

EXHIBIT C101

Subject Matter Ineligibility Contentions for U.S. Pat. No. 9,456,053 (“the ’053 patent”)

U.S. Patent No. 9,456,053 (“the ’053 patent”) is entitled “Content delivery network.” These ineligibility contentions are based on Defendant’s present understanding of the Asserted Claims (claims 27-29, 31, 33-35, 37-42, 44-50) and Sandpiper’s apparent construction of the Asserted Claims in its Infringement Contentions (“Infringement Contentions”).

The Asserted Claims of the ’053 patent are directed to an unpatentable, abstract idea because they claim no more than the “longstanding,” “routine,” and “conventional” concept of centralized management and application of data. *Alice Corp. Pty. Ltd. v. CLS Bank Int’l*, 573 U.S. 208, 219 (2014); *see also, e.g., Elec. Power Grp., LLC v. Alstom S.A.*, 830 F.3d 1350, 1354 (Fed. Cir. 2016) (“The advance they purport to make is a process of gathering and analyzing information of a specified content, then displaying the results, and not any particular assertedly inventive technology for performing those functions.”); *Two-Way Media Ltd. v. Comcast Cable Commc’ns, LLC*, 874 F.3d 1329, 1337-39 (Fed. Cir. 2017) (finding that representative claim that “recites a method for routing information using result-based functional language” “requires the functional results of ‘converting,’ ‘routing,’ ‘controlling,’ ‘monitoring,’ and ‘accumulating records,’ but does not sufficiently describe how to achieve these results in a non-abstract way”); *British Telecomms. PLC v. IAC/InterActiveCorp*, 381 F.Supp.3d 293, 309 (D. Del. Feb. 4, 2019) (invalidating claims directed to distributing information based on feedback from people receiving that information); *ChargePoint, Inc. v. SemaConnect, Inc.*, 920 F.3d 759, 773 (Fed. Cir. 2019) (finding that claims are “directed to the abstract idea of communicating over a network for device interaction”); *Dropbox, Inc. v. Synchronoss Techs., Inc.*, 815 F. App’x 529, 536 (Fed. Cir. 2020) (finding that “[f]ormatting data, tagging data, transmitting data, and retrieving data are generalized steps to be performed on a computer using conventional computer activity”) (internal citations omitted); *Miller Mendel, Inc. v. City of Anna, Texas*, 107 F.4th 1345, 1352 (Fed. Cir.), *cert. denied*, 145 S. Ct. 593, 220 L. Ed. 2d 231 (2024) (“These steps demonstrate that the claims are directed to receiving, storing, transmitting, determining, selecting, and generating information, which place them in the ‘familiar class of claims directed to a patent-ineligible concept.’”) *Trinity Info Media, LLC v. Covalent, Inc.*, 72 F.4th 1355, 1362 (Fed. Cir. 2023); *Elec. Commc’n Techs., LLC v. ShoppersChoice.com, LLC*, 958 F.3d 1178, 1182 (Fed. Cir. 2020) (finding “gathering, storing, and transmitting information” abstract). Further, because they are altogether devoid of any “inventive concept,” the Asserted Claims of the ’053 patent are patent ineligible under § 101. *See Alice*, 573 U.S. at 224–25.

The *Alice* test requires the Court to look at the “focus of the claimed advance over the prior art to determine if the claim’s character as a whole is directed to excluded subject matter.” *Affinity Labs of Tex., LLC v. DIRECTV, LLC*, 838 F.3d 1253, 1257 (Fed. Cir. 2016) (quotation and citation omitted). Here, the purported “advance” claimed in the ’053 patent relates to the abstract idea of centralized management and application of data.

The Asserted Claims lack an inventive concept because they rely on conventional methods and routine operations already widely used. The ’053 patent’s specification describes the use of generic components in carrying out the steps recited in the Asserted Claims. For example, the specification states that “[a]n exemplary cache cluster 204 is described in U.S. published Patent Application No. 2010-

