. EX1003, ¶183. When user C interacts with the conference while user E views conference messages but does not participate, user E teaches the claimed *target member node*. EX1005, 6:66-7:18, 7:38-47. User E is connected to user C, which is *another node that interacted with the event node*. EX1003, ¶183.

K. Claims 7 and 16

Amidon teaches these claims for the reasons provided for claims 6 and 15 and [1.3]-[1.5]. Sections V.D.4-6, V.J; EX1003, ¶¶185-188. Amidon establishes links between an event node and users who have accepted an invitation. *Id.* This may form the conference depicted in Figure 1:

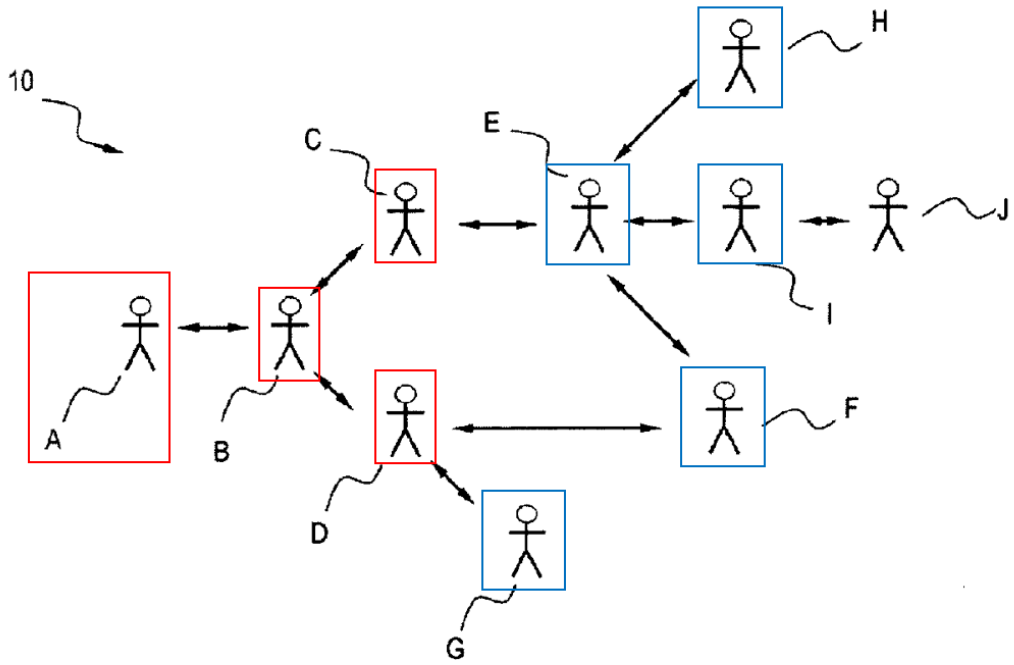


FIGURE 1

EX1005, FIG. 1 (annotated).

Amidon describes a conference where "users within 2 degrees of separation from a moderator may be allowed to fully participate, [while] users ***within four degrees of separation may be allowed to view the conference but not participate***." EX1005, 13:23-29. For example, users A, B, C, and D may participate in a conference formed by accepting a link. *Id*., 10:45-67. When user C establishes a

link with the event node to interact with the conference while user E views conference messages but does not participate, user E teaches the claimed *target member node*. *Id*., 6:66-7:18, 7:38-47. User E is connected to user C, which is *another node that established a link with the event node*. EX1003, ¶¶185-188.

L. Claims 8 and 17

Amidon teaches these claims for the reasons presented for claims 6 and 15. Section V.J; EX1003, ¶¶189-192. Claims 8 and 17 recite a "common dimension" rather than a "connection," but Amidon discloses the claimed "common dimension" for the same reasons. *Id.* For example, Amidon's Figure 1 depicts users C and E linked as friends. EX1005, 7:6-18.

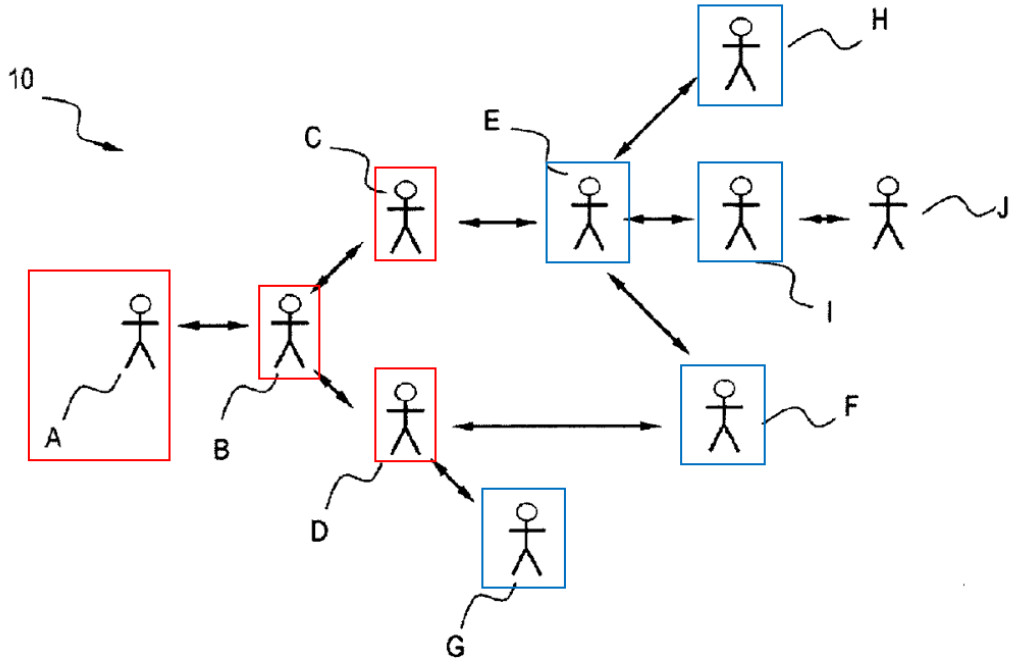


FIGURE 1

EX1005, FIG. 1 (annotated).

Friendship between users C and E is a *common dimension*. Section V.D.7 ([1.6]); EX1001, 15:11-17 ("friendship is a dimension"); EX1003, ¶191.

M. Claims 9 and 18

Amidon teaches these claims for the reasons presented for claims 7 and 16. Section V.K. Claims 9 and 18 recite a "common dimension" rather than a "connection," but Amidon discloses the claimed "common dimension" for the same reasons provided for claims 8 and 17. Sections V.L. When user C has established a link with the event node and user E views conference messages based on a common dimension or connection with user C, user E teaches the claimed *target member node*. EX1005, 6:66-7:18, 7:38-47; EX1003, ¶¶193-195.

VI. GROUND 2: CLAIMS 1-18 WOULD HAVE BEEN OBVIOUS OVER WONG, GOGIC, AND KRAFT.

A. Wong

Wong relates to a "method and system for generating an interactive computerized biological network consisting of living and non-living entities based upon the multiple relationship types which can exist between entities." EX1006, Abstract. Wong teaches creating a social network. *See, e.g.*, *id.*, ¶¶2, 3, 17-19. Figure 2 of Wong is reproduced below.

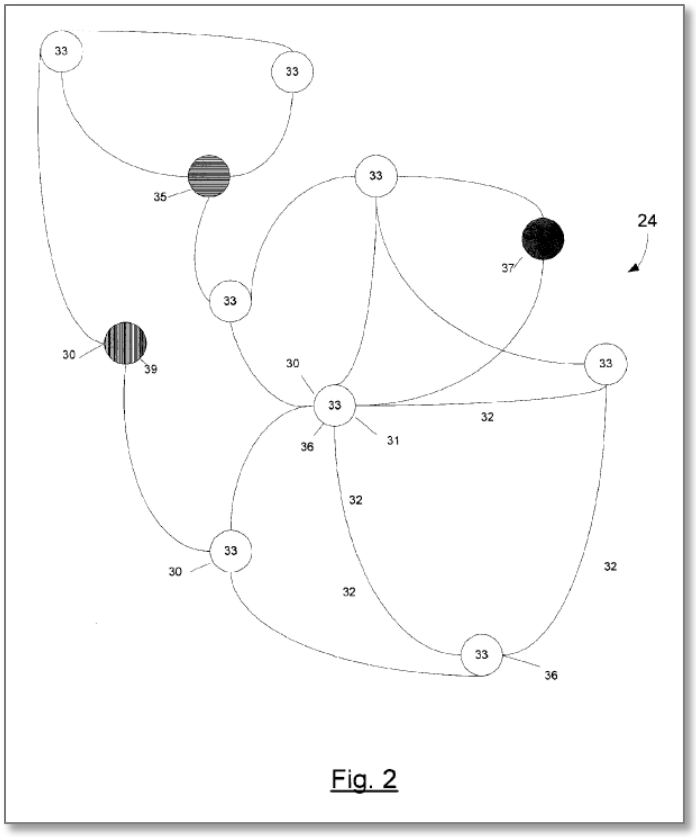


Fig. 2

EX1006, FIG. 2.

In Wong, the "network of living and non-living entities is represented by a number of elements, each representing a living or non-living entity, which are referred to as 'nodes' 30, joined by connections 32, referred to as 'linkages', to other nodes 30." *Id.*, ¶21.

