IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner,

v.

SITNET LLC,
Patent Owner

U.S. Patent No. 8,332,454
IPR Case No.: 2024-00529

PATENT OWNER'S MOTION TO AMEND AND REQUEST FOR PRELIMINARY GUIDANCE

Meta EX1053
Meta v. SitNet
IPR2026-00111

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I. INTRODUCTION

Patent Owner, SitNet LLC ("SitNet") respectfully submits this Motion to Amend under 35 U.S.C. § 316(d) and 37 C.F.R. § 42.121 contingent upon a finding of unpatentability with respect to the original challenged claim 10 of U.S. Patent No. 8,332,454 ("the 454 Patent") (Ex. 1001).

Patent Owner submits the present motion on a contingent basis. If the Patent Trial and Appeal Board ("Board") determines claim 10 of the 454 Patent to be unpatentable, Patent Owner respectfully requests the Board look to the present motion to see whether the corresponding substitute claim is patentable.

Pursuant to 37 C.F.R. § 42.121(e), Patent Owner requests the Board provide preliminary guidance on the present motion, and an opportunity for Patent Owner to file a reply responding to the preliminary guidance, or a revised motion to amend under 37 C.F.R, § 42.121(f), if needed.

Patent Owner attaches the proposed substitute claim as Appendix A. Patent Owner proposes to substitute claims 10-19 with substitute claims 21-30. Proposed substitute claims 21-30 contain additional limitations not found in the prior art of record. As shown in Appendix A, substitute claims 22-30 are substantively identical to existing claims 11-19 but depend upon substituted claim 21 rather than claim 10. The proposed substitute claims are presented on a contingent basis for consideration in the event the Board finds that claim 10 is unpatentable.

As this motion demonstrates, the substitute claims meet all the requirements of 37 C.F.R § 42.121. Namely, the amendments are responsive to a ground of unpatentability on which trial was instituted, and none of the amendments seek to enlarge the scope of the claims or introduce new subject matter. Further, the motion shows the changes that are sought and the support in the original disclosure of the patent and a priority application for each substitute claim.

Moreover, although the burden of persuasion for any substitute claims is on the Petitioner to show that such claims are unpatentable, *see Aqua Prods. v. Matal*, 872 F.3d 1290, 1324-25 (Fed. Cir. 2017) (*en banc*); *Bosch Auto. Serv. Sols. LLC v. Matal*, 878 F.3d 1027, 1040 (Fed. Cir. 2017), this motion demonstrates that the substitute claims are patentable over the references in this proceeding.

To satisfy the requirement of 37 C.F.R. § 42.121(a), Patent Owner emailed the Board on November 15, 2024, to state that it intended to file a motion to amend. That day, the Board responded by email permitting Patent Owner to file a motion to amend.

II. STATEMENT OF RELIEF REQUESTED

Patent Owner hereby moves to amend the 454 Patent contingent upon claim 10 being found unpatentable in the present proceeding. If claim 10 is found to be unpatentable, Patent Owner requests the Board order the following:

- Replacement of independent claim 10 with substitute claim 21; and
- Replacement of dependent claims 11-19 with substitute claims 22-30.

No other changes are proposed. *See* 37 C.F.R. § 42.22(a)(1); *see also* 35 U.S.C. § 316(d).

III. THE SUBSTITUTE CLAIMS MEET ALL THE REQUIREMENTS OF 37 C.F.R. § 42.121

Under 35 U.S.C. § 316(d)(1)(B), a patent owner may propose a reasonable number of substitute claims for each challenged claim. A patent owner must show that each amendment in the proposed substitute claims is responsive to a ground of unpatentability involved in the trial, does not seek to broaden a challenged claim, and is supported by the filed or earlier filed disclosures. 35 U.S.C. § 316(d)(3); 37 C.F.R. § 42.121(a)(2).