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0332664, titled ‘Load-Balancing Cluster,’ filed Sep. 13, 2010, and U.S. Pat. No. 8,015,298, titled ‘Load-Balancing Cluster,’ filed Feb. 23, 2009, issued Sep. 6, 2011” and “fully incorporate[s]” “the entire contents of each” of the aforementioned patent application and patent. ’053 patent at 4:23-28. The ’053 patent specification also relies on known CDN architecture and components. *See, e.g.*, ’053 patent at 3:13-22 (“The primary purpose of a content delivery network—a CDN—is to distribute resources efficiently to client machines on behalf of one or more content providers, preferably via a public Internet. A CDN can also provide an over-the-top transport mechanism for efficiently sending content in the reverse direction—from the client to the origin server. Both end-users (clients) and content providers benefit from using a CDN. By using a CDN, a content provider is able to take pressure off its own servers. Clients benefit by being able to obtain content with fewer delays.”). Further, the ’053 patent specification describes generic hardware and software components. ’053 patent at 10:3-5 (“The server 1102 includes a request/response mechanism 1104 (preferably implemented by software in combination with hardware on the server 1102)”; 33:13-16 (“In practice, this list equates to a rack of hardware; i.e., the set of machines plugged into a single router. Each entry includes one or more clusters.”); 43:19-22 (“[h]ard-wired circuitry or custom hardware may be used in place of, or in combination with, some or all of the software instructions that can implement the processes of various embodiments. Thus, various combinations of hard-ware and software may be used instead of software only.”). The ’053 patent specification also describes routine operations and protocols. ’053 patent at 9:49-55 (“The server 1102 preferably supports HTTP/1.0, and HTTP/1.1, and HTTPS requests, although it is not limited to those protocols or to any particular version of any protocol. HTTP/1.1 is defined in Network Working Group, Request for Comments: 2616, June 1999, “Hypertext Transfer Protocol—HTTP/1.1,” the entire contents of which are fully incorporated herein by reference for all purposes”).

As of the alleged priority date for the ’053 patent (December 14, 2011), the relevant industry was well-developed. Content delivery networks and related server architectures had been around for years. Further, all individual elements disclosed and recited in the ’053 patent were conventional, routine, and well-known in the industry. *See generally* Exhibits C1–C10. By way of example, a computer-implemented method, operable in a content delivery network (CDN) comprising: (a) a control core; and (b) a plurality of cache servers was known. *See* Exhibits C1–C10, C101 at 27[pre]. Obtaining global configuration data from the control core, as well as selectively obtaining updated global configuration data were also known. *See id.* at 27[a], 27[b]. It was further known to obtain customer configuration information associated with a particular customer of the CDN and serve, to a client, a particular resource associated with the particular customer in accordance with (i) the global configuration data; and (ii) the customer configuration information associated with the particular customer. *See id.* at 27[c], 27[d]. Indeed, none of these concepts was new or merely on the verge of development as of the alleged priority date of the ’053 patent. Instead, these concepts had been known for years and were the subject of many published articles and/or patents from around the world. The ’053 patent contributed nothing beyond what was already conventional, routine, well-known technology as of the relevant time period.

The Primary “Advance”: Dynamically Serve Content in Accordance with Configuration Data Obtained from Control Core

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The main purported advance of the ’053 patent over the prior art is to address how caches dynamically serve content in accordance with configuration data obtained from a central source or “control core.” ’053 patent at Abstract. But the ’053 patent does not purport to have invented or improved a central source or “control core” that stores configuration data, or serving content based on updated global and customer-specific configuration data. The ’053 patent also does not purport to have invented or improved CDNs, edge servers, or origin servers. Further, the Asserted Claims recite purely functional terms that fail to transform the claimed abstract idea beyond the conventional computer tasks. *Bot M8 LLC v. Sony Corp. of Am.*, 465 F. Supp. 3d 1013, 1025 (N.D. Cal. 2020) (“Though given special names, each part remains a generic computer part invoked to effect the conventional computer task of gathering, manipulating, transmitting, and using data.”); *AI Visualize, Inc. v. Nuance Commc’ns, Inc.*, 97 F.4th 1371, 1378 (Fed. Cir. 2024) (“We have explained that the steps of obtaining, manipulating, and displaying data, particularly when claimed at a high level of generality, are abstract concepts.”); *Elec. Power Grp. LLC v. Alstom S.A.*, 830 F.3d 1350, 1354 (Fed Cir. 2016) (finding “a process of gathering and analyzing information of a specified content, then displaying the results” abstract); *Intell. Ventures I LLC v. Capital One Bank (USA)*, 792 F.3d 1363, 1369 (Fed. Cir. 2015) (finding “tailoring content based on the [user’s] location” abstract); *buySAFE, Inc. v. Google, Inc.*, 765 F.3d 1350, 1355 (Fed. Cir. 2014) (claiming “a computer receiv[ing] and send[ing] information over a network – with no further specification – is not even arguably inventive”).