Wong also teaches communication between nodes in a social network. "The social networking features … facilitate many forms of communication, such as notification of updates, alerts, sharing of files and photos, blogs, instant messaging and comments." *Id.*, ¶44. The sender of communications can select which nodes in the network can receive a particular communication. *Id.*; EX1003, ¶¶70-74.

B. Gogic

Gogic relates to "a system and method for providing group communication services to an ad-hoc group formed according to vicinity with other users of communication device(s) (CD), or according to proximity of a given locality, in an existing communication system." EX1007, 4:16-20, Abstract.

"In group communication system 200, a group of communication device users, individually known as group or net members, communicate with one another using a wireless communication device (CD) assigned to each group or net member." *Id.*, 5:65-6:2.

In Gogic, an ad-hoc communication group may be formed, for example, in response to an emergency notification and based on the geographic proximity of users to a designated location. *Id.*, 10:16-11:13, FIG. 4. Users are invited to join the communication group, and, if they meet the designated criteria, may accept the invitation. *Id.*, 10:45-11:9; EX1003, ¶¶75-78.

C. Kraft

Kraft relates to "systems and methods for information retrieval and communication using a world model." EX1019, 2:35-37; EX1003, ¶¶79-81. "The world model is made up of interrelated entity models, where each entity model corresponds to an entity (or abstraction) in the real world, such as a person, place, business, other tangible thing, community, ***event*,** or thought." EX1019, 2:37-41,

8:28-31. Kraft's "world model can include features of a conventional social network" but "allows other types of entities, not just users, to be included as full participants in the network." *Id*., 10:25-30. Kraft depicts an example of a "world model" in Figure 2. *Id*., 8:35-38.

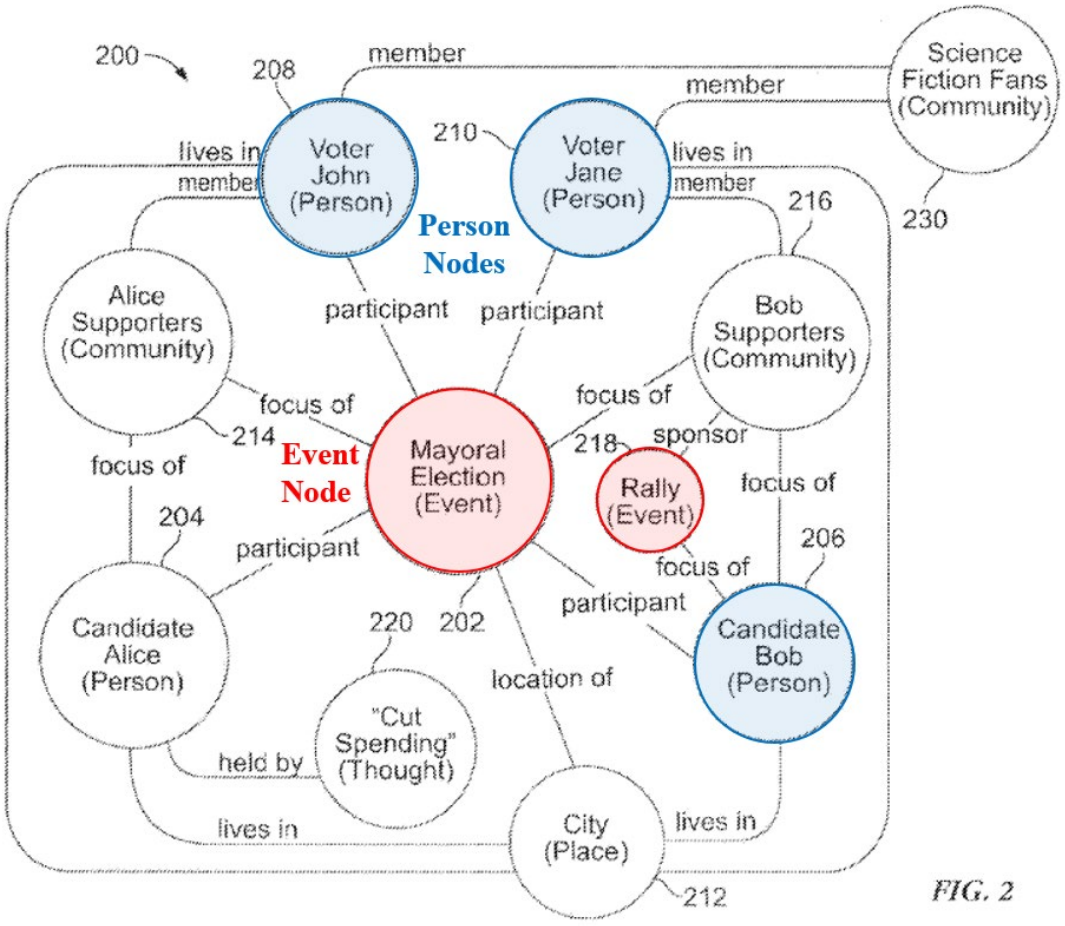


FIG. 2

EX1019, FIG. 2 (annotated).

In Figure 2, "***[n]ode 202 represents the event***, in this example a mayoral election," and "[o]ther participants in the election include voter Joe (node 208) and voter Jane (node 210)." EX1019, 8:39-44. Kraft explains that event nodes or event models can represent "occurrences such as elections***, natural disasters***, sports

events." *Id*., 9:65-66. "Each entity model is advantageously implemented as a data structure that provides access to information about a real-world entity that the node represents." *Id*., 8:26-28. And the "types of information that may be contained in an entity model include … text or media content related to the corresponding entity." *Id*., 3:18-24.

Kraft further explains that a "user request may include a search query specifying a property for the information contained in the entity models." *Id*., 2:66-3:2, 9:33-36. "A world server receives a request from a querying user for an entity model," and "[t]he world server returns the information contained in the requested entity model." EX1019, 3:52-57.

D. A POSA would have found it obvious to combine Wong, Gogic, and Kraft

As the Board determined in IPR2025-00529, a POSA would have been motivated to combine Wong and Gogic. EX1020, 34-37. If SitNet continues to argue that Wong and Gogic do not render obvious an "event node," Kraft explicitly teaches such an event node. EX1019, 8:39-44, 9:65-66. A POSA would have been motivated to incorporate Kraft in the Wong-Gogic combination to further extend the "node types" described in Wong, create different kinds of links, and to provide a discoverable event node. EX1006, ¶¶22, 26; EX1019, 2:29-31.

As explained in the '454 Petition, a POSA would have been motivated to modify Wong's social network communication system to incorporate Gogic's

teachings of an ad-hoc location-based communication group. EX1020, 34-37; EX1021, 47-49; EX1003, ¶¶197-199. Wong teaches that "notification of updates" or "alerts" may be communicated via its social network. EX1006, ¶44. A POSA would have recognized that it would be useful in Wong's social network system to send such updates or alerts to users located in an emergency-affected area.[3] EX1003, ¶¶197-199.

This would have led to Gogic. EX1003, ¶200. Like Wong, Gogic is directed to group communication over a network. Gogic teaches that, "[d]uring emergency situations, the formation of a communication group based on proximity of other users, or based on user's location being confined to a given area, may facilitate the deployment of emergency services." EX1007, 4:20-24.

A POSA would have had a reasonable expectation of success in implementing Gogic's ad-hoc location-based communication group in Wong's social-network communication system. EX1003, ¶201. For example, Gogic's ad-hoc groups can be used with "any wireless communication system" and with "telephones, paging devices, [and] portable or desktop computers." EX1007, 4:40-57. In Wong, users communicate with other users via the social network and may

[3] Kraft also supports this understanding and explicitly describes the concept of "event" nodes that can represent "natural disasters." EX1019, 8:39-44, 9:65-66.

access the social network over similar communication devices (e.g., "laptops, desktops, handheld, personal digital assistants, mobile telephones"). EX1006, ¶17.

A POSA would have been motivated to combine Gogic and Wong to provide communication and deployment of emergency services. EX1003, ¶202. A POSA would have had a reasonable expectation of success in implementing the combination. *Id.*, ¶203. The proposed combination simply combines prior-art elements (e.g., Wong's social network communication system with Gogic's ad-hoc location-based communication group) according to known methods to yield predictable results, and amounts to the use of a known technique (Gogic's ad-hoc location-based communication group) to improve similar devices (Wong's social network communication system) in the same way. *Id.*

Additionally, a POSA would have been motivated to implement Kraft with Wong-Gogic to further extend the types of nodes that may be used in Wong's social-network communication system and to provide node discovery. EX1006, ¶¶22, 26; EX1019, 16:36-57. Both Wong and Kraft describe nodes that can correspond to people, places, businesses, or groups. EX1006, ¶¶22, 26; EX1019, 16:36-57, *see also* 9:50-10:6. Additionally, Kraft describes nodes for an "event." EX1019, 8:39-44, 9:50-10:6. Implementing additional node types would have been a natural extension of Wong. EX1003, ¶204. Additionally, a POSA would have been motivated to implement Kraft's teaching of "navigable" nodes and a "search-

and-navigation interface" allowing a user to discover other nodes. EX1019, 8:1-10, 9:15-28, 10:36-41, 13:16-26, 16:28-59. Navigable nodes would have extended Wong's functionality of "searching" for and "selecting" a node to link to another node. EX1006, ¶28; EX1003, ¶204. This would enable discovering an "event" node and linking to such an event node to receive or communicate event-related information. EX1019, 8:39-44, 9:65-66; EX1007, 2:12-17.