If a patent owner has met these statutory requirements, then the Board considers whether the substitute claims are unpatentable by a preponderance of the evidence. *Western Digit. Corp. v. Spex Techs., Inc.*, IPR2018-00082, Paper 13 at 4 (PTAB Apr. 25, 2018). The petitioners have the burden to show that the amended claims are unpatentable over the prior art. 35 U.S.C. § 316(e); *Aqua Prods. Inc.*, 872 F.3d at 1324-25.

A. <u>Reasonable Number of Substitute Claims</u>

As shown in Appendix A, Patent Owner proposes only one substitute claim for each conditionally canceled claim, thus satisfying the general presumption that "only one substitute claim would be needed to replace each challenged claim." 37 C.F.R. § 42.121(a)(3).

B. The Proposed Claims Are Responsive to the Instituted Grounds

The proposed substitute claims are responsive to one or more grounds of unpatentability at issue in this proceeding. See 37 C.F.R. § 42.121(a)(2)(i). Specifically, the limitations added in proposed substitute independent claim 21 obviates the asserted grounds alleging obviousness by incorporating at least one additional limitation not disclosed in Amidon, Wong, Gogic and the Wong/Gogic combination.

C. The Proposed Claims Do Not Enlarge the Scope of the Original Claims

Proposed substitute independent claim 21 includes additional limitations to address the prior art grounds that do not enlarge the scope of the claims. Instead, the amendments shown in proposed substitute independent claim 21 add at least one further limitation to the original claim 10.

Proposed substitute independent claim 10 narrows the scope of the original independent claim 10 by requiring an event node in the N-dimensional social network, said event node hosted by an event node server.

As discussed in more detail below, the amendments presented in substitute claim 21 have support in the specification as originally filed. In addition, proposed substitute dependent claims 21-30 only amend claims 11-19 to be dependent upon substitute claim 21. claims from which they depend.

IV. THE SUBSTITUTE CLAIMS DO NOT INTRODUCE NEW SUBJECT MATTER

The originally filed disclosure of the 454 Patent supports each proposed substitute claim. *See* 37 C.F.R. § 42.121(b)(1)-(2).

A. <u>The Priority Claim of the 454 Patent</u>

The 454 Patent issued from U.S. App. Ser. No. 13/274,712, filed October 17, 2011, which was a divisional of U.S. App. Ser. No. 11/924,711, filed on October 26, 2007, now U.S. Patent No. 8,069,202, which claims the benefit of priority to U.S. Provisional Patent Application No. 60/887,843, filed February 2, 2007.

B. <u>Support for Substitute Claims 21-30</u>

Substitute independent claim 21 narrows the scope of the original independent claim 10 by adding limitations requiring an event node in the multi-dimensional personal network, said event node hosted by an event node server. This limitation is similar to independent claim 1, which includes a limitation (a) directed at "creating, by an event node server, an event node in a multi-dimensional personal information network…"

Support that the event node may be "hosted by" an event node server exists in the patent specification. "A situation or event may be associated with more than one event node, hosted by the same or different trusted provider, within a SitNet." Col. 20, ll. 20-22. The specification describes that the trusted provider may be a situation authority: "The situation authority 207 may be a trusted provider of weather or traffic information…" Col. 20, ll. 49-54. The situation authority may establish or host "the event node corresponding to an event node server" *See* Col. 19, ll. 56-60. Each

situation authority also has a corresponding "***situation authority server 3011, also referred to as an event node server***" *See* Col. 4, ll. 10-19.

Accordingly, because the situation authority hosts the event node, and because there is a corresponding event node server (i.e., situation authority server) for each situation authority, the event node server must be able to host the event node.

The table below provides support for each of the proposed substitute claims 21-30 from (1) U.S. App. Ser. No. 13,274,712 which resulted in the 454 patent (*i.e.*, the original disclosure of the patent), filed October 17, 2011 (Ex. 1002); and (2) U.S. App. Ser. No. 11/924,711, which is the first non-provisional application in the chain of priority (*i.e.*, an earlier-filed disclosure for which benefit of the filing date is sought), filed on October 26, 2007 (Ex. 2008). There is continuity of disclosure from this first non-provisional application through the divisional application which resulted in the 454 Patent.

