

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner

v.

SITNET LLC,
Patent Owner

Case IPR2026-00110
U.S. Patent No. 12,120,769

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 12,120,769**

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	IDENTIFICATION OF THE CHALLENGE (37 C.F.R. §42.104(B))	1
	A. Identification of Prior Art.....	1
	B. Grounds Summary.....	2
III.	THE '769 PATENT	2
	A. Overview of the '769 Patent.....	2
	B. Person of Ordinary Skill in the Art (“POSA”).....	6
	C. Claim Construction.....	6
IV.	GROUND 1: CLAIMS 1-30 WOULD HAVE BEEN OBVIOUS IN VIEW OF KRAFT, NGUYEN, AND ALTMAN.....	7
	A. Kraft.....	7
	B. Nguyen	8
	C. Altman	8
	D. Motivation to Combine	9
	E. Independent Claim 1	11
	1. [1.P].....	11
	2. [1.A]	12
	3. [1.B]	14
	4. [1.C]	16
	5. [1.D.1]	18
	6. [1.D.2]	20
	7. [1.E].....	21
	8. [1.F]	23
	9. [1.G]	25
	10. [1.H.1]	25
	11. [1.H.2]	27
	12. [1.I].....	27
	13. [1.J].....	29

F.	Independent Claim 11	29
G.	Claims 2, 12.....	31
H.	Claims 3, 13.....	31
I.	Claims 4, 14.....	31
J.	Claims 5, 15.....	32
K.	Claims 6, 16.....	33
L.	Claims 7, 17.....	33
M.	Claims 8, 18.....	33
N.	Claims 9, 19.....	34
O.	Claims 10, 20.....	34
P.	Independent Claims 21, 26.....	34
Q.	Claims 22, 27.....	37
R.	Claims 23, 28.....	37
S.	Claims 24, 29.....	38
T.	Claims 25, 30.....	39
V.	GROUND 2: CLAIMS 1-24 AND 26-29 WOULD HAVE BEEN OBVIOUS IN VIEW OF WONG, BURFEIND, AND CROWLEY.	40
A.	Wong	40
B.	Burfeind.....	41
C.	Crowley	43
D.	Motivation to Combine	43
E.	Independent Claim 1	48
1.	[1.P].....	48
2.	[1.A]	48
3.	[1.B]	50
4.	[1.C]	51
5.	[1.D.1]	55
6.	[1.D.2]	57
7.	[1.E].....	59

8.	[1.F].....	61
9.	[1.G]	62
10.	[1.H.1]	62
11.	[1.H.2]	63
12.	[1.I].....	64
13.	[1.J].....	65
F.	Independent Claim 11	66
G.	Claims 2, 12.....	67
H.	Claims 3, 13.....	68
I.	Claims 4, 14.....	69
J.	Claims 5, 15.....	70
K.	Claims 6, 16.....	70
L.	Claims 7, 17.....	71
M.	Claims 8, 18.....	71
N.	Claims 9, 19.....	71
O.	Claims 10, 20.....	71
P.	Independent Claims 21, 26.....	71
Q.	Claims 22, 27.....	73
R.	Claims 23, 28.....	73
S.	Claims 24, 29.....	74
VI.	GROUND 3: CLAIMS 25 AND 30 WOULD HAVE BEEN OBVIOUS OVER WONG-BURFEIND-CROWLEY IN VIEW OF ALTMAN	75
VII.	GROUNDS FOR STANDING (37 C.F.R. § 42.104(A)).....	76
VIII.	MANDATORY NOTICES (37 C.F.R. § 42.8(A)(1)).....	76
IX.	CONCLUSION.....	78

PETITIONER'S EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 12,120,769 to Cona et al., issued October 15, 2024 (“the ’769 patent”)
1002	Prosecution History of U.S. Patent No. 12,120,769 (“’769 File History”)
1003	Declaration of Dr. Bernard Jansen
1004	<i>Curriculum Vitae</i> of Dr. Bernard Jansen
1005	U.S. Patent No. 7,747,648 B1 to Kraft et al. (“Kraft”)
1006	U.S. Patent Publication No. 2005/0033615 A1 to Nguyen et al. (“Nguyen”)
1007	U.S. Publication No. 2008/0103784 A1 to Wong et al. (“Wong”)
1008	U.S. Publication No. 2007/0233635 to Burfeind et al. (“Burfeind”)
1009	U.S. Publication No. 2006/0270419 to Crowley et al. (“Crowley”)
1010	U.S. Publication No. 2007/0281690 to Altman et al. (“Altman”)
1011	U.S. Patent No. 8,024,330 to Franco <i>et al.</i> (“Franco”)
1012	U.S. Publication No. 2006/0047825 to Steenstra <i>et al.</i> (Steenstra”)
1013	U.S. Publication No. 2003/0197615 to Roche <i>et al.</i> (“Roche”)
1014	U.S. Patent No. 8,346,864 B1 to Amidon <i>et al.</i> (“Amidon”)
1015	Boyd & Ellison, Social Network Sites: Definition, History, and Scholarship, Journal of Computer-Mediated Communication, 13 (2008) pp. 210-230.
1016	U.S. Publication No. 2007/0194938 to Mitchell (“Mitchell”)
1017	U.S. Publication No. 2003/0162557 to Shida (“Shida”)
1018	November 26, 2006 Wikipedia page “Social network” (from web.archive.org) (accessed Jan. 24, 2024)
1019	Adamic & Adar, How to Search a Social Network, Social Networks 27, 187-203 (2005), accessed at https://www.cs.toronto.edu/~bor/303s19/docs/adamic-adar.pdf .

Exhibit No.	Description
1020	Caroline Haythornthwaite, Social Networks and Internet Connectivity Effects, Information, Communication & Society 125-147 (2005), accessed at https://www.dhi.ac.uk/san/waysofbeing/data/communication-zangana-haythornthwaite-2005.pdf
1021	Andrew Turner, Introduction to Neogeography 36-37 (2006), accessed at https://learning.oreilly.com/library/view/introduction-to-neogeography/0596529953/index.html#what_is_neogeography .
1022	Gary Rivlin, Friendster, Love and Money, N.Y. Times (Jan. 24, 2005), https://www.nytimes.com/2005/01/24/technology/friendster-love-and-money.html
1023	Myspace Events, MySpace, (from web.archive.org) (accessed Nov. 5, 2025)
1024	Alex Williams, MySpace: A Site with 26 Million ‘Friends’, N.Y. Times (Sept. 1, 2005), https://www.nytimes.com/2005/09/01/technology/myspace-a-site-with-26-million-friends.html .
1025	Theodora Stites, Someone to Watch Over Me (on a Google Map), N.Y. TIMES (July 9, 2006), https://www.nytimes.com/2006/07/09/fashion/sundaystyles/someone-to-watch-over-me-on-a-google-map.html
1026	Amanda Lenhart & Mary Madden, Social Networking Websites and Teens, Pew Rsch. Ctr. (Jan. 7, 2007), https://www.pewresearch.org/internet/2007/01/07/social-networking-websites-and-teens/
1027	Janet Kornblum, Teens Hang Out at MySpace, USA Today (Jan. 8, 2006) (from web.archive.org) (accessed Nov. 3, 2025)
1028	Subset, Dictionary.com, https://www.dictionary.com/browse/subset (accessed Nov. 3, 2025).
1029	Joseph T. Plummer, The Concept and Application of Life Segmentation, 38 J. Mktg. 1, 33-37 (Jan. 1974)

Exhibit No.	Description
1030	Meta Platforms, Inc. v. SitNet LLC, IPR2024-00529, Final Written Decision, Paper 33 (P.T.A.B. Sept. 8, 2025).
1031	Meta Platforms, Inc. v. SitNet, LLC, IPR2024-00530, Final Written Decision, Paper 30 (PTAB September 8, 2025)
1032	Claim Construction Order in SitNet LLC v. Meta Platforms, Inc., Case No. 1:23-cv-06389-AS (SDNY) (Dkt. 79) filed July 26, 2024
1033	A Systematic Review on Search Engine Advertising
1034	U.S. Publication No. 2006/0272012 to Wu (“Wu”)
1035	U.S. Patent No. 6,910,077 to Najork (“Najork”)
1036	Best Computer Science Scientists - Data Sources for the 11th Edition of the Research.com Best Computer Science Scientists Ranking (Page 14) https://research.com/scientists-rankings/computer-science?page=14

I. INTRODUCTION

Meta Platforms, Inc. (“Petitioner”) petitions for *inter partes* review, seeking cancellation of claims 1-30 of U.S. Patent No. 12,120,769 (“’769 patent”; EX1001), assigned to SitNet LLC (“Patent Owner”). The ’769 patent is part of the same family as U.S. Patent Nos. 8,332,454 and 11,470,682. The Board previously found all claims of those patents unpatentable and should do the same here.

The ’769 patent relates simply to methods and systems that allow participants in a social network to exchange information about an event or situation. The ’769 patent uses nothing more than a conventional computer network and does not claim or allege any new networking technology. EX1003, ¶¶44-66.

This Petition is supported by the declaration of Dr. Bernard Jansen (EX1003), an expert in computer networking and telecommunications. Dr. Jansen’s testimony confirms all challenged claims are unpatentable. The Board should institute IPR and cancel all claims of the ’769 patent.

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

A. Identification of Prior Art

The ’769 patent’s earliest possible priority date is February 2, 2007. All references relied on here are prior art under at least 35 U.S.C. § 102(e) as of February 2, 2007.

Kraft (EX1005) was filed February 14, 2005, and issued June 29, 2010.

Nguyen (EX1006) was filed February 23, 2004, and published February 10, 2005.

Altman (EX1010) was filed June 1, 2006, and published December 6, 2007.

Wong (EX1007) was filed October 25, 2006, and published May 1, 2008.

Burfeind (EX1008) was filed April 4, 2006, and published October 4, 2007.

Crowley (EX1009) was filed on May 11, 2005, and published November 30, 2006. Crowley also is prior art under § 102(a).

B. Grounds Summary

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

Ground	35 U.S.C. §	Claims	References
1	103(a)	1-30	Kraft-Nguyen-Altman
2	103(a)	1-24, 26-29	Wong-Burfeind-Crowley
3	103(a)	25, 30	Wong-Burfeind-Crowley-Altman

III. THE '769 PATENT

A. Overview of the '769 Patent

The '769 patent relates to systems and methods for creating a situational network or "SitNet." 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. A "projection," also referred to as "a 'projected' view," is described as "a subset of the nodes" of a social network

and can be determined based on a wide variety of criteria, including the geographic location of the user device. *Id.*, 17:4-5, 22:52-23:39. In short, the '769 patent relates simply to methods and systems that allow a set of participants in a social network to exchange information about an event or situation.

One embodiment of a SitNet 3000 is illustrated in Figure 28.

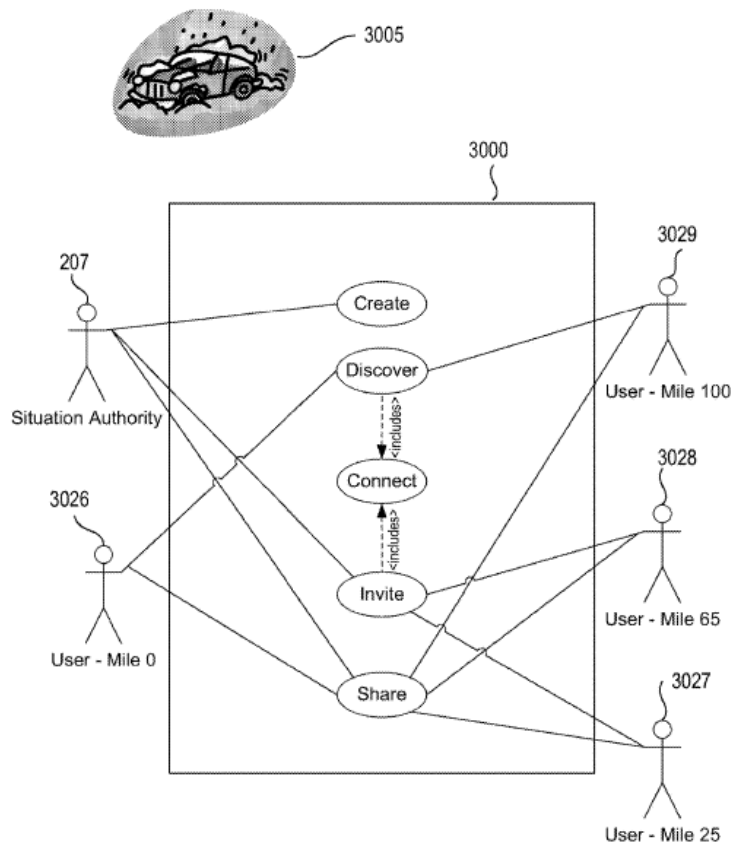


Fig. 28

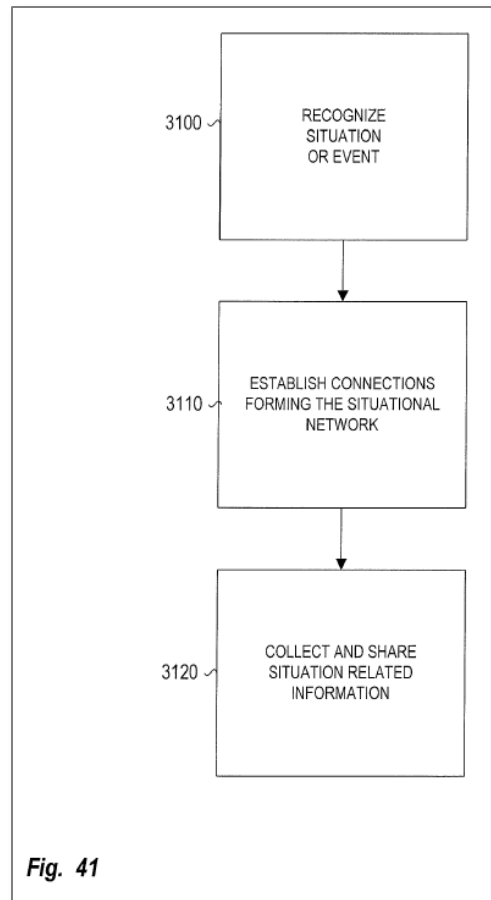
EX1001, FIG. 28

Situation authority 207 creates an event node (not shown) relating to a storm event 3005. EX1001, 24:16-27. Users (i.e., travelers 3026-3029) connect to the

event node, either by discovering it or being invited to join if they are within a pre-determined distance from the event's location. EX1001, 24:27-33. Information regarding the event (e.g., traffic, weather) is shared between users and/or by the situation authority. EX1001, 24:33-47, *also* 24:48-26:11.

The '769 patent also describes a "roll call" feature, which can be included in the situational network. EX1001, 27:20-23. Using this feature, a message is sent out to users, and the users' responses are received and recorded. EX1001, 27:23-38. The responses may be made viewable to users within the situational network or to users not connected to the situational network. EX1001, 27:38-28:11.

The '769 patent makes clear that the implementation of its methods is architecture agnostic. EX1001, 6:58-59. Regardless of the architecture, the same generic process, shown in Figure 41, is used to form the situational network. *Id.*, 7:48-53.



EX1001, FIG. 41.

The situational network of the '769 patent is implemented using known and conventional technologies. For example, users are connected using known devices, e.g., cell phones, PDAs, personal computers, network servers, or “other devices generally known to those skilled in the art that enable connection to, from and through the computer network.” EX1001, 4:52-57. Further, 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, 15:59-63. The nodes of the network “may be interconnected and may communicate with each other using a wide variety of available hardware and technologies generally known in the art.” *Id.*, 15:63-67. *See* EX1003, ¶¶35-43.

B. Person of Ordinary Skill in the Art (“POSA”)

A 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 significant work experience could substitute for formal education. EX1003, ¶¶68-69.

C. 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 “situational network” and “projection,” and determined “event node” needs no construction. EX1030, 8-12, 18-24, 37-41; EX1032, 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, ¶¶70-73.