A POSA would have also easily formed this combination given that both Kraft and Wong describe node implementations using a "conventional social network." EX1006, ¶44; EX1019, 10:22-30. Thus, combining Kraft with Wong-Gogic would have amounted to combining prior-art elements according to known methods to yield predictable results and using a known technique to improve similar devices in the same way. EX1003, ¶205.

E. Independent Claim 1

1. [1.P]

To the extent limiting, the Wong-Gogic-Kraft combination teaches the preamble. EX1003, ¶¶206-216.

Wong and Kraft teach the claimed *multi-dimensional personal information network*. In Wong, "[t]he network … 24 can be viewed in many ways, such as graphically as a set of nodes 30 connected by their associated linkages 32." EX1006, ¶35. This is depicted in Figure 2:

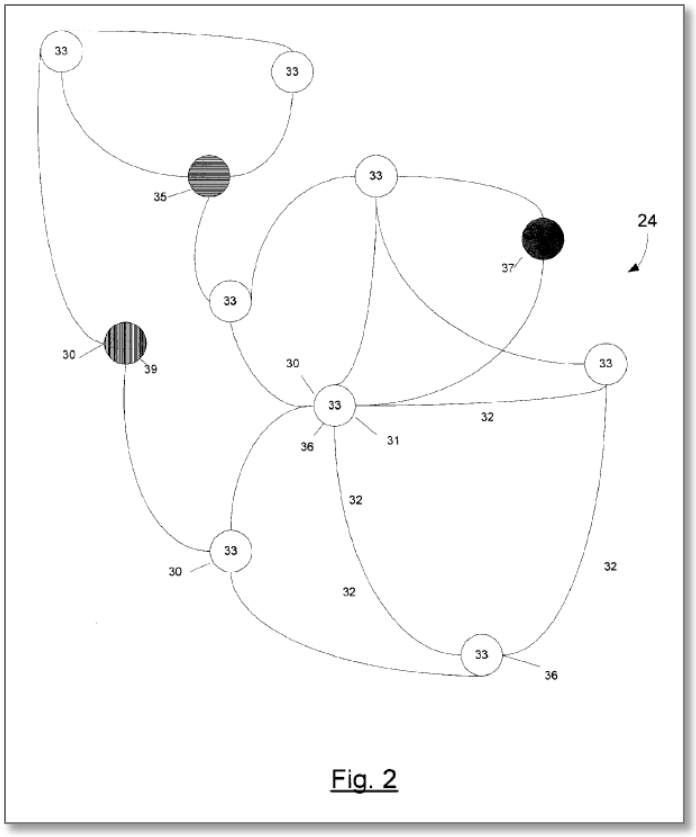


Fig. 2

EX1006, FIG. 2.

Kraft similarly describes a "world model" and depicts "world model 200" as a "network graph" in Figure 2 that "represents entities relevant to a real-world event." EX1019, 8:32-38.

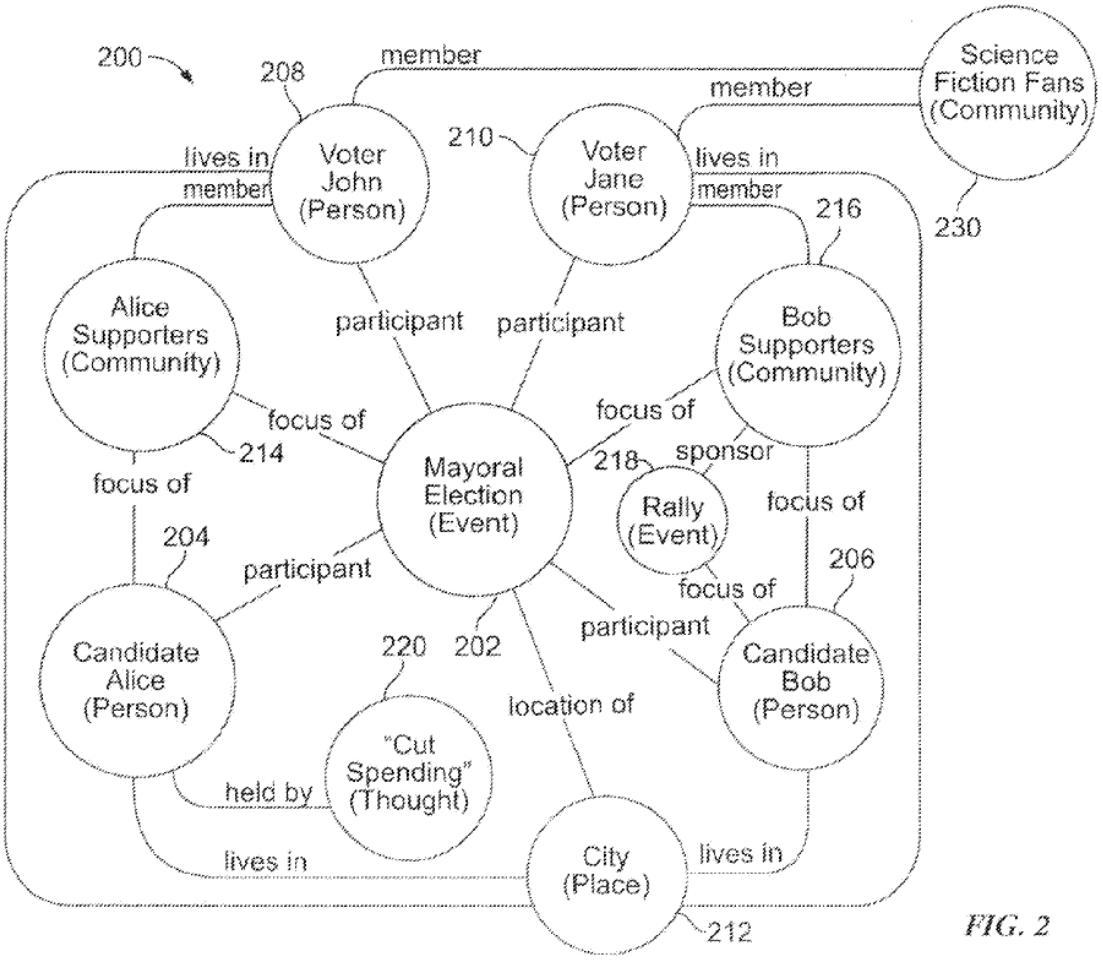


FIG. 2

EX1019, FIG. 2.

Kraft's world model includes a "collection of interrelated data objects" represented as "nodes" or entity models. EX1019, 8:32-38. An entity model can be "implemented as a data structure that can reference other entity model data structures… ***thereby allowing relationships among entity models to be defined***." *Id*., 9:42-47 (emphasis added). In Figure 2, each line or "edge" represents "a relationship between entity models." *Id*., 8:33-38.

Kraft explains that each of the entity models (i.e., "nodes") correspond to different categories, such natural persons, businesses, or events "such as elections, natural disasters, sports events, and so on." *Id*., 9:50-10:6.

Similar to Wong, Kraft explains that the "world model can include features of a conventional social network." *Id*., 10:22-30. For example, "Person entity models can have trust (or friendship) relationships with each other." *Id.* Thus, both Wong and Kraft teach the claimed *multi-dimensional personal information network*. EX1003, ¶¶207-211.

Wong and Kraft in view of Gogic further renders obvious *creating a situational network based on a projection* and *transmitting information related to a situation*. EX1003, ¶212. Gogic discloses a "method for providing group communication services to an ad-hoc group formed according to vicinity with other users … or according to proximity of a given locality." EX1007, 4:16-20. For example, Gogic teaches identifying users and forming an "ad-hoc group" and "providing group communication services" to users experiencing an "emergency situation." EX1007, 4:16-24, Abstract. "[G]roup membership location criteria such as region or location criteria defining the inclusive boundary of users that are invited to join the group," may be used to identify a group of users or communication devices. *Id.*, 10:16-34. Thus, Gogic describes identifying and connecting communication devices in a geographic proximity and teaches *creating*

a situational network based on a projection. EX1007, 6:3-21; EX1001, 17:4-5, 22:52-23:39.

Gogic further explains that *information related to a situation* can be transmitted to each member of the ad-hoc group. EX1003, ¶213. Gogic describes granting "[p]ermission to transmit to others of the plurality of wireless communication devices of the communication group." EX1007, Abstract. Gogic describes the transmission of "[a]udio, including voice, video, or data (collectively referred to herein as media)." EX1007, 9:8-10. This information is related to a situation because Gogic's transmissions operate over an "emergency broadcast channel," which would allow communications related to an "emergency situation." EX1007, 10:51-61, 12:1-18. Gogic also allows a "disabled user to make voice requests for emergency services or may allow monitoring of situational or conditional data." *Id*., 12:3-6. Thus, Gogic facilitates the communication of information related to a situation.

Both Wong and Kraft also aggregate and distribute information via nodes. EX1003, ¶214. Wong communicates information, "such as notification of updates, alerts, sharing of files and photos, blogs, instant messaging and comments," using conventional "social networking features." EX1006, ¶44. Kraft similarly aggregates and distributes "media content." EX1019, 11:58-63. When used for an Event node, this content includes information related to situations like "natural

disasters." EX1019, 8:39-44, 9:65-66. Thus, both Wong and Kraft also teach distributing *information related to a situation*. EX1003, ¶214.