Claim Limitation	Support for Substitute Claims 21-30 in U.S. App. Ser. No. 13,274,712	Support for Substitute Claims 21-30 in U.S. App. Ser. No. 11/924,711
Claim 21 – Substituting for Claim 10 A method of creating a projection of a situational network, the method comprising:	Ex. 1002, at Abstract; ¶¶ [0120], [0126]-[0130], [0156]	Ex. 2008, at Abstract; ¶¶ [0119], [0125]-[0129], [0155]
(a) receiving, by a first device corresponding to a node in a multi-dimensional personal information network, an invitation to establish a link with an event node <u>in the multi-dimensional personal information network, said event node hosted by an event node</u> server in response to the first device being included in a projection of nodes of the multi-dimensional personal information network;	Ex. 1002, at Abstract; ¶¶ [0071], [0113]-[0117], [0120], [0142]-[0151], [163]	Ex. 2008, at Abstract; ¶¶ [0070], [0112]-[0116], [0119], [0141]-[0150], [0162]
(b) transmitting a response accepting the invitation to establish a link with the event node <u>hosted by the event node</u> server;	Ex. 1002, at Abstract; ¶¶ [0071], [0113]-[0117], [0120], [0142]-[0151], [163]	Ex. 2008, at Abstract; ¶¶ [0070], [0112]-[0116], [0119], [0141]-[0150], [0162]

(c) establishing a link with the event node hosted by the event node server; and	Ex. 1002, at Abstract; ¶¶ [0071], [0113]-[0117], [0120], [0142]-[0151], [163]	Ex. 2008, at Abstract; ¶¶ [0070], [0112]-[0116], [0119], [0141]-[0150], [0162]

(d) receiving information about the situation from the event node hosted by the event node server.	Ex. 1002, at Abstract; ¶¶ [0071], [0113]-[0117], [0120], [0142]-[0151], [163]	Ex. 2008, at Abstract; ¶¶ [0070], [0112]-[0116], [0119], [0141]-[0150], [0162]
Claim 22 22. [[11.]] The method of claim [[10]]21, wherein the invitation is received based on a geographic proximity of the first device with other devices in the multi-dimensional personal information network.	Ex. 1002, at Abstract; ¶ [0151]	Ex. 2008, at Abstract; ¶ [0150]

Claim 23 23. [[12.]] The method of claim [[10]]21, wherein the event node server corresponds to an event node of the situational network created in response to identification of the situation by a situation authority.	Ex. 1002, at Abstract; ¶¶ [0071], [0113]-[0117], [0120], [0142]-[0151], [163]	Ex. 2008, at Abstract; ¶¶ [0070], [0112]-[0116], [0119], [0141]-[0150], [0162]
Claim 24 24. [[13.]] The method of claim [[10]]21, further comprising: (e) receiving the projection of the nodes of the situational network from step (a) from the event node server.	Ex. 1002, at ¶¶ [0156]	Ex. 2008, at ¶¶ [0155]

Claim 25 25. [[14.]] The method of claim [[13]]24, further comprising: (f) inviting at least one other device included in the projection to establish a link with the first device; (g) connecting to the at least one other device from step (e) accepting the invitation; and (h) sharing information related to the situation with the at least one other device.	Ex. 1002, at Abstract; ¶¶ [0071], [0113]-[0117], [0120], [0142]-[0151], [163]	Ex. 2008, at Abstract; ¶¶ [0070], [0112]-[0116], [0119], [0141]-[0150], [0162]
Claim 26 26. [[15.]] The method of claim [[14]]25, wherein the connections established in step (g) have an order of separation of one.	Ex. 1002, at ¶¶ [0124], [0125]	Ex. 2008, at ¶¶ [0123], [0124]