IV. GROUND 1: CLAIMS 1-30 WOULD HAVE BEEN OBVIOUS IN VIEW OF KRAFT, NGUYEN, AND ALTMAN.

A. Kraft

Kraft describes “systems and methods for information retrieval and communication using a world model.” EX1005, 2:35-37. A “[w]orld server 160 maintains a world model data store 162.” EX1005, 6:33-35. “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* ... [or] *event*.”¹ EX1005, 2:37-41, 8:28-31. The entity models are “linked to each other by navigable relationships.” EX1005, 8:1-3. 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.” EX1005, 10:25-30.

Kraft’s world server 160 includes a query response module 166 that interacts with client systems 120 to retrieve information from the world model or to add/modify entity models 164. EX1005, 6:52-65. Figure 2 illustrates an example “world model.” EX1005, 8:35-38.

¹ Emphasis added throughout, unless otherwise noted.

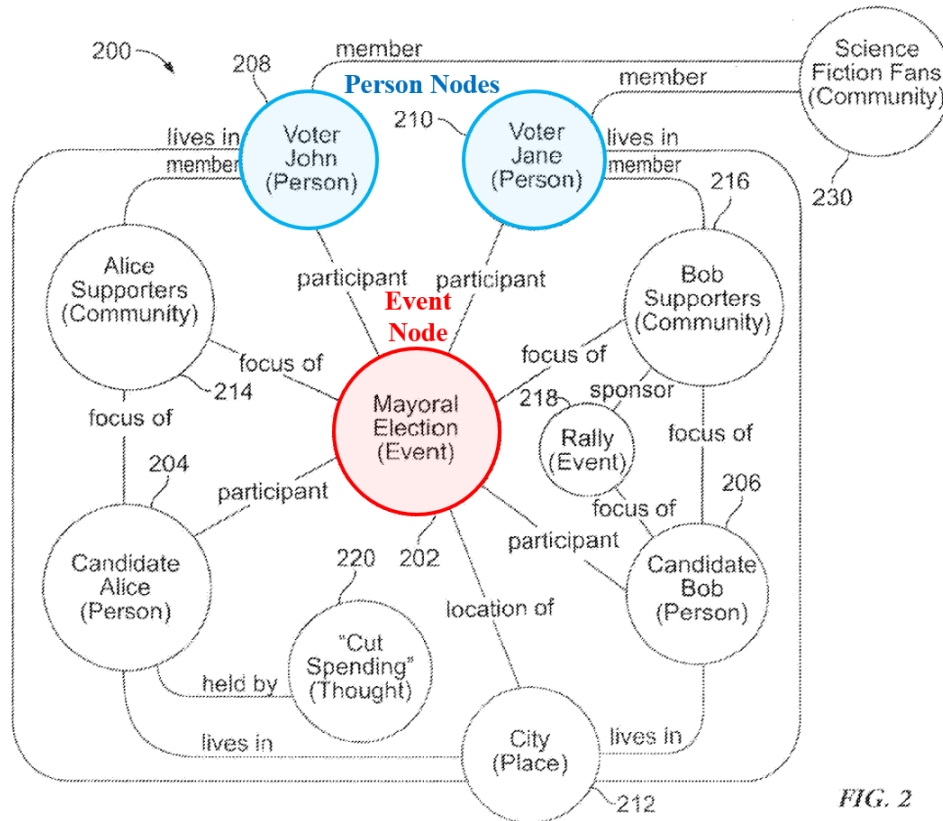


FIG. 2

EX1005, FIG. 2 (annotated).

See EX1003, ¶¶74-75.

B. Nguyen

Nguyen describes an event planning system that allows “an event planner, to organize events and manage information associated with events.” EX1006, ¶3. An “important advantage of” Nguyen’s “event planning system ... is that it facilitates event planning tasks,” including “inviting guests” and “tracking RSVP status of each invited guest.” EX1006, ¶23. See EX1003, ¶76.

C. Altman

Altman describes a “location-based social network manager process.” EX1010, ¶8. The manager allows users “to set up virtual networks that connect that

user to other people, places, and events” and “utilizes the geographic location information for each of these items.” EX1010, ¶39. Mobile communication devices include a location determination component, e.g., a GPS module. EX1010, ¶40. Location information, “such as location histories, frequently visited areas, and so on, is stored in the location database 126.” EX1010, ¶37. *See* EX1003, ¶77.

D. Motivation to Combine

A participant in Kraft’s world model can create an Event entity that represents an event, “such as elections, natural disasters, sports events, and so on.” EX1005, 9:50-66, 15:28-16:54. Relationships of the Event to existing entity models 400 are also defined; for example, a Person may be a “participant” of an event. EX1005, 10:7-18, 16:28-40, FIG. 3. But Kraft does not explicitly disclose techniques for connecting users to events based on their current location and does not disclose methods for tracking responses from the invited entity, which a POSA would have recognized to be useful in Kraft’s world model to facilitate event planning tasks, such as inviting Persons to connect to an Event. EX1003, ¶¶88-93. This would have led a POSA to references like Nguyen and Altman.

Like Kraft, Nguyen is directed to a network for connecting users. A POSA would have been motivated to incorporate Nguyen’s invitation and tracking system into Kraft to achieve Nguyen’s explicitly taught advantages of facilitating event planning tasks (sending invitations and tracking responses) and managing

relationships between an Event and other entities (e.g., to update the relationship of a Person as a “participant” of the Event by providing a “yes” response to an invitation). EX1003, ¶¶94-96.

A POSA would have had a reasonable expectation of success in implementing Nguyen’s invitation and RSVP tracking in Kraft because both Kraft and Nguyen use conventional elements, such as servers that send/receive communications to/from clients and databases. *See e.g.*, EX1005, 4:64-5:15, FIG. 1; EX1006, ¶55, FIG. 1A. The Kraft-Nguyen combination combines known prior-art elements (e.g., Kraft’s communication network that includes world server with Nguyen’s event planning functions) according to known methods to yield predictable results (e.g., the ability of Kraft’s system to send and track invitations to join an event). EX1003, ¶¶97-98.

Similar to Kraft, Altman discloses a virtual network that connects users to people, places, and events. EX1010, ¶39. Similar to Nguyen, Altman discloses its social network manager includes “an event manager module” that allows a user to create and manage events and send invitations regarding the events. EX1010, ¶53. Kraft’s entities may include a “Location” field, but Kraft’s system focuses on a static location entered by the user, e.g., an “address.” EX1005, 11:39-41. A POSA would have found it obvious that it would be useful to incorporate Altman’s teachings of a location determination component (e.g., GPS module) and location

history/frequently visited areas into Kraft's world model (as modified by Nguyen).

A POSA would have been motivated to include Altman's teachings of GPS location to use a more precise and current location of users that are close enough to the event to invite to participate. A POSA would have also been motivated to incorporate Altman's teachings of location history/frequently visited areas to identify potential participants/invitees for the event that, although may not be currently geographically proximate, are likely to travel to the event location.

EX1003, ¶¶99-102.

A POSA would have had a reasonable expectation of success in implementing Altman's GPS and location history in Kraft-Nguyen, and been further motivated to make the combination, because it is simply a predictable combination of known elements (Kraft's database that stores location information with Altman's database that obtains and stores GPS location and location history) according to known methods to yield predictable results (Kraft's world model storing specific GPS location information and location history). EX1003, ¶103.

E. Independent Claim 1

1. [1.P]

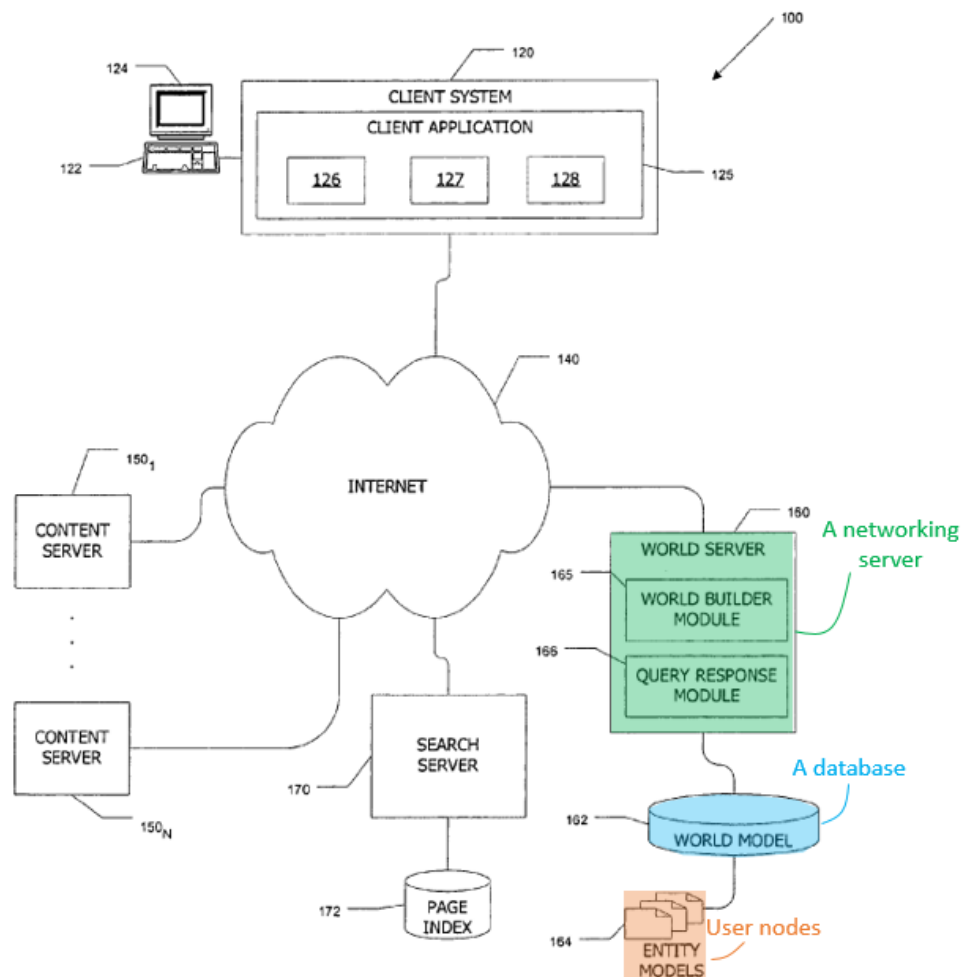
To the extent limiting, Kraft discloses this element. EX1003, ¶104. Kraft discloses "systems and methods for information retrieval and communication using a world model." EX1005, 2:35-37. Kraft also discloses "a communication network

100 including a client system 120,” which is “configured to communicate with a world server system 160” to interact with its world model.” EX1005, 4:64-5:12.

2. [1.A]

Kraft teaches this element. EX1003, ¶¶105-112.

First, Kraft teaches “maintaining, by a networking server configured to maintain data ... a database.” Kraft’s world server 160 is a *networking server* that maintains a *database* (world model data store 162). EX1005, 6:33-35; EX1003, ¶106. Figure 1 illustrates Kraft’s system.



EX1005, FIG. 1 (annotated)

Second, Kraft's world model is "*data defining a multi-dimensional information network*." The '769 patent uses a "multi-dimensional personal information network" and "N-dimensional social network (NDSN)" interchangeably. *See* EX1001, 6:24-28, 8:4-8, 15:1-4. The "NDSN uses multiple dimensions of association to characterize the relationships." EX1001, 15:9-16. Kraft's world model "provides a searchable set of interrelated entity models 164." EX1005, 6:35-37. Each entity model 164 "corresponds to some entity existing in the real world, such as **a person**" and is "implemented as a data structure" that provides information about the real-world entity. EX1005, 6:37-42, 8:26-31.

Third, Kraft discloses a "real-world person who is a world-model participant may create" one or more Person models "to represent himself or herself in the world model." EX1005, 14:1-14. The Person models are *a plurality of user nodes* stored in database 162. EX1003, ¶109. Kraft's entity models are "linked to each other by navigable relationships," i.e., "*dimensions in a multi-dimensional information network*." EX1005, 8:1-3. Kraft's world model captures and stores relationships between user nodes along multiple dimensions, which are "*node-to-node links characterizing relationships between the plurality of user nodes via dimensions in the multi-dimensional network*." EX1003, ¶110. Kraft's world model 162 "can be represented visually using a network graph, with each node representing an entity model 164 and each edge representing a relationship

between entity models.” EX1005, 8:32-36. Person models “can have trust (or friendship) relationships with each other” and world model “can include features of a conventional social network.” EX1005, 10:22-26. Kraft’s world model 200 can model “the full complexity and scope of interrelationships that exist in the real world” (e.g., employer to employee). EX1005, 9:3-5, 16:45-47. Users may also be linked by common interests and community involvement; for example, two users may be linked by an interest in “science fiction.” EX1005, 9:5-14; FIG. 2.

Fourth, Kraft teaches “*wherein at least some of the user nodes of the plurality of user nodes are respectively associated with user data.*” Entity model includes “structured metadata section 406” that “stores a number of field-value pairs related to the real-world entity being modeled”; content section 404 provides content “that pertains to the real-world entity being modeled”; and “[r]elationships section 430 defines relationships between the entity model and other entity models.” EX1005, 11:36-12:18; 13:6-26, FIG. 4. For Person models (*user nodes*), the metadata fields “might include name, age, sex, address, occupation, or the like” and “may be varied as desired.” EX1005, 11:39-43. The metadata fields, content data, and relationship data is *user data associated with* the Person entity (*user node*). EX1003, ¶111.

3. [1.B]

Kraft teaches this element. EX1003, ¶¶113-118.

First, Kraft's client devices are "respective user devices associated with respective user nodes of the plurality of user nodes" (the real-world persons associated with Person models). Kraft's users may interact with world model using client devices 120 (user devices such as cell phones) and may use devices 120 to communicate with other users of world server 160. EX1005, 5:8-19, 6:61-65. Client system 120 interacts with world server 160 as a "user" (to retrieve information from the world model) or as "a participant" (to add or modify entity models 164 in world model data store 162). EX1005, 6:61-65. Kraft's entities store contact information, e.g., an IM or other communication channel, to contact the entity manager (e.g., for a Person entity, the real-world person the entity represents). EX1005, 11:5-29; 13:61-14:11. In other words, users may be contacted at devices identified in the communication channel (e.g., at a device associated with the IM contact). EX1003, ¶¶114-115.

Second, Kraft's world server 160 (the networking server) includes "a query response module 166" which "provid[es] ... respective composite data feeds that are based on the database of the plurality of user nodes and multi-dimensional node-to-node links." EX1005, 6:52-59; EX1003, ¶116. The query response module interacts with "client system 120" and "enables users to search world model data store 162 for entity models 164 that match user-specified criteria." EX1005, 6:52-59. A user "can access world model data store 162 to facilitate information

retrieval” through a “world search module 126 of client application 125, which interacts with query response module 166 of world server 160.” EX1005, 18:31-40. Once a search query is submitted, “the search is performed,” and “search results, including links to matching entity models from world model data store 162, are returned to the user” (“*composite data feeds*”). EX1005, 18:61-19:9.

4. [1.C]

Kraft teaches this element. EX1003, ¶¶119-122.

First, Kraft’s world server 160 “may include multiple servers and associated database systems.” EX1005, 7:45-47. Kraft teaches “*establishing, by an event node server*” (server of world server 160 that creates/stores an Event entity) “*an event node associated with an event*” (Event model) “*in a particular geographical area*” (“location” specified in the metadata). EX1003, ¶120. Kraft discloses an entity model may be assigned an “event” category for “entity models representing occurrences such as elections, natural disasters ... and so on.” EX1005, 9:50-66. Kraft’s “world-model participants can create and update entity models.” EX1005, 15:21-28, FIG. 1. The participant selects a category for the new entity model 400 (e.g., event); completes core information for the entity model, including structured metadata (e.g., location); and populates content section 404. EX1005, 15:45-52; 15:64-16:14. Relationships of the new entity model to existing entity models are also defined—for example, “if the metadata includes a ‘Location’ filed [*sic*], a

search and navigation interfaces and tools.” EX1005, 16:53-59. As described in [1.B], client system 120 (*user device*) can “communicate with a world server system 160” (e.g., through “world search module 126”) “to search world model data store 162 for entity models that match user-specified criteria” (e.g., events located near a specified location). EX1005, 5:8-10, 6:52-59, 18:31-54. The user may select a matched entity model of interest to show an “entity view” which “displays information from the entity model in a user-readable form.” EX1005, 19:37-41.