Further, the claims are drafted using largely (if not entirely) result-focused functional language, containing no specificity about how the purported invention achieves those results. Claims of this nature are almost always found to be ineligible for patenting under Section 101. *See Beteiro, LLC v. DraftKings Inc.*, 104 F.4th 1350, 1356 (Fed. Cir. 2024) (finding subject matter ineligible a patent “using largely (if not entirely) result-focused functional language, containing no specificity about how the purported invention achieves those results” because “[c]laims of this nature are almost always found to be ineligible for patent under Section 101”). Yet the ’053 patent’s specification offers no guidance as to what claim terms mean or how to make sense of its illustrative embodiments and figures. Because the claims stand in isolation and are untethered to any disclosure in the specification, their terms are abstract monikers rather than concrete descriptions of the claimed invention. Additionally, the ’053 patent does not disclose motivations behind the alleged invention.

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Ordered Combination of the Claims Does Not Confer Eligibility

The ordered combinations of limitations does not shelter the claims from ineligibility because each of the Asserted Claims simply uses “conventional ordering of steps . . . with conventional technology to achieve [their] desired result.” *Two-Way*, 874 F.3d at 1339. The combination of elements in the Asserted Claims do not result in an inventive concept because “the claims do not recite particular features to yield” the advantages of any purported combination. *See Intell. Ventures I LLC v. Capital One Fin. Corp.*, 850 F.3d 1332, 1342 (Fed. Cir. 2017). “[T]he claim language here provides only a result-oriented solution, with insufficient detail for how a computer accomplishes it.” *Id.*

Claim 27 of the ’053 patent is representative of all claims in the ’053 patent. *See, e.g., Phoenix Licensing, LLC v. Consumer Cellular, Inc.*, No. 2:16-cv-152-JRG-RSP, 2017 WL 1065938, at *8–9 (E.D. Tex. Mar. 8, 2017); *Content Extraction and Transmission LLC v. Wells Fargo Bank, Nat’l Ass’n*, 776 F.3d 1343, 1349 (Fed. Cir. 2014). When claims are “substantially similar and linked to the same” ineligible concept, it is proper to treat a single claim as representative. *Cleveland Clinic Found. v. True Health Diagnostics LLC*, 859 F.3d 1352, 1360 (Fed. Cir. 2017) (internal quotation marks omitted); *see also Content Extraction & Transmission LLC v. Wells Fargo Bank, N.A.*, 776 F.3d 1343, 1348 (Fed. Cir. 2014). Indeed, the other claims of the ’053 patent are substantially and substantively similar to Claim 27 of the ’053 patent, and they are therefore not patent eligible for the same reasons. Independent Claim 1 is almost identical to Claim 27—Claim 1 generally describes a system for implementing the method described in Claim 27.

The dependent claims add only post-solution activity and well-known, conventional concepts that do not confer patent eligibility. *Apple, Inc. v. Ameranth, Inc.*, 842 F.3d 1229, 1244 (Fed. Cir. 2016) (“[A]ppending preexisting practice[s] to [] independent claims does not make them patentable.”); *Mayo Collaborative Servs. v. Prometheus Labs., Inc.*, 566 U.S. 66, 132 S. Ct. 1289, 1297–98, 1300–01 (2012); *Bilski v. Kappos*, 561 U.S. 593, 610 (2010); *see also Clear with Computers, LLC v. Dick’s Sporting Goods, Inc.*, 21 F. Supp. 3d 758, 763 (E.D. Tex. 2014) (noting limitations must “do more than recite pre- or post-solution activity, they [must be] central to the solution itself” to be meaningful) (quotations omitted).