Claim 27 27. [[16.]] The method of claim [[14]]25, wherein the connections established in step (g) are multi-dimensional.	Ex. 1002, at Abstract; ¶¶ [0071], [0113]-[0117], [0120], [0142]-[0151], [163]	Ex. 2008, at Abstract; ¶¶ [0070], [0112]-[0116], [0119], [0141]-[0150], [0162]
Claim 28 28. [[17.]] The method of claim [[16]]27, wherein at least one of the dimensions corresponds to the situation.	Ex. 1002, at ¶¶ [0148], [0149]	Ex. 2008, at ¶¶ [0147], [0148]
Claim 29 29. [[18.]] The method of claim [[17]]28, wherein the dimension corresponding to the situation includes an affinity greater than affinity included along the other dimensions.	Ex. 1002, at ¶¶ [0121], [0122], [0127], [0153]-[0155], [0164]; claim 18	Ex. 2008, at ¶¶ [0120], [0121], [0126], [0152]-[0154], [0163]; claim 18
Claim 30 **30**. [[19.]] The method of claim [[10]]21, further comprising: [[(e)]] (i) providing information about the situation to the event	Ex. 1002, at Abstract; ¶¶ [0071], [0113]-[0117], [0120], [0142]-[0151], [163]	Ex. 2008, at Abstract; ¶¶ [0070], [0112]-[0116], [0119], [0141]-[0150], [0162]

node server. .		

V. SUBSTITUTE CLAIMS 21-30 ARE PATENTABLE OVER AMIDON AND THE WONG/GOGIC COMBINATION

No prior art of record known to Patent Owner anticipates or renders obvious proposed substitute claims 21-30.

In IPR2024-00529, Petitioner alleged that Amidon (U.S. Patent No. 8,346,864) renders obvious claims 1-7, 10-17, 19, and 20 (Ground 1) and that the combination of Wong (U.S. Publication No. 2008/0103784) and Gogic (U.S. Patent No. 8,103,300) renders claims 1-4, 6, 8-18, and 20 unpatentable (Ground 2), which for both includes all independent claims including claim 10.

Substitute independent claim 21 adds limitations that differentiate over Amidon, Wong, Gogic, and the Wong/Gogic combination—namely, an event node. For example, substitute claim 21 specifies that "an event node in the multi-dimensional personal information network, said event node hosted by an event node server." The inclusion of an "event node" brings claim 21 in line with independent claims 1 and 20.

Petitioner contends that "Amidon's social network conference (as defined by the stored data and accessible via window 200) teaches the claimed event node."

Petition, at 20 (citing Ex. 1003 ¶ 77). But a conference cannot be a node, let alone an event node.

A conference is defined by the American Heritage Dictionary as "a. A meeting for consultation or discussion. b. An exchange of views." American Heritage Dictionary Entry: conference, https://ahdictionary.com/word/search.html?q=conference. A meeting requires a group of participants, and a discussion requires communicating with other participants in the meeting. Thus, a conference is a group of individuals communicating with one another.

Consistent with the accepted meaning of "conference," Amidon states:

> Users may ***participate*** in social network conferences by way of any ***suitable communication technique(s)***. For example, conferences may comprise textual messages, such as instant message (IM) and short message service (SMS) messages. Conferences may comprise audio messages. Such as voice chat via streamed audio content, shared audio files, telephone (including VoIP. cellular, or other telephonic communication), or other suitable technique. Conferences may comprise video messages, such as video chat via streamed video, shared video files, or other suitable techniques. Of course, combinations of the foregoing (and additional communication techniques) may be used in conferencing.
>
> For purposes of this disclosure, the term "conferencing system' is used to refer to components arranged to provide social network conferencing functionality. ***Conferencing functionality may be provided by a separate***

> ***communication system*** dedicated to conferencing or may be provided as a component in a larger communication system.

Amidon, 3:4-21.

Amidon thus details a user participates in the conference by means of communicating with other participants of the conference via "any suitable communication technique." Furthermore, Amidon notes that "conference functionality" is provided by a "communication system." Accordingly, Amidon defines its social networking conference consistent with the plain and ordinary meaning of a conference – *i.e.*, a group of individuals communicating with one another.