5. [1.D.1]

Kraft-Altman teaches this element. EX1003, ¶¶123-130.

First, Kraft-Altman renders obvious “*joining the first subset of the plurality of user devices that have discovered the event node to the event node, wherein user devices of the first subset of the plurality of user devices are respectively associated with a first subset of user nodes of the multi-dimensional information network*” (user devices are associated with user nodes through an “own” relationship as described below). EX1003, ¶124. Kraft’s world model defines relationships that exist among entity models. EX1005, 10:7-15; FIG. 3. One such relationship is *ownership*—e.g., a Person can “own” a “thing” entity, which can be “focused on” an event. EX1005, 10:10-18; FIG. 3. A POSA would have understood the user may create a “Thing entity” to add a “user device” (e.g., a

client device 120, such as a cell phone) to Kraft's world model and define an "own" relationship with its Person entity to model its real-world relationship with the device. A POSA would have been motivated to create a "user device" entity and associate it with a user because Kraft describes "any type of real-world entity can be represented by an entity model," including "tangible things" and its world model "advantageously" reflects real-world relationships. EX1003, ¶125; EX1005, 8:23-31, 10:7-13, FIG. 3. Such a real-world relationship between a user and a device was well-known, as evidenced by Altman's teachings of associating user profile information and user location with a mobile device operated by the user. EX1010, ¶¶8, 32, 36-37, 44. A POSA would have been further motivated to create an association between a user and a device in Kraft's world model to allow the location of a user to be more precisely determined (as taught by Altman and further discussed in Section IV.D and [1.E]). After a user has discovered an event node (as described in [1.C]), Kraft's relationships enable a user to *join the event node* by modifying the relationship of their Person model (e.g., to be a "participant" of the event). EX1005, 17:11-17, 17:35-37; FIG. 3; EX1003, ¶¶126-127. The device entity is *join[ed] to the event node* through its relationship with Person entity (representing the user) (i.e., the device is joined to the user node, which in turn is joined to the event node, and thus is indirectly joined to the event) and/or the device entity may have a direct "focused on" relationship with the event. EX1003,

¶127; EX1005, FIG. 3. A POSA would have understood that additional users that discover the event would follow a similar process to join their *user device* (“*first subset*”) to the event node.² EX1003, ¶128.

Second, Kraft teaches, or renders obvious, “*user nodes ... that are joined to a centralized architecture for the event node*” because, as described above, Kraft teaches the user nodes are joined to the event node and, as described in [1.D.2], the “*event node is configured as a central node in the centralized architecture.*” EX1003, ¶129.

6. [1.D.2]

Kraft teaches this element. EX1003, ¶¶131-134.

Kraft’s Event entity (*event node*) “*is configured as a central node in the centralized architecture for accessing information associated with the event*” because the event node is stored and accessed from its central location on the world server 160 to obtain information associated with the event. EX1003, ¶132; EX1005, FIG. 1. As described in [1.B] and [1.C], Kraft’s client systems communicate with world server system to “search world model data store 162 for entity models 164 that match user-specified criteria” and a user may select a

² The plain and ordinary meaning of subset includes a set of “one”; thus, the claim does not require multiple users to join the event node. EX1003, ¶128.

matched entity model (e.g., an Event) to obtain information about the entity.

EX1005, 5:8-10, 6:52-59, 18:31-40, 19:37-41.

The information is accessed “*from a location in the multi-dimensional network*” because, as discussed in [1.P], [1.B], and [1.D.1], client systems 120 are part of Kraft’s multi-dimensional network and at least some of the devices are associated with user nodes. EX1005, 4:64-5:12, FIG. 1; EX1003, ¶133.

7. [1.E]

Kraft-Altman teaches this element. EX1003, ¶¶135-142.

First, Kraft teaches “*creating, by the networking server, based on the database of the plurality of user nodes and multi-dimensional node-to-node links, a projection of the plurality of user nodes*” (world server 160 creates a view of Person entities that match specified criteria upon user request). EX1003, ¶136. The ’769 patent describes a “projected view,” which “is also referred to as a projection,” as a subset of nodes of the NDSN. EX1001, 17:4-5, 22:52-54. Kraft discloses a participant may “access a search-and-navigation interface to the world model data store 162,” which “may include a network view, similar to FIGS 2 and 5, as well as other components” of exemplary search and navigation interfaces. EX1005, 16:36-42; FIGS. 2, 5. Users may search for entity models that match specified criteria and a “network graph ... might be used to display the matching entity model as well as related entity models.” EX1005, 19:6-8, 19:29-32; *also id.*

at 20:59-21:9.

Second, Kraft-Altman renders obvious “*wherein the projection represents a second subset of user devices*” (user device(s) associated with the user node(s) in the projection). EX1003, ¶137. As explained above in [1.B] and [1.D.1], Kraft-Altman teaches user devices associated with user nodes and that relationships between Kraft’s user nodes (Person entities) and their devices (Thing entities) are stored in world model. EX1005, 8:28-31, 10:10-12, FIG. 3.

Third, Kraft-Altman renders obvious “*wherein the second subset of user devices is selected based on respective distances from the event.*” EX1003, ¶138. Kraft discloses the metadata associated with its entities includes a “location” field. EX1005, 11:36-45. Kraft teaches that a search may be performed that is “constrained in some way by geographic location” and that the projection (network view) can be based on geographic location. EX1005, 19:17-32. For example, Kraft’s Figure 2 illustrates a projection in which candidate and voter participants in an election event all live in the same city 212. EX1005, FIG. 2. A participant (e.g., event organizer) would have been motivated to create a view of devices close to the event (i.e., *devices selected* based on similar location as the event) to identify potential participants close enough to the event to participate. EX1005, 16:36-39, also 11:5-8, 21:3-8; EX1003, ¶139. However, Kraft’s location is static and does not explicitly disclose selecting the subset of user devices based on current

distance between the device and event at the time the projection is created.

Altman determines the geographic location of a mobile communication device operated by a user and the location of event(s). EX1010, ¶¶8, 39. The location information “is transmitted and stored in the server computer of the network.” EX1010, ¶63. The device’s GPS location may be provided on a real-time basis or by polling each device at a set frequency. EX1010, ¶¶65-67. Based on the device location, relative distances to events may be provided to the user and users may be alerted of locations of events of interest when the user enters a particular area (i.e., alerted *based on distance from the event*). EX1010, ¶¶54, 61. EX1003, ¶¶140-141. A POSA would have found it obvious to include Altman’s teachings of obtaining and storing a user device’s GPS location in Kraft (e.g., in the location field of either a Person model associated with the device or a Thing entity that represents the device) and would have been motivated to do so for the reasons discussed in Section IV.D.

8. [1.F]

Kraft-Nguyen-Altman renders obvious this element. EX1003, ¶¶143-147.

The ’769 patent describes a “roll call” as a “check-in” feature to invite users to respond to an invitation. EX1001, 27:20-26. Kraft does not explicitly describe transmitting requests to connect to the event node in the form of roll calls. Nguyen does.

Nguyen discloses “an event planning system that facilitates event planning tasks.” EX1006, ¶11. Nguyen’s system allows the event planner to specify “invited guest information including information indicative of addresses of the invited guests” and “allowable RSVP methods ... by which an invitee may RSVP for the planned event.” EX1006, ¶60. Nguyen’s server “generates and sends the specified invitations to the specified invitees ... each invitation soliciting a response.” EX1006, ¶62. Thus, Nguyen teaches *transmitting*, by a server, *respective requests* to respond to an event invitation, *wherein the respective requests to connect are in the forms of roll calls* (requesting the invitee to check-in with an RSVP response). EX1003, ¶145.

As discussed in Section IV.D, a POSA would have been motivated to incorporate Nguyen’s teachings of transmitting invitations to specified invitees and soliciting a response (a *roll call*) into Kraft’s world model to facilitate event planning and achieve the advantages of Nguyen’s system. Kraft describes how a participant can create an Event entity and “define relationships” between the Event entity and other entities (e.g., *user nodes*) EX1005, 16:28-42. A POSA would have understood, or found obvious, that Kraft’s participant would be motivated to use Nguyen’s event-planning teachings to invite the users to connect to the event node to facilitate event planning. Thus, Kraft-Nguyen-Altman renders obvious *transmitting, by the networking server* (Kraft’s world server), *respective requests*

to connect to the event node to the second subset of user devices (devices associated with the second subset of user nodes as discussed in [1.B] and [1.E]) and that, because the request would solicit a response as taught by Nguyen, the requests are in forms of roll calls. EX1003, ¶146.

9. [1.G]

Kraft-Nguyen renders obvious this element. EX1003, ¶¶148-158.

Nguyen's event planning database 16 includes "a plurality of participant payment records," each associated with a guest invited to the event, where each participant record includes "RSVP status information indicating whether ... the invitee has accepted or declined the invitation" (recorded "*responses to the respective request[]*"). EX1006, ¶66. A POSA would have been motivated to incorporate Nguyen's teachings of recording responses to invitations in Kraft for the reasons discussed in Section IV.D and [1.F]. In the Kraft-Nguyen combination, *the record[ed] responses are the respective responses to the respective requests to connect.* EX1003, ¶149.

10. [1.H.1]

Kraft-Nguyen renders obvious this element. EX1003, ¶¶151-155.

First, Nguyen teaches "*making ... respective responses viewable*" because Nguyen discloses the event planner may enable an invitee "to view ... RSVP status information associated with each of the other invitees." EX1006, ¶¶18, 93.

Second, Kraft-Nguyen renders obvious “*making a subset of the respective responses viewable, via the event node.*” Kraft’s entity models include relationship and category information and other information about the entity. EX1005, 10:49-11:39, FIG. 4. Kraft describes “the entity model data structure” may include additional elements. EX1005, 13:40-45. A POSA would have found obvious in the Kraft-Nguyen combination to include Nguyen’s RSVP information in the related event node data structure to track the responses to the requests to connect to the event and would have been motivated to track and record the RSVP responses for the reasons discussed previously. EX1003, ¶153. As taught by Nguyen, those responses can be made viewable to other invitees (e.g., through an event invitation Web page with which the invitees may interact). EX1006, ¶¶18, 62, 93. Kraft-Nguyen teaches the claimed subset of responses for the reasons discussed for [1.H.2].³

Third, Kraft-Nguyen renders obvious making the responses viewable “*to a first device, associated with a first node that is connected to the event node.*” As discussed in [1.B], Kraft teaches user devices associated with user nodes. Thus, in Kraft-Nguyen, the RSVP information stored in the event node may be made

³ The claim uses the open-ended “comprising” and does not preclude additional responses from other participants (not in the subset) being made viewable.

viewable (e.g., through a web page as taught by Nguyen) to a *first device* associated with a Person node (*first node*) that was invited to connect to the event node. EX1003, ¶154.

11. [1.H.2]

Kraft-Nguyen renders obvious this element. EX1003, ¶¶156-158.

For the reasons discussed in [1.E], Kraft teaches creating a projection of user nodes that, for example, the event manager can create to identify potential participants for the event. Kraft further teaches Person entities may be related through a trust (or friendship) relation. EX1005, 10:22-25. A POSA would have understood at least one of the user nodes associated with a potential participant and invited to connect to the event as discussed in [1.F], would be connected to the event manager's Person entity (*first node*) through a trust/friendship relationship because it would be logical for the manager to invite friend(s) to participate in the event. Thus, Kraft-Nguyen renders obvious *each response of the subset was received from a device associated with a node having a single degree of separation from the first node in the database of the plurality of user nodes and multi-dimensional node-to-node links* (e.g., the response discussed in [1.G] is received from a friend). EX1003, ¶157.

12. [1.I]

Kraft teaches this element. EX1003, ¶¶159-162.

As discussed in [1.B] and [1.E], Kraft's users may search for entity models that match specified criteria, and a participant may access a search-and-navigation interface to identify entities that should be related. EX1005, 16:36-42, 18:31-19:32. A network graph may be displayed (similar to FIGS. 2, 5) and all related entities up to a maximum degree of separation (e.g., 2) from the current entity may be shown. EX1005, 20:59-67. When the world server performs the specified search, it is "*analyzing (a) the database of the plurality of user nodes and multi-dimensional node-to-node links, and (b) data of user nodes of the multi-dimensional information network that are joined to the centralized architecture for the event node.*" EX1003, ¶160.

In view of Kraft's description of displaying a network graph related to the currently viewed entity for two degrees of separation, the network graph of the Event entity will show both the user nodes (Person entities) connected to the Event entity (i.e., in one degree of separation), and also will "*identify at least one second node included in the database*" having a second degree of separation from the event node (i.e., "*that is: (a) not connected to the event node, and (b) connected via at least one dimension to at least one user node of the multi-dimensional information network that is joined to the centralized architecture for the event node.*" Thus, Kraft renders obvious [1.I]. EX1003, ¶161.

13. [1.J]

Kraft-Nguyen renders obvious this element. EX1003, ¶¶163-165

Kraft teaches *delivering information* to nodes in several exemplary ways.

Entity models may “be automatically updated to reflect changes in real-world relationships that can be ... reported to world server 160”—for example if a user joins a community group, that transaction can be reported to world server 160 (i.e., by an “*information node*” that reports the transaction), which can modify the Person entity model (“*second node*”) to reflect the user’s membership in the group. EX1005, 18:17-26. Kraft also discloses content for inclusion in the entity model’s content section 404 “may be stored on servers other than world server 160” (i.e., “*information node*”) and that content “may be automatically added or updated” (i.e., *deliver[ed] to the node*). 11:47-56. Thus, Kraft renders obvious “*delivering information to the at least one second node from an information node*” (e.g., the content server delivers content, or other data that pertains to the Person entity) “*configured to store and provide supplemental information via the multi-dimensional information network*” (e.g., a content provider that stores information pertaining to the second node and provides that information via Kraft’s world model to the second node). EX1003, ¶164.

F. Independent Claim 11

Kraft-Nguyen-Altman renders obvious claim 11. Claim 11 recites elements

substantially the same as claim 1, and are thus rendered obvious for the same reasons as claim 1. EX1003, ¶¶166-172.

Kraft-Nguyen-Altman also renders obvious the additional generic server components (*memory, network controller, central processing unit*) recited in claim 11. EX1003, ¶167. Kraft discloses “elements in the system shown in FIG. 1” (including world server 160) include “conventional, well-known elements.” EX1005, 5:14-15; FIG. 1; *also* EX1006, ¶¶55-56 (Nguyen’s teachings of exemplary network system components). A POSA would have recognized that “world model data store 162” is stored in *memory* of world server 160 (claimed *networking server*). EX1005, 6:34-36. A POSA would have further recognized *network controller(s)* of world server 160 are *configured to* perform the *provide, transmit, and deliver* limitations because Kraft’s world server 160 communicates with client system 120 via a network, such as the Internet. EX1005, 5:8-12, 5:33-39; FIG. 1. EX1003, ¶167. Finally, a POSA would have recognized that *one or more central processing units* of world server 160 are *coupled to the one or more networking controllers* (to send/receive communications) and *are configured to* perform the remaining limitations of claim 11 because a CPU is a conventional component that executes instructions to perform server functions. EX1003, ¶¶168-171.

G. Claims 2, 12.

Kraft teaches these claims because Kraft’s entities (e.g., an Event entity, which is the claimed *event node*) define at least one communication channel 420, which may be “a message board channel 428.” EX1005, 12:36-12:49; EX1003, ¶¶173-175. “[A] user who has retrieved entity model 400 from world model data store 162”—using client device 120 (*user devices*) *connected to the event node* for reasons discussed in claim 1—can use message board channel 428 (*a message board*) to “post messages about the entity and to view and respond to postings from other users.” EX1005, 12:67-13:5.