Similar to the claim limitations in the representative Claim 27, the added claim limitations consist of generic components used for their conventional purpose, and thus they do not alter the § 101 analysis. Claim 27 is thus representative for the § 101 analysis. *See PPS Data, LLC v. Jack Henry & Assocs., Inc.*, No. 2:18-cv-00007-JRG, 2019 WL 1317286, at *5 (E.D. Tex. Mar. 21, 2019) (articulating that defendants first bear the burden of demonstrating a claim is representative, which then shifts to the plaintiff to identify a difference material to the § 101 analysis); *see also Content Extraction and Transmission LLC v. Wells Fargo Bank, Nat’l Ass’n*, 776 F.3d 1343, 1348 (Fed. Cir. 2014).

This chart is subject to all reservations, objections, and disclaimers in Defendant’s Invalidity Contentions and any amendment, supplement, or modification thereof, which are incorporated by reference in their entirety. Nothing stated herein will be treated as an admission or suggestion that Defendant agrees with Sandpiper regarding the scope of the Asserted Claims, Sandpiper’s apparent claim constructions, or the accuracy of any particular claim construction. Defendant reserves all rights to challenge any of the claim terms

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herein under 35 U.S.C. § 112, including by arguing that they are indefinite, are unsupported by the written description, and/or are not enabled. Defendant further reserves all rights to amend this invalidity claim chart without leave of court under the Court’s Scheduling Order, or upon a showing of good cause.

This disclosure is not an admission that Defendant concedes any claim construction implied or suggested by Sandpiper’s apparent positions as to the scope of the patent’s claims, nor is it an admission by Defendant that any of its products are covered by or infringe the patent’s claims, particularly when they are properly construed and applied. Defendant is not taking any claim construction positions through this disclosure, including whether the preamble is a limitation.

Defendant reserves the right to rely on additional citations or sources of evidence that also may be applicable, or that may become applicable in light of claim construction, changes in Sandpiper’s infringement contentions, and/or information obtained during discovery as the case progresses. Defendant further reserves the right to amend or supplement this claim chart at a later date as more fully set forth in the Invalidity and Subject Matter Eligibility Contentions.

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27[Pre]. A computer-implemented method, operable in a content delivery network (CDN) comprising: (a) a control core; and (b) a plurality of cache servers, the CDN serving resources on behalf of one or more customers of the CDN, the method comprising, by hardware and software on a particular cache server of said plurality of cache servers:	Claim 27 is directed to an abstract idea. Claim 27 (and similar claims) of the ’053 patent relates to a cache that upon receipt of a request for a particular resource, obtains updated global configuration data, if needed, from a control core; obtains customer-specific configuration data; and serves the particular resource in accordance with the configuration data. ’053 patent at Abstract. At the most basic level, the claims of the ’053 patent are directed to centralized management and application of data. Under <i>Alice</i> Step 1, that idea is abstract, as it relates to a fundamental long prevalent practice. <i>See Intellectual Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307, 1314 (Fed. Cir. 2016). A claim is drawn to an abstract idea when “humans have always performed [the claimed] functions.” <i>Content Extraction & Transmission LLC v. Wells Fargo Bank, NA</i>, 776 F.3d 1343, 1347 (Fed. Cir. 2014). The following cases, among others, support the abstract nature of this claim. <i>Alice Corp. Pty. Ltd. v. CLS Bank Int’l</i>, 573 U.S. 208, 219 (2014); <i>see also, e.g., Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350, 1354 (Fed. Cir. 2016) (“The advance they purport to make is a process of gathering and analyzing information of a specified content, then displaying the results, and not any particular assertedly inventive technology for performing those functions.”); <i>Two-Way Media Ltd. v. Comcast Cable Commc’ns, LLC</i>, 874 F.3d 1329, 1337-39 (Fed. Cir. 2017) (finding that representative claim that “recites a method for routing information using result-based functional language” “requires the functional results of ‘converting,’ ‘routing,’ ‘controlling,’ ‘monitoring,’ and ‘accumulating records,’ but does not sufficiently describe how to achieve these results in a non-abstract way”); <i>British Telecomms. PLC v. IAC/InterActiveCorp</i>, 381 F.Supp.3d 293, 309 (D. Del. Feb. 4, 2019) (invalidating claims directed to distributing information based on feedback from people receiving that information); <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759, 773 (Fed. Cir. 2019) (finding that claims are “directed to the abstract idea of communicating over a network for device interaction”); <i>Dropbox, Inc. v. Synchronoss Techs., Inc.</i>, 815 F. App’x 529, 536 (Fed. Cir. 2020) (finding that “[f]ormatting data, tagging data, transmitting data, and retrieving data are generalized steps to be performed on a computer using conventional computer activity”) (internal citations omitted); <i>Miller Mendel, Inc. v. City of Anna, Texas</i>, 107 F.4th 1345, 1352 (Fed. Cir.), <i>cert. denied</i>, 145