FIGS. 4 and 5 of Amidon (reproduced below) reveal that the social networking conference is nothing more than individuals communicating with one another in a conference group chat.

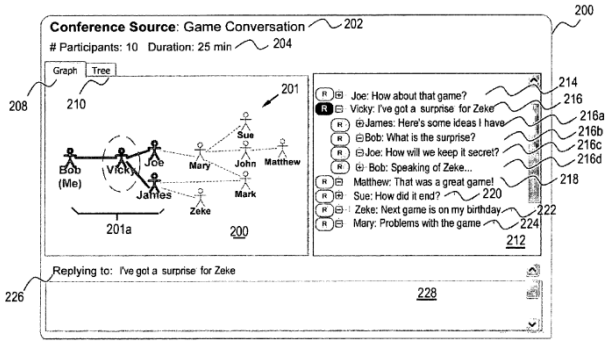


FIGURE 4

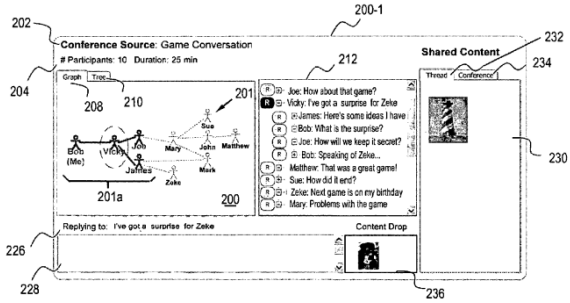


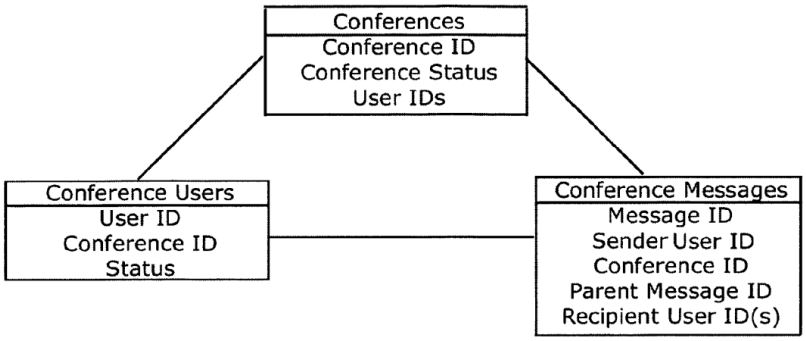
FIGURE 5

With respect to the above figures, Amidon describes that its "display area comprises a portion of the window comprising a display of ***social network conference group 201 comprising Bob, Vicky, James, Joe, Mary, Zeke, Sue, John, Matthew, and Mark***." Amidon, 17:7-10. As the conference merely comprises members, it is nothing more than an online meeting of individual users. Furthermore, "[w]indow 200 further includes conference thread display area 212 … includes a plurality of threads (214, 216, 218, 220, 222, 224), each thread comprising data (messages, content, etc.) exchanged 25 amongst the members of conference 201." Amidon, 17:21-26. In other words, the members of Amidon's conference are

communicating with another; Amidon's conference is a merely group of individual members in communication.

A group of individuals cannot be a node, let alone an "event node," as claimed The specification states: "Each node is capable of communicating in a peer-to-peer fashion with other nodes in the NDSN". 454 Patent, 15:1-2. Additionally, "an event node in an NDSN that propagates up-to-date information on the situation." *Id*., 7:48-50. Accordingly, an event node is node communicating information regarding a situation in a peer-to-peer fashion. Communicating in peer-to-peer fashion requires one node communicating with another user. *See* Definition of peer-to-peer PCMag, https://www.pcmag.com/encyclopedia/term/peer-to-peer ("From user to user. Peer-to-peer implies that either side can initiate a session and has equal responsibility"). Accordingly, an event node would be an element ***within*** a conference, but ***not*** a conference.