H. Claims 3, 13.

As discussed in [1.B], [1.E], and [1.I], Kraft discloses users may search for entities matching specified criteria (“*identifying the at least one second node*”), such as a search for “entities located near a specified geographic location.” *E.g.*, EX1005, 6:52-59, 18:31-50. As further discussed in [1.E], Kraft-Altman renders obvious storing the user device’s current GPS location in the location field of the Person entity (i.e., *user data that indicates a particular association with a geographical area*). Thus, Kraft’s search of Person entities with a location near a specified geographic location of the event renders obvious claims 3 and 13. EX1003, ¶¶176-178.

I. Claims 4, 14.

As discussed in [1.D.1], Kraft teaches joining user nodes to an event node by

modifying the relationship data of a Person entity model (claimed *user node*) to indicate a relationship with the event. EX1005, 17:11-17, 17:35-37. Because the relationship data is “*user data associated with user nodes*” (as discussed in [1.A]) and the data is updated “*based on joining the centralized architecture for the event node*,” Kraft renders obvious claims 4 and 14. EX1003, ¶¶179-182.

J. Claims 5, 15.

Kraft’s entities include a communication channel for communicating with the entity’s manager “or for communications pertaining to the entity (either the real world entity or the entity model).” EX1005, 12:36-39. This communication channel enables a user to initiate direct communication with the entity via e-mail, IM, chat room, message board, or other communication channel. EX1005, 6:42-48, 12:36-63. For example, Kraft explains a user sends a message to an Event entity “to volunteer as a poll worker” and that such messages are routed to the participant responsible for the event node. EX1005, 9:29-39. A POSA would have recognized that *based on the updated user data* (relationship data is modified as described in claim 4 to join the event node), communications about the real-world event are *additional information that is deliver[ed] to at least one device* (device associated with the communication channel of the event entity). EX1003, ¶184. Thus, Kraft-Nguyen renders obvious claims 5 and 15. EX1003, ¶¶183-185.

K. Claims 6, 16.

Kraft-Altman renders obvious these claims. EX1003, ¶¶186-188.

In Kraft-Altman, when the projection discussed in [1.E] is created based on the location field (storing the current GPS location of the user's device,) "*the projection represents the second subset of user devices determined to be geographically proximate to the event.*"

L. Claims 7, 17.

Kraft-Altman renders obvious these claims. EX1003, ¶¶189-191.

For the reasons discussed in claim 6, Kraft-Altman renders obvious the projection represents *user devices determined to be geographically proximate to the event*. Kraft discloses its location may be a city and provides an example of a user requesting a network view (*projection*) of businesses located in the same city as the viewed entity. Similarly, in Kraft-Altman, a user may create a projection based on *the event occurring in the same town* (i.e., the city location of the device event matches the city location of the event). EX1005, 8:44-48, 21:3-9, FIG. 3; *also id.*, FIG. 2 (illustrating a projection including City node 212).

M. Claims 8, 18.

Kraft-Nguyen-Altman renders obvious these claims. EX1003, ¶¶192-194. Altman discloses the mobile device's geographic location (described in claim 6) "can be a GPS module ... that provides the location of the mobile communication devices." EX1010, ¶40. Thus, determining a user device is geographically

proximate to the event *is based on GPS data* of the user device.

N. Claims 9, 19.

Kraft renders obvious these claims. EX1003, ¶¶195-197. For the reasons discussed in [1.H.2], Kraft teaches a single degree of separation that is a friendship relation. EX1005, 10:22-25.

O. Claims 10, 20.

Kraft renders obvious these claims. EX1003, ¶¶198-200. For the reasons discussed in [1.H.2], Kraft teaches a single degree of separation that is a trust (e.g., friendship) relation. EX1005, 10:22-25. Kraft's world model includes "features of a conventional social network" (*the single degree of separation*) that "reflect[s] different real-world roles (e.g., career, social, **family**, etc.)" (*is indicative of a family relationship*). EX1005, 10:25-27, 10:42-48, 14:14-17; *also* EX1010, ¶41 (Altman's teaching its social network includes "family" relationships).

P. Independent Claims 21, 26

Kraft-Nguyen-Altman renders obvious these claims. EX1003, ¶¶201-205. With the exception of the differences noted below, these claims set forth elements substantially the same as claims 1 and 11, which are rendered obvious for the reasons discussed in Sections IV.E-F.

[21.I] and [26.I] are substantially the same as [1.I], other than reciting the claimed *analyzing ... to identify at least one second node is based at on user data associated with the at least one second node* and the *second node is connected via*

one dimension of the multi-dimensional information network to the event node. For the reasons set forth in [1.I], Kraft renders obvious the claimed *analyzing ... to identify at least one second node*. Kraft teaches the analysis is *based on user data associated with the at least one second node* because Kraft teaches the entities store *user data* (for reasons stated in [1.A]) and, as discussed in [1.B], [1.E], and [1.I], users may search the content of entities (including *user data* associated with Person entities, such as relationship data) for entities that match user-specified criteria. EX1005, FIG. 3, 16:28-42. For the same reasons, Kraft renders obvious the identified *second node is connected via at least one dimension to the event node* (e.g., a search, or network view, to identify Person entities connected as a “participant” to the Event entity). EX1003, ¶202.

[21.J] and [26.J] are substantially the same as [1.J], other than specifying the information is *event information relevant to the event*. The specific content of the “*event information*” is not functionally related to the claim and should not 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) (“[P]rinted matter encompasses *any information claimed for its communicative content*, and the

doctrine prohibits patenting such printed matter unless it is ‘functionally related’ to its ‘substrate,’ which encompasses the structural elements of the claimed invention.”). Here, the claimed delivery of information to the second node method can be performed irrespective of the particular content of information provided. EX1003, ¶203.

Regardless, Kraft-Nguyen renders obvious delivering the claimed *event information* to the second node. As discussed in [1.J], Kraft teaches automatically updating content section 404 of entity model with “links to content” that pertain to the real-world entity being modeled. EX1005, 11:47-50. Kraft also teaches its entity model data structures are illustrative, and variations are possible. EX1005, 13:40-42; *also id.* 24:36-45 (“the entity model is not limited to any particular data structure or content”). Nguyen describes a user may post an invitation Web page in a list of public events “thereby enabling any user to access the invitation Web page.” EX1006, ¶62. Thus, it would have been obvious in Kraft-Nguyen to *deliver[] event information relevant to the event to the at least one second node* (e.g., delivering, to the content section or other data structure of the second node, a link to an invitation web page to the event as taught by Nguyen), which is *received from an information node* (content provider) as claimed for the reasons described in [1.J]. A POSA would have been motivated to *deliver information relevant to the event* to the second node to fulfill Kraft’s stated objective of modeling “the full

complexity and scope of interrelationships that exist in the real world” (e.g., by modeling the second node received an invitation to the event – which other interested users may then discover by viewing content of the second node).

EX1005, 9:3-5; EX1003, ¶204.

Q. Claims 22, 27.

Kraft teaches these claims for the reasons discussed for claim 2. EX1003, ¶¶206-207.

R. Claims 23, 28.

Kraft’s Person data indicating membership in a Community with a relationship or interest in the event is *user data associated with the at least one second node indicating an interest in at least one particular topic relevant to the event*. EX1003, ¶209. Kraft’s world model includes “Community” entities “representing groups of people united by a common interest or characteristic.” EX1005, 9:61-63. Community entities may, for example, be connected to events through a “focus of,” “sponsor of,” or “participant of” relationships. EX1005, FIGS. 2, 3. Kraft illustrates exemplary Community entities (214, 216) related to an election event. EX1005, 8:49-62, FIG. 2. As discussed in claim elements [1.B], [1.E], [1.I], and claim 21, Kraft teaches a user may perform a search for entities matching user-specified criteria. A POSA would have recognized from these teachings that a search for Person entities (user nodes) with user data indicating

they are members of a community with a relationship or interest in the event identifies the claimed user data (e.g., membership in “Bob Supporters” 216 in Fig. 2 indicates interest in Mayoral Election 202; membership in “Science Fiction Fans” 230 in Fig. 2 indicates interest in a topic relevant to science fiction events). EX1003, ¶209; EX1005, FIG. 2.

Kraft also teaches the claimed *identifying* through the display of a network graph within two degrees of separation of an entity—e.g., such a network graph of an event with a related Community entity also identifies Person entities (second nodes) that are members of the Community (have *user data indicating an interest in the topic relevant to the event*). EX1005, 20:59-67; EX1003, ¶210; Section IV.E.7.

Thus, Kraft renders obvious claims 23 and 28. EX1003, ¶¶208-211.

S. Claims 24, 29.

Kraft teaches these claims in at least two ways. EX1003, ¶¶212-215. *First*, as discussed in [1.B], [1.E], [1.I], and claim 21, Kraft teaches a user may perform a search for entities that match user-specified criteria. Kraft also teaches events may have a “focus on” relationship to other events. EX1005, FIG. 3. A POSA would have recognized from these teachings that a search for Person entities with user data indicating they are participants of a second event relevant to the event (e.g., related through a “focus on” relationship) *identif[ies] user data associated with the*

at least one second node indicating participation in at least one particular activity (participation in the related event) *relevant to the event*. EX1003, ¶213.

Second, Kraft also teaches the claimed *identifying* through the display of a network graph within a specified degree of separation from the entity—for example, a display of the network graph shown in Figure 2 within three degrees of separation would display the participants of “Rally” 218 (*identifying second node[s]* that have *user data indicating participation in an activity relevant to the Mayoral Election event*). EX1003, ¶214.

T. Claims 25, 30.

As discussed in claim 21, Kraft renders obvious analyzing its database to identify a second node connected to the event node. But Kraft does not explicitly describe its user data includes travel history.

Altman does. Its data store includes location information for each user, such as location histories and frequently visited areas. EX1010, ¶¶37, 71; FIG. 1; *also* EX1010, FIG. 13 (illustrating a location history table). A POSA would have been motivated to incorporate Altman’s teachings of user location history (“*participation travel history*”) in Kraft-Nguyen (e.g., by storing location history as metadata in a user’s Person model) for the reasons discussed in Section IV.D. In the Kraft-Nguyen-Altman combination, a search for Person entities with user data having location history to the event location/region *identif[ies] user data*

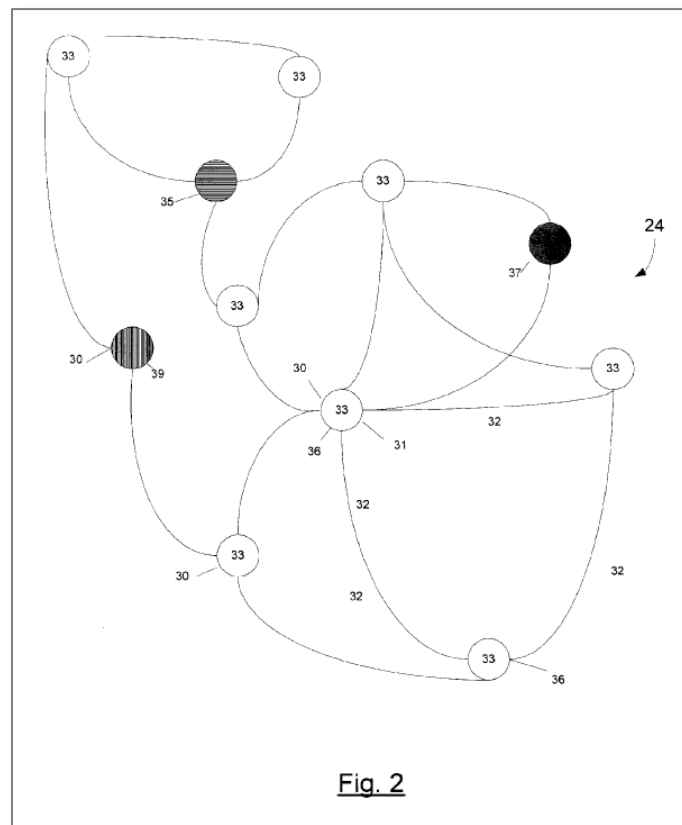
associated with the at least one second node indicating participation travel history to a particular region relevant to the event. EX1003, ¶218. Thus, Kraft-Nguyen-Altman renders obvious claims 25 and 30. EX1003, ¶¶216-220.

V. GROUND 2: CLAIMS 1-24 AND 26-29 WOULD HAVE BEEN OBVIOUS IN VIEW OF WONG, BURFEIND, AND CROWLEY.

A. Wong

Wong teaches creating a social network. EX1007, Abstract, ¶¶2-3, 17-19.

Wong's network 24 is illustrated in Figure 2.



EX1007, FIG. 2.

Wong's social "network ... is represented by a number of elements, ... which are referred to as 'nodes' 30, joined by connections 32, referred to as

‘linkages’, to other nodes 30.” *Id.*, ¶21.

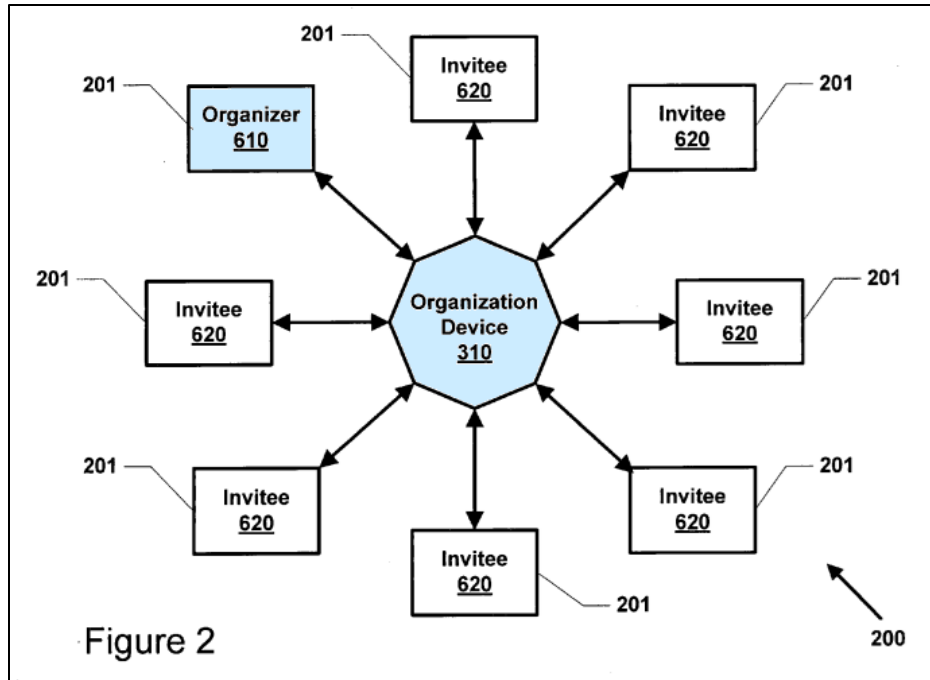
In Wong, people or organizations “can represent themselves to other persons or organizations of persons through their active nodes and interact electronically with other persons or organizations of persons represented by an active node.”

EX1007, ¶30. Users 10 access the network via computer terminals 14. *Id.*, ¶17.

Communication between the nodes may occur via Wong’s “social networking features” including e.g., “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.*, ¶44. *See* EX1003, ¶¶78-81.

B. Burfeind

Burfeind’s system enables a user to “schedule[] a location-specific event.” EX1008, Abstract. In Burfeind’s network 200, “users 201 ... are communicatively coupled to an organization device 310,” which facilitates event planning. EX1008, ¶54, FIG. 2.



EX1008, FIG. 2.

“[E]vent organizer 610” (a user) provides event information—including time, location, and invitees for the event—to “organization device 310,” which in turn communicates the invitations and other event information to invitees 620.

EX1008, ¶¶52-57, 108, 111-113, 115.