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	S. Ct. 593, 220 L. Ed. 2d 231 (2024) (“These steps demonstrate that the claims are directed to receiving, storing, transmitting, determining, selecting, and generating information, which place them in the ‘familiar class of claims directed to a patent-ineligible concept.’”) <i>Trinity Info Media, LLC v. Covalent, Inc.</i>, 72 F.4th 1355, 1362 (Fed. Cir. 2023); <i>Elec. Comm’n Techs., LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178, 1182 (Fed. Cir. 2020) (finding “gathering, storing, and transmitting information” abstract). Further, limiting the invention to a particular technological environment “do[es] not render an otherwise abstract concept any less abstract.” <i>Intellectual Ventures I LLC v. Capital One Fin. Corp.</i>, 850 F.3d 1332, 1340 (Fed Cir. 2017). Furthermore, because the patent relates to transmission of information, it is likewise abstract, as “information is . . . an intangible.” <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350, 1353 (Fed. Cir. 2016). Claim 27 lacks an inventive concept because it relies on conventional methods and routine operations already widely used. At the time of the alleged invention, the elements of the Asserted Claims were well understood, routine, and/or conventional in the field of CDN technology. The ’053 patent Asserted Claims employ well-known components or functionality which is not enough to impart patent eligibility of an abstract idea. The ’053 patent’s specification describes the use of generic components in carrying out the steps in Claim 1. <i>See, e.g.</i>, ’503 patent at 3:13-22; 10:3-5; 33:13-16; 43:19-22; 9:49-55. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [27pre]; Appendix C at Element [27pre].
[27.a] (A) obtaining global configuration data from the control core;	Obtaining global configuration data from the control core does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 27 lacks an inventive concept because it relies on conventional methods and routine operations already widely used. At the time of the alleged invention, the elements of the Asserted Claims were well understood, routine, and/or conventional in the field of CDN technology. The ’053 patent Asserted Claims employ well-known components or functionality

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	which is not enough to impart patent eligibility of an abstract idea. The ’053 patent’s specification describes the use of generic components in carrying out the steps in Claim 1. <i>See, e.g.,</i> ’503 patent at 3:13-22; 10:3-5; 33:13-16; 43:19-22; 9:49-55. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [27.a]; Appendix C at Element [27.a].
[27.b] (B) selectively obtaining updated global configuration data; and	Selectively obtaining updated global configuration data does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 27 lacks an inventive concept because it relies on conventional methods and routine operations already widely used. At the time of the alleged invention, the elements of the Asserted Claims were well understood, routine, and/or conventional in the field of CDN technology. The ’053 patent Asserted Claims employ well-known components or functionality which is not enough to impart patent eligibility of an abstract idea. The ’053 patent’s specification describes the use of generic components in carrying out the steps in Claim 1. <i>See, e.g.,</i> ’503 patent at 3:13-22; 10:3-5; 33:13-16; 43:19-22; 9:49-55. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [27.b]; Appendix C at Element [27.b].
[27.c] (C) obtaining customer configuration information associated with a particular customer of the CDN;	Obtaining customer configuration information associated with a particular customer of the CDN does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 27 lacks an inventive concept because it relies on conventional methods and routine operations already widely used. At the time of the alleged invention, the elements of the Asserted Claims were well understood, routine, and/or conventional in the field of CDN technology. The ’053 patent Asserted Claims employ well-known components or functionality