In addition to the graphical depictions of the social network conferences provided in FIGS. 4 and 5, Amidon provides illustrations of "the stored data" defining a conference that Petitioner also asserts teaches the claimed "event node." Petition, at 20. For example, Amidon's FIG. 3 (reproduced below) shows "a plurality of exemplary data structures suitable for use in defining and tracking social network conferences." Amidon, 5:24-26.



As shown in the above FIG. 3, "conferences may be defined by a database record including a ***conference ID and list of users by user ID***." Amidon, 15:10-12. Furthermore, "[c]onference activity may ***be cross-referenced between database records***—for instance, a record may be included for each user indicating the status of each user with regard to one or more conferences by conference ID." Amidon, 15:12-15. Accordingly, Fig. 3 shows a database entry for a conference. The record includes a cross-reference (foreign key) establishing a relationship with another database entry representing a user – *i.e.*, the "user ID". This relationship by foreign key cross-reference is shown in Fig, 3 by the line connecting the "Conferences" database record with the "Conference Users" database record.

Likewise, Fig. 3 shows a relationship between a database record for each conference (in "Conferences") and a database record for a message (in "Conference Messages"). "Each message may be tracked by a record including a unique message ID and cross-reference to a conference ID." Amidon, 15:18-19. Thus, each Conference Message record within the database includes a foreign key (conference

ID) relating it to a specific conference. The relationship is shown by the line connecting the "Conference Messages" database record to the "Conferences" database record.

Fig. 3 also shows a relationship between the database record for a message and the database record for the user. "[T]he message record may include a list of recipients by user ID or other data indicating recipients, such as a cross-reference to other records." Amidon, 15:20-22. Thus, each Conference Message record within the database includes a foreign key (user ID) relating it to a specific conference user that either received or sent the message. The relationship is shown by the line connecting the "Conference Messages" database record to the "Conference Users" database record.

Showing database records and their relationships via foreign keys, Amidon's Fig. 3 depicts the architecture of a relational database. But the architecture of relational database is *not* the claimed "event node" which communicates information regarding a situation in a peer-to-peer fashion with other nodes. See 484 Patent, 15: 1-5. Furthermore, the architecture fails to include a database record for the situation underlying the conference. The failure to include a database record defining the situation further indicates that Amidon's social network conferences lack an "event node" corresponding to the underlying event node corresponding situation, and necessarily, an "event node server" hosting such a node.

As Amidon fails to disclose or suggest an "event node," Amidon does not anticipate or render obvious proposed substitute claims 21-30.

Similarly, the combination of Wong and Gogic, alone or in combination, do not disclose or suggest an "event node." Petitioner acknowledges that "Wong describes four exemplary 'main node types'—people, places, objects, animals." Petition, at 53. Gogic shows the initiation of the ad-hoc communication group in FIG. 4 (reproduced below):