Invitees can view events to which they are invited in event listing 2110. EX1008, ¶¶120-122, FIG. 21. “[E]ach entry 2115 includes a hyperlink 2117 associated with a webpage containing additional information about the event,” including the event name and time. *Id.*

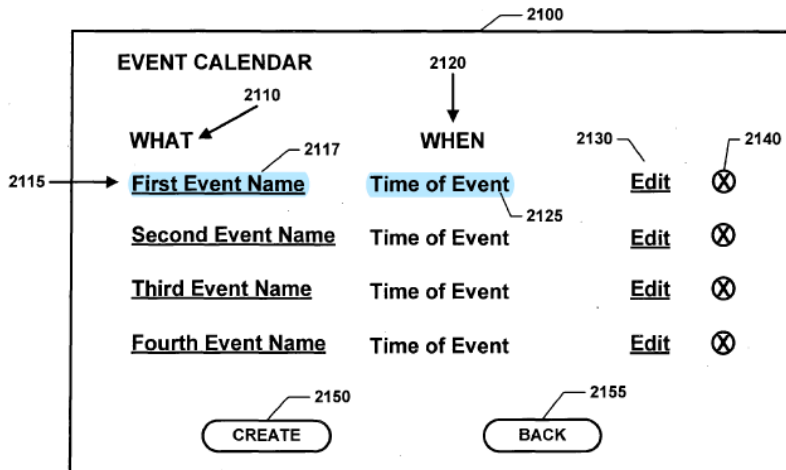


Figure 21

EX1008, FIG. 21.

See EX1003, ¶¶82-85.

C. Crowley

Crowley’s system coordinates meetings between friends and acquaintances.

EX1009, Abstract. Crowley discloses “location-based social software” for “establishing connection between users of mobile devices.” EX1009, ¶¶7-8.

Specifically, Crowley’s system determines when a user’s participating acquaintances are geographically proximate to an event venue, and automatically sends invitations to those individuals, inviting them to meet the user at that venue. EX1009, ¶45. See EX1003, ¶86.

D. Motivation to Combine

Wong teaches creating a social network composed of nodes (representing entities, e.g., users or objects) and connections (representing the relationship

between entities). EX1007, ¶¶6, 17, 22-24; Section V.A. In Wong, the “individual represented by an active node can join groups, organize memberships, send emails from the node, and the like and in particular **take advantage of the activities facilitated by the social networking features** of the network of living and non-living entities, such as using certain communication tools.” EX1007, ¶44. Wong, thus, explicitly recognizes the benefit of including and utilizing various “social networking features.” EX1003, ¶222.

In February 2007, it was well-known to use social networks to facilitate and organize events, including location-specific events. EX1003, ¶50. A POSA would have been motivated to include such well-known event-organizing capabilities in Wong’s social network and would have looked for references including implementation details for event-organization functionality. EX1003, ¶223. Burfeind and Crowley are such references.

A POSA would have been motivated to include the event-organizing capabilities of Burfeind’s user network as an additional “social networking feature” in Wong’s social network because it would have amounted simply to including a known technique (event-organizing capabilities) into a known system ready for improvement (Wong’s social network) to yield predictable results (a social network including event-organizing capabilities). EX1003, ¶224.

Burfeind’s organization device communicates invitations and other

information regarding an event to invitees. EX1008, ¶¶52-57, 108, 115; Section V.B. Based on these teachings of Burfeind—and because, in Wong, communication happens between nodes in the network⁴, EX1007, ¶44—a POSA would have recognized that a **new node related to the event** (i.e., an *event node*) would be useful in Wong’s social network to facilitate the event-related communication in the social network. Wong discloses users (such as Burfeind’s organizer 610) can create new nodes and link them to existing nodes. *Id.*, ¶¶26-27, 41, FIGs. 5, 6. Although Wong describes four exemplary “main node types”—people, places, objects, animals—Wong also teaches there may be additional node types. EX1007, ¶¶21-22. Therefore, in the Wong-Burfeind combination, a new node associated with the event would be created in Wong’s network 24. EX1003, ¶225.

A POSA would have had a reasonable expectation of success in implementing Burfeind’s features in Wong, including the creation of a new *event node*. Wong recognizes creating nodes was “well known to web site

⁴ In Wong, each node contains 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.” EX1007, ¶19; *also* ¶¶31-32.

programmers.” EX1007, ¶18. In Wong, nodes are created and/or edited by a user accessing the network via user device, and information representing the nodes is stored on the social network server. EX1007, ¶¶17-19. Likewise, in Burfeind, events are created and/or edited by the event organizer (a user) accessing the organization device (a server) via a user device and updating the information related to the event. EX1008, ¶¶57, 59. As in Wong, Burfeind’s users access the user network via user devices, e.g., computers or cellular phones, and Burfeind’s event organizer 610 communicates with organization device 310 over a networked environment. EX1008, ¶¶56-57, FIG. 3. EX1003, ¶226.

Similar to Burfeind, Crowley discloses a system for coordinating meetings between friends and acquaintances. EX1009, Abstract; Section V.C. Unlike Burfeind’s manual selection of invitees, EX1008, ¶¶159-161, FIG. 33, Crowley’s system determines when a user’s participating acquaintances are geographically proximate to an event venue, and automatically sends invitations to those individuals, inviting them to meet the user at that venue. EX1009, ¶45. Indeed, Crowley acknowledges the inefficiencies of systems like Burfeind that “require the organizer to select attendees from a manually-created list of acquaintances, such as members of an e-mail address book.” EX1009, ¶4. EX1003, ¶¶227-228.

Crowley’s system provides numerous advantages, such as enabling “spontaneous socializing” and “convenient communication among friends.”

EX1009, ¶6. Crowley also “help[s] avoid the problem of friends who were out near each other, but never realized it until later.” *Id.*, also ¶35. Crowley thus provides express motivation for implementing its location-based features in the Wong-Burfeind combination. EX1003, ¶229. A POSA would have thus been motivated to enable the Wong-Burfeind system to identify and invite all contacts that are geographically proximate to the event location, as taught by Crowley. EX1009, ¶¶45, 78; EX1003, ¶229.

A POSA would have had a reasonable expectation of success in implementing these features in the Wong-Burfeind combination. EX1003, ¶230. Similar to Crowley, Burfeind already contemplates “location-specific event[s]” that are held at the event organizer’s current location and tracks its users’ GPS locations to determine the “arrival information” for the user. EX1008, ¶¶3, 110, 112, 136, 143-145, 169-171, FIG. 36. A POSA would have readily been able to adapt this location-tracking feature to identify user locations for the purpose of inviting individuals who are located near the event location. EX1003, ¶230. A POSA also would have thus readily been able to modify the Wong-Burfeind combination to determine the event organizer’s contacts that are located proximate the selected event venue, and to send invitations to that group of contacts, as taught by Burfeind and Crowley. EX1003, ¶231.

A POSA would have understood that implementing Crowley’s techniques in

the Wong-Burfeind combination would merely amount to the use of a known technique (Crowley's location-based messaging) to improve similar systems (Wong-Burfeind's social network based invitation system) in the same way (enabling the system to automatically send messages/invitations to nearby individuals), as well as applying a known technique to a known system ready for improvement to yield predictable results. EX1003, ¶232.

E. Independent Claim 1

1. [1.P]

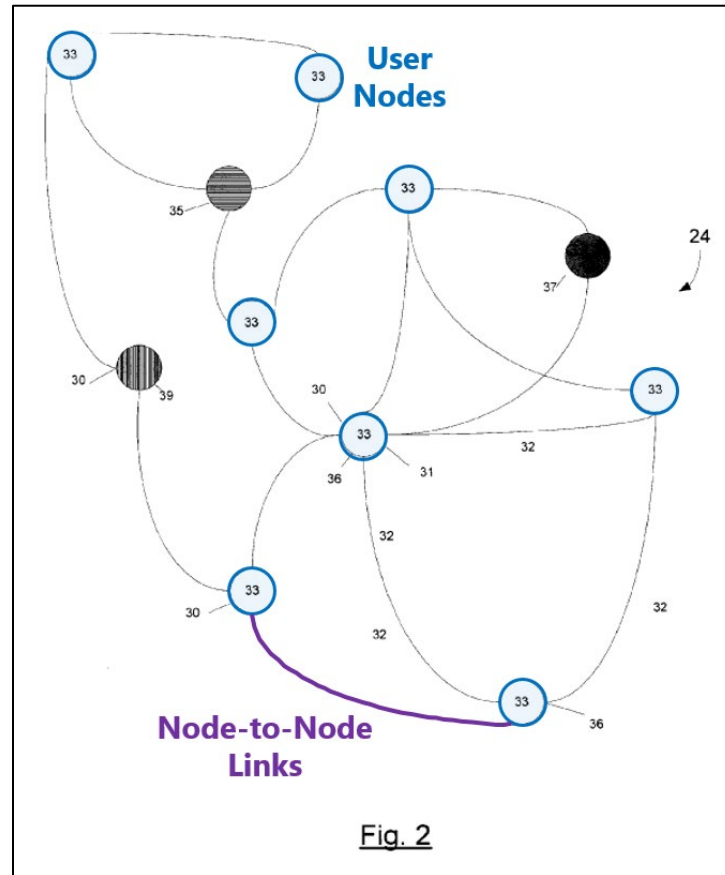
Each of Wong, Burfeind, and Crowley is implemented on a computer. EX1007, ¶6 (“interactive computerized network”); EX1008, ¶59 (“organizing device 310 is a computer server”); EX1009, ¶69 (“computer system 82” implements the functionality); EX1003, ¶¶233-235.

2. [1.A]

Wong teaches this element. EX1003, ¶¶236-240.

Wong discloses a social network server 20 (*a networking server*) that *maintain[s] data defining a social network 24 (a multi-dimensional information network)*. EX1007, ¶17. That data, Wong explains, is stored in “the same database [(a database)] which forms part of the system.” EX1007, ¶36. The stored data includes “[n]odes, linkages, linkage types, and all data pertaining to the network” (*a plurality of user nodes and multi-dimensional node-to-node links characterizing relationships between the plurality of user nodes via dimensions in the multi-*

dimensional information network). EX1007, ¶36, also ¶¶21, 24, 33. Wong's network 24 (*multi-dimensional information network*) is illustrated in FIG. 2.



EX1007, FIG. 2 (annotated).

Wong also teaches *at least some of the user nodes of the plurality of user nodes are respectively associated with user data* because, according to Wong, each node in network 24 represents a living or non-living entity, e.g., “people 33 (living and deceased), places 35, objects 37 and animals 39.” EX1007, ¶21. In Wong, each of these nodes is associated with information pertaining to the person or entity that it represents (*user data*). EX1007, ¶¶18-19, 31-32.

3. [1.B]

Wong-Burfeind teaches this element. EX1003, ¶¶241-248.

Wong's users 10 access and interact with Wong's social network using computer terminals 14 (*respective user devices*) and are *associated with respective user nodes* 30. EX1007, ¶¶17-18, FIG. 1; EX1003, ¶242.

In Burfeind, each invitee can “view the status of each event to which the individual is a party,” e.g., to which the user is invited, via interface 2100 which includes “a listing 2110 of events” (*respective composite data feeds*). EX1008, ¶¶120-121, FIG. 21; *also* ¶¶163-165, FIG. 35.

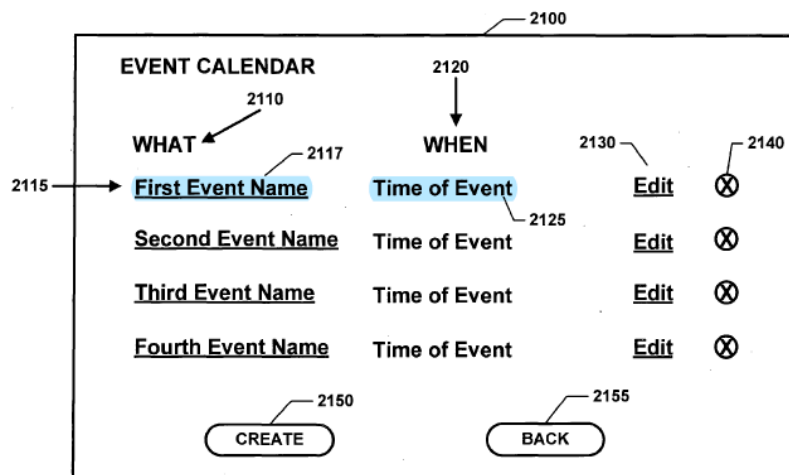


Figure 21

EX1008, FIG. 21.

These event listings 2110 are *respective composite data feeds* because, consistent with the disclosure in the '769 patent, they, upon request, provide the user with an updated listing of all of events they are invited to. EX1001, 8:50-9:3, 12:52-64,

20:46-49; EX1003, ¶¶243-245.

Wong-Burfeind also teaches the event listings 2110 (*composite data feeds*) are based on the database of the plurality of user nodes and multi-dimensional node-to-node links. In the combined system, Burfeind's events are implemented as nodes (*event node*) in Wong's network. See §§V.D, V.E.4. When a user is invited to an event, a link is created between that user's node and the corresponding event node and stored in the *database* of the social network server (*networking server*). EX1007, ¶¶27-28, 36. The information included in the event listing comes from this database. EX1003, ¶246.

Finally, Wong's social network server (*networking server*), provide[s] Burfeind's event listing (*composite data feeds*) to the respective user devices. Wong's system includes "an Internet website, database and associated data, which is accessible to users" and is maintained by social network server 20. EX1007, ¶17. In the combined system, Burfeind's interface 2100 is accessed via this Internet website.

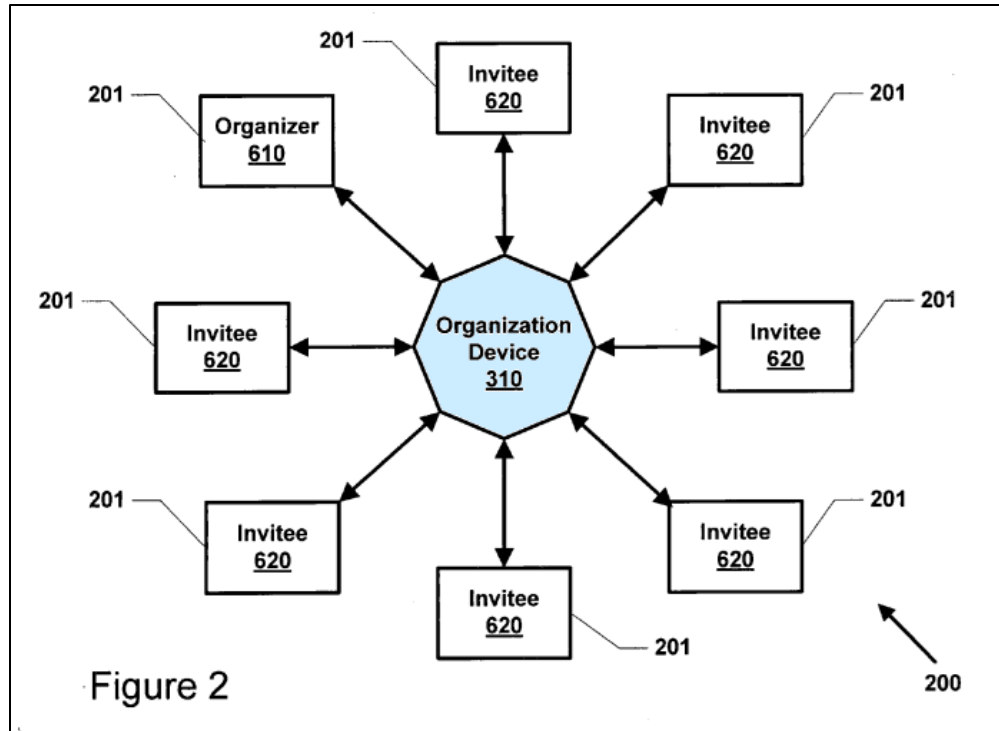
4. [1.C]

Wong-Burfeind teaches this element. EX1003, ¶¶249-259.

Burfeind's organization device 310 (*event node server*) is a "computer server" that "schedules a location-specific event" (*establish[es] an event in a particular geographical area*). EX1008, Abstract, ¶59.

As explained above (Section V.D), a POSA would have recognized that a new node related to the event (i.e., *an event node associated with [the] event*) would be useful in Wong's social network to facilitate event-related communication in the social network. EX1003, ¶¶250-251. A POSA would have understood that each node in Wong is created by and associated with a server to provide the home page, communication tools, data and files, storage space, network information, and/or editing tools associated therewith. EX1007, ¶¶17-19, 31-32. This is consistent with the '769 patent's teaching that "users may have their nodes hosted in a common location, e.g., on a local or remote server." EX1001, 16:1-2; EX1003, ¶¶251-252.