As discussed above, a POSA would have been motivated to incorporate Gogic's teachings of an ad-hoc location-based communication group into Wong's social network communication system to send updates or alerts to users located in an emergency-affected area. EX1003, ¶215. Kraft uses an "event" node to represent an event like a natural disaster. EX1019, 8:39-44, 9:65-66. Thus, in the Wong-Gogic-Kraft combination, a POSA would have selected the subset of nodes in Wong's social network that are invited to participate in the ad-hoc communication group based on the nodes' location. Section VI.D.

2. [1.1]

This element includes four features: (i) *creating, by an event node server, an event node*; (ii) the *event node* is in a *multi-dimensional personal information network* that *comprises member nodes*; (iii) the *event node* corresponds *to the situation*; and (iv) *the event node is discoverable by browsing the multi-dimensional personal information network*. The Wong-Gogic-Kraft combination teaches all four features of this element. EX1003, ¶¶217-231.

(i) The Wong-Gogic-Kraft combination renders obvious the creation of an *event node* by an *event node server*. EX1003, ¶¶218-222. Wong describes network 24 that includes nodes 30 joined by connections 32, also called "linkages."

EX1006, ¶21. While Wong describes four exemplary "main node types"—people, places, objects, animals—Wong also describes additional main node types and that new nodes may be created. EX1006, ¶¶21-22, 26-27, FIGs. 5, 6. As taught in Gogic and Kraft, one such type of node is an event node. EX1003, ¶218.

Gogic teaches identifying "the occurrence or presence of an event or condition wherein communications between proximately located users could be beneficial." EX1007, 10:18-21. After identifying the event or condition, Gogic creates an ad-hoc communication group. *Id.*, 7:25-34, 10:16-11:13, FIG. 4. Based on Gogic's teachings—and because, in Wong, communication happens between nodes, EX1006, ¶44—a POSA would have recognized that a new node (i.e., *an event node*) related to the identified event would be useful in Wong's social network to facilitate communication related to the event. EX1003, ¶¶219-220. The nodes/users would be linked to this newly created event node in Wong's system to form an ad-hoc communication group. *Id.*

Kraft confirms that event nodes were well known. Section VI.C. Kraft depicts an example event node in Figure 2. EX1019, 8:39-44, 9:65-66.

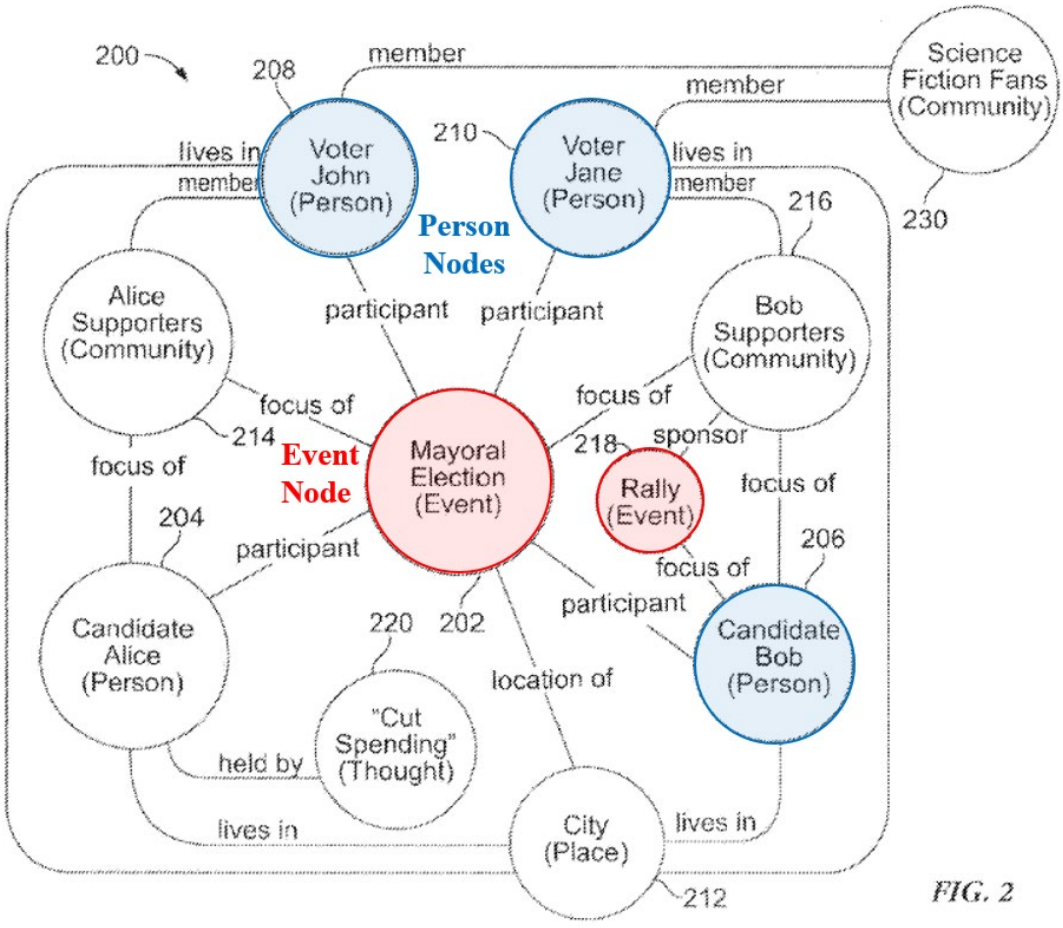
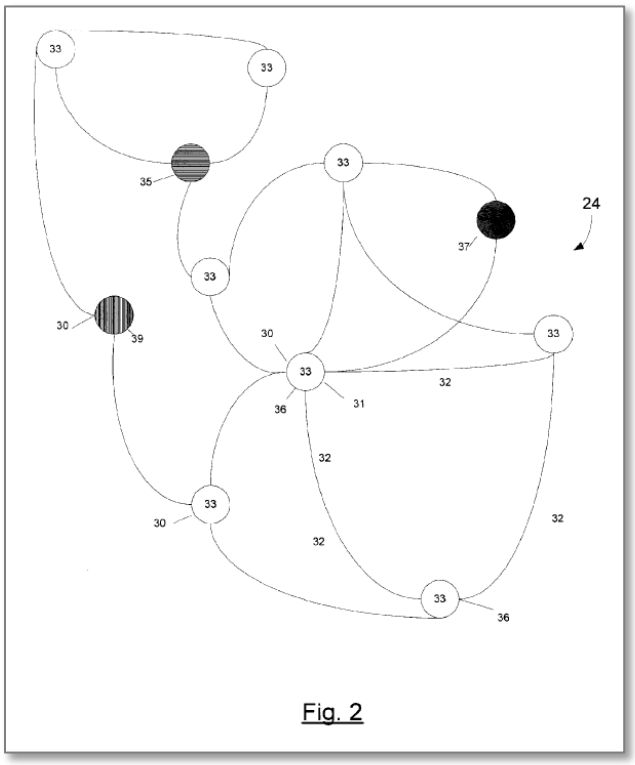


FIG. 2

EX1019, FIG. 2 (annotated).

To create and implement the event node, Wong describes a "social network server or servers 20" that create nodes. EX1006, ¶¶17-18 (creation of nodes is "carried out in a manner well known to web site programmers"). Kraft similarly discloses a "world server" that creates nodes like an "Event" node. EX1019, 2:47-61, 6:33-7:10. Wong's server 20 as combined with Gogic and Kraft's event node and "world server" teachings therefore renders obvious the claimed *event node server*. EX1003, ¶¶221-222.

(ii) Wong teaches a *multi-dimensional personal information network* that *comprises member nodes*. EX1003, ¶¶223-225. As explained for [1.P], Wong's network 24 teaches a *multi-dimensional personal information network*. EX1006, FIG. 2.



EX1006, FIG. 2.

Network 24 includes nodes 30 (*member nodes*) joined by connections 32, also called "linkages." EX1006, ¶21. Each node represents a living or non-living entity, such as people, places, objects, and animals. *Id.* Linkages 32 have a linkage type, "representing the actual type relationship which exists between … the linked nodes." *Id.*, ¶24. "Nodes can be linked by *more than one* linkage type, representing [] multiple types of relationships." *Id.*, *see also* ¶33, FIG. 4. In Wong, each node

can contain, information pertaining to the person or entity that it represents and other tools (e.g., communication tools for "communicat[ing] with other entities within or outside the network using the features of the social network" and/or "communicat[ing] with nodes in the same network"). *Id.*, ¶¶19, 31-32. Wong also teaches that "notification of updates" or "alerts" may be communicated via its social network. *Id.*, ¶44.

In the Wong-Gogic-Kraft combination, the event node described in Gogic and Kraft would have been implemented in Wong's social network. Section VI.D; EX1003, ¶225. As Kraft explains, an event node can be linked to person nodes, which can be linked via a "conventional social network." EX1019, 8:39-44, 10:25-30, FIG. 2. The Wong-Gogic-Kraft combination therefore renders obvious the claimed *event node* being part of a *multi-dimensional personal information network* that comprises *member nodes*. Section VI.D; EX1003, ¶225.