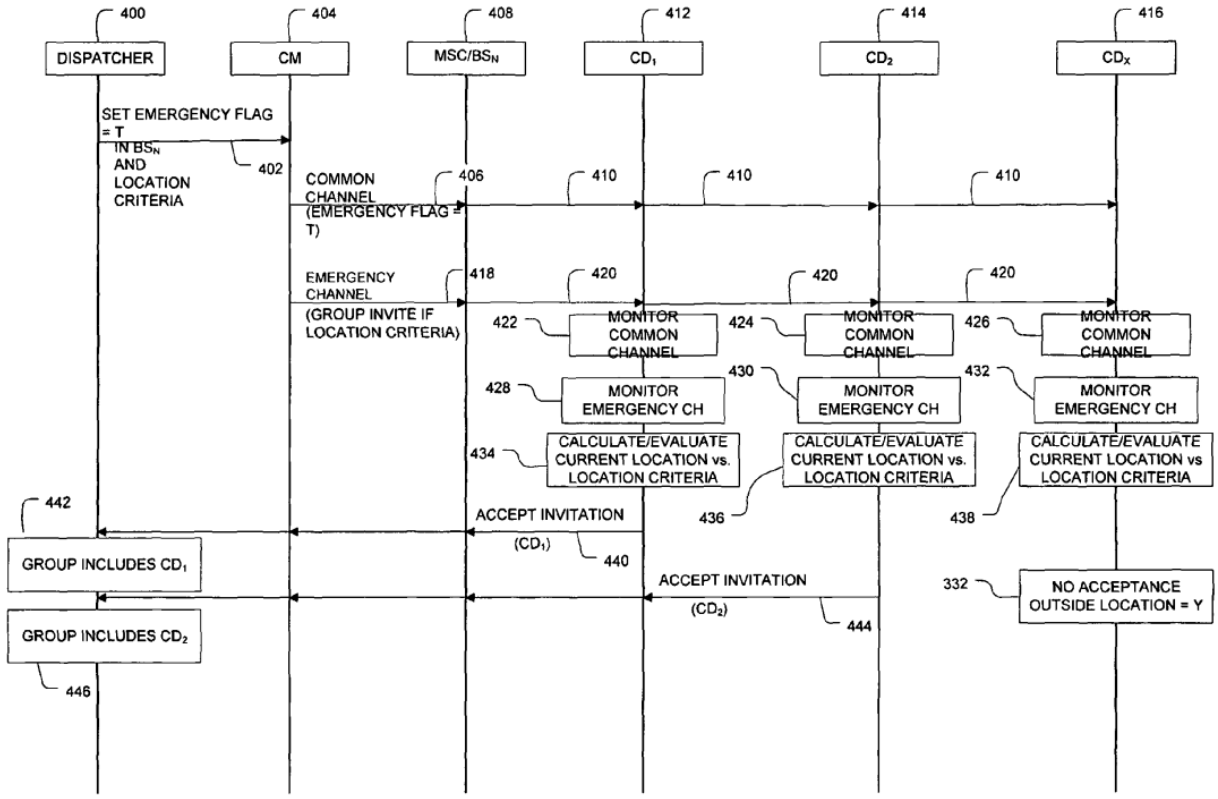


FIG. 4

The participants of the ad-hoc communication group created according to FIG. 4 of Gogic do not include an "event node" as in substitute claim 21, which also provides "information about the situation." Rather the ad-hoc communication group

includes a dispatcher 400 who "identifies the occurrence or presence of an event or condition wherein communications between proximately located users could be beneficial" and "requests 402 the setting of an emergency flag in a commonly monitored channel ('common channel') such as a paging or broadcast channel that is regularly monitored by CDs [(communication devices)] located in the area of interest." Gogic, 10:19-25. After requesting the formation of an ad-hoc communication group, the dispatcher 400 "accept[s] 444 the invitation which is relayed back to dispatcher 400 through CM404" and "amends 446 the group list to include CD 414 as a confirmed member of the group." Gogic, 11:6-9. The dispatcher, therefore, is the individual organizing the ad-hoc communication group, and not the event or situation causing the group's formation.

Likewise, the communication devices (CDs) are not representative of the underlying event or situation. Rather, "a group of communication device users, individually known as group or net members, communicate with one another using a wireless communication device (CD) assigned to each group or net member." Gogic, 5:66-6:2. Thus, the CDs accepting the invitations and joining the ad-hoc communication group are users and not the situation causing the group's formation.

The communication manager (CM) is also not an event node, or even a node at all. Rather the CM "manages the real-time and administrative operation of groups, including PTT request arbitration (e.g., floor request/grant/deny), maintenance, and

distribution of group membership and registration lists, call set-up and tear-down of necessary system and communication resources, as well as overall control of group or net status." Gogic, 7:11-16. The CM is thus an administrator of the ad-hoc communication group and an event node nor a server hosting an event node.