Burfeind's organization device (*event node server*) "executes a number of processes at the request of the event organizer 610," including creating and scheduling an event. EX1008, ¶¶78, 107, 111, 114, *also* ¶¶146, 155, FIGs. 18, 33.



EX1008, FIG. 2.

In doing so, the event organizer inputs information identifying the event—e.g., name, time, date, and location of the event, as well as individuals to be invited.

EX1008, ¶¶111-114, *also* ¶¶147, 155-162, FIG. 18.

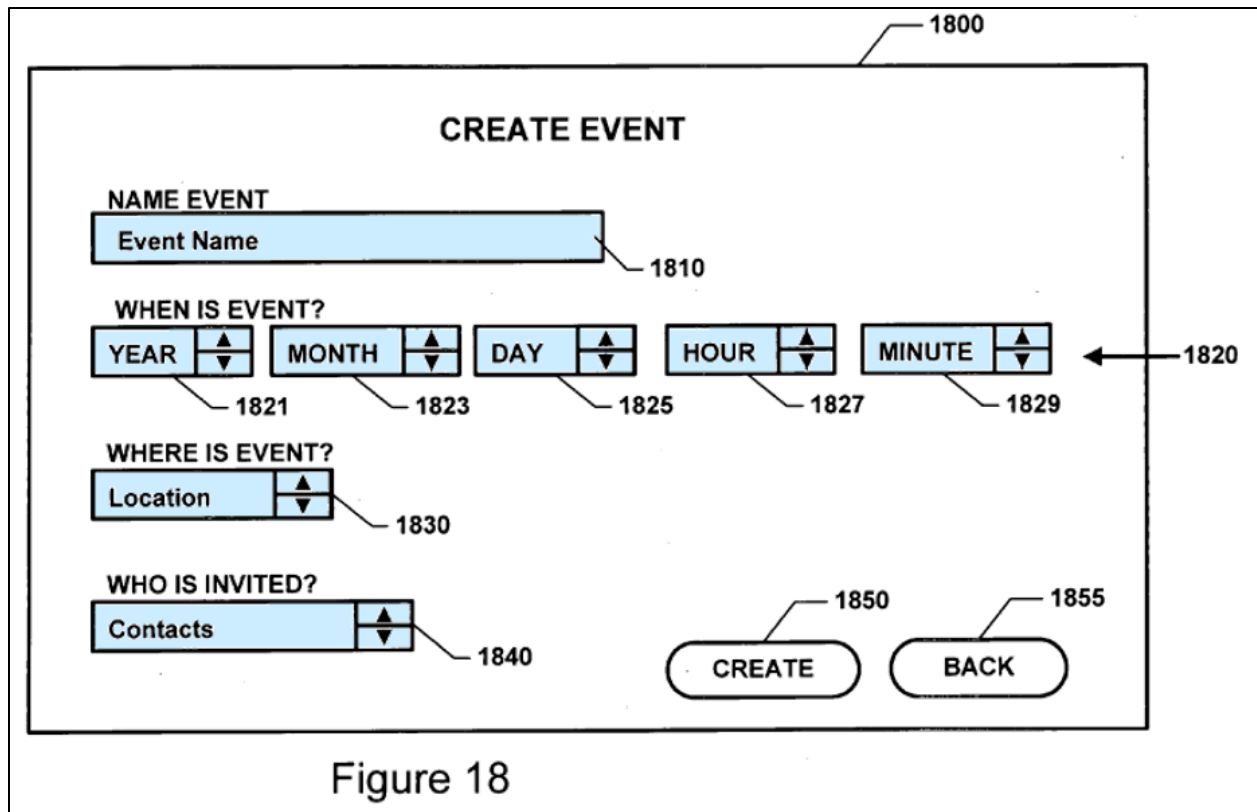


Figure 18

EX1008, FIG. 18.

Wong-Burfeind also teaches *the event node is discoverable to each respective user device of a first subset of a plurality of user devices by browsing a respective composite data feed*. Burfeind's organization device transmits

invitations to the user devices of the respective individuals invited to the event.

EX1008, ¶¶108, 115. Invitations may be sent to "one or more groups" of the event organizer's contacts. EX1008, ¶159, also ¶89, FIGs. 11-13; EX1003, ¶¶255-257.

The devices associated with these event invitees are *a first subset of a plurality of user devices*. Once a user has been invited to an event, that event is viewable in their event listing 2110 (*composite data feed*). EX1008, ¶¶120-121, FIG. 21.

In Burfeind, each event has a corresponding webpage, accessible via an

interface tool 2117 (e.g., a hyperlink) in the event listing. EX1008, ¶121. Likewise, each of Wong's nodes is accessible via a web page. EX1007, ¶22. Thus, in the combined system a user (via their *user device*) can *brows[e]* their *respective* listing of events (*composite data feed*) and access (*discover[]*) the event webpage (associated with the *event node*). EX1007, ¶¶17, 28; EX1008, ¶121. Thus, each event node is *discoverable to each respective user device* as claimed. EX1003, ¶258.

5. [1.D.1]

Wong-Burfeind teaches this element. EX1003, ¶¶260-264.

Wong-Burfeind teaches *joining the first subset of the plurality of user devices that have discovered the event node to the event node*. Once a *user device* ... *discover[s] the event node* (i.e., by viewing it in the user's list of events), it can access the corresponding interface tool 2117 (e.g., to a website providing the event information, EX1008, ¶108). Burfeind further teaches "an event participant can obtain additional information pertaining to an event" by "access[ing] an event database ... stored on organization device 310." EX1008, ¶132. In this way, the **user's device** is *join[ed] to the event node*, because, in order to access this event database, the computer terminal 14 (*user device*) must be connected (*join[ed]*) to the node (*event node*). EX1007, ¶22; EX1003, ¶261. A POSA would have understood that this *joining* process—joining the *user device* to the *event node*—is

repeated for each device of the *first subset of the plurality of user devices* (user devices associated with invitees) *that ha[s] discovered the event node*, or at least that it would have been obvious to do so. EX1003, ¶261.

Wong-Burfeind also teaches *a first subset of user **nodes** of the multi-dimensional information network* [i.e., those associated with the first subset of user devices that have discovered the event node] *... are joined to ... the event node*. As discussed above, Wong-Burfeind teaches creating an event node and linking the event node to existing user nodes, such as “one or more contacts whom the event organizer 610 desires to invite to the event.” EX1007, ¶¶27, 41; EX1008, ¶107. By sending/receiving an invitation, these **nodes**—i.e., the respective event/user nodes—are linked. This is evidenced by the fact that once an invitation has been sent by the organizing device and received at the user node, the event appears in the list of events viewable on the user’s device. EX1008, ¶¶120-121. The connection (being *joined*) to a *centralized architecture for the event node* is taught as described in the next section. Section V.E.6. EX1003, ¶262.

Wong-Burfeind teaches the *user **devices** of the first subset of the plurality of user devices are respectively associated with [the] first subset of user **nodes*** because each event invitee, which is associated with a respective node 30 (*user node*), accesses the social network via their respective computer terminal 14 (*user device*). EX1007, ¶¶17-18, FIG. 1; EX1003, ¶263.

6. [1.D.2]

Wong-Burfeind teaches this element. EX1003, ¶¶265-269.

As discussed above, Burfeind's event organizer utilizes an organizing device to create an *event node* in Wong's social network. Sections V.D, V.E.4. In the combined system, *the event node is configured as a central node in the centralized architecture for accessing information associated with the event*. Like the "centralized architecture" disclosed in the '769 patent (*see* EX1001, 6:61-7:9, FIG. 43; EX1003, ¶266), Burfeind teaches users "communicate with one another through the organizing device." EX1008, ¶56. Thus, in the combination, user nodes (and the associated user devices) are connected (*joined*) to a *centralized architecture for the event node*. Further, the organizing device "can also provide to event participants (*[is configured for accessing]*) ... information pertaining to the event" (*information associated with the event*). *Id.*, ¶131, *also* ¶139 ("event status interface 2600 includes additional information 2660 pertaining to the event"), FIG. 26. EX1003, ¶267.

Figure 26

2600

EVENT NAME ← 2605

2640

2615 ☐ First Invitee Name ← 2610
Arrival Information ← 2620
Optional message ← 2630

☐ Second Invitee Name
Arrival Information
Optional message

☐ Third Invitee Name
Arrival Information
Optional message

☐ Fourth Invitee Name
Arrival Information
Optional message

OPTIONAL INFORMATION 2660

EX1008, FIG. 26.

Further, Wong-Burfeind teaches the *information associated with the event [is accessed] from a location in the multi-dimensional information network* because the *information* is stored in “one or more databases on the organization device” (*event node server*). In the combined system, the *event node* (and therefore the *event node server*) is a part of Wong’s social network 24 (*the multi-dimensional information network*). EX1008, ¶132. EX1003, ¶268.

7. [1.E]

Wong-Burfeind-Crowley teaches this element. EX1003, ¶¶270-276.

The '769 patent depicts an example of what is meant by “a geographic projection of nodes” in Figure 30. EX1001, 3:26-27, 23:8-18.

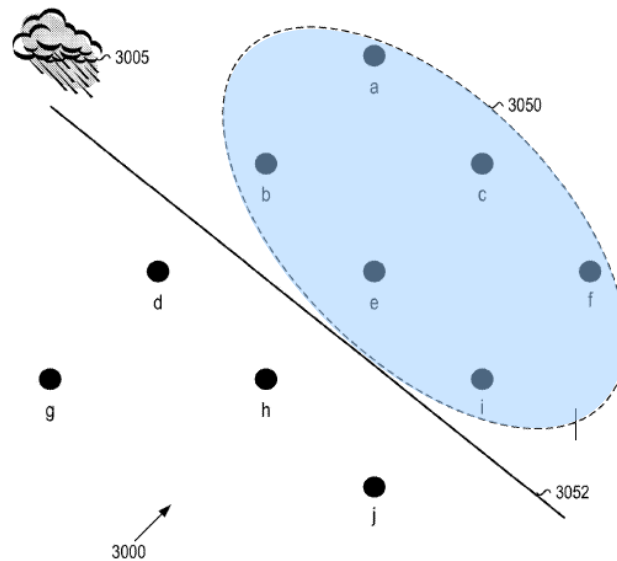


Fig. 30

EX1001, FIG. 30.

Consistent with this example, Wong teaches *creating, by the networking server, based on the database of the plurality of user nodes and multi-dimensional node-to-node links, a projection of the plurality of user nodes*. In Wong, the information defining Wong’s network is stored in the *database*. EX1007, ¶36; *see*

[1.A]. Wong’s “network ... 24 can be viewed in many ways, such as graphically as a set of nodes 30 connected by their associated linkages 32, or as a list.” EX1007, ¶35. Wong teaches different parts of the network can be viewed by selecting different nodes as the root of the graphical view (*projection*). EX1007, ¶35. EX1003, ¶272.

Wong-Burfeind-Crowley also teaches *the projection represents a second subset of user devices that is selected based on respective distances of devices of the second subset of user devices from the event*. Burfeind’s event organizer can “modify the event,” for example, to “add ... invitees” (*a second subset of user devices*). EX1008, ¶¶123, 127-128, 166. Burfeind determines users’ proximity to the event location but does not explicitly disclose those users are invited to the event based on their proximity. *See* EX1008, ¶¶136-138, *also* ¶¶131, 143-145, 169-171, FIG. 36. EX1003, ¶¶273-274.

Crowley provides that explicit disclosure. It teaches inviting users to the event based both on their relationship to a first user (corresponding to Burfeind’s event organizer) and on their geographic proximity (*selected based on respective distances of devices of the second subset of user devices from the event*). EX1009, ¶¶45, 64. A POSA would have been motivated to implement Crowley’s location-based invitations into Wong-Burfeind. *See* Section V.D. EX1003, ¶275.

8. [1.F]

Wong-Burfeind-Crowley teaches this element. EX1003, ¶¶277-280.

Crowley teaches automatically sending (*transmitting*) invitations (*respective requests to connect to the event node*) to a group of contacts (i.e., users associated with *the second subset of user devices*) that are geographically proximate the event location. EX1009, ¶¶45, 78. As explained above, in the combination, once an invitation has been sent by the organizing device to the user node, the event appears in the list of events viewable on the user's device. EX1008, ¶¶120-121; *see* [1.D.1]. Once viewable in the list of events, the *second subset of user devices* is able to *connect to the event node*. *See* [1.D.1] (discussing joining devices to the event node). A POSA would have understood that, in the combination, the communications between nodes, including *transmitting* the invitations, are implemented by the social network server (*by the networking server*) because the communications are facilitated by the social network features of Wong's system. EX1007, ¶¶17, 44. EX1003, ¶278.

Wong-Burfeind-Crowley further teaches *the respective requests to connect are in forms of roll calls*. Burfeind teaches that upon receiving an invitation from the organization device, invitees provide "a response to the invitation" by transmitting their respective participation statuses to the organization device. EX1008, ¶119, *also* ¶¶52, 117, 133. The invitations (*respective requests to*

connect) prompt the users to respond with their participation statuses so the system can “track[] the participation status of each invitee,” and are therefore *roll calls*.

EX1008, ¶52. This is consistent with the disclosure of “roll calls” in the ’769 patent, in which a user is presented with an unsolicited message and an option to respond. EX1001, 27:20-46. EX1003, ¶279.

9. [1.G]

Burfeind teaches this element. EX1003, ¶¶281-283.

Burfeind teaches that in response to the invitation (*respective requests to connect*), invitees transmit, e.g., a “Y” or “N” indicating their participation status. EX1008, ¶117. The participation status of each invitee (*respective responses*) is saved (*record[ed]*) “for future reference,” for example in a database in the organization device. EX1008, ¶119.

10. [1.H.1]

Wong-Burfeind teaches this element. EX1003, ¶¶284-287.

The participation statuses (*subset of respective responses*) are then displayed in the event status interface 2600 (*making [them] viewable*) to the event organizer’s user device (*first device*). EX1008, ¶¶54, 56-57, 131, 134, 137-139. A *subset* of responses can include *all* responses. Because the participation statuses are stored in a database in the organization device (*event node server*), it is the *event node* that provides the information to the event status interface. EX1003,

¶285.

The event organizer's user device (*a first device*) is *associated with* a user node corresponding to the event organizer (*first node*) in Wong's social network. EX1003, ¶286. A POSA would have understood the event organizer's device (*first device*) is *connected to the event node* because the event organizer creates and modifies the event via the device. EX1008, ¶¶54, FIG. 2.

11. [1.H.2]

Wong-Burfeind-Crowley teaches this element. EX1003, ¶¶288-293.

In the combination, each participation status (*each response of the subset*) is *received from* a corresponding user device (*device*) associated with a user that is in turn *associated with a node*. The *second subset of users* (to whom the *roll calls* are *transmit[ed]*, per [1.F], and from whom *respective responses* are *record[ed]*, per [1.G]), are selected from Burfeind's event organizer's contacts, further based on their proximity as taught by Crowley. *See* Section V.E.7. EX1003, ¶289.

Burfeind also teaches, or at least suggests, that the responses are received *from a device associated with a node having a single degree of separation from the first node in the database of the plurality of user nodes and multi-dimensional node-to-node links*. A POSA would have understood, or at least found it obvious, that the event organizer's contacts are users *having a single degree of separation* from the event organizer. This is further confirmed by Crowley, in which users to

whom messages (or invitations) are sent are identified based on *both* their relationship to a first user (corresponding to Burfeind's event organizer) and geographic proximity to the first user. EX1009, ¶64. Crowley specifically identifies sending messages to "friends," which a POSA would have understood to mean a single degree of separation. EX1009, ¶¶11, 39; EX1003, ¶¶290-291.

Finally, even if users having more than a single degree of separation are invited to the event and all of the responses are displayed (i.e., even responses not included in the subset), nothing in the claim prevents that from being the case. In other words, the claim does not require that *only* the subset of responses be made viewable and is met as long as at least one response satisfies the limitations.