(iii) Gogic and Kraft teach the *event node* corresponding to *a situation.* Gogic teaches identifying "an event or condition wherein communications between proximately located users could be beneficial." EX1007, 10:18-21. In response, Gogic creates an ad-hoc communication group. *Id.*, 7:25-34, 10:16-11:13, FIG. 4. Based on Gogic's teachings—and because communication happens between nodes in Wong, EX1006, ¶44—a POSA would have recognized that a new node (i.e., *an event node*) related to the identified event or condition (i.e., *a situation*) would be

useful in Wong's social network to facilitate communications related to the event or condition. EX1003, ¶226. The nodes/users linked to this new event node in Wong's system would, thus, form an ad-hoc communication group, which is desirable as taught by Gogic. EX1003, ¶226.

Additionally, Kraft also describes event nodes that correspond to a situation. EX1019, 8:39-44. These event nodes can represent "occurrences such as elections**,** ***natural disasters***, sports events." EX1019, 9:65-66. Kraft explains that "[e]ach entity model is advantageously implemented as a data structure that provides access to information about [the] real-world entity that the node represents." EX1019, 8:26-28. And the "types of information that may be contained in an entity model include … text or media content related to the corresponding entity." EX1019, 3:18-24. Thus, the Wong-Gogic-Kraft combination also teaches the claimed *event node* corresponding to a *situation*. EX1003, ¶¶227-229.

(iv) The Wong-Gogic-Kraft combination renders obvious the *event node* being *discoverable by browsing the multi-dimensional personal information network*. EX1003, ¶¶230-231. For example, Wong describes a user "searching" for and "selecting" a node to link to another node. EX1006, ¶28. Kraft similarly explains that entity models or nodes can be "navigable" via their linked relationships. EX1019, 8:1-10, 9:15-28. Users can follow the links between nodes to discover other nodes, which teaches the claimed *discoverable by browsing*.

EX1019, 9:15-28, 10:36-41, 13:16-26, 16:36-57. A user may also "access a search-and-navigation interface to world model data store 162 in order to identify entity models." EX1019, 16:28-42, 16:52-59. One such entity model or node that Kraft describes is an "event" node, which can correspond to a natural disaster as described in Gogic. EX1007, 2:12-17.

3. [1.2]

The Wong-Gogic-Kraft combination teaches this element. EX1003, ¶¶232-236. In particular, (i) Wong teaches *identifying a subset of the member nodes of the multi-dimensional personal information network*, and (ii) Gogic teaches that the identification of nodes is *based on geographic proximity to the situation of a plurality of devices*.

First, Wong teaches *identifying a subset of the member nodes of the multi-dimensional personal information network*. EX1003, ¶233. Wong teaches that a "sender can select those in the network … who can receive or view a particular communication." EX1006, ¶44, *see also* ¶¶34-35. This is consistent with the '325 patent's description of "a subset of the nodes" of the NDSN. EX1001, 17:4-5.

Second, Gogic identifies *a subset of member nodes based on geographic proximity* of a *plurality of devices* to the *situation* when determining which users to invite to the ad-hoc communication group. As described with respect to Gogic's Figure 4, "the group is formed on the basis of proximity to a designated location."

EX1007, 10:16-18. Gogic includes "group membership location criteria such as a region or location criteria defining the inclusive boundary of users that are invited to join the group." *Id.*, 10:26-34. Gogic therefore identifies users that are "proximately located" to "the occurrence or presence of an event or condition." EX1007, 10:18-2, *see also* 2:12-17; EX1003, ¶234.

A POSA would have been motivated to incorporate Gogic's teachings of an ad-hoc location-based communication group into Wong's social-network communication system to send updates or alerts to users located in an emergency-affected area. EX1003, ¶235. Kraft confirms this understanding and describes updating information related to entity models or nodes such as an "Event" node. EX1019, 8:39-44, 9:65-66, 11:47-57, 15:20-28, 17:28-34, 18:17-19. Thus, in the Wong-Gogic-Kraft combination, a POSA would have been motivated to select the particular subset of nodes in Wong's social network that are invited to participate in the ad-hoc location-based communication group based on the geographic locations of the devices used to access the social network. EX1003, ¶235.

4. [1.3]

The Wong-Gogic-Kraft combination teaches this element. EX1003, ¶¶237-241.

First, the combination teaches *transmitting an invitation … to devices corresponding to each node in the subset formed in step (b)*. EX1003, ¶238. Gogic

teaches *transmitting an invitation* to join the ad-hoc communication group. Gogic describes transmitting "a broad or indiscriminant or generalized invitation to join a group to all recipient CDs with their invitation acceptance being conditional upon the CD qualifying according to the location criteria also transmitted in the broad indiscriminant invitation." EX1007, 10:45-50. This invitation is transmitted via an "emergency broadcast channel." *Id.*, 10:57-61.

A POSA would have been motivated to likewise transmit an invitation to participate in the ad-hoc location-based communication group to the devices corresponding to the particular subset of nodes in Wong's social network determined to meet the geographic-location criteria. EX1003, ¶239. Alternatively, as in Gogic, a POSA would have been motivated to transmit a broad invitation to all nodes in the network along with geographic-location criteria. *Id.*

Second, the combination teaches the *invitation* is *to establish a respective link with the event node*. EX1003, ¶¶240-241. In the Wong-Gogic-Kraft combination, participating in the ad-hoc communication group results in a linkage between the user node and the newly created event node. This is because communication in the Wong system occurs between nodes. EX1006, ¶44. Kraft confirms that connecting Person nodes to an Event node was also a well-known concept. EX1019, FIG. 2, 8:39-44, 9:65-66. Thus, an invitation to join the ad-hoc communication group constitutes an invitation to link to the event node and its

associated server. Section VI.E.6 ([1.5]) (regarding the combination's teachings of *establishing a respective link*).

5. [1.4]

The Wong-Gogic-Kraft combination teaches this element. EX1003, ¶¶242-246.

Gogic teaches *receiving a response from at least one of the devices … accepting the invitation* to join the ad-hoc communication group. EX1003, ¶243. "FIG. 4 illustrates CD_1 412 as qualifying to join the group and accordingly accepting 440 the invitation which is relayed back to dispatcher 400 through CM 404." EX1007, 10:67-11:2; *see id.*, 11:4-7 (CD_2 also accepting the invitation).

A POSA would have understood the nodes in Wong's social network that receive an invitation and qualify to join the group would likewise accept the invitation. EX1003, ¶¶244-245. After acceptance, nodes corresponding to users would be linked to an event node similar to the linking described in Kraft, which links Person nodes to an Event node. EX1019, 8:1-3, 8:39-62, 9:15-28.

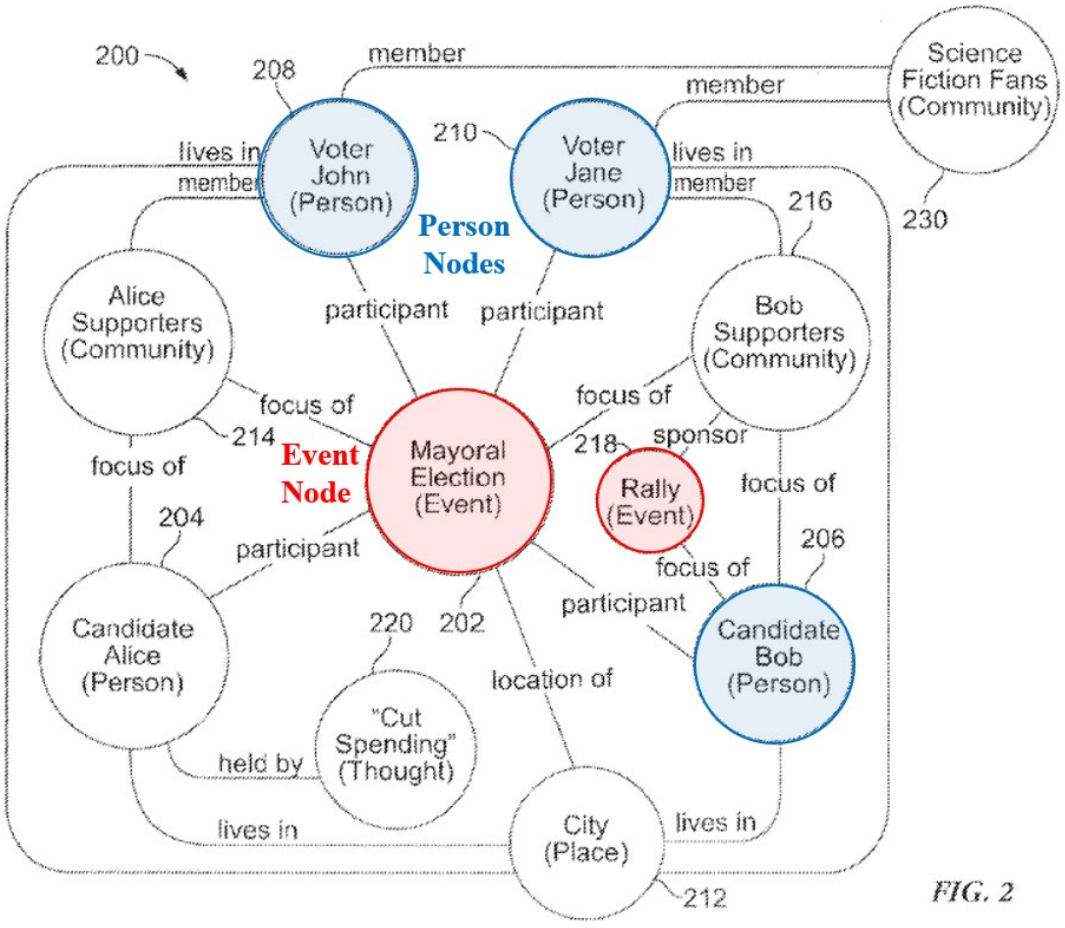


FIG. 2

EX1019, FIG. 2 (annotated).