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	which is not enough to impart patent eligibility of an abstract idea. The ’053 patent’s specification describes the use of generic components in carrying out the steps in Claim 1. <i>See, e.g.,</i> ’503 patent at 3:13-22; 10:3-5; 33:13-16; 43:19-22; 9:49-55. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [27.c]; Appendix C at Element [27.c].
[27.d] (D) serving, to a client, a particular resource associated with the particular customer in accordance with (i) the global configuration data; and (ii) the customer configuration information associated with the particular customer.	Serving, to a client, a particular resource associated with the particular customer in accordance with (i) the global configuration data; and (ii) the customer configuration information associated with the particular customer does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 27 lacks an inventive concept because it relies on conventional methods and routine operations already widely used. At the time of the alleged invention, the elements of the Asserted Claims were well understood, routine, and/or conventional in the field of CDN technology. The ’053 patent Asserted Claims employ well-known components or functionality which is not enough to impart patent eligibility of an abstract idea. The ’053 patent’s specification describes the use of generic components in carrying out the steps in Claim 1. <i>See, e.g.,</i> ’503 patent at 3:13-22; 10:3-5; 33:13-16; 43:19-22; 9:49-55. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [27.d]; Appendix C at Element [27.d].
28. The method of claim 27 further comprising: (A)(2) obtaining data from one or more other locations in the CDN.	Obtaining data from one or more other locations in the CDN does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 28 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference.

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	In addition, the prior art references cited in Defendants’ Invalidation Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [28]; Appendix C at Element [28].
29. The method of claim 27 wherein the obtaining of said customer configuration information in (C) occurs upon receipt of a request of said particular cache server for a resource associated with the particular customer.	Obtaining customer configuration information upon receipt of a request of a particular cache server for a resource associated with the particular customer does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 29 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidation Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [29]; Appendix C at Element [29].
31. The method of claim 27 wherein the customer configuration information comprises one or more scripts to be used by the particular cache server to process requests for resources associated with the particular customer.	Wherein the customer configuration information comprises one or more scripts to be used by the particular cache server to process requests for resources associated with the particular customer does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 31 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidation Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [31]; Appendix C at Element [31].

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33. The method of claim 27 wherein the customer configuration information comprises at least one customer configuration script (CCS) associated with the particular customer.	Wherein the customer configuration information comprises at least one customer configuration script (CCS) associated with the particular customer does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 33 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [33]; Appendix C at Element [33].
34. The method of claim 27 wherein the customer configuration information associated with the particular customer specifies customer-specific processing for resources served on behalf of that customer.	Wherein the customer configuration information associated with the particular customer specifies customer-specific processing for resources served on behalf of that customer does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 34 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [34]; Appendix C at Element [34].
35. The method of claim 27 wherein the global configuration data comprises at least one CDN resource.	Wherein the global configuration data comprises at least one CDN resource does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional.

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	Claim 35 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [35]; Appendix C at Element [35].
37. The method of claim 28 wherein the one or more other locations in the CDN comprise at least one location selected from: a cache server, a cache server site, a region of cache servers, a cache cluster, and a cache cluster site	Wherein the one or more other locations in the CDN comprise at least one location selected from: a cache server, a cache server site, a region of cache servers, a cache cluster, and a cache cluster site does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 37 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [37]; Appendix C at Element [37].
38. The method of claim 37 wherein the one or more other locations in the CDN comprise at least one peer location.	Wherein the one or more other locations in the CDN comprise at least one peer location does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 38 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood,

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	routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [38]; Appendix C at Element [38].
39. The method of claim 28 wherein the particular cache server determines said one or more other locations using said information in said global configuration data.	Wherein the particular cache server determines said one or more other locations using said information in said global configuration data does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 39 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [39]; Appendix C at Element [39].
40. The method of claim 27 wherein said particular cache server obtains said updated global configuration data in (B) from one or more locations in the CDN.	Wherein said particular cache server obtains said updated global configuration data in (B) from one or more locations in the CDN does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 40 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [40]; Appendix C at Element [40].
41. The method of claim 40 wherein the one or more locations in the CDN comprise one or more	Wherein the one or more locations in the CDN comprise one or more locations selected from: (i) the control core; and (ii) one or more locations selected from: a cache server, a cache server site, a region of cache servers, a cache cluster, and a cache cluster site does not add an inventive

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locations selected from: (i) the control core; and (ii) one or more locations selected from: a cache server, a cache server site, a region of cache servers, a cache cluster, and a cache cluster site.	concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 41 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [41]; Appendix C at Element [41].
42. The method of claim 27 wherein the control core comprises a distributed system consisting of a plurality of machines.	A control core comprising a distributed system consisting of a plurality of machines does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 42 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [42]; Appendix C at Element [42].
44. The method of claim 27 further comprising, by said particular cache server: [44.a] (F) determining validity of a version of global configuration data	Wherein determining validity of a version of global configuration data stored on said particular cache server does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 44 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference.