12. [1.I]

Wong-Burfeind-Crowley teaches this element. EX1003, ¶¶294-297.

Burfeind teaches forwarding invitations to uninvited friends. EX1008, ¶184. Crowley suggests "using well-known social networking approaches to allow for communications, not only with direct friends, but with friends of friends and other further relations." EX1009, ¶6. Based on these teachings, a POSA would have been motivated to use Wong's social networking functionality to *identify* additional potential invitees (users associated with *at least one second node*), i.e., users in the social network that are friends with/connected to current invitees ((b) *connected via at least one dimension to at least one user node of the multi-*

dimensional information network that is joined to the centralized architecture for the event node) but not already invited to the event ((a) *not connected to the event node*). EX1003, ¶295.

As discussed above, Wong teaches the network can be viewed “graphically as a set of nodes 30 connected by their associated linkages 32.” EX1007, ¶35. A POSA would have understood that such a graphical view would be created by *analyzing (a) the database of the plurality of user nodes and multi-dimensional node-to-node links, and (b) data of user nodes of the multi-dimensional information network that are joined to the centralized architecture for the event node*. EX1003, ¶296. A POSA naturally would have chosen the *event node* as a starting point from which to identify additional users. In this way, Wong’s graphical view could be used to identify the potential invitees.

13. [1.J]

Wong-Burfeind-Crowley teaches this element. EX1003, ¶¶298-301.

In the combination, once the additional potential invitees (users associated with *the at least one second node*) are identified, it would have been obvious to send invitations to these invitees. EX1008, ¶¶184-185, FIG. 39; EX1009, ¶¶6, 46. Once invited to the event, the additional invitees have access to the event status interface, which provides (*deliver[s]*) additional information pertaining to the event (*supplemental information*), including e.g., pictures, movies, maps, to the

invitees (users associated with *the at least one second node*). EX1008, ¶¶139, 172, 196.

Wong teaches its network (*the multi-dimensional information network*) facilitates communication between nodes, including the “sharing of information, contributing information, and storage of information.” EX1007, claim 7; *also* ¶44 (describing, e.g., the sharing of data between nodes). A POSA would have been motivated to include an additional node (*information node*) in the network to store and provide the *supplemental information*.

F. Independent Claim 11

Wong-Burfeind-Crowley renders obvious claim 11. EX1003, ¶¶302-307.

Claim 11 recites elements substantially the same as claim 1, which are thus rendered obvious by Wong-Burfeind-Crowley for the same reasons as claim 1.

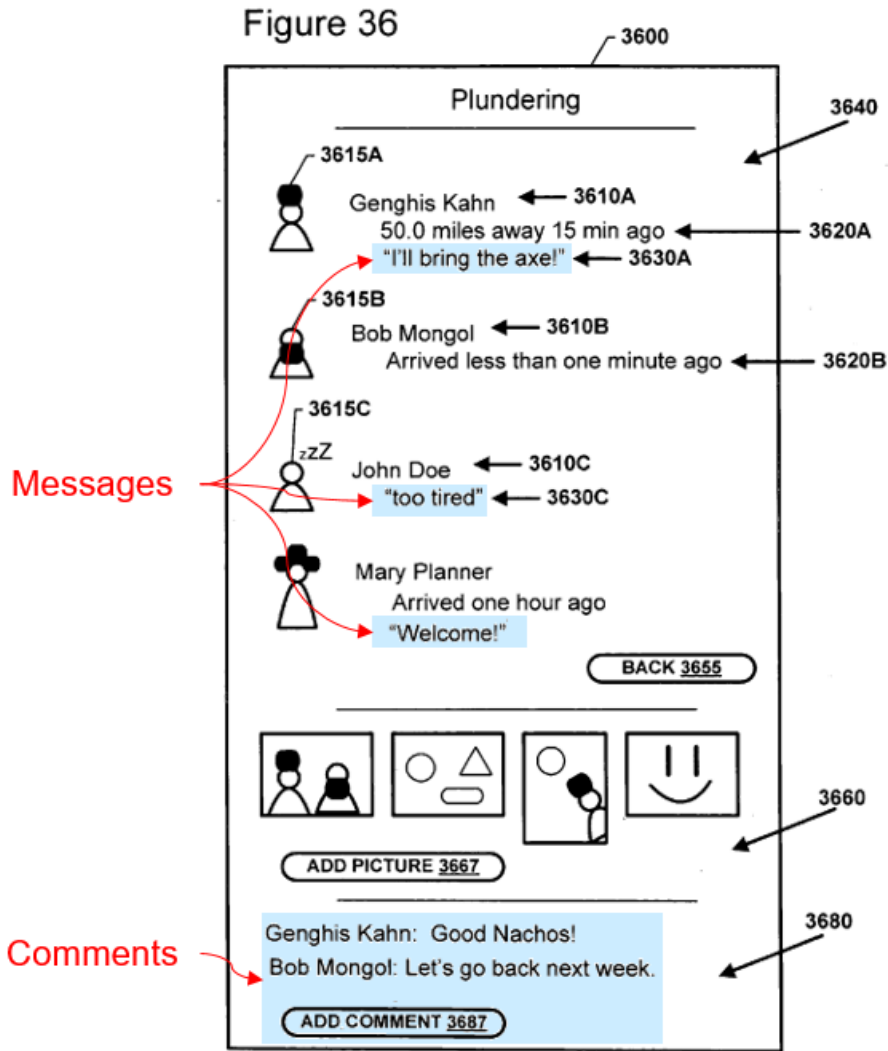
Wong-Burfeind-Crowley also renders obvious the additional generic server components (*memory, network controller, central processing unit*) recited in claim 11. EX1003, ¶303. Wong’s “[s]erver 20 has the hardware and software required to operate an internet-accessible social network, including web server, email server, databases, data storage and the like.” EX1007, ¶17, *also* ¶16 (“well known elements may not have been shown or described in detail”); *also* EX1008, ¶¶58-77, FIGs. 4-6 (Burfeind’s teachings of “example hardware and operating environments”). A POSA would have recognized Wong’s database is stored in

“data storage” (*memory*) of social network server 20 (claimed *networking server*).

EX1007, ¶17. A POSA would have further recognized *network controller(s)* of server 20 are *configured to perform the provide, transmit, and deliver* limitations because Wong’s server 20 communicates with user terminals 14 over via a network, e.g., the Internet. EX1007, ¶17, FIG. 1. Finally, a POSA would have recognized *one or more central processing units* of server 20 are *coupled to the one or more networking controllers* (to send/receive communications) and *are configured to perform the remaining limitations of claim 11* because a CPU is a conventional component that executes instructions to perform server functions. EX1003, ¶¶304-306.

G. Claims 2, 12.

Wong-Burfeind teaches these claims. EX1003, ¶¶308-311. Burfeind’s organization device (*event node server* hosting the *event node*) provides an “event status interface” (*a message board*) available to event participants (*user devices connected to the event node*) and uninvited individuals. EX1008, ¶¶131, 137, 139. Event status interface 3600 *enable[s] ... communicat[ion]* by facilitating “an optional message for each invitee[]” and a section in which “participants can post a comment [] pertaining to the event.” *Id.*, ¶¶139, 169-170, 174, FIG.36.



EX1008, FIG. 36.

H. Claims 3, 13.

Wong-Burfeind-Crowley teaches these claims. EX1003, ¶¶312-314. As discussed in [1.I], the *at least one second node* corresponds to additional potential invitees that, in Wong's social network, are friends with/connected to current invitees. Wong's *user data* includes "address" information (*user data that indicate[s] an association with [a] particular geographical area*). EX1007, ¶18,

also ¶24 (describing linkages with places). Crowley teaches inviting users to the event based on *both* their relationship to other users and their proximity to the event. EX1009, ¶¶45, 64; Section V.E.7. Based on these teachings, it would have been obvious to identify additional potential invitees as users whose address information *indicate[s]* they live near an event (*the particular geographical area of the event*). EX1003, ¶313.

I. Claims 4, 14.

Wong-Burfeind renders obvious these claims. EX1003, ¶¶315-317. As discussed above, Wong-Burfeind teaches joining user nodes to the centralized architecture for the event node. Sections VI.E.5-6. Wong also discloses “adding or modifying a series of linkages [] between the existing nodes in the network” and that linkage data pertaining to the network is stored in a database. EX1007, ¶¶36, 40. This linkage data is *user data associated with user nodes*, because it represents the relationship(s) between the user node and other nodes to which it linked (e.g., “mother/daughter”, “owner/pet”). EX1007, ¶¶19, 23-24, FIG. 4. A POSA would have understood that when the user node is joined to the event node (*based on joining the centralized architecture for the event node*), the linkage data between the user node and the event node is updated (*updating user data associated with user nodes of the multi-dimensional information network that are joined*). In particular, in the combination, the data is updated to reflect the event/invitee

relationship between the event node and the user nodes joined thereto. EX1003, ¶316.

J. Claims 5, 15.

Wong-Burfeind renders obvious these claims. EX1003, ¶¶318-320. As just discussed, when a user node joins the event node, the user data is updated to reflect the user's relationship as an invitee to the event. Burfeind's organizing device "provide[s] to event participants (*[deliver/s] ... based on the updated user data]*) ... information pertaining to the event;" and event status interface 3660 includes a "second section 3660 in which pictures, movies, and other such media files can be displayed." EX1008, ¶¶131, 172. This "second section" includes, e.g., a picture of the building where the event will be held or a map of the location (*additional information*). *Id.*

K. Claims 6, 16.

Wong-Burfeind-Crowley renders obvious these claims. EX1003, ¶¶321-323. For the same reasons discussed for [1.E], Wong-Burfeind-Crowley teaches *the projection represents the second subset of user devices determined to be geographically proximate to the event*. EX1003, ¶322; VI.E.7. In particular, Crowley teaches identifying user devices that "are nearby" (*geographically proximate to the event*). EX1009, ¶64, *also* ¶¶45, 78 (selecting "all other users in a particular proximity (whether geographic and/or time frame)").

L. Claims 7, 17.

Wong-Burfeind-Crowley teaches, or at least renders obvious, these claims. EX1003, ¶¶324-326. Crowley's system can determine a user's location using "a GPS feature associated with the device." EX1009, ¶59. Crowley teaches identifying groups of users "according to geographic location" (*a particular user device is determined to be geographically proximate*) such as "bounded by a downtown area" (*in the same town as the event*). EX1009, ¶¶99-100.

M. Claims 8, 18.

Wong-Burfeind-Crowley renders obvious these claims. EX1003, ¶¶327-329. Crowley teaches determining a user's location using "a GPS feature associated with the device." EX1009, ¶59.

N. Claims 9, 19.

Wong teaches these claims. EX1003, ¶¶330-332. Wong teaches the linkage (*relationship*) of a person node to another person node can be "best friend." EX1007, ¶24; *also* EX1009, ¶¶39, 61.

O. Claims 10, 20.

Wong teaches these claims. EX1003, ¶¶333-335. Wong teaches the linkage (*relationship*) of a person node to another person node can be "mother/daughter" (*family*). EX1007, ¶24.

P. Independent Claims 21, 26

Wong-Burfeind-Crowley renders obvious claims 21 and 26. EX1003, ¶¶336-

340. With the exception of differences noted below, these claims set forth elements substantially the same as claims 1 and 11, which are rendered obvious for the reasons discussed in Sections V.E-F.

[21.I] and [26.I] are substantially the same as [1.I], other than reciting the claimed *analyz[ing] ... to identify at least one second node is based at [sic] on user data associated with the at least one second node* and the *second node is connected via at least one dimension of the multi-dimensional information network to the event node*. Wong-Burfeind-Crowley teaches this. As explained above, event invitees (*at least one second node*) are *connected ... to the event node*. See Section V.E.5. A POSA would have understood this connection to be *via at least one dimension*, because that is how connections in *multi-dimensional information network* work. EX1003, ¶337.

Further, Wong-Burfeind-Crowley teaches the *at least one second node is identif[ied] ... based at [sic] on user data associated with the at least one second node*. Burfeind teaches “provid[ing] targeted advertisements to event participants,” which includes event invitees. EX1008, ¶¶54, 181-183. Crowley teaches tailoring “advertising targeted to the particular users.” EX1009, ¶98. For example, advertisers *identify* relevant users (users associated with the *at least one second node*) by “select[ing] criteria ... that match” (*based on*) a “demographic/psychographic profile” (*user data associated with the at least one second node*).

EX1009, ¶111, *also* ¶101. EX1003, ¶338.

[21.J] and [26.J] are substantially the same as [1.J], other than specifying the information is *event information relevant to the event*. As explained above in Section IV.P, the specific content of the “*event*” information is not functionally related to the claim and should not be given patentable weight. EX1003, ¶339. Regardless, Wong-Burfeind-Crowley teaches delivering the claimed *event information* to the second node. Crowley teaches that one form of advertising may be “[e]xclusive memberships” where “special ‘inside’ information” about events (*event information relevant to the event*) is *deliver[ed]* to members. EX1009, ¶111. Thus, the targeted advertisements constitute *event information* that is *deliver[ed]* to an event invitee (*the at least one second node*). In the combined system, the targeted advertisements (*event information*) would come from advertisers, which would be associated with a corresponding node (*information node*) in the social network in order to communicate with the event invitees. EX1003, ¶339.

Q. Claims 22, 27.

Wong-Burfeind teaches these claims for the reasons discussed for claim 2. EX1003, ¶¶341-343.

R. Claims 23, 28.

Wong-Burfeind-Crowley renders obvious these claims. EX1003, ¶¶344-346. Crowley teaches the relevant users (*at least one second node*) are identified based

on a “demographic/psychographic profile” (*user data ... indicating an interest in at least one particular topic*). EX1009, ¶111; *see* Section V.P. Crowley also teaches the “[a]dvertising ... may be customized ... according to ... the topic that the users have in common” or may be “targeted to ... the type of event.” EX1009, ¶¶98, 109. A POSA would have understood that, when selecting particular users (*at least one second node*) to receive an advertisement regarding the event, the interest (*particular topic*) based upon which those users are selected should be *relevant to the event*. EX1003, ¶345.

S. Claims 24, 29.

Wong-Burfeind-Crowley renders obvious these claims. EX1003, ¶¶347-349. Crowley teaches the relevant users (*at least one second node*) are identified based on a “demographic/psychographic profile.” EX1009, ¶111; *see* Section V.P. A user’s profile (*user data*) may include “hobbies” or “viewing a particular movie” (*indicating participation in at least one particular activity*). EX1009, ¶¶97, 101. Crowley also teaches the advertising may be “targeted to ... the type of event.” EX1009, ¶¶98, 109. A POSA would have understood that, when selecting particular users (*at least one second node*) to receive an advertisement regarding the event, the *particular activity* based upon which those users are selected should be *relevant to the event*. EX1003, ¶348.

VI. GROUND 3: CLAIMS 25 AND 30 WOULD HAVE BEEN OBVIOUS OVER WONG-BURFEIND-CROWLEY IN VIEW OF ALTMAN

Wong-Burfeind-Crowley renders obvious these claims. EX1003, ¶¶350-355.

As explained for claims 21 and 26, Wong-Burfeind-Crowley teaches identifying relevant users (associated with the *at least one second node*) based on user data, to send targeted advertising to those users. But Wong-Burfeind-Crowley does not explicitly disclose this user data includes *travel history*.

Altman does, for the reasons described above. Section IV.T; EX1010, ¶¶37, 71, FIGs. 1, 13. A POSA would have been motivated to incorporate Altman's teachings of user location history (*participation travel history*) in Wong-Burfeind-Crowley (e.g., by storing location history as part of the user data) in order to identify invitees that may be particularly interested in the event based on their prior participation in events in the area. EX1003, ¶353.

A POSA would have readily made the combination. Similar to Wong, Altman discloses a virtual network that connects users to people, places, and events. EX1010, ¶39. Similar to Burfeind and Crowley, Altman discloses its social network manager includes "an event manager module" that allows a user to create and manage events and send invitations regarding the events. EX1010, ¶53. A POSA would have had a reasonable expectation of success in implementing Altman's location history in Wong-Burfeind-Crowley, and been further motivated to make the combination, because it is simply a predictable combination of known

elements (Wong-Burfeind-Crowley's database that stores user information including location information, with Altman's database that obtains and stores location history) according to known methods to yield predictable results (Wong-Burfeind-Crowley's interactive network additionally storing location history of user nodes). EX1003, ¶354.