This linking would facilitate the communication of emergency information (as described in Gogic) to nodes linked to the emergency. EX1007, 4:16-24, 5:65-6:2, Abstract.

6. [1.5]

The Wong-Gogic-Kraft combination teaches this element. EX1003, ¶¶247-249.

As discussed for [1.4], participating in the ad-hoc communication group formed by the Wong-Gogic-Kraft combination results in a linkage between the

user node and the newly created event node. EX1003, ¶248. This is because communication in the Wong system occurs between nodes. EX1006, ¶44. In Gogic, communication device(s) (CD) are added to the ad-hoc communication group in response to accepting the invitation. EX1007, 6:3-5, 11:2-9. Thus, a user device associated with the user node accepting the invitation would be linked to the event node to participate in the ad-hoc communication group. EX1003, ¶248. As explained in [1.4], Kraft confirms this understanding and links Person nodes to an Event node. EX1019, FIG. 2, 8:39-44, *see also* 5:13-39. Further, to the extent a particular user's device was not previously linked to the event node to which it has been invited, it would have been obvious that a new link would be established to create an ad-hoc communication group as described in Gogic. EX1007, 10:43-61; EX1003, ¶248.

7. [1.6]

Wong and Gogic teach this element for the reasons provided in this section and as further explained with reference to dependent claims 2-9 and 11-18. EX1003, ¶¶250-254; Sections VI.G-N.

Wong and Gogic describe *identifying a target member node* when delivering information or content. Wong describes using "social networking features" to "facilitate many forms of communication." EX1006, ¶44. The "sender can select those in the network … who can receive or view a particular communication or

file." *Id.* Accordingly, Wong describes a system that identifies recipient users (i.e., *target member node*) when providing communications and/or updates related to nodes. EX1003, ¶251. Gogic similarly identifies group members and communication devices to receive information related to emergencies. EX1007, 2:12-17, 4:16-24, 8:26-38, 12:1-6, Abstract.

Additionally, Wong and Gogic teach a *target member node* that *is connected to at least one node of the subset of the member nodes via at least one dimension of the multi-dimensional personal information network*. For example, Wong teaches that nodes can be connected by "one or more defined linkage types representing different relationship types." EX1006, ¶33. Each linkage type corresponds to a *dimension* by which the connections may be characterized. EX1003, ¶252. For example, Wong describes a "direct link between two adjacent nodes" as well as a "chain of links and nodes between non-adjacent nodes." EX1006, ¶21, *see also* ¶¶24-25, 34.

When Wong's linked nodes are grouped into an ad-hoc communication group as described in Gogic and communications are shared among those linked nodes, a recipient node in that group is a *target member node* that *is connected to at least one node of the subset of the member nodes via at least one dimension of the multi-dimensional personal information network*. EX1003, ¶253. This grouping occurs for nodes that are directly linked ("adjacent") or indirectly linked

("non-adjacent"). EX1006, ¶21; EX1007, 10:45-61. For direct and indirect links, Gogic explains that users are grouped based on geographic proximity to an "event or condition." EX1007, 10:16-25. Thus, the combination renders obvious identifying the claimed *target member node* and the *target member node* being connected via at least one dimension to a subset of the member nodes. EX1003, ¶¶253-254.

8. [1.7]

The Wong-Gogic-Kraft combination teaches this element. EX1003, ¶¶255-257.

As explained for [1.P], [1.1], and [1.6], Wong and Gogic teach transmitting messages and content to linked nodes participating in an ad-hoc communication group related to an emergency situation. Sections VI.E.1-2, VI.E.7. Wong teaches that "notification of updates" or "alerts" may be transmitted to recipient nodes. EX1006, ¶44. This includes transmitting information such as "sharing of data, receiving data, editing data, notification of data updates within a node, transfer of data to another node, and addition of data to another node." *Id.* Gogic further explains that *information related to the situation* is transmitted to members of the ad-hoc group experiencing the "emergency situation." EX1007, 2:12-17, 4:16-24, 8:26-38, 12:1-6, Abstract. As explained for [1.6], the combination of Wong and

Gogic renders obvious transmitting the information related to the situation to a *target member node*. Section VI.E.7.

F. Independent Claim 10

Wong-Gogic-Kraft renders obvious Claim 10. Claim elements [10.1]-[10.7] are substantially the same as [1.1]-[1.7] respectively. Wong-Gogic-Kraft therefore renders obvious [10.1]-[10.7] for the same reasons. Sections VI.E.2-8; EX1003, ¶258. Claim 10 further recites generic sever components in [10.P] and [10.A]-[10.D], including "*central processing units*" and "*network controllers*." Wong-Gogic-Kraft, however, render these components obvious.

Regarding [10.P], the combination of Wong-Gogic-Kraft teaches the claimed *system* for the reasons provided for [1.P]. Section VI.E.1. For example, Wong describes a "social network server or servers 20 [that] maintain a system comprising an Internet website, database and associated data, which is accessible to users 10." EX1006, ¶17. The Wong-Gogic-Kraft system would have been configured to implement the claimed functionality of [10.P] as previously explained for [1.P]. Section VI.E.1; EX1003, ¶259.

Regarding [10.A] and [10.C], Wong's social network server as combined with Kraft's world server system 160 functionality and Gogic's communication system teaches the claimed *event node server* and *central processing units* for reasons similar to those presented for [1.1]. Section VI.E.2. Wong's "social

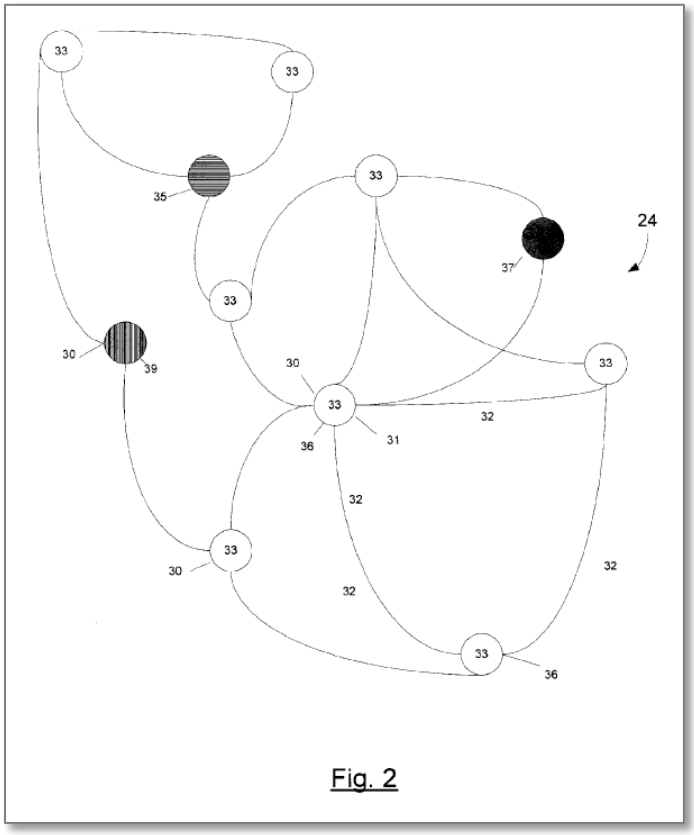
network server" may implement the event node functionality provided by Kraft's world server system 160 and Gogic's ad-hoc communication groups for emergency situations. EX1006, ¶17; EX1007, 4:16-24, Abstract; EX1019, 6:33-7:10. Servers like social network server 20 include central processing units and would have employed a central processing unit to perform Wong's functionality. EX1003, ¶260. Wong's social network system and "online (Internet) method" can be applied in a "computer network." EX1006, ¶45. Gogic further explains that data networks and communication system components such as a "server" can employ a "general purpose processor," such as a "microprocessor" or "any conventional processor." EX1007, 5:17-44, 12:27-13:3. Thus, Wong-Gogic-Kraft renders obvious an *event node server* with *one or more central processing units* configured to perform the functions recited in claim 10. EX1003, ¶260.

Regarding [10.B] and [10.D], Wong-Gogic-Kraft also teaches implementing *one or more network controllers* on a server. To provide social network functionality via the "Internet," Wong's social media server 20 includes the "hardware and software required to operate an internet-accessible social network." EX1006, ¶17. Gogic further explains that "various Internet access technologies are utilized." EX1007, 5:9-16. To perform the functionality recited in claim 10 and to "route data packets in accordance with Internet Protocol (IP)," the Wong-Gogic-

Kraft combination would have implemented *one or more network controllers* on a server. *Id.*, 8:19-20; EX1003, ¶261.