The MSC/BS is likewise not an event node, but rather the infrastructure underlying the ad-hoc communication group. "A mobile switching center (MSC) 220 comprises a well-known Inter Working Function (IWF) (not shown) for processing data packets, including the request, between MSC 220 and data network 214. MSC 220 is typically a packet switch, designed to route data packets in accordance with Internet Protocol (IP)." Gogic, 8:14-20. Thus, the MSC/BSN provides transmissions to the users' communication devices. For instance, "the MSC/BSN 408 to transmit a set emergency flag on a common channel in at least an area serviced by a specific base station, designated herein as BS 408, that services the area surrounding the desired location of users to be included within the ad-hoc group." Gogic, 10:37-42. Providing the infrastructure necessary for communication and transmission, the MSC/BSN is the network itself, and thus not an "event node" on the network corresponding to the underlying situation, nor a server hosting such node.

As neither the dispatcher, communication manager (CM), MSC/BSN, nor users' communication devices (CD) are an event node, Gogic's ad-hoc

communication group does not include an "event node" corresponding to the underlying situation or event. Lacking an event node, Gogic's ad-hoc communication group necessarily lacks an "event node server." Furthermore, as the Petitioner acknowledges, Wong fails to disclose a social network including an "event node." As neither Wong nor Gogic disclose an "event node" corresponding to a situation or event, both necessarily fail to disclose or suggest an "event node server" hosting an "event node." The combined teachings of Wong and Gogic, consequently, fail to render obvious proposed substitute claims 21-30.

VI. CONCLUSION

For each original claim that the Board finds unpatentable, Patent Owner respectfully requests that the Board grant this motion to amend as to the substitute claims.

Dated: December 4, 2024

Respectfully submitted,

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APPENDIX A

Proposed amended claims are shown in marked-up form below, beginning with claim 21. Underlining and double-bracketed text show, respectively the additions and deletions to the original claim being made in the corresponding substitute claim.

21 (substitute for claim 10, if found unpatentable)

A method of creating a set of nodes forming a projection of a situational network, the method comprising:

(a) receiving, by a first device corresponding to a node in a multi-dimensional personal information network, an invitation to establish a link with an event node in the multi-dimensional personal information network, said event node hosted by an event node server in response to the first device being included in a projection of nodes of the multi-dimensional personal information network;

(b) transmitting a response accepting the invitation to establish a link with the event node hosted by the event node server;

(c) establishing a link with the event node hosted by the event node server; and

(d) receiving information about the situation from the event node hosted by the event node server.

22 (substitute for claim 11, if found unpatentable)

The method of claim [[10]]21, wherein the invitation is received based on a geographic proximity of the first device with other devices in the multi-dimensional personal information network.

23 (substitute for claim 12, if found unpatentable)

The method of claim [[10]]21, wherein the event node server corresponds to an event node of the situational network created in response to identification of the situation by a situation authority.

24 (substitute for claim 13, if found unpatentable)

The method of claim [[10]]21, further comprising:

(e) receiving the projection of the nodes of the situational network from step (a) from the event node server.

25 (substitute for claim 14, if found unpatentable)

The method of claim [[13]]24, further comprising:

(f) inviting at least one other device included in the projection to establish a link with the first device;

(g) connecting to the at least one other device from step (e) accepting the invitation; and

(h) sharing information related to the situation with the at least one other device.

26 (substitute for claim 15, if found unpatentable)

The method of claim [[14]]25, wherein the connections established in step (g) have an order of separation of one.

27 (substitute for claim 16, if found unpatentable)

The method of claim [[14]]25, wherein the connections established in step (g) are multi-dimensional.

28 (substitute for claim 17, if found unpatentable)

The method of claim [[16]]27, wherein at least one of the dimensions corresponds to the situation.

29 (substitute for claim 18, if found unpatentable)

The method of claim [[17]]28, wherein the dimension corresponding to the situation includes an affinity greater than affinity included along the other dimensions.

30 (substitute for claim 19, if found unpatentable)

The method of claim [[10]]21, further comprising:

[[(e)]] (i) providing information about the situation to the event node server.

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

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that Patent Owner's Preliminary Response was served on December 4, 2024 by e-mailing copies to the e-mail addresses as provided in Petitioner's Petition.

Dated: December 4, 2024

Respectfully submitted,

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