VII. GROUNDS FOR STANDING (37 C.F.R. § 42.104(A))

Petitioner certifies that the '769 patent is available for IPR and Petitioner is not barred or estopped from requesting IPR of any '769 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 '769 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
12,238,815	IPR2026-00111
12,245,325	IPR2026-00101
12,256,463	IPR2026-00112
12,336,052	IPR2026-00113

The '769 patent claims the benefit of U.S. Patent Nos. 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 Nos. 12,336,052; 12,256,463; and 12,245,325 claim the benefit
of the '769 patent.

Pending U.S. Patent Application No. 19/205,541 also claims the benefit of
the '769 patent.

The Board granted requests for adverse judgment or issued Final Written
Decisions in the following proceedings and determined that 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 **Michael D. Specht** (Reg. No. 54,463) as lead counsel, and
Jonathan Tuminaro (Reg. No. 61,327), **Jennifer Meyer Chagnon** (Reg. No.
55,440), **Steven M. Pappas** (Reg. No. 73,904), and **Timothy L. Tang** (Reg. No.
75,187) 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: **mspecht-PTAB@sternekessler.com, jtuminar-PTAB@sternekessler.com, jchagnon-PTAB@sternekessler.com, spappas-PTAB@sternekessler.com, ttang-PTAB@sternekessler.com, and PTAB@sternekessler.com.**

IX. CONCLUSION

The challenged claims are unpatentable as obvious and IPR is warranted.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jonathan Tuminaro/

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

Date: November 12, 2025

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

Claims Appendix – U.S. Patent No. 12,120,769

Claim 1

Element	
[1.P]	A computer-implemented method comprising:
[1.A]	maintaining, by a networking server configured to maintain data defining a multi-dimensional information network, a database of a plurality of user nodes and multi-dimensional node-to-node links characterizing relationships between the plurality of user nodes via dimensions in the multi-dimensional information network, wherein at least some of the user nodes of the plurality of user nodes are respectively associated with user data;
[1.B]	providing, by the networking server, respective user devices associated with respective user nodes of the plurality of user nodes, respective composite data feeds that are based on the database of the plurality of user nodes and multi-dimensional node-to-node links;
[1.C]	establishing, by an event node server, an event node associated with an event in a particular geographical area, wherein the event node is discoverable to each respective user device of a first subset of a plurality of user devices by browsing a respective composite data feed;
[1.D.1]	joining the first subset of the plurality of user devices that have discovered the event node to the event node, wherein user devices of the first subset of the plurality of user devices are respectively associated with a first subset of user nodes of the multi-dimensional information network that are joined to a centralized architecture for the event node,
[1.D.2]	wherein the event node is configured as a central node in the centralized architecture for accessing information associated with the event from a location in the multi-dimensional information network;

[1.E]	creating, by the networking server, based on the database of the plurality of user nodes and multi-dimensional node-to-node links, a projection of the plurality of user nodes, wherein the projection represents a second subset of user devices, wherein the second subset of user devices is selected based on respective distances of devices of the second subset of user devices from the event;
[1.F]	transmitting, by the networking server, respective requests to connect to the event node to the second subset of user devices, wherein the respective requests to connect are in forms of roll calls;
[1.G]	recording respective responses to the respective requests to connect;
[1.H]	making a subset of the respective responses viewable, via the event node, to a first device, associated with a first node, that is connected to the event node, wherein each response of the subset was received from a device associated with a node having a single degree of separation from the first node in the database of the plurality of user nodes and multi-dimensional node-to-node links;
[1.I]	analyzing (a) the database of the plurality of user nodes and multi-dimensional node-to-node links, and (b) data of user nodes of the multi-dimensional information network that are joined to the centralized architecture for the event node to identify at least one second node included in the database of the plurality of user nodes and multi-dimensional node-to-node links that is: (a) not connected to the event node, and (b) connected via at least one dimension to at least one user node of the multi-dimensional information network that is joined to the centralized architecture for the event node; and
[1.J]	delivering information to the at least one second node, wherein the information was received from an information node configured to store and provide supplemental information via the multi-dimensional information network.

Claim 2

Element	
[2]	The method of claim 1, wherein user devices connected to the event node are enabled to communicate via a message board available by way of the event node.

Claim 3

Element	
[3]	The method of claim 1, wherein identifying the at least one second node comprises identifying nodes associated with user data that indicate an association with the particular geographical area of the event.

Claim 4

Element	
[4]	The method of claim 1, further comprising updating user data associated with user nodes of the multi-dimensional information network that are joined to the centralized architecture for the event node based on joining the centralized architecture for the event node.

Claim 5

Element	
[5]	The method of claim 4, further comprising delivering additional information to at least one device based on the updated user data.

Claim 6

Element	
[6]	The method of claim 1, wherein the projection represents the second subset of user devices determined to be geographically proximate to the event.

Claim 7

Element	
[7]	The method of claim 6, wherein a particular user device is determined to be geographically proximate to the event based on the user device and the event occurring in the same town.

Claim 8

Element	
[8]	The method of claim 6, wherein a particular user device is determined to be geographically proximate to the event based on GPS data of the particular user device.

Claim 9

Element	
[9]	The method of claim 1, wherein the single degree of separation is indicative of a friend relationship.

Claim 10

Element	
[10]	The method of claim 1, wherein the single degree of separation is indicative of a family relationship.

Claim 11

Element	
[11.P]	A system comprising:
[11.A]	memory of a networking server configured to: maintain a database of a plurality of user nodes and multi-dimensional node-to-node links characterizing relationships between the plurality of user nodes via dimensions in a multi-dimensional information network, wherein at least some of the user nodes are respectively associated with user data;
[11.B]	one or more network controllers of the networking server configured to: provide respective user devices associated with respective user nodes of the plurality of user nodes, respective composite data feeds that are based on the database of the plurality of user nodes and multi-dimensional node-to-node links;

[11.C]	one or more central processing units of the networking server, coupled to the one or more network controllers, configured to: establish an event node associated with an event in a particular geographical area, wherein the event node is discoverable to each respective user device of a first subset of a plurality of user devices by browsing a respective composite data feed;
[11.D]	join the first subset of the plurality of user devices that have discovered the event node to the event node, wherein user devices are respectively associated with a first subset of user nodes of the multi-dimensional information network that are joined to a centralized architecture for the event node, wherein the event node is configured as a central node in the centralized architecture for accessing information associated with the event from a location in the multi-dimensional information network;
[11.E]	create, based on the database of the plurality of user nodes and multi-dimensional node-to-node links, a projection of the plurality of user nodes, wherein the projection represents a second subset of user devices, wherein the second subset of user devices is selected based on respective distances of devices of the second subset of user devices from the event;
[11.F]	wherein the one or more network controllers of the networking server are further configured to: transmit respective requests to connect to the event node to the second subset of user devices, wherein the respective requests to connect are in forms of roll calls;
[11.G]	wherein the one or more central processing units are further configured to: record respective responses to the respective requests to connect;
[11.H]	make a subset of the respective responses viewable, via the event node, to a first device, associated with a first node, that is connected to the event node, wherein each response of the subset was received from a device associated with a node having a single degree of separation from the first node in the database of the plurality of user nodes and multi-dimensional node-to-node links; and

[11.I]	analyze (a) the database of the plurality of user nodes and multi-dimensional node-to-node links, and (b) data of user nodes of the multi-dimensional information network that are joined to the centralized architecture for the event node to identify at least one second node included in the database of the plurality of user nodes and multi-dimensional node-to-node links that is: (a) not connected to the event node, and (b) connected via at least one dimension to at least one user node of the multi-dimensional information network that is joined to the centralized architecture for the event node; and
[11.J]	wherein the one or more network controllers of the networking server are further configured to: deliver information to the at least one second node, wherein the information was received from an information node configured to store and provide supplemental information via the multi-dimensional information network.

Claim 12

Element	
[12]	The system of claim 11, wherein user devices connected to the event node are enabled to communicate via a message board available by way of the event node.

Claim 13

Element	
[13]	The system of claim 11, wherein the one or more central processing units are configured to identify the at least one second node by identifying nodes associated with user data that indicate an association with the particular geographical area of the event.

Claim 14

Element	
[14]	The system of claim 11, wherein the one or more central processing units are further configured to update user data associated with user nodes of the multi-dimensional information network that are joined to the centralized architecture for the event node based on joining the centralized architecture for the event node.

Claim 15

Element	
[15]	The system of claim 14, wherein the one or more network controllers are further configured to deliver additional information from the information node to at least one device based on the updated user data.

Claim 16

Element	
[16]	The system of claim 11, wherein the projection represents the second subset of user devices determined to be geographically proximate to the event.

Claim 17

Element	
[17]	The system of claim 16, wherein the one or more central processing units are further configured to determine that a particular user device is geographically proximate to the event based on the user device and the event occurring in the same town.

Claim 18

Element	
[18]	The system of claim 16, wherein the one or more central processing units are further configured to determine that a particular user device is geographically proximate to the event based on GPS data of the particular user device.

Claim 19

Element	
[19]	The system of claim 11, wherein the single degree of separation is indicative of a friend relationship.

Claim 20

Element	
[20]	The system of claim 11, wherein the single degree of separation is indicative of a family relationship.

Claim 21

Element	
[21.P]	A method comprising:
[21.A]	maintaining, by a networking server configured to maintain data defining a multi-dimensional information network, a database of a plurality of user nodes and multi-dimensional node-to-node links characterizing relationships between the plurality of user nodes via dimensions in the multi-dimensional information network, wherein at least some of the user nodes are respectively associated with user data;
[21.B]	providing, by the networking server, respective user devices associated with respective user nodes of the plurality of user nodes, respective composite data feeds that are based on the database of the plurality of user nodes and multi-dimensional node-to-node links;
[21.C]	establishing, by an event node server, an event node associated with an event in a particular geographical area, wherein the event node is discoverable to each respective user device of a first subset of a plurality of user devices by browsing a respective composite data feed;

[21.D.1]	joining the first subset of the plurality of user devices that have discovered the event node to the event node, wherein user devices associated with a first subset of user nodes of the multi-dimensional information network are joined to a centralized architecture for the event node,
[21.D.2]	wherein the event node is configured as a central node in the centralized architecture for accessing information relating to the event from a location in the multi-dimensional information network;
[21.E]	creating, by the networking server, based on the database of the plurality of user nodes and multi-dimensional node-to-node links, a projection of the plurality of user nodes wherein the projection of the plurality of user nodes represents a second subset of user devices, wherein the second subset of user devices is selected based on respective distances of devices of the second subset of user devices from the event;
[21.F]	transmitting, by the networking server, respective requests to connect to the event node to the second subset of user devices, wherein the respective requests to connect are in forms of roll calls;
[21.G]	recording respective responses to the respective requests to connect to the event node;
[21.H]	making a subset of the respective responses viewable, via the event node, to a first device, associated with a first node, that is connected to the event node, wherein each response of the subset was received from a device associated with a node having a single degree of separation from the first node in the database of the plurality of user nodes and multi-dimensional node-to-node links; and
[21.I]	analyzing the database of the plurality of user nodes and multi-dimensional node-to-node links to identify at least one second node included in the database of the plurality of user nodes and multi-dimensional node-to-node links, based at on user data associated with the at least one second node, wherein the at least one second node is connected via at least one dimension of the multi-dimensional information network to the event node; and

[21.J]	delivering event information relevant to the event to the at least one second node, wherein the event information was received from an information node configured to store and provide supplemental information via the multi-dimensional information network.
--------	---

Claim 22

Element	
[22]	The method of claim 21, wherein user devices connected to the event node are enabled to communicate via a message board available by way of the event node.

Claim 23

Element	
[23]	The method of claim 21, wherein identifying that the at least one second node is connected via the at least one dimension of the multi-dimensional information network to the event node comprises: identifying user data associated with the at least one second node indicating an interest in at least one particular topic relevant to the event.

Claim 24

Element	
[24]	The method of claim 21, wherein identifying that the at least one second node is connected via the at least one dimension of the multi-dimensional information network to the event node comprises: identifying a user data associated with the at least one second node indicating participation in at least one particular activity relevant to the event.

Claim 25

Element	
[25]	The method of claim 21, wherein identifying that the at least one second node is connected via the at least one dimension of the multi-dimensional information network to the event node comprises: identifying a user data associated with the at least one second node indicating participation travel history to a particular region relevant to the event.

Claim 26

Element	
[26.P]	A system comprising:
[26.A]	memory of a networking server configured to:maintain a database of a plurality of user nodes and multi-dimensional node-to-node links characterizing relationships between the plurality of user nodes via dimensions in a multi-dimensional information network, wherein at least some of the user nodes are respectively associated with user data;
[26.B]	one or more network controllers of the networking server configured to: provide respective user devices associated with respective user nodes of the plurality of user nodes, respective composite data feeds that are based on the database of the plurality of user nodes and multi-dimensional node-to-node links;
[26.C]	one or more central processing units of the networking server, coupled to the one or more network controllers, configured to: establish an event node associated with an event in a particular geographical area, wherein the event node is discoverable to each respective user device of a first subset of a plurality of user devices by browsing a respective composite data feed;

[26.D]	join the first subset of the plurality of user devices that have discovered the event node to the event node, wherein user devices associated with a first subset of user nodes of the multi-dimensional information network are joined to a centralized architecture for the event node, wherein the event node is configured as a central node in the centralized architecture for accessing information relating to the event from a location in the multi-dimensional information network;
[26.E]	create based on the database of the plurality of user nodes and multi-dimensional node-to-node links, a projection of the plurality of user nodes wherein the projection of the plurality of user nodes represents a second subset of user devices, wherein the second subset of user devices is selected based on respective distances of devices of the second subset of user devices from the event;
[26.F]	wherein the one or more network controllers of the networking server are further configured to: transmit respective requests to connect to the event node to the second subset of user devices, wherein the respective requests to connect are in forms of roll calls;
[26.G]	wherein the one or more central processing units are further configured to: record respective responses to the respective requests to connect to the event node;
[26.H]	make a subset of the respective responses viewable, via the event node, to a first device, associated with a first node, that is connected to the event node, wherein each response of the subset was received from a device associated with a node having a single degree of separation from the first node in the database of the plurality of user nodes and multi-dimensional node-to-node links; and
[26.I]	analyze the database of the plurality of user nodes and multi-dimensional node-to-node links to identify at least one second node included in the database of the plurality of user nodes and multi-dimensional node-to-node links, based at on user data associated with the at least one second node, wherein the at least one second node is connected via at least one dimension of the multi-dimensional information network to the event node; and

[26.J]	wherein the one or more network controllers of the networking server are further configured to: deliver event information relevant to the event to the at least one second node, wherein the event information was received from an information node configured to store and provide supplemental information via the multi-dimensional information network.
--------	---

Claim 27

Element	
[27]	The system of claim 26, wherein user devices connected to the event node are enabled to communicate via a message board available on the event node.

Claim 28

Element	
[28]	The system of claim 26, wherein the one or more central processing units are configured to identify that the at least one second node is connected via the at least one dimension of the multi-dimensional information network to the event node by: identifying user data associated with the at least one second node indicating an interest in at least one particular topic relevant to the event.

Claim 29

Element	
[29]	The system of claim 26, wherein the one or more central processing units are configured to identify that the at least one second node is connected via the at least one dimension of the multi-dimensional information network to the event node by: identifying a user data associated with the at least one second node indicating participation in at least one particular activity relevant to the event.

Claim 30

Element	
[30]	The system of claim 26, wherein the one or more central processing units are configured to identify that the at least one second node is connected via the at least one dimension of the multi-dimensional information network to the event node by: identifying a user data associated with the at least one second node indicating participation travel history to a particular region relevant to the event.

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 13,978 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 12, 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. 12,120,769 and associated Exhibits 1001-
1036 were served in their entireties upon the Patent Owner on November 12, 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. 12,120,769*

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 12, 2025

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