G. Claims 2 and 11

Wong and Gogic teach these claims as explained for [1.6]. EX1003, ¶¶262-265; Section VI.E.7. Wong teaches that nodes can be connected by "one or more defined linkage types representing different relationship types." EX1006, ¶¶24, 33. Each linkage type corresponds to a *dimension* by which the connections may be characterized. EX1003, ¶263. For example, Wong describes a "direct link between two adjacent nodes" as seen in Figure 2. EX1006, ¶21.



EX1006, FIG. 2.

Wong therefore teaches the direct connection of nodes of a social network by a single dimension. EX1003, ¶¶263-264. As explained for [1.6], the combination of Wong and Gogic renders obvious the *target member node* being *connected to at least one node of the subset of the member nodes* when linked nodes in Wong are grouped into an ad-hoc communication group as described in Gogic. Section VI.E.7.

H. Claims 3 and 12

Wong and Gogic teach these claims as explained for [1.6]. EX1003, ¶¶266-268; Section VI.E.7. Wong teaches that nodes can be indirectly linked via "chain of links and nodes between non-adjacent nodes." EX1006, ¶21, Cl. 21. An example of a non-adjacent node connection may be a link between a "mother/daughter" and another link between the daughter and the daughter's friend. EX1006, ¶24; EX1003, ¶267. Based on connections between non-adjacent nodes, the mother and daughter's friend are *indirectly connected* using two links, which include a family dimension and a friendship dimension (i.e., *a plurality of dimensions*). EX1003, ¶267. As explained for [1.6], the combination of Wong and Gogic renders obvious the *target member node* being *connected to at least one node of the subset of the member nodes* when linked nodes in Wong are grouped into an ad-hoc communication group as Gogic describes. Section VI.E.7.

I. Claims 4 and 13

The ’325 patent states that an “NDSN might utilize dimensions that link participants by preferences and behaviors, e.g., a preference for a type of product or service.” EX1001, 15:17-20.

Wong teaches a linkage based on an “object” or “product.” EX1006, ¶¶2, 21-22, 24, Abstract. “Object subtypes” can include “groups, organizations, ***products***, businesses, books, songs, etc.” EX1006, ¶22. “A linkage of a person node to an object node can be, for example, customer, ***fan, owner, admirer***, member and the like.” EX1006, ¶24. Wong therefore teaches the same “preference” dimension described in the ’325 patent. EX1003, ¶¶269-273.

As explained for claims 3 and 12, Wong also describes a “chain of links and nodes between non-adjacent nodes.” EX1006, ¶21, Cl. 21. Based on Wong’s different linkage types, a POSA would have recognized that Wong teaches a configuration of two person nodes (*target member node*; *node of the subset*) connected to a common object or product node (*additional node*) via a “fan,” “owner,” or “admirer” linkage (*preference dimension*). EX1006, ¶¶24, 33, FIG. 4; EX1003, ¶272. The combination of Wong and Gogic renders obvious the *target member node* being *connected to at least one node of the subset of the member nodes* when linked nodes in Wong are grouped into an ad-hoc communication group as Gogic describes. Section VI.E.7 ([1.6]).

J. Claims 5 and 14

Wong explains that using conventional "social networking features," Wong's system can "facilitate many forms of communication, such as notification of updates, alerts, sharing of files and photos, blogs, instant messaging and comments." EX1006, ¶44. The "sender can select those in the network … who can receive or view a particular communication or file." *Id.* The selection of other network members indicates that the recipient (*target member node*) is also networked with—or linked to—the sender. EX1003, ¶¶274-275. Based on the sender's recipient selection, Wong's system identifies a *target member node* linked to the sender's node. *Id.*

The Wong-Gogic combination therefore teaches claims 5 and 14 when a sender node is experiencing an emergency while a designated recipient node is not experiencing the emergency. EX1003, ¶276. For example, a sender node may be part of an ad-hoc communication group and transmit a message/content to a linked recipient (e.g., a friend or family member) that is not part of the ad-hoc communication group. EX1007, 4:16-24, 10:16-25, Abstract; EX1006, ¶¶22-25, 44. Wong also describes sending a "notification of data updates within a node" which may also be transmitted to linked recipients not in the ad-hoc communication group. EX1006, ¶44. Wong therefore describes communications

based on links between nodes that do not necessarily interact with an event node. EX1003, ¶¶276-277.

K. Claims 6 and 15

Wong and Gogic teach these claims for reasons similar to claims 5 and 14. Section VI.J. Wong describes selecting a recipient of a message/content. EX1006, ¶44. The "sender can select those in the network … who can receive or view a particular communication or file." *Id.* Selecting a networked member indicates that the recipient (*target member node*) is linked to the sender. EX1003, ¶¶278-279. Based on the sender's selection, Wong's system identifies a *target member node* linked to the sender's node. *Id.*

The Wong-Gogic combination therefore teaches claims 6 and 15 when a sender node (*another node*) is experiencing an emergency and has designated a recipient node (*target member node*) to receive a message or content. EX1003, ¶280. The sender node may be part of the ad-hoc communication group and transmit a message/content to a linked recipient (e.g., a friend or family member). EX1007, 4:16-24, 10:16-25, Abstract; EX1006, ¶¶22-25, 44. Additionally, Wong describes sending a "notification of data updates within a node" which may also be transmitted to linked recipients. EX1006, ¶44. Wong therefore describes communications based on node links where one of the nodes (a sender node; claimed *another node*) may be part of and interact with the ad-hoc communication

group and transmit a message to a recipient node (*target member node*). EX1003, ¶¶280-281.

L. Claims 7 and 16

Wong and Gogic teach these claims for the reasons provided for claims 6 and 15 and for [1.3]-[1.5]. Sections VI.E.4-6, VI.K. The Wong-Gogic combination establishes links between an event node and users who have responded with an acceptance of an invitation to join an ad-hoc communication group. *Id.*

The Wong-Gogic combination teaches identifying a *target member node* based on a dimension indicating a connection with *another node* that established a link with the event node when a sender node (*another node*) joins the ad-hoc communication group based on proximity to an emergency situation and has designated a recipient node (*target member node*) to receive a message/content. *Id.*; EX1003, ¶¶282-285.

M. Claims 8 and 17

Wong and Gogic teach these claims for the reasons presented for claims 6 and 15. Section VI.K. Claims 8 and 17 recite a "common dimension" rather than a "connection," but Wong discloses the claimed "common dimension" for the same reasons. *Id.* Wong describes linkages between nodes. EX1006, ¶¶21-22, 24. When a sender node (*another node*) selects and transmits a message to a recipient node (*target member node*) that is part of the same network, the nodes share a common

dimension. EX1003, ¶¶286-288. For example, a sender node (*another node*) may be part of the ad-hoc communication group and transmit a message/content to a linked recipient (e.g., a friend or family member). EX1007, 4:16-24, 10:16-25, Abstract; EX1006, ¶¶22-25, 44.

N. Claims 9 and 18

Wong and Gogic teach these claims for the reasons presented for claims 7 and 16. Section VI.L. Claims 9 and 18 recite a "common dimension" rather than a "connection," but Wong discloses the claimed "common dimension" for the same reasons. *Id.* Wong describes linkages between nodes. EX1006, ¶¶21-22, 24. When a sender node (*another node*) selects and transmits a message to a recipient node (*target member node*) that is part of the same network, the nodes share a common dimension. EX1003, ¶¶289-291. For example, a sender node (*another node*) may be part of the ad-hoc communication group described and may transmit a message/content to a linked recipient (e.g., a friend or family member). EX1007, 4:16-24, 10:16-25, Abstract; EX1006, ¶¶22-25, 44.

VII. CERTIFICATION THAT THE PATENT MAY BE CONTESTED VIA *INTER PARTES* REVIEW BY THE PETITIONER AND STANDING (37 C.F.R. § 42.104(A))

Petitioner certifies that the '325 patent is available for IPR and Petitioner is not barred or estopped from requesting IPR of any '325 patent claim.

VIII. MANDATORY NOTICES (37 C.F.R. § 42.8(A)(1))

REAL PARTY-IN-INTEREST: The real party-in-interest is Petitioner Meta Platforms, Inc.

RELATED MATTERS: The '325 patent is at issue in *SitNet LLC v. Meta Platforms, Inc. f/k/a Facebook, Inc.*, Civil Action No. 1:25-cv-06185 (S.D.N.Y.), filed July 28, 2025.

Petitioner is concurrently filing petitions for the following U.S. Patents, all of which are also at issue in the above-captioned civil action.

U.S. Patent No.	Proceeding No.
10,117,290	IPR2026-00100
12,120,769	IPR2026-00110
12,238,815	IPR2026-00111
12,256,463	IPR2026-00112
12,336,052	IPR2026-00113

The '325 patent claims the benefit of U.S. Patent Nos. 12,120,769; 11,470,682; 10,524,307; 10,375,759; 10,117,290; 9,877,345; 9,143,535; 8,332,454; and 8,069,202.

U.S. Patent No. 12,336,052 claims the benefit of the '325 patent.

Pending U.S. Patent Application No. 19/205,541 also claims the benefit of the '325 patent.