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stored on said particular cache server, and	In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [44.a]; Appendix C at Element [44.a].
[44.b] wherein said particular cache server obtains updated global configuration data in (B) when said particular cache server determines that said version of said global configuration data stored on said particular cache server is invalid.	Wherein said particular cache server obtains updated global configuration data in (B) when said particular cache server determines that said version of said global configuration data stored on said particular cache server is invalid does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 44 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [44.b]; Appendix C at Element [44.b].
45. The method of claim 27 further comprising, by said particular cache server. [45.a] (G) determining validity of a version of particular customer configuration information associated with the particular customer and stored on said particular cache server, and	Wherein determining validity of a version of particular customer configuration information associated with the particular customer and stored on said particular cache server does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 45 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [45.a]; Appendix C at Element [45.a].

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[45.b] wherein said particular cache server obtains customer configuration information in (C) when said particular cache server determines that said version of said particular customer configuration information stored on said particular cache server is invalid.	Wherein said particular cache server obtains customer configuration information in (C) when said particular cache server determines that said version of said particular customer configuration information stored on said particular cache server is invalid does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 45 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [45.b]; Appendix C at Element [45.b].
46. The method of claim 45 wherein said particular cache server determines validity of said version of particular customer configuration information in (G) in response to a request to serve content associated with said particular customer.	Wherein said particular cache server determines validity of said version of particular customer configuration information in (G) in response to a request to serve content associated with said particular customer does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 46 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [46]; Appendix C at Element [46].
47. The method of claim 27 wherein the CDN further comprises:	A collector system comprising one or more collector mechanisms, each of said collector mechanisms being constructed and adapted to obtain information from at least one cache server,

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[47.a] (d) a collector system comprising one or more collector mechanisms, each of said collector mechanisms being constructed and adapted to obtain information from at least one cache server, the method further comprising,	the method further comprising does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 47 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [47.a]; Appendix C at Element [47.a].
by said particular cache server: [47.b] (E) generating information; and	Generating information does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 47 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [47.b]; Appendix C at Element [47.b].
[47.c] (F) providing at least some of said generated information to said collector system.	Providing at least some of said generated information to said collector system does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 47 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood,

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	routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [47.c]; Appendix C at Element [47.c].
48. The method of claim 47 wherein said providing in (F) comprises: (F)(1) streaming said at least some of said generated information to one or more collector mechanisms in said collector system.	Streaming said at least some of said generated information to one or more collector mechanisms in said collector system does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 48 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [48]; Appendix C at Element [48].
49. The method of claim 27 further comprising, by said particular cache server of said plurality of cache servers: [49.a] (E) obtaining second customer configuration information associated with a second customer of the CDN, said second customer being distinct from said particular customer; and	Obtaining second customer configuration information associated with a second customer of the CDN, said second customer being distinct from said particular customer does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 49 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [49.a]; Appendix C at Element [49.a].
[49.b] (F) serving a second particular resource	Serving a second particular resource associated with the second customer in accordance with (i) the global configuration data, and (ii) the second customer configuration information

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associated with the second customer in accordance with (i) the global configuration data, and (ii) the second customer configuration information associated with the second customer.	associated with the second customer does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 49 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [49.b]; Appendix C at Element [49.b].
50. The method of claim 27 wherein the CDN has customer configuration information associated therewith, and wherein the particular cache server serves CDN resources in accordance with the global configuration data and the customer configuration information associated with the CDN.	Wherein the CDN has customer configuration information associated therewith, and wherein the particular cache server serves CDN resources in accordance with the global configuration data and the customer configuration information associated with the CDN does not add an inventive concept. At the time of the alleged invention, this element was well understood, routine, and/or conventional. Claim 50 is ineligible under 35 U.S.C. 101 at least for each of the factual and legal bases provided above for claim 27 with respect to claim 27[pre] through claim 27.d. Said bases are herein incorporated by reference. In addition, the prior art references cited in Defendants’ Invalidity Contentions cover pleadings—including prior art references cited in Exs. C1-C10—establish the well-understood, routine, and conventional nature of the claims. <i>See</i> Exs. C1-C10 at all disclosures for Element [50]; Appendix C at Element [50].