The Board granted requests for adverse judgment or issued Final Written Decisions in the following proceedings and determined that several claims were unpatentable:

- IPR2024-00528 (U.S. Patent No. 8,249,932)
- IPR2024-00612 (U.S. Patent No. 8,249,932)
- IPR2024-00529 (U.S. Patent No. 8,332,454)
- IPR2024-00530 (U.S. Patent No. 9,877,345)
- IPR2024-00531 (U.S. Patent No. 11,470,682)

LEAD AND BACK-UP COUNSEL: Under 37 C.F.R. §§ 42.8(b)(3) and 42.10(a), Petitioner appoints **Jonathan Tuminaro** (Reg. No. 61,327) as lead counsel, and **Michael D. Specht** (Reg. No. 54,463), **Timothy L. Tang** (Reg. No. 75,187), **Jennifer Meyer Chagnon** (Reg. No. 55,440), and **Steven M. Pappas** (Reg. No. 73,904) as back-up counsel, all at the address: STERNE, KESSLER, GOLDSTEIN & FOX PLLC, 1101 K Street, NW, Washington, DC, 20005, phone (202) 371-2600, and facsimile (202) 371-2540.

SERVICE INFORMATION: Petitioner consents to electronic service by email at: **jtuminar-PTAB@sternekessler.com**, **mspecht-PTAB@sternekessler.com**, **ttang-PTAB@sternekessler.com**, **jchagnon-PTAB@sternekessler.com**, **spappas-PTAB@sternekessler.com**, and **PTAB@sternekessler.com**.

IX. CONCLUSION

The challenged claims are unpatentable as obvious and *inter partes* review is warranted.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jonathan Tuminaro/

Jonathan Tuminaro (Reg. No. 61,327)
Attorney for Petitioner Meta Platforms, Inc.

Date: November 6, 2025

1101 K Street, NW, 10th Floor
Washington, DC 20005
(202) 371-2600

Claims Appendix – U.S. Patent No. 12,245,325

Claim 1

Element	Claim Language
[1.P]	A method of creating a situational network based on a projection from a multi-dimensional personal information network and for transmitting information related to a situation, the method comprising:
[1.1]	(a) creating, by an event node server, an event node in the multi-dimensional personal information network, wherein the multi-dimensional personal information network comprises member nodes, and the event node that corresponds to the situation, wherein the event node is discoverable by browsing the multi-dimensional personal information network;
[1.2]	(b) identifying a subset of the member nodes of the multi-dimensional personal information network based on geographic proximity to the situation of a plurality of devices corresponding to the member nodes in the multi-dimensional personal information network;
[1.3]	(c) transmitting an invitation to establish a respective link with the event node to devices corresponding to each node in the subset formed in step (b);
[1.4]	(d) receiving a response from at least one of the devices from step (c) accepting the invitation to establish the respective link with the event node;
[1.5]	(e) establishing the respective link with each device accepting the invitation to form the situational network;
[1.6]	(f) identifying a target member node wherein the target member node is connected to at least one node of the subset of the member nodes via at least one dimension of the multi-dimensional personal information network; and
[1.7]	(g) transmitting information related to the situation to the identified target member node.

Claim 2

Element	
[2]	The method of claim 1, wherein the target member node is directly connected to the at least one node of the subset of the member nodes by a single dimension.

Claim 3

Element	
[3]	The method of claim 1, wherein the target member node is indirectly connected to the at least one node of the subset of the member nodes by a plurality of dimensions.

Claim 4

Element	
[4]	The method of claim 3, wherein the target member node being indirectly connected to the at least one node of the subset of the member nodes comprises: the target member node being connected by a preference dimension to an additional node, and the at least one node of the subset of the member nodes being connected by the preference dimension to the additional node.

Claim 5

Element	
[5]	The method of claim 1, wherein the identifying the target member node comprises identifying the target member node based on a dimension of the multi-dimensional personal information network other than interaction with the event node.

Claim 6

Element	
[6]	The method of claim 1, wherein the identifying the target member node comprises identifying the target member node based on a dimension of the multi-dimensional personal information network that

	indicates a connection to another node that interacted with the event node.

Claim 7

Element	
[7]	The method of claim 1, wherein the identifying the target member node comprises identifying the target member node based on a dimension of the multi-dimensional personal information network that indicates a connection to another node that established a link with the event node.

Claim 8

Element	
[8]	The method of claim 1, wherein the identifying the target member node comprises identifying the target member node based on a dimension of the multi-dimensional personal information network that indicates a common dimension with another node that interacted with the event node.

Claim 9

Element	
[9]	The method of claim 1, wherein the identifying the target member node comprises identifying the target member node based on a dimension of the multi-dimensional personal information network that indicates a common dimension with another node, that is linked to the event node.

Claim 10

Element	
[10.P]	A system of creating a situational network based on a projection from a multi-dimensional personal information network and for transmitting information related to a situation, the method comprising:

[10.A]	one or more central processing units of an event node server configured to:
[10.1]	(a) create an event node in the multi-dimensional personal information network, wherein the multi-dimensional personal information network comprises member nodes, and the event node that corresponds to the situation, wherein the event node is discoverable by browsing the multi-dimensional personal information network;
[10.2]	(b) identify a subset of the member nodes of the multi-dimensional personal information network based on geographic proximity to the situation of a plurality of devices corresponding to the member nodes in the multi-dimensional personal information network; and
[10.B]	one or more network controllers of the event node server configured to:
[10.3]	(c) transmit an invitation to establish a respective link with the event node to devices corresponding to each node in the subset formed in step (b); and
[10.4]	(d) receive a response from at least one of the devices from step (c) accepting the invitation to establish the respective link with the event node;
[10.C]	wherein the one or more central processing units are configured to:
[10.5]	(e) establish the respective link with each device accepting the invitation to form the situational network; and
[10.6]	(f) identify a target member node wherein the target member node is connected to at least one node of the subset of the member nodes via at least one dimension of the multi-dimensional personal information network; and
[10.D]	wherein the one or more network controllers are configured to:
[10.7]	(g) transmit information related to the situation to the identified target member node.

Claim 11

Element	
[11]	The system of claim 10, wherein the target member node is directly connected to the at least one node of the subset of the member nodes by a single dimension.

Claim 12

Element	
[12]	The system of claim 10, wherein the target member node is indirectly connected to the at least one node of the subset of the member nodes by a plurality of dimensions.

Claim 13

Element	
[13]	The system of claim 12, wherein the target member node being indirectly connected to the at least one node of the subset of the member nodes comprises: the target member node being connected by a preference dimension to an additional node, and the at least one node of the subset of the member nodes being connected by the preference dimension to the additional node.

Claim 14

Element	
[14]	The system of claim 10, wherein the one or more central processing units of an event node server are configured identify the target member node by identifying the target member node based on a dimension of the multi-dimensional personal information network other than interaction with the event node.

Claim 15

Element	
[15]	The system of claim 10, wherein the one or more central processing units of an event node server are configured identify the target member node by identifying the target member node based on a dimension of the multi-dimensional personal information network that indicates a connection to another node that interacted with the event node.

Claim 16

Element	
[16]	The system of claim 10, wherein the one or more central processing units of an event node server are configured identify the target member node by identifying the target member node based on a dimension of the multi-dimensional personal information network that indicates a connection to another node that established a link with the event node.

Claim 17

Element	
[17]	The system of claim 10, wherein the one or more central processing units of an event node server are configured identify the target member node by identifying the target member node based on a dimension of the multi-dimensional personal information network that indicates a common dimension with another node that interacted with the event node.

Claim 18

Element	
[18]	The system of claim 10, wherein the one or more central processing units of an event node server are configured identify the target member node by identifying the target member node based on a dimension of the multi-dimensional personal information network that indicates a common dimension with another node that is linked to the event node.

CERTIFICATE OF WORD COUNT (37 C.F.R. § 42.24(d))

1. This Petition for *Inter Partes* Review complies with the type-volume limitation of 14,000 words, comprising 13,793 words, excluding the parts exempted by 37 C.F.R. § 42.24(a)(1).

2. This Petition for *Inter Partes* Review complies with the general format requirements of 37 C.F.R. § 42.6(a) and has been prepared using Microsoft® Word 2016 in 14-point Times New Roman font.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jonathan Tuminaro/

Jonathan Tuminaro
Registration No. 61,327
Attorney for Petitioner Meta Platforms, Inc.

Date: November 6, 2025

1101 K Street, NW, 10th Floor
Washington, DC 20005
(202) 371-2600

CERTIFICATE OF SERVICE (37 C.F.R. §§ 42.6(e)), 42.105(a))

I certify that the above-captioned **PETITION FOR *INTER PARTES* REVIEW FOR U.S. PATENT NO. 12,245,325** and associated Exhibits 1001-1024 were served in their entireties upon the Patent Owner on November 6, 2025 via FedEx® Express at the following addresses:

HALEY GUILIANO LLP
75 Broad Street, Suite 510
New York, NY 10004
Patent Owner's Correspondence Address of Record for U.S. Patent No. 12,245,325

HECHT PARTNERS LLP
125 Park Ave, 25th Floor
New York, NY 10017
Additional Address Known to Petitioner as Likely to Effect Service

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jonathan Tuminaro/

Jonathan Tuminaro
Registration No. 61,327
Attorney for Petitioner Meta Platforms, Inc.

Date: November 6, 2025

1101 K Street, NW, 10th Floor
Washington, DC 20005
(202) 371